



Mr. Leo Perkowski
Project Developer Forum Ltd.
Sent by e-mail to: leo.perkowski@pd-forum.net
Cc to: Martin.Hession@decc.gsi.gov.uk

Date: 20 December 2011
Reference: 63-3
Direct line: +49 228 815-1687

Re.: Verification and Validation Standard

Dear Mr. Perkowski,

Thank you for your letter to the CDM Executive Board (hereinafter is referred to as the Board), dated 29 June 2011. On behalf of the Chair of the Board, I wish to inform you that your letter was made available to the Board on the date of its submission and considered in full.

In your letter, you mentioned that ambiguous guidance and lack of definition leads to delay by the Designated Operational Entities (DOEs); hence you suggested fallback provisions such as defining principles on how to identify the most appropriate interpretation and a list of endorsed interpretations linked to the Catalogue of Decisions, and differentiated procedural treatment for minor and major issues for the DOEs enabling them to make great use of Forward Action Requests (FARs).

We would like to inform you that Validation and Verification Standard (VVS) is a consolidation of existing requirements applicable to DOEs in conducting validation and verification activities. While drafting the VVS, we identified and removed irrelevant text, references, and footnotes. We also removed duplicate requirements. To address unclear requirements, where possible, we also attempted to re-draft existing requirements to improve their clarity, and improve the general flow of information. The text is rearranged and/or reconstructed to improve clarity without changing the intent of the requirement. Ambiguous terms such as appropriate, clear, may, can, etc. was taken into consideration. Use of the terms “should” and “shall” is clarified in the VVS. Improvement of any ambiguous requirements that are difficult to interpret was further considered. Moreover, where there were gaps related to the means of validation/ verification, by default the VVS instructs DOEs to apply standard auditing techniques.

Having mentioned the work undertaken to address ambiguity of the standard, we would however like to consider incorporation of various fallback provisions when a revision of VVS takes place in future.

Regarding FARs, we would like to draw your attention to following paragraphs of Validation and Verification Manual (VVM) Version 01.2¹, where the scope of FAR is clearly delineated.

Paragraph 37 - “The DOE shall raise a forward action request (FAR) during validation to highlight issues related to project implementation that require review during the first verification of the project activity. FARs shall not relate to the CDM requirements for registration.”

Paragraph 193 - “The DOE shall raise a FAR during verification for actions if the monitoring and reporting require attention and/or adjustment for the next verification period.”

¹ http://cdm.unfccc.int/Reference/Manuals/accr_man01.pdf



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Thank you once again for contacting the Board with your comments and request.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'A. Howard', written in a cursive style.

Andrew Howard
Secretary to the CDM Executive Board