



**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>Accredited entity for JI, CDM and Quality 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)**

**Introduction**

Bureau Veritas Certification recognizes that the issuance of the Joint Implementation (JI) Accreditation Standard is an important step on the development of the JI activities, and, besides its objectives, as stated in its paragraph 4, the standard is also an important element for the Independent Entities (IE) in the adjustment of their day-by-day operation, ultimately coping with the Joint Implementation Supervisory Committee (JISC) expectations.

We would like thank the JISC the opportunity to comment on the JI Accreditation Standard.

**General Comments**

It is our understating that the JI Accreditation Standard in fact “consolidates into a single standard all JI accreditation requirements for the implementation of the JI accreditation process”. Nevertheless, three major areas of concerns are raised here:

**a. Documented procedures**

In most of the paragraphs of the standard, a documented procedure is required. While the issuance of a documented procedure is not a problem per se, its need can diverse the aim of the system to establishing a heavy documented structure rather than something focused on the results.

This concern is substantiated when one looks into the evolution of the most known standards for quality systems, which evolved from a “documented procedure” fashion to an “evidences of results” approach.

Paragraph 89 of the standard is a good example of this concern. What is the need of a “documented procedure to take all necessary actions to comply with the obligation of acquiring assigned amount units (AAUs) or emission reduction units (ERUs)?” If an IE has to acquire AAUS or ERUs, it will do it, with or without a procedure.

**b. Allocation of function to other sites**

It is our understanding that the standard leaves the possibility to the IE to perform certain JI determination/verification related activities out of the central office, or accredited location.

In this sense, we would like to request to JISC, to:

a) Align the definitions of related bodies, non central offices, other sites/locations, etc.

b) Clearly define which activities can be performed out of the central office. Annex A of the CDM Accreditation Standard for Operational Entities may serve as a good example on how to document this allocation of functions.

**c. Other accreditation standards**

It may make sense compare the JI Accreditation Standard with a similar International Standard ISO/IEC 17021 "Conformity assessment - Requirements for bodies providing audit and certification of management systems".

An analysis shows that the JI Accreditation Standard covers all issues of the ISO/IEC 17021 but one: Section 8 "Information Requirements" (cf. attached). Relevant provisions thereof should be included in the JI Accreditation Standard.

Along the lines mentioned above, suggestions are made over the paragraphs of the standard as presented on part 2 of this form.

**Conclusion**

Once again, we would like thank the JISC the opportunity to comment on the JI Accreditation Standard, and we expect that we have had contributed to the development of such an important element of the JI activities.

**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
24	Related body: A body related to an IE on the basis of common ownership or governance, personnel, shared resources, finances, contracts, marketing, payment of commission or other inducement for bringing in business or the referral of new clients, <b>and for performing part of the determination and verification process.</b>
33	An shall demonstrate its financial stability through ( <i>inter alia</i> ):  (a) Documentary evidence of financial resources, such as savings and/or line credit, etc.;  (b) Externally audited financial statements (e.g. balance sheets, profit and loss statements) for the last three years or, for newly established entities, other relevant documentary evidence, such as shareholders commitment; <b>and</b>  (c) <del>A financial plan for the current and next two years.</del>
39	An IE shall <del>establish and implement a documented procedure for the allocation of responsibilities within the entity.</del>
40	<del>An IE shall make its allocation of responsibilities procedure publicly available.</del>
53	An IE shall <del>establish and implement a documented policy that commits it to have the necessary expertise to carry out its determination and verification work and have sufficient knowledge and understanding of:</del>
55	An IE shall <del>establish and implement a documented procedure for defining</del> define the competence necessary for performing its determination and verification work.
56	The IE.s competence definition <del>procedure</del> shall include, at a minimum, provisions for:
57	An IE shall <del>establish and implement a documented procedure for analysing</del> analyse the competence of its management personnel and its personnel involved in determination or verification work, based on the competence criteria defined in paragraph 56 above, to ensure and demonstrate that the IE employs a sufficient number of competent personnel to carry out its determination and verification

	work.
68	An IE shall <del>establish and implement a documented procedure for providing training</del> train, including and develop competence development for, its personnel involved in determination or verification work and its technical experts to improve their competence or to address new technical or regulatory needs.
69	The IE.s <del>training procedure shall include provisions for recording</del> record training results, evaluating the effectiveness of the training and providing additional training as needed.
71	If an IE uses external personnel for specific determination or verification work, <del>it shall establish and implement a documented procedure for using such external personnel</del> it shall ensure that:
72	The IE.s <del>procedure for using external personnel shall ensure that:</del>
74	If an IE subcontracts determination or verification work to another legal entity, <b>other than a related body,</b> it shall establish and implement a documented subcontracting procedure.

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