

DOE/AE Forum | *Javier Castro* | 11 September 2025

AEP005

Relations with Designated Operational and Applicant Entities

Topics

- **Introduction IAVVB & DOE Forum**
- **Draft Accreditation standard**
- **Draft Accreditation procedure**

IAVVB

- International Association of Validation & Verification Bodies
IAVVB
 - Change name from DIA to IAVVB
 - Open membership to all GHG validation and verification bodies
 - Acting as Chair of the CDM DOE Forum
 - Interaction with some voluntary carbon market regulators/standards
 - Participate in DMRV activities
 - Enhanced participation in events and meetings
 - Increasing attractiveness for DOEs and VVBs in general

IAVVB & DEO Forum

- Impact for interaction with SBM and AEP
 - Only positive impact
 - Experiences from Voluntary Carbon Market and CDM could serve as input to PACM discussions
 - The association will continue to appoint its general manager as candidate as chairman of the DOE/AIE Coordination Forum
 - For this year no other candidates were proposed

Accreditation Standard

- § 8 (l) the proposed definition of Integrity relies on subjective moral and ethical standards, which are highly dependent on the cultural background
 - It is recommended to align with ISO 14066 §4.3 where the principle of integrity is clearly presented. This approach would enhance cross-cultural applicability and objectivity
- §12 the inclusion of a definition of „judicial process“ with connecting conditions through „and“ create ambiguity in the requirement
 - If not, all judicial processes are to be considered, a clear-cut line should be presented. Statements like „bring disrepute to the DOE **and** UNFCCC“ can be misleading

Accreditation Standard

- § 27 the option 2 presented is too restrictive and does not recognize that a DOE shall assess any impartiality risk.
 - It is recommended to take option 1
- Footnote 18, 40 and 43 define that the interval between two meetings is within one year, while the requirement mentioned that is to be performed yearly.
 - These footnotes would mean that every meeting shall be performed exactly every 365 days to comply with both statements.
 - The recommendation is to include a maximum period of 14 to 16 months in the footnote which does not affect the requirement of a yearly meeting.

Accreditation Standard

- § 40 (a) considering that laboratory testing and calibration for A6.4 project and PoAs will be used only if are based on an appropriate accreditation, it is not clear why are these considered as a treat to the impartiality.
 - It is recommended include “in case that are performed outside an accredited scope” as only those cases might create a treat to impartiality
- §40 (b) there is no reference to a period, which would imply that is valid for ever.
 - The recommendation is to include a period of two years as already done in §45 € (iii).

Accreditation Standard

- § 41 Option 2 is too restrictive as refers to a large company and not only the DOE
 - It is recommended to approve option 1
- §41 Option 1 (b) consultancy should be defined to avoid misinterpretations
 - The recommendation is to use the definition for “GHG consultancy services” ISO 14050:2020(en), 3.9.34
- §41 Option 1 (c) providing training is a capacity building activity that is required by the market
 - It is recommended to specify that only training as part of a consultancy service are not allowed

Accreditation Standard

- § 45 (b) the accreditation requirements have a clear focus on assuring impartiality, hence a prohibition to perform a VVC service independently of all the measure for impartiality is against the intention of an accreditation.
 - It is recommended to delete (b)
- §45 (c) a direct relationship will include a very wide number of services that a TIC (Testing, inspection and certification) company provide that are additional to third-party conformity assessments
 - The recommendation is to only relate “direct relationship” to any matter related to the project and not to the entities (DOE client and activity participants).

Accreditation Procedure

- 6.5.2 the inclusion of a Pre-assessment is more than welcome
 - It is proposed to include also the possibility for an AE to request a pre-assessment before any desk review.
- §58 the same AT should perform the pre-assessment and further accreditation activities, which could create a familiarity issue
 - It is recommended to use a different AT for the pre-assessment
- The procedures include deadlines of 5 days for several requests, if a weekend is in between is only effectively 3 days, which might difficult the possibility to perform that requested reaction
 - It is recommendable to clarify in those cases that weekends are excluded or expand in all cases to 7 days.

Thank you for your attention!

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