



**GENERIC IMPARTILITY RISK ASSESSMENT
FORM**

Note: This review to be carried out annually for the whole of Carbon Check. For individual applications and projects - Refer to the Application and Planning Process

RISK REVIEW DETAILS

Risk Review date/s

Names of Reviewer/s:

Role/s:

This impartiality risk assessment is carried out as the 2nd with specific reference to Carbon Check as a whole/entity – for projects impartiality risk assessments, refer to FM4.2.

IMPARTIALITY RISK RELATED INFORMATION COLLECTION

Please refer to Attachment I - the Impartiality – “Generic Threat/Risk Identification questionnaire” attached at the end of this document.

RISK REVIEW EVALUATION AND DETAILS OF ANY NECESSARY MITIGATION

Does some impartiality risk exist?

Yes

No

If "No" then no further action required.

If "Yes" (some impartiality risk exists):

Can all the impartiality risks be mitigated?

Yes

No

If "no" - services cannot be offered until all impartiality risks are mitigated

If "yes" complete details of how the risks will be mitigated. ---[Provided in the table below](#)

Details of how the risks will be mitigated

Threat/Risk identified (References items in Attachment I questionnaire)	Threat/Risk Description	Decision and Mitigation Measure/Action

Management Approval sign-offs

Name

Position

Signature

Date

RISK REVIEW OUTCOME - IMPARTIALITY PANEL

Where risks exist, submit to Impartiality Panel for review and ratification

Approval:

Y

N

If No: Reasons/corrections: (Include reference to Action Forms if necessary)



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Impartiality Approval sign-offs

Name	Position	Signature	Date

**Attachment I
Impartiality – Generic Threat/Risk Identification questionnaire**

To be used to gather input for the first organization wide Generic Assessment of Threats/Risks to Impartiality and subsequent Generic Assessments of organization wide Threats/Risks to Impartiality.

Please put a **X** mark on the appropriate boxes below. Any other information regarding threats/risks can be added in the section provided below.

1. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in identification of CDM project activities? Yes No
2. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in identification of CDM project activities in the past 3 years? Yes No
3. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in identification of CDM project activities? Yes No
4. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in development of CDM project activities? Yes No
5. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in development of CDM project activities in the past 3 years? Yes No
6. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in development of CDM project activities? Yes No
7. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in financing CDM project activities? Yes No
8. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in financing CDM project activities in the past 3 years? Yes No
9. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in financing CDM project activities? Yes No
10. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing consultancy for establishing validation or verification or monitoring systems? Yes No
11. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing consultancy for establishing validation or verification or monitoring systems in the past 3 years? Yes No
12. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in providing consultancy for establishing validation or verification or monitoring systems? Yes No
13. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing CDM related training to CDM project participants? Yes No
14. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing CDM related training to CDM project participants in the past 3 years? Yes No
15. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in providing CDM related training to CDM project participants? Yes No
16. Is the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing laboratory testing and calibration services? Yes No



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- 17. Was the organization or any of its parts or any of its parents or any of its subsidiaries engaged in providing laboratory testing and calibration services in the past 3 years? Yes No
- 18. Does the organization or any of its parts or any of its parents or any of its subsidiaries plan to engage in providing laboratory testing and calibration services? Yes No
- 19. Was any of the present personnel for validation or verification or certification function associated with CDM project participants in CDM related activities such as development, consultancy or training? Yes No
- 20. Was any of the present personnel for validation or verification or certification function associated with CDM project participants in CDM unrelated activities? Yes No
- 21. Does the organization set performance targets on assessors which require them to validate or verify or certify specific number of projects during a period of time? Yes No
- 22. Is the organization funded by any entity or person who has stake in other companies? Yes No
- 23. What are the other sources of income of the organization other than revenue receipts from validation/verification/certification of CDM projects?
The organization has no revenue earning at present. The planned revenue of the organization will be fees received from providing validation/verification/certification services related to CDM.

- 24. Does any of the directors of the organization have any income from CDM projects? Yes No
If yes, is CCL involved in providing any service to such projects? Yes No

- 25. Does any of the directors of the organization have any income from project participants of CDM projects? Yes No

- 26. Does the organization have any arrangement to sub-contract work to another entity? Yes No

- a. If the answer to the above question is "Yes" – Name the organization and specify which other activities are such organizations engaged in?

