



**INPUTS TO THE FIRST DRAFT  
JOINT IMPLEMENTATION ACCREDITATION STANDARD**



**Your information**

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<i>Practical experience in using similar standards, if any (brief summary)</i>	<i>DNV is an accredited Designated Operational Entity for the CDM is accredited for several ISO standards.</i>

*Please provide your inputs on the first draft Joint implementation accreditation standard, which can be found on the call page.*

**Input (1): General remarks (optional)**

DNV appreciates the efforts to consolidate the accreditation requirements as proposed and appreciate the opportunity to provide comments on the draft Joint Implementation Accreditation Standard. We would like to herewith provide some input that can hopefully contribute to a best possible JI Accreditation Standard for all of us.

The presented JI Accreditation Standard is a good document that would be helpful both for accreditation assessment teams and accredited entities, nevertheless it can be improved to maximize its value. The most important is considered to be:

- The present text is still vague on difference in mandate between central office and local offices.
- Parts of the document could be rewritten to be goal-based rather than rule based, in practice this would mean that several requested procedures could be removed and replaced by text that describes the wanted result (goal-based), one example is paragraph 68.

**Input (2): Inputs on the first draft Joint implementation accreditation standard (Add or remove rows according to your needs.)**

Section and paragraph	Proposed change to or comment on the draft text and rationale, as appropriate
41, 42, 44	<p>It should not be needed to have two paragraphs (41 and 42) specifying differences in tasks for “the top management” and “the IE’s management”. DNV suggests to integrate this to one paragraph describing responsibilities and another describing the mandates and work split between central office and local offices. A rewriting of 41 and 42 along these lines could hopefully be so descriptive that 44 as written now would be obsolete.</p> <p>For implementation referring to section VI (42b) we have further comments under paragraphs in VI (68 and 74).</p>
50	<p>It is considered relevant to include a person “performing determination and verification work” in the structure proposed. The proposed exclusion of this operational experience could reduce the quality of the assessments in impartiality.</p>
52 (e)	<p>It is questioned why the described requirements for subcontractors (.. Text in para 48 says: .....JI projects) is less strict than for work performed by the IE itself (52f: ..JI projects for which it carries out determination or verification work).</p> <p>DNV suggest to adjust 52e to be in line with strictness in 52f</p>
68	<p>It seems more adequate to have a plan for training instead of the described procedure.</p>
74	<p>Assumingly the intent with this paragraph is to regulate subcontracting to actors outside of the organisation of the accredited entity. As stated it will regulate also the interaction between central office and local offices as there will be different legal entities for these. This also goes into the description in paragraph 41 and 42 where responsibilities and mandates between local and central offices are regulated.</p>
98	<p>A clarification is needed what is meant with “functions” in paragraph 98a. In our opinion and internal auditor should have experience with performing the functions of determination and verification of JI projects, but he/she shall obviously not audit determination and verifications where he/she was directly involved.</p>

**Please submit the form through the call web page.**