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Concept note on improving the procedure on performance monitoring of DOEs

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TABLE OF CONTENTS	Page
1. PROCEDURAL BACKGROUND.....	4
2. PURPOSE	4
3. KEY ISSUES AND PROPOSED SOLUTIONS	6
3.1. Alignment with the CDM requirements adopted since last revision.....	6
3.1.1. Completeness and information and reporting check processes for registration and issuance	6
3.1.2. Updating the Categorization and weighting of issues identified at requests for registration and issuance	8
3.1.3. Post-registration changes.....	8
3.2. Improvement in the data reporting process.....	11
3.2.1. Improvements in reporting on the DOE performance for <i>Registration Issuance</i> :.....	11
3.2.2. Monitoring periods and frequency of reporting for Indicators	13
3.3. Revision of thresholds for Registration and Issuance for Indicator, I_2	14
3.4. Defining the actions to be undertaken based on the DOE performance monitoring.....	15
3.4.1. Actions to be taken by DOEs	15
3.4.2. Action to be taken by CDM-AP	15
4. IMPACTS.....	20
5. PROPOSED WORK AND TIMELINES	20
6. BUDGET AND COSTS	20
7. RECOMMENDATIONS TO THE BOARD	20
APPENDIX 1. CATEGORIZATION AND WEIGHTING OF ISSUES IDENTIFIED AT REQUESTS FOR REGISTRATION.....	22
APPENDIX 2. CATEGORIZATION AND WEIGHTING OF ISSUES IDENTIFIED AT REQUESTS FOR ISSUANCE	24
APPENDIX 3. CATEGORIZATION AND WEIGHTING OF ISSUES IDENTIFIED AT REQUESTS FOR POST-REGISTRATION CHANGES.....	25
APPENDIX 4. ROAD TEST TO DETERMINE THRESHOLD FOR CC AND IRC	27

APPENDIX 5. SUMMARY OF STAKEHOLDERS INPUTS.....

28

1. Procedural background

1. The Executive Board of the clean development mechanism (CDM) (hereinafter referred to as the Board) at its fifty-eight meeting adopted the “Procedure on performance monitoring of designated operational entities” which sets a requirement to monitor performance and address non-compliance by designated operational entities (DOEs) in a systematic manner. This procedure provides for monitoring, classification and categorization of non-compliance into sub-categories and weights used for classifying and grading non-compliances, rating of all DOEs non-compliances, agreed thresholds and applicable sanctions, system wide analysis including feedback to the Board, Accreditation Panel, DOEs and the public. It is applicable from completion of the initial assessment process and accreditation of an applicant entity by the Board until expiration of its accreditation. The procedure provides for regular reporting to the DOEs, the CDM-AP, the Board and the public on the performance of each individual DOE, to allow the DOEs to take actions in the areas where most of the issues were identified in request for reviews raised on registration and issuance, to allow the CDM-AP to have a better planning of its assessment of DOEs and to inform the Board and the public on the performance of individual DOEs. In addition to the regular reports, a report containing a more detailed analysis of the issues arising from the DOE performance especially those identifying shortcomings in the CDM requirements, procedures and guidance is provided to the Board on a bi-annual basis. The procedure has been implemented since the first quarter of 2010 and the results of the performance monitoring are available on UNFCCC website¹.
2. The Board at its sixty-eighth meeting considered a “Concept note on the analysis for strengthening the accreditation system”, as per the CDM management plan 2012 (CDM-MAP 2012), and decided to improve the performance and role-definition of operational entities within the mechanism including through revised standards and procedures. This work covers among other elements the revision of the three key documents related to the CDM accreditation system; the accreditation standard, the accreditation procedure and the designated operational entity performance monitoring procedure.
3. This document includes and consolidates the feedback received from the DOE Forum and the CDM-AP. The DOEs were consulted on the draft concept note during the DOE/AIE coordination meeting held on 11 October 2012 and the CDM-AP was consulted at its sixty-second meeting held on 15-19 October 2012. The advance draft version of the concept note was provided to DOEs and the CDM-AP one week prior to the meeting. A summary of the comments received and how they have been taken into account is provided in Appendix 5 to this document.

2. Purpose

4. The purpose of this document is to focus on the revision of the procedure on performance monitoring of designated operational entities, setting the scope of this revision by identifying the need to improve existing provisions and introduce new ones; detailing the work-plan including the consideration of consultations with stakeholders

¹ <<http://cdm.unfccc.int/Reference/Notes/index.html#accr>>

- (DOE Forum and the CDM-AP); and providing options for improvement and recommendations to the Board on this area of work.
5. The scope of the paper is focussed on conducting further analysis, developing the business case for revisions and proposing solutions for the identified priorities as listed below:
- (a) Alignment of the procedure on performance monitoring of designated operational entities with the requirements of the CDM project cycle procedure (PCP) and validation and verification standard (VVS) adopted since last revision, in particular:
 - (i) Completeness and information and reporting check processes for registration and issuance;
 - (ii) Updating the categorization and weighting of issues identified at requests for registration and issuance; and
 - (iii) Post-registration changes;
 - (b) Improvement in the data reporting process, in particular:
 - (i) Improving the reporting and utilization of the data generated including that within the existing four reports and its relation to assessments; and
 - (ii) Enhancing the speed and frequency of the generation of the results and its relation to current performance and the monitoring results.
 - (c) Revision of thresholds for registration and issuance for indicator, I_2 ;
 - (d) Defining the actions to be undertaken by various actors based on the outputs reported under the DOE performance monitoring, for registration and issuance, by interlinking the requirements in the CDM accreditation procedure/standard, which will include:
 - (i) Actions to be taken by the DOEs;
 - (ii) Actions to be taken by the CDM-AP.
6. These identified areas are based on various mandates from the Board, the need to take into account different developments in the regulatory framework and suggestions for improvement from the Board, the CDM-AP and the DOEs.
7. The scope of this paper is limited to CDM project activities only and does not cover programme of activities (PoA).
8. This concept note provides a consolidated overview of the problem statement, options for implementation and recommendations arising therefrom, for the Board's consideration.

3. Key issues and proposed solutions

3.1. Alignment with the CDM requirements adopted since last revision

9. The Board has adopted a number of new documents particularly the CDM PCP and VVS, which require reflection in this procedure, in particular the completeness and information and reporting check process for registration and issuance, updating the categorization and weighting of issues identified at requests for registration and issuance, and post-registration changes.

3.1.1. Inclusion of completeness and information and reporting check processes for registration and issuance

3.1.1.1. Problem statement

10. The existing procedure does not include the separate monitoring of the performance of DOEs with respect to the completeness check (CC) and information and reporting check (IRC) processes for registration and issuance.

3.1.1.2. Recommendations

11. Replace the existing indicator I_1 , i.e. "Rate of rejections at completeness check" by two indicators $I_{1,CC}$ and $I_{1,IRC}$, in order to obtain separately the rate of rejections at CC and the rate of rejections at IRC for each registration and issuance process.
12. Establish thresholds for the indicators $I_{1,CC}$ and $I_{1,IRC}$, in order to trigger further actions when reached by a DOE.

3.1.1.2.1. Scope

13. The indicators $I_{1,CC}$ and $I_{1,IRC}$ will provide the specific rate of requests rejected at completeness check and information and report check for each DOE, respectively, based on the number of requests submitted which have completed the cycle,² regardless of the number and type of issues identified in each rejection. The definition of thresholds for these indicators will allow the determination of which DOEs are failing to meet the requirements at completeness check and at information and reporting check. If a DOE reaches the threshold it is notified of the need to undertake a root-cause analysis and implement corrective actions to improve its performance with reference to the conduct of completeness and information and reporting checks.

3.1.1.2.2. Definition of performance indicators

14. The indicators $I_{1,CC}$ and $I_{1,IRC}$ will be calculated for each DOE, for each of its completed registration and issuance requests, as follows:
 - (a) Rate of rejections at CC calculated as the number of requests rejected at completeness check divided by the number of requests submitted which have completed the cycle, regardless of the number of issues identified in each rejection:

² A request for registration/issuance completes its cycle once a final decision (approval, rejection, or withdrawal) is taken in a given monitoring period.

- (i) Indicator $I_{1,CC}$ = number of requests rejected at completeness check/number of requests completed;³
- (b) Rate of rejections at IRC calculated as the number of requests rejected at information and reporting check divided by the number of requests submitted which have completed the cycle, regardless of the number of issues identified in each rejection:
 - (i) Indicator $I_{1,IRC}$ = number of requests rejected at information and reporting check/number of requests completed.

3.1.1.2.3. Definition and determination of thresholds for CC and IRC

15. For each of the indicators $I_{1,CC}$ and $I_{1,IRC}$, thresholds are defined and are common to all DOEs.
16. For each of the registration and issuance processes, a threshold is identified corresponding to each of the completeness check and the information and reporting check. On reaching the threshold a DOE shall be notified of the need to undertake a root-cause analysis⁴ and implement corrective actions to improve its performance with reference to the conduct of completeness and information and reporting checks⁵.
17. The defined thresholds are as follows:
 - (a) For the registration process: Threshold is reached when $I_{1,CC}$ and $I_{1,IRC}$ is > 0.3 ⁶;
 - (b) For the issuance process: Threshold is reached when $I_{1,IRC}$ and $I_{1,IRC}$ is > 0.25 .
18. A DOE is considered to be in the “green zone” if its indicator ($I_{1,CC}$ and $I_{1,IRC}$) is equal to or less than 0.3 (for the registration process) and 0.25 (for the issuance process). If the indicator ($I_{1,CC}$ or $I_{1,IRC}$) is greater than 0.3 (for the registration process) and 0.25 (for the issuance process), it is considered to be in the “red zone”.
19. The $I_{1,CC}$ and $I_{1,IRC}$ takes into account the number of times a particular request is rejected at completeness check or information and reporting check.

³The indicators $I_{1,CC}$ and $I_{1,IRC}$ are dependent on the number of times a particular request is rejected at CC or IRC.

⁴The analysis of the root cause may indicate the gaps between the correct application of completeness checklists as per the PCP and/or documentation of reporting requirements as mentioned in the VVS and/or a lack of training of DOE staff in use of these checklists and/or a lack of training on reporting requirements on VVS, etc.

⁵ The PCP requires that the issues raised at completeness checks, information and reporting checks and requests for review of registration and issuance shall be made publicly available on the UNFCCC website and communicated to DOEs (paragraph 63, 66, 70, 190, 193, 196).

⁶ The values of threshold for $I_{1,CC}$ and $I_{1,IRC}$ have been determined for both registration and issuance based on a road test carried out on actual data for the period from 1 July to 31 December 2011 as mentioned in Appendix 4.

3.1.2. Updating the categorization and weighting of issues identified at requests for registration and issuance

3.1.2.1. Problem statement

20. The Board has adopted a number of new documents particularly the PCP and VVS, which need to be reflected and requires updating the categorization and weighting of issues identified at requests for registration and issuance.

3.1.2.2. Recommendations

21. Appendix 1 and 2 contain the revised Categorization and weighting of issues identified at requests for registration and issuance, which incorporate:
- (a) Removing requirements related to corrections;
 - (b) Introducing requirements related to Forward Action Request (FAR);
 - (c) Removing references to previous obsolete documents, such as the validation and verification manual (VVM);
 - (d) Editorial changes;
 - (e) Introducing requirements related to the submission of changes as a part of issuance, if changes are solely of the types listed in Appendix 1 of the project standard (PS).

3.1.3. Post-registration changes

3.1.3.1. Problem statement

22. The existing procedure does not include the separate monitoring of performance of DOEs with respect to post-registration changes, as required by the recently approved PCP, such as:
- (a) Temporary deviation from the monitoring plan as described in the registered project design document (PDD) or the monitoring methodology;
 - (b) Permanent changes to the monitoring plan as described in the registered PDD or the monitoring methodology;
 - (c) Permanent changes: changes to the project or programme design in the registered CDM project activity;
 - (d) Permanent changes: changes to the start date of the crediting period;
 - (e) Permanent changes: corrections.

3.1.3.2. Recommendations

23. It is recommended to:
- (a) Establish a procedure for monitoring of the performance of DOEs for the post-registration changes in a similar way as is done for the determination of requests for registration and issuance. Given that the PCP allows all five sub-types of post-

registration changes to be submitted together in a single submission, the submission should be assessed as a whole covering all sub-types;

- (b) Introduce two new indicators I_3 , i.e. “Rate of rejections at completeness check”, and I_4 , i.e. “Rate of request for clarifications from the DOE and rejected requests adjusted by weight of the requests” for each post-registration change process;
- (c) Introduce new Categorization and weighting of issues identified at requests for Post-Registration Changes as proposed in Appendix 3;
- (d) Establish a threshold for the indicator I_4 , in order to trigger further actions when reached by a DOE, which is expected to be part of future work.

3.1.3.2.1. Definition of performance indicators

24. Based on the classification and weights referred to in Appendix 3, the two indicators I_3 and I_4 shall be calculated for each DOE. The indicators shall be used to both monitor the performance of DOEs and to trigger sanctions as appropriate.
25. The two indicators I_3 and I_4 shall be calculated, for each post-registration change request:
 - (a) **Rate of rejections at completeness check** calculated as the number of requests rejected at completeness check divided by the number of requests submitted which have completed the cycle,⁷ regardless of the number of issues identified in each rejection:

Indicator I_3 = number of requests rejected at completeness check/number of requests completed;⁸
 - (b) **Rate of requests for** clarifications from the DOE and rejected requests for post-registration changes **adjusted by weight of the requests:**

Indicator I_4 = SUM (weights of requests for clarification from the DOE and rejected requests for post-registration changes adjusted by weight of the requests) / number of requests completed.
26. The indicators shall be calculated based on those requests for which a final decision (approval or rejection) was taken in a given monitoring period.

⁷ A request for post-registration change completes its cycle once a final decision (approval or rejection) is taken in a given monitoring period.

⁸ The indicator I_3 is dependent on the number of times a particular request is rejected at completeness check.

3.1.3.2.2. Data collection and calculation of the indicators for post-registration changes

27. Once a DOE submits a request for post-registration change, the related documentation shall be assessed by the secretariat in two stages,⁹ to determine whether it meets the CDM requirements:
- (a) At the completeness check stage: based on this assessment, the submission shall be either deemed complete or rejected based on the compliance with the checklist. Based on the rate of rejection the indicator I_3 shall be calculated;
 - (b) At the request for clarification stage and rejected requests for post registration changes: non-compliance issues shall be identified and classified into categories and subcategories based on the nature and the severity of the issue as specified in Appendix 3. A weighting shall be associated with each of the issues identified in the request for clarification from the DOE including the rejected requests. Each post-registration request will be assigned an overall weight equal to the sum of the identified weights of individual issues, across the sub-types of post-registration changes, including those that are closed after the provision of further information/documentation by the DOE. The weighting of non-compliance issues shall be finalized only after a final decision on the specific request has been reached;
 - (c) Based on the final weighting of the issues identified, the indicator I_4 shall be calculated.

3.1.3.2.3. Determination of thresholds for CC and IRC

28. The new procedure for dealing with post-registration changes has been adopted only recently by the Board. To date just over 50 requests have been submitted by DOEs and assessed by the secretariat. The small number of those requests makes it difficult to determine sound indicators. Therefore, it is recommended that the values of threshold and the actions to be undertaken based on the DOE performance monitoring should be determined after sufficient data is gathered and a road test is carried out.
29. The post-registration changes, as defined by the PCP, are a new process and currently there is insufficient data to provide a meaningful road test to determine thresholds. The data that are currently available from submissions¹⁰ are not enough and not sufficiently representative of the performance of DOEs to determine the thresholds. Therefore, it is proposed that data be collected to develop and define thresholds later, if the Board accepts the recommendation.
30. The proposal is that the post-registration changes be included within the scope of the procedure for DOE performance monitoring and that the Board agree to the proposal in

⁹ The PCP requires that the issues raised at completeness checks of post registration changes shall be made publicly available on UNFCCC website and informed to DOEs (paragraph 142) and implies that the clarifications raised to DOEs on post registration changes during summary note preparation will be communicated to the DOEs (paragraph 144).

¹⁰ Since, 1 May till 20 September 2012, about 67 post-registration changes have been submitted, out of which only 13 are approved, none of them being rejected or withdrawn, 5 have requested DOE clarification and the rest are under processing.

the concept note in principle. The Board may wish to implement the procedure as proposed to provide an opportunity to gather data and may decide to establish the threshold at a future meeting, when sufficient data have been generated.

3.1.3.2.4. Monitoring period and frequency of reporting

31. For the post-registration changes, an approach similar to that proposed in section 3.2.2 may be followed.
32. For monitoring the performance of DOEs for post-registration change requests, reporting should be done the same way as for monitoring requests for registration and issuance.

3.2. Improvement in the data reporting process

33. Currently the data and output produced from the DOE performance monitoring process have scope for improvement. There is a need to:
 - (a) Identify the information and data that are additionally required by various actors/users to take appropriate decisions;
 - (b) Make improvements in the reporting and enhance the utilization of the data generated within the existing four reports and its relation to assessments;
 - (c) Enhance the speed and frequency of the generation of the results and their relation to current performance and the monitoring results.

3.2.1. Improvements in reporting on the DOE performance for *registration and issuance*:

3.2.1.1. Problem statement

34. Currently four different reports as required by the current procedure are generated and provided to the Board, the CDM-AP, the DOEs and the public. The information provided requires further improvement for the actors/users to take appropriate decisions. The provision of adequate information and data for each actor/user would enhance transparency and usefulness for the users.
35. There is a need for improving the information currently provided to a DOE once it reaches the threshold of indicator I_2 , in order to allow it to carry out an exhaustive root-cause analysis and more adequate corrective actions.
36. Currently the confidential report (as per paragraphs 28 and 30(b) EB58, Annex 1: DOE performance monitoring procedure) from the DOE performance monitoring process is sent to the CDM-AP and includes the values of the indicators (I_1 and I_2) for DOEs and the tables that mention the project numbers for which issues raised during request for review have been classified into the categories and frequency of occurrence of the issues during the monitoring period. Based on this information, the CDM-AP is expected to take appropriate decisions. Feedback received has suggested that the data provided to the CDM-AP can be improved to enable an appropriate decision to be taken.

3.2.1.2. Recommendations

37. In addition to the confidential information and data already provided through reports¹¹ and the data on additional indicators proposed in this concept note, the following specific data related to the particular DOE, which are currently captured by the DOE performance monitoring system, may be provided to the DOEs to enable them to take appropriate actions:
- (a) Number of CDM project requested for review;
 - (b) Sectoral scope of the CDM project;
 - (c) Methodology(ies) applied by the CDM project;
 - (d) Related CDM requirements;
 - (e) Issue raised during the request for review;
 - (f) Category of the issue raised (e.g. prior consideration, investment analysis, etc).
38. In addition to the confidential information and data already provided through reports¹² and the data on additional indicators proposed in this concept note, the following data, which are currently captured by the DOE performance monitoring system, may be provided to the CDM-AP to enable them to take appropriate decisions/actions:
- (a) Number of CDM project requested for review;
 - (b) Sectoral scope of the CDM project;
 - (c) Methodology(ies) applied by the CDM project;
 - (d) Related CDM requirements;
 - (e) Issue raised during the request for review;
 - (f) Type of issue raised (reporting, procedural, technical issue);
 - (g) Category of the issue raised (e.g. prior consideration, investment analysis, etc);
 - (h) Weight assigned to the issue.
39. There may be no changes in the format and information in the existing public report except the additional indicators proposed in this concept note. For the post-registration changes, reporting should be integrated with the proposed modified four reports and should include the data on additional indicators proposed in this concept note.

¹¹ F-CDM-RTDOE: Report as per DOE performance monitoring procedure (paragraph 30 (a) EB58, Annex 1)

¹² F-CDM-RTAP and F-CDM-RTEB: Report as per DOE performance monitoring procedure (paragraph 30 (b) and (c) EB58, Annex 1)

3.2.2. Monitoring periods and frequency of reporting for Indicators

3.2.2.1. Problem statement

40. Currently DOE performance is monitored and the performance indicators are calculated based on the “start of the pipe treatment approach” where requests for registration or issuance submitted during monitoring periods of six months are considered. For each monitoring period, only projects submitted for registration and issuance within the period are monitored. Indicators are gradually calculated at the end of the monitoring period as the requests get finalized. The secretariat issues preliminary reports on the DOE performance at the fourth month after the end of the monitoring period and subsequent reports at three-monthly intervals, in order to take into consideration all the finalized requests for registration or issuance submitted within the six-month monitoring period. Therefore, the monitoring results on the performance of the DOEs are obtained at least four months after the monitoring period, which does not contain all the projects submitted that have completed the cycle¹³ and the subsequent reports gradually account for the requests for registration or issuance submitted and finalized later. For each monitoring period, the first version of the report is available four months after the end date of the monitoring period, the second report seven months after, and the third report ten months after. Moreover, the values of indicators also change from one version to the next. Therefore, this option is very data intensive and leads to the requirement to produce six reports a year (at least three versions of the report for each monitoring period).
41. The Board at its sixty-ninth meeting also requested the secretariat to provide proposals to improve the timeline and speed of the process (paragraph 12(c), EB69 report).

3.2.2.2. Recommendations

42. The recommendation is to replace two six-month monitoring periods per year with three-four monthly monitoring periods.

3.2.2.2.1. Monitoring periods

43. DOE performance shall be monitored and the performance indicators calculated based on requests for registration or issuance or post-registration changes submitted during monitoring periods of four months. A monitoring period starts on 1 January each year and finishes on 30 April, followed by the next monitoring period that starts on 1 May and ends on 31 August and, the final monitoring period that starts on 1 September and ends on 31 December.
44. For each monitoring period, only projects submitted for registration and issuance including post-registration changes within the period shall be monitored. Indicators shall be gradually calculated at the end of the monitoring period as the requests become finalized.
45. To account for the change in the length of the monitoring period, it is recommended that a DOE shall be subject to monitoring only after a final decision has been reached on the

¹³ The cycle time of any request for registration/ issuance may vary from around three months for automatic registration to six months or more for others. On average, it takes around nine months for 97-100 per cent of projects submitted during monitoring periods to complete the cycle.

seventh request for registration or issuance in a given monitoring period instead of the 10th request for registration or issuance as required in the current procedure.

3.2.2.2.2. Frequency of reporting

46. The secretariat shall prepare and issue preliminary reports on the DOE performance based on data related to requests for registration or issuance or post-registration changes finalized within three months of the end of each monitoring period. This would ensure a sufficient number of requests for registration or issuance or post-registration changes for which a final decision was made by the Board and a sufficient number of DOEs eligible for monitoring. The first version of such report shall be issued four month after the end of each monitoring period and the second version shall be issued seven months after the end of the same monitoring period.
47. Subsequent reports on DOE performance shall be issued at three-monthly intervals after the first preliminary report is issued and until all submitted requests for registration or issuance have been finalized. This would provide a more realistic picture of the performance of the DOE as the indicators would be stabilizing and reflecting the real performance of the DOE for a given monitoring period only as a significant number of submissions have been finalized.
48. In addition to the regular reports to the Board, DOEs, the CDM-AP and the public on individual DOE performance, an analysis report containing a detailed analysis of the issues arising from the DOE performance especially those identifying shortcomings in the CDM requirements, procedures and guidance shall be provided to the Board on a bi-annual basis. This report shall assist the Board in developing or revising its work-plans and those of its panels and working groups.
49. This proposal of reducing the length of monitoring periods to four months instead of six months is likely to improve the speed of the reporting process by making the second report (more than 90 per cent of the projects would have completed the cycle) available three months earlier than in the current situation. However, this will result in producing a minimum of six reports per year.

3.3. Revision of thresholds for registration and issuance for Indicator I₂

3.3.1. Problem statement

50. The Board at its sixty-ninth meeting (see paragraph 12(c), EB69 report) requested the secretariat to review the adequacy of the thresholds for indicator I₂.
51. The results from the “Third analysis report on DOE performance monitoring (annex 3 to the annotated agenda of EB69) as considered at the sixty-ninth meeting of the Board, noted that:
 - (a) The maximum value of the indicator I₂ (rate of requests for review) in the registration process, from 1 January 2010 to 31 December 2011, is 1.81 and has never been crossed and is much lower than the higher threshold of 3;
 - (b) The maximum value of the indicator I₂ (rate of requests for review) in the issuance process, from 1 January 2010 to 31 December 2011, is 1.71 and has crossed the higher threshold of 1.5 only once, which triggered a spot-check.

3.3.2. Recommendations

- 52. From the above analysis, it appears that, of the thresholds for registration and issuance for indicator I_2 , the thresholds for registration has scope for revision and update.
- 53. The values of indicator I_2 calculated so far do not reflect the impact of the recent major changes made in the regulatory system after 1 January 2012, such as the implementation of the PCP, PS, VVS which started from 1 May 2012 and will be implemented fully after 31 January 2013, the work-plan on top-down improvement of the methodologies and the tools, the revision of the guidelines on first-of-its-kind and common practice and the further revision of other guidelines. Therefore the values of Indicator I_2 are not representative of the current situation. Moreover, as only the future reporting periods after the fourth quarter of 2013 are expected to capture the impact of the implementation of these regulatory changes on the Indicator I_2 it is not advisable to revise the thresholds for indicator I_2 until the fourth quarter of 2013.

3.4. Defining the actions to be undertaken based on the DOE performance monitoring

- 54. Currently the actions to be undertaken by various actors based on the outputs reported under the DOE performance monitoring are not detailed and there is scope for improvement by interlinking the actions with the requirements in the CDM accreditation procedure and accreditation standard.

3.4.1. Actions to be taken by DOEs**3.4.1.1. Problem statement**

- 55. An additional action needs to be incorporated in the procedure for monitoring the performance of DOEs in accordance with the new indicators $I_{1,CC}$ and $I_{1,IRC}$ and their respective thresholds as described in section 3.1.1 of this document.

3.4.1.2. Recommendations

- 56. Actions to be undertaken based on the indicators $I_{1,CC}$ and $I_{1,IRC}$ of the DOE performance monitoring: once a DOE reaches the threshold ($I_{1,CC}$ and/or $I_{1,IRC}$) the secretariat shall formally request the DOE to undertake a root-cause analysis to identify the causes of the deficiencies in its system with regard to the conduct of completeness and/or information and reporting checks, and implement appropriate corrective actions as per paragraph 123 of the accreditation standard. The DOE shall be responsible for ensuring that corrective actions identified as a result of the root-cause analysis carried out are adequate and address in a systematic manner the identified issues.
- 57. It is recommended that the output form the completeness and information and reporting checks may be explored to be used as additional criteria for the risk-based assessment.

3.4.2. Action to be taken by the CDM-AP**3.4.2.1. Number of performance assessments****3.4.2.1.1. Problem statement**

- 58. The current CDM accreditation procedure and the procedure on performance monitoring of designated operational entities does not describe in detail how the number and nature

of performance assessment shall be determined by the CDM-AP in accordance with the results of the DOE performance monitoring.

3.4.2.1.2. Recommendations

59. If the DOE reaches the first threshold of the indicator I_2 ($I_2 > 0.5$) in two consecutive monitoring periods, the CDM-AP shall add one additional performance assessment to the number of planned performance assessments. The nature of this performance assessment shall be defined considering the process that reached the threshold, i.e. if the threshold is reached as a result of the registration process, a validation performance assessment shall be conducted. Likewise, a verification performance assessment shall be conducted if the threshold is reached as a result of the issuance process. The performance assessments, when possible, shall be on the sectoral scopes and/or methodologies where a DOE recurrently fails according to the results of the DOE performance monitoring reports.
60. The CDM-AP shall reduce one additional performance assessment from the number of planned performance assessments when four consecutive DOE performance monitoring periods show that the indicator I_2 has remained in the green zone.

3.4.2.2. Preparation of assessment work-plans

3.4.2.2.1. Problem statement

61. The current CDM accreditation procedure and the procedure on performance monitoring of designated operational entities do not describe in detail how to use the information provided in the monitoring report once a DOE has reached the yellow zone¹⁴ based on indicator I_2 . In addition, the information provided in the monitoring reports to the CDM-AP does not allow specific identification of the areas where the DOE fails within the validation/verification process.
62. An additional action for the CDM-AP needs to be incorporated in the procedure for monitoring the performance of DOEs in accordance with the new indicators $I_{1,CC}$ and $I_{1,IRC}$ and their respective thresholds as described in section 3.1.1. of this document.

3.4.2.2.2. Recommendations

63. It is recommended that the CDM-AP be provided with the information about the issues identified in the performance monitoring reports, once a DOE reaches the yellow zone, detailing the specific CDM requirements where the DOE failed to comply.
64. This information contained in the DOE performance monitoring reports¹⁵, is to be used to prepare the work plan of the regular surveillance assessment and re-accreditation assessment, whichever is conducted earlier. Additionally, the work-plan shall include a request for the Assessment Team (CDM-AT) to assess whether the DOE has carried out a root-cause analysis as a result of the DOE performance monitoring (based on $I_{1,CC}$,

¹⁴ Which is the region falling between the first and the second threshold. Refer Table 2 in this document

¹⁵ All the reports corresponding to the final version (e.g., version 2 of the report is expected to include projects where more than 90 per cent of projects would have completed the cycle) shall be considered.

$I_{1,IRC}$ and/or I_2^{16}) and that corrective actions identified are adequate and address the identified issues in a systematic manner. The CDM-AT shall report the result of this assessment in the assessment report.

65. The CDM-AP may consider reducing the number of non-central sites to be visited during the regular surveillance after re-accreditation (as per paragraph 140 of the accreditation standard), when four consecutive DOE performance monitoring reports show that the I_2 for the DOE has remained in the green zone.

3.4.2.3. Activation of spot-checks

3.4.2.3.1. Problem statement

66. Currently the procedure on performance monitoring of designated operational entities triggers a spot-check every time a DOE reaches the second threshold of indicator I_2 (red zone). There is a need to consider the timing when this spot-check is triggered in relation to the rest of the accreditation processes and their outcome.

3.4.2.3.2. Recommendations

67. It is recommended that the CDM-AP may decide not to conduct a spot check on a DOE that has reached the red zone in case:
- (a) The issues in the scope of the spot check have been covered and resolved in recent assessments; and
 - (b) A regular visit is planned to take place in the subsequent two to three months which can be combined with the scope of the spot check.
68. The summary of the recommendations made in section 3.4 is provided below in Table 1 and 2.

¹⁶ The road test of the application of the proposal on actions triggered when indicator (I_2) crosses the threshold for registration and issuance has been provided in Appendix 4.

Table 1: Recommendations for actions to be triggered when thresholds are crossed

Registration and Issuance - Thresholds and Actions Triggered ($I_{1,CC}$ and $I_{1,IRC}$)								
Indicator Values	Compliance Zone	Activity	Frequency Threshold Crossed	Actions by				
				Secretariat	DOEs	CDM-AP	CDM-EB	Remarks
$I_{1,CC} \leq 0.3$	Green	Registration	-	-	-	-	-	
$I_{1,IRC} \leq 0.3$			-				-	
$I_{1,CC} > 0.3$	Red	Registration	One Monitoring Period	Formally Request DOE for Root Cause Analysis	DOE to Carry out Root Cause Analysis and themselves take corrective and Preventive Actions as per para 123 of Accreditation standard	-	-	
$I_{1,IRC} > 0.3$			Two Consecutive Monitoring Periods			1) Include in Workplan: CDM-AT to access whether RCA and CA/PA are adequately undertaken in next site visit (Non-central site, Regular surveillance or Re-accreditation) 2) CDM-AT shall report the outcome in their Assessment Reports	-	Refer para 123 of Accreditation Standard v4
$I_{1,CC} > 0.3$								
$I_{1,IRC} > 0.3$								
$I_{1,CC} \leq 0.25$	Green	Issuance	-	-	-	-	-	
$I_{1,IRC} \leq 0.25$			-				-	
$I_{1,CC} > 0.25$	Red	Issuance	One Monitoring Period	Formally Request DOE for Root Cause Analysis	DOE to Carry out Root Cause Analysis and themselves take corrective and Preventive Actions as per para 123 of Accreditation standard	-	-	
$I_{1,IRC} > 0.25$			Two Consecutive Monitoring Periods			1) Include in Workplan: CDM-AT to access whether RCA and CA/PA are adequately undertaken in next site visit (Non-central site, Regular surveillance or Re-accreditation) 2) CDM-AT shall report the outcome in their Assessment Reports	-	Refer para 123 of Accreditation Standard v4
$I_{1,CC} > 0.25$								
$I_{1,IRC} > 0.25$								

Table 2: Recommendations for actions to be triggered when thresholds are crossed

Registration and Issuance - Thresholds and Actions Triggered (I ₂)								
Indicator Values	Compliance Zone	Activity	Frequency Threshold Crossed	Actions by				
				Secretariat	DOEs	CDM-AP	CDM-EB	Remarks
I ₂ <= 0.5	Green	Registration	-	-	-	-	-	
		Issuance						
		Registration	Four Consecutive Monitoring Periods	-	-	1) Reduce one Performance assessment 2) Consider Reducing the number of non-central site visits during routine/regular surveillance after re-accreditation visit which ever earlier	-	Refer para 66, 91 and 140 of Accreditation Procedure
		Issuance						
I ₂ > 0.5; < 3	Yellow	Registration	One Monitoring Period	Formally Request DOE for Root Cause Analysis	DOE to Carry out Root Cause Analysis and themselves take corrective and Preventive Actions as per para 123 of Accreditation standard	1) Include in Workplan: CDM-AT to access whether RCA and CA/PA are adequately undertaken in next site visit (Non-central site, Regular surveillance or Re-accreditation) 2) CDM-AT shall report the outcome in their Assessment Reports	-	Refer para 123 of Accreditation Standard v4
I ₂ > 0.5; < 1.5		Issuance						
I ₂ > 0.5; < 3		Registration	Two Consecutive Monitoring Periods			In addition to above 1) & 2) : 3) Add one performance assessment (validation/verification) 4) Define scope of the audit based on analysis of specific issues	-	Refer para 66, 91 and 140 of Accreditation Procedure
I ₂ > 0.5; < 1.5		Issuance						
I ₂ > 3	Red	Registration	One Monitoring Period			1) To conduct Spot Check 2) To not conduct spot check in case: (a) When the issues in the scope of Spot check have not been covered and resolved in recent assessment; (b) A regular visit is planned to take place in sub-sequent 2-3 months 3) Notify Board as per para 123 of Accreditation procedure	Board to take note of notification by CDM-AP	Refer para 118 (a) and 123 of Accreditation Procedure
I ₂ > 1.5		Issuance						

4. Impacts

69. This work is not likely to impact the work of stakeholders other than the DOEs and the CDM-AP. This work is likely to provide enhanced data and feedback to the DOEs and the CDM-AP for appropriate decision-making, would enhance the transparency and objectivity and efficiency of the CDM, with the longer-term objective of enhancing the performance of the DOEs and facilitating an overall system-wide improvement.

5. Proposed work and timelines

70. After consideration of this concept note by the Board at its seventieth meeting and agreement on the way forward, the procedure on the DOE performance monitoring shall be revised and considered by the Board at its seventy-second meeting.

6. Budget and costs

71. The implementation of the recommendations made in this concept note will have small budget implications mainly due to the extra manpower requirement and on account of the IT implementation/automation once the procedure is adopted by the Board and implemented. The routine manual operation would thereafter require additional annual manpower requirements of two and a half person months. The IT requirements would be separately determined later.

7. Recommendations to the Board

72. The secretariat recommends that the Board agree to the proposed recommendations for improvement of the DOE performance monitoring outlined in this concept note. The Board may wish to agree to the recommendations:
- (a) To establish separate indicators for completeness checks and the information and reporting checks at requests for registration and issuance and the proposed thresholds;
 - (b) On the revised categorization and weighting of issues identified at requests for registration and issuance;
 - (c) On re-defining the reporting requirements including additionally providing the information on the newly introduced indicators to the DOEs and providing enhanced information to the CDM-AP to be used in decision-making;
 - (d) Not to revise the threshold for indicator I₂;
 - (e) On the revised procedures proposed for defining the actions to be taken by various actors (secretariat, CDM-AP and CDM-AT) when the thresholds for indicators are crossed;
 - (f) To include the post-registration changes within the scope of the procedures for DOE performance monitoring and agree to the proposal in the concept note in principle. The Board may choose to implement the procedure as proposed to provide an opportunity to gather data and may decide to establish the threshold later, when sufficient data have been generated;

- (g) On re-defining the length of monitoring period, speed of the process and frequency of reporting to various actors, to replace the current requirement of two six-month monitoring periods per year with three four-month monitoring periods.
- 73. The Board may wish to request the secretariat to incorporate the agreed proposals and options into the revised procedure for its consideration at its seventy-second meeting.

Appendix 1. Categorization and weighting of issues identified at requests for registration

	Classification of Issues	Weight
I	Issues related to reporting	
1	This category includes errors covering: <ul style="list-style-type: none"> - Inconsistencies in the information presented in the documents presented/information supplied; - Incomplete information/missing data; - DOE has not fully reported how the requirements are being complied with; - The latest PDD template was not used 	1
II	Issues related to failure to follow procedural requirements	
1	<ul style="list-style-type: none"> - The DOE did not raise a FAR during validation to identify issues related to project implementation that required review during the first verification of the project activity (VVS, para. 27). - The DOE raised a FAR that relates to the CDM requirements for registration (VVS, para. 27). 	4
2	CAR/CLs in validation reports which are not closed out correctly: <ul style="list-style-type: none"> - Where the CAR resolution indicates that the PDD has been updated but it has not (VVS, para. 28); - Where a CAR/CL is marked as closed without explanation (VVS, para. 29). 	2
3	Failure to carry out the global public stakeholder consultation in line with the CDM requirements (VVS, paras. 34-36).	3
4	Failure to visit project site or provide justification (VVS, paras. 65, 66, and 69).	4
5	Failure to request a deviation from the methodology when non-compliance of the project activity with the requirements of the methodology has been identified (VVS, para. 87).	4
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;	
1	This sub-category includes cases for which the DOE has not precisely validated the project in accordance with the requirements of the VVM or VVS, however the failure is not likely to alter the validation opinion: <ul style="list-style-type: none"> - Failure to ensure precise project start date where the change in the date does not impact additionality; - Failure to fully validate all minor input values in an investment analysis - Failure to ensure that the common practice analysis has been conducted fully in accordance with the requirements; - Failure to ensure that the LoA refers to the precise title of the proposed project activity; - Failure to assess compliance with environmental impacts and/or local stakeholder consultation. 	3
2	This sub-category includes cases for which the DOE has failed to ensure compliance with a requirement which may ultimately be resolved during verification/issuance: <ul style="list-style-type: none"> - The monitoring plan is incomplete; - The validation report or PDD contains conflicting information regarding the baseline which may lead to a request for review at issuance. 	4

3	This sub-category includes cases for which the DOE's failure to ensure compliance with CDM requirements is likely to have an impact on the projects, or similar future projects', eligibility to receive the estimated quantity of CERs: - Errors in validation of additionality that would lead to a failure to identify non-additional projects; - Failure to apply or the misapplication of the requirements of the methodology that would lead to a non-applicable methodology being applied or the baseline being incorrectly established.	5
IV	Other issues, to analyze system-wide gaps and improve classification	
1	Absence of requirement/guidance by the Board.	0
2	Ambiguity of interpretation of requirements of methodology/guidance.	0

Appendix 2. Categorization and weighting of issues identified at requests for issuance

	Classification of Issues	Weight
I	Issues related to reporting	
1	This category includes errors covering: <ul style="list-style-type: none"> - Inconsistencies in the information presented in the documents presented/information supplied; - Incomplete information/missing data; - DOE has not fully reported how the requirements are being complied with. 	1
II	Issues related to failure to follow procedural requirements	
1	This sub-category covers: <ul style="list-style-type: none"> - CAR/CLs in verification reports are not appropriately closed out (VVS, para. 222); - Failure to follow up FAR from previous verification (VVS, para. 223). 	2
2	This sub-category covers failure to conduct a site visit as per the requirements of the verification process, or provide justification (VVS, para. 227).	4
3	This sub-category covers: <ul style="list-style-type: none"> - Failure to submit changes as part of request for issuance, if the changes are solely of the types listed in appendix 1 of the Project Standard (VVS para. 249 (a)); - Failure to submit changes via the request for approval, if the changes do not fall within the types listed in appendix 1 of the Project Standard (VVS para. 249 (b)). 	4
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with CDM requirements	
1	This sub-category covers basic verification to ensure the quality of required data measured and reported: <ul style="list-style-type: none"> - Failure to verify equipment/systems/protocols/procedures; - Failure to cross-check reported data/no clear audit trail (data generating, aggregating, reporting); - Failure to identify calculation errors in the supporting documents/spreadsheets due to omissions or data transposition. 	3
2	This sub-category covers failure to apply the conservativeness approach when required.	4
3	This sub-category covers failures to correctly apply methodological requirements which may lead to incorrect issuance of CERs: <ul style="list-style-type: none"> - Failure to verify installation of monitoring system as per the methodology; - Parameters required by methodology not being monitored; - Incorrect application of methodology and formulae, factors, default values. 	5
IV	Other issues, to analyze system-wide gaps and improve classification	
1	Absence of requirement/guidance by the Board.	0
2	Ambiguity of interpretation of requirements of methodology/guidance.	0

Appendix 3. Categorization and weighting of issues identified at requests for post-registration changes

	Classification of Issues	Weight
I	Issues related to reporting	
1	<p>This category includes errors covering:</p> <ul style="list-style-type: none"> - Inconsistencies in the information presented in the documents presented/information supplied; - Incomplete information/missing data; - DOE has not fully reported how the requirements are being complied with; - Situations where the revised PDD does not address all the required changes. 	1
II	Issues related to failure to follow procedural requirements	
1	The DOE submitted a wrong request, instead of the other applicable post-registration changes (PCP, para. 130).	3
2	The DOE incorrectly requested approval of change in start date of the crediting period more than once for each registered project (PCP, para. 136).	3
3	Failure to visit project site for change in project design or provide justification (VVS, paras. 271 and 272).	4
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with CDM requirements	
1	<p>This sub-category includes cases for which the DOE has not precisely made the assessment of the post-registration change in accordance with the requirements of the VVS, although the failure is not likely to alter the assessment opinion:</p> <ul style="list-style-type: none"> - Failure to determine impact of proposed changes on emission reductions where the omission does not impact emission reductions; - Failure to fully validate whether the request complies with the requirements of the applicable methodology; - Failure to take into account the findings of previous verification reports; - Failure to prevent reporting of conflicting information regarding the baseline, additionality, scale of the project, monitoring requirements, emission reduction calculations in the assessment report or PDD which may not change the final outcome/assessment opinion. 	3
2	<p>This sub-category includes cases for which the DOE's failure to ensure compliance with CDM requirements is likely to have an impact on this or similar future post-registration change requests, decision to issue the real quantity of CERs:</p> <ul style="list-style-type: none"> - The request and the assessment report violates the requirements of the applicable methodology; - Failure to identify technical issues which impact emission reductions and may lead to over-issuance of CERs; - The assessment report incorrectly states that the changes ensure that the level of accuracy and completeness of the monitoring is not reduced; - Failure to identify technical issues which may impact emission reductions baseline, additionality, scale of the project, monitoring requirements and emission reduction calculations and will lead to non-compliance/possible rejection. 	4