Name of the organization, contact person, contact information	Activities involved in
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- 27. Does the organization have any arrangement to sub-contract validation/verification/certification work to an external expert? Yes No

- a. If the answer to the above question is "Yes", does any such external expert provide/has in the past provided services related to CDM related development, consultancy or financial services? Yes No

- 28. Which other activities other than validation/verification/certification of CDM projects does the organization carry out now? List activities in detail.

- 29. Will the validation/verification/certification services be marketed packaged with any other services from Carbon Check or any other organization? Yes No

- 30. What measures are in place to ensure that the organization does not have any bias towards a CDM project function based on the consultancy or financing organization used for the project function?

*The Carbon Check policies and procedures related to impartiality management and control are contained in Proc6.0, which includes the following:
As a DOE CarbonCheck is committed to assess projects based only on the compliance to the requirements articulated by the decisions of the CDM EB, methodologies, tools and guidelines stipulated by the CDM EB.*

*Towards that end the pricing policy of Carbon Check will take into account the following factors:
(a) type of project – technology measure employed, single/bundled/PoA (b) number of sites (b) size of project –small scale/large scale (c) geographical location of sites (d) T&M rates of our assessors which are in vogue from time to time.*



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The time required to complete a validation/verification will depend on (a)our resource booking status (b)work in hand (c)complexity of project (d)availability of information/documents/evidences required to validate/verify any project.

Factors such as consultancy organization used or financial organization used for a project function will not play any role in matters of time, price, simplicity/complexity of the validation/verification.

Carbon Check specifically instructs its personnel to not indicate or state or perform in contradiction to the above, and requires assessors to commit to impartial conduct by means of sign off of the Assessors Agreement (FM 7.4) which stipulates the requirements regarding identifying and reporting impartiality threats and risks. (Also refer item 33 below.

31. Which other activities other than validation/verification/certification of CDM projects do you plan to carry out in future? List the activities.

Providing validation/verification services for GHG offset generation programs as per other offset generation standards which accept UNFCCC accredited DOEs as eligible validators/verifiers.

32. What other relationships does the organization have with other companies such as JVs, Holding Company, Subsidiary etc? Please list each organization and describe the nature of relationship?

Carbon Check does not have any relationship with any other organization at present.

33. What policy does the organization have to handle threats arising from intimidation or coercion of personnel engaged in validation/verification of a CDM project?

The Carbon Check Assessor agreement includes requirement for assessors to notify Carbon Check of any impartiality threats Refer FM 7.4 as per the extract below. Further the Impartiality Management Process policy requires that in such case CarbonCheck will withdraw from all engagements with the project function and report to UNFCCC (refer Proc6.0)

26. Impartiality

As a contractual condition to this agreement, you will ensure that you act in an impartial and independent manner and disclose any threats to such impartial and independence as soon as they become known. Sources of impartiality threat to be considered will include but not be limited to the following

- *Source of revenue and self interest:*
 - *risks from a person or body acting in their own interest, for example financial self-interest*
 - *risks where finances and sources of income; commercial or, financial factors could compromise impartiality, which can include any financial relationship or benefit.*
Examples - any current financial, funding or shareholding relationships.
- *Self-review:*
 - *risks from a person or body reviewing their own work; assessing validation or verification activities of a client to whom the validation body or verification body provided consultancy would be a self review risk:*
Examples – any involvement in consultancy, training, assistance within the past 2 years
- *Familiarity (or trust):*
 - *risks from a person or body being too familiar or trusting of another person instead of seeking validation or verification evidence is a familiarity risk Identifying and analyzing potential conflict of interest situations from validation or verification activities, including potential conflicts arising from any relationships.*
Examples: - worked with or for the entity over the past 2 years, familial relative, social familiarity or other
- *Intimidation:*
 - *risks from a person or body having a perception of being coerced openly or secretly*
Example - a risk to be replaced or reported or losing a job

34. Any other relevant information can be added in the space provided below or in one or more separate sheet duly affixing the signature of the CEO in each additional sheet. No. of additional sheets attached: _____.