



Perry Johnson Registrars CDM Inc.

Complaints/Disputes/Appeals Procedure

Dissatisfied parties and the complaints they generate are inevitable. It is important that all complaints, whether against PJRCDM or PJRCDM contractors, are dealt with fairly. This procedure outlines a process whereby PJRCDM grants all parties a fair hearing in disputes that may arise. This procedure also defines how the interested party can present an argument for reversal of a decision with which it disagrees (appeals).

Reviewed by: _____

Approved by: _____

Date: _____

COMPLAINT/DISPUTES AND APPEALS PROCEDURE

1. General

- 1.1 Purpose: a) To set forth the procedures for handling complaints directed towards PJRCDM and to derive maximum benefit from any such complaint by instituting or requiring corrective action and quality improvement where necessary.
- b) To set forth a process whereby the complainant can receive a fair and equitable handling of disputes and a process by which complainants can appeal decisions made by PJRCDM
- 1.2 Scope: Applies to all complaints/disputes regardless of source made about PJRCDM or its representatives
- 1.3 PJRCDM will make complaints publicly available a description of the complaints handling, dispute/appeals handling processes upon request.
- 1.4 PJRCDM shall ensure that the persons engaged in the complaints handling process are different from those related to the complaint.
- 1.5 PJRCDM shall ensure that the persons engaged in the appeals handling process are different from those involved in the V&V activities and prepared statements on the GHG assertion.
- 1.6 PJRCDM will safeguard the confidentiality of the complainant and subject of the complaint.
- 1.7 Definitions:
- “Complaint”: Expression of dissatisfaction, other than “appeal,” by any person or organization, where response is expected.
- “Dispute” A disagreement or argument between PJRCDM client and PJRCDM about a decision PJRCDM has made relating to the object of validation or verification.
- “Appeal”: Request by the PJRCDM client to PJRCDM for reconsideration by PJRCDM of a decision PJRCDM has made relating to the object of validation or verification.
- “Complainant” 1) interested party or organization whose project we have validated/verified, 2) any entity which has a complaint regarding PJRCDM with the exception of the UNFCCC, or 3) organization whose complaint is about the conduct of PJRCDM employees or contractors.

2. Related Procedures, Exhibits

- 2.1 PJR-1cdm Quality Manual
- 2.2 F-121cdm Client Complaints Registration Form
- 2.3 F-170cdm Root Cause Corrective Action form

3. Mechanism for receiving complaints

- 3.1 SPM or nominee will be responsible for receiving complaints from various stake holders / interested parties / complainants etc.
- 3.2 If the complaints are received by any of the employees or the contractors in relation to the V&V services, they shall be forwarded to the SPM for further action.
- 3.3 If the complaints are received orally by SPM or the nominee, then it shall be documented in Form F-121cdm. The receiver of complaints shall obtain relevant details of the complainant and his organisation etc, so that authenticity of the complaint can be established.

- 3.4 If the complaints are received in writing or email then they shall be transferred to Form-121cdm and the received documents shall be used as evidences
- 3.5 If the complaints are received indirectly by other means through public sources like press reports and other news media (paper, TV etc) then this shall be investigated and verified for its authenticity and genuineness before recording in F-121cdm.

4. Responsibilities

- 4.1 All PJRCDM employees will accept complaints and forward it to SPM (for sites) and GPM (for Central office) for investigation and resolution.
- 4.2 Complaints are registered on F-121cdm by GPM for Central office and by SPM for Site office. GPM /SPM will propose the actions to be taken by involving the concerned personnel using F-170cdm to QM for approval. The QM and GD will then review the proposed action and approve or improve the action and also determine if the president needs to be involved in its resolution.
- 4.3 The GPM/SPM will inform the complainant of the receipt of the complaint, the complaint handling process, persons chosen to handle the process, provide the necessary reports and whenever necessary a formal notice of the outcome.
- 4.4 PJRCDM should not deem corrective action to have been completed until its effectiveness has been demonstrated and the necessary changes made in the procedures, processes, documentation, and records.
- 4.5 Any opportunities for preventative action are discussed at Management Review. They become action items and are assigned to the appropriate person with a deadline. PJRCDM should ensure that the organization is using investigations of complaints to develop corrective action, which include measures for:
 - a) Notification to appropriate authorities if required by regulation;
 - b) Restoring conformity as quickly as practicable;
 - c) Preventing recurrence;

5. Disputes

- 5.1 In all disputes SPM will obtain the pertinent information from interested parties. Then SPