

DOE/AE Forum | *Javier Castro* | October 2025

SBM 018

Relations with DOE/AE Coordination Forum

Topics

- **Introduction IAVVB & DOE Forum**
- **AEP inputs**
- **MEP inputs**

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
 - Platform for raising operational issues and contributing to standard evolution

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

Acknowledgment

The DOE Forum thanks the AEP for its constructive consideration of our interaction. The following points from our interaction were **taken into account**:

- **Chapter 9:** Integrity concept now aligned with ISO 14066 §4.3
- **§13** – Clarified scope and interpretation of judicial processes
- **Footnote 18** – Clarifications on consultancy and training activities adopted
- **Footnotes 18, 40, 43** – Flexibility acknowledged in meeting intervals

These changes enhance consistency, objectivity, and operational feasibility of the accreditation standard.

Accreditation Standard

Despite significant progress, **key technical issues remain unresolved:**

- **§44(f)** – Lab testing and calibration are flagged as threats to impartiality
→ *Clarification needed:* This should apply **only when conducted outside accredited scopes**
- **§44(g)** – No time limitation on previous relationships
→ *Recommendation:* Introduce a **2-year cooling-off period** (aligned with §45(e)(iii))
- **Implications are presented in §48:**
- **§48(c)** – Blanket prohibition on VVC services ignores existing impartiality safeguards

These clarifications are essential to uphold impartiality **without undermining service practicality** in complex project contexts.

Accreditation Procedure

The DOE Forum **welcomes the adoption of 7-day response timelines**, which improves procedural feasibility.

One additional refinement is proposed:

- **§6.5.2 Pre-assessment timing**
→ *Suggestion*: Allow **Applicant Entities** to request a pre-assessment before **initiating desk review**

This early engagement mechanism will:

- Enhance readiness of AEs
- Avoid procedural backlogs
- Align with risk-based accreditation principles

MEP Submission: Comments on Non-Permanence Standard

Core themes:

- Excessive post-crediting monitoring burden
- Unrealistic timelines for DOE engagement (90 days)
- Lack of fallback mechanisms in case of project insolvency
- Ambiguity in concepts like “high level of confidence”

MEP Submission: Key Technical Recommendations

Issue	Recommendation
Post-crediting monitoring	Introduce sunset clauses or pooled guarantees
“Materiality threshold”	Only applicable to auditing. Replace with “significance threshold”
Risk thresholds (11b)	Maintain 0.1%–5% or differentiate by project type and considered materiality threshold
Verification deadlines	Extend and allow justified DOE unavailability
Insolvency management	Propose host Party fallback or reserve fund. No action will be preformed if entity is insolvent.

Closing & Acknowledgements

- Encourage AEP/MEP/SB coordination with DOE Forum in early drafts
 - Including access to all DOEs to the early drafts
- Appreciation for the open consultation process
- The DOE Forum remains committed to constructive, expert-driven contributions
- We kindly request to published the agenda and documents for the next meeting as early as possible to allow enough time for preparing any presentation for the interactions

Thank you for your attention!

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Chair of the DOE/AIE Forum

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