IV	Other issues, to analyze system-wide gaps and improve classification	
1	Absence of requirement / guidance by the Board.	0
2	Ambiguity of interpretation of requirements of methodology/guidance.	0

Appendix 4. Road test to determine threshold for CC and IRC

Table 1. Threshold for Indicators calculated for eligible DOEs for Registration Process (Jul-Dec 2011)

DOE	Total requests submitted	Requests completed	Requests kicked-out at CC	Requests kicked-out at IRC	Indicator $I_{1,CC}$	Indicator $I_{1,IRC}$
DOE 1	59	49	2	9	0.04	0.18
DOE 2	19	19	5	6	0.26	0.32
DOE 3	13	13	1	3	0.08	0.23
DOE 4	122	99	6	17	0.06	0.17
DOE 5	20	19	0	3	0.00	0.16
DOE 6	15	14	6	6	0.43	0.43
DOE 7	21	19	6	7	0.32	0.37
DOE 8	23	20	3	6	0.15	0.30
DOE 9	16	14	1	1	0.07	0.07
DOE 10	72	62	15	17	0.24	0.27
DOE 11	27	23	0	5	0.00	0.22
DOE 12	13	11	3	5	0.27	0.45
DOE 13	48	46	12	8	0.26	0.17
DOE 14	21	17	3	5	0.18	0.29
Avg.					0.17	0.26
Min.					0	0.07
Max.					0.43	0.45
Proposed threshold					0.3	0.3

Table 2. Threshold for Indicators calculated for eligible DOEs for Issuance Process (Jul-Dec 2011)

DOE	Total requests submitted	Requests completed	Requests kicked-out at CC	Requests kicked-out at IRC	Indicator $I_{1,CC}$	Indicator $I_{1,IRC}$
DOE 1	13	12	1	3	0.08	0.25
DOE 2	135	134	13	9	0.10	0.07
DOE 3	26	26	4	3	0.15	0.12
DOE 4	30	30	0	0	0.00	0.00
DOE 5	184	173	8	24	0.05	0.14
DOE 6	39	39	0	5	0.00	0.13
DOE 7	10	8	3	1	0.38	0.13
DOE 8	13	11	3	5	0.27	0.45
DOE 9	11	11	0	2	0.00	0.18
DOE 10	25	24	0	2	0.00	0.08
DOE 11	16	16	0	1	0.00	0.06
DOE 12	108	107	14	17	0.13	0.16
DOE 13	151	150	2	11	0.01	0.07
DOE 14	35	31	4	1	0.13	0.03
DOE 15	63	55	3	18	0.05	0.33
Avg.					0.09	0.15
Min.					0	0
Max.					0.38	0.45
Proposed threshold					0.25	0.25

Appendix 5. Summary of stakeholders inputs

S. No	Comments/input provided	Stakeholder	Summary of how the comments have been considered
1	Reporting to DOEs to be improved, e.g. by providing project specific information, names of projects provided, Dashboard of results on website, rather than loads of dense PDF reports, etc.	DOE Forum (11 Oct 2012)	Accepted. The concept note mentions providing additional information on the newly introduced indicators to the DOEs including providing project-specific information. The request related to dashboard of results requires IT support and will be considered as appropriate.
2	General agreement to establish separate indicators for CC and IRC, and post registration changes and proposed thresholds		Accepted. This comment was already reflected in the concept note. There was general agreement on this issue.
3	General agreement not to revise the threshold for indicator I ₂		Accepted. This comment was already reflected in the concept note. There was general agreement on this issue.
4	On the revised procedures proposed for defining the actions to be taken by various actors (secretariat, CDM-AP and CDM-AT) when the thresholds for indicators are crossed: - Not having an unnecessary spot check is very welcome.		Accepted. This comment was already reflected in the concept note. There was general agreement on this issue.

S. No	Comments/input provided	Stakeholder	Summary of how the comments have been considered
5	DOEs taking on more complex projects are penalized.		The framework generates an indicator, which provides an average value considering all the types of projects (including small-scale, large-scale, different methodologies, sector scope, etc). The DOEs that make the choice to validate complex projects over simple ones may have different reasons for that. For example, this choice gets them premium payments over simpler projects and some DOEs want to maintain their position in the market by providing diversity of services. So, this is an intentional business decision that the DOEs make and the DOE performance monitoring is not intended to account for this.
6	Does not mention reporting for DOEs (currently at least 10 projects).		Accepted. The concept note now includes this input. A DOE shall be subject to monitoring only after a final decision has been reached on the seventh request for registration or issuance in a given monitoring period instead of the 10 th request for registration or issuance as mentioned in the current procedure.
7	Speed of reporting: explore the possibility of asking the DOEs to do a root-cause analysis based on the results at the briefing note stage.		Not acceptable. This proposal will lead to a situation where feedback is requested to be provided to the DOEs prior to the decision by the Board, which is not encouraging for the integrity of CDM. Secondly, this option does speed up the process but only by 20 days (para. 219, Annex 64, EB66,) or by around 30-40 days (para 221, Annex 64, EB66,) as per the PCP, whereas the proposal in the concept note is likely to speed up the process by three months. However, the DOEs have the request for review questions, available to them at this point of time and they may choose to carry out the root-cause analysis at this stage or during responding to request for review questions for their system improvement.

S. No	Comments/input provided	Stakeholder	Summary of how the comments have been considered
8	Most members requested to explore more possibilities to further speed up the reporting of the indicators and results of the DOE performance.	CDM-AP62 (15 Oct 2012)	<p>The secretariat explored a number of options: option 1: continuation of current practice but with three monthly monitoring periods; option 2: end of the pipe treatment approach (includes the projects which have completed the cycle in three months monitoring period, irrespective of when they are submitted, i.e. a running indicator-like concept); and option 3: continuation of current practice but with four-month monitoring periods. All of the options have both advantages and disadvantages. The proposal in option 2 has a limitation as it does not refer to the time period when the projects are originally submitted and therefore reporting of DOE performance will not correspond to the time period when projects are submitted, and this option will not really speed up the reporting process as the report will provide monitoring of the DOE performance based on projects which would have been submitted in the past (e.g. last one year). Looking at the pros and cons of each of the options, it was concluded that out of the three options, only option 3 proposed in the concept is adequate and feasible and is likely to speed up the reporting by three months.</p> <p>No other options were proposed by stakeholders.</p>

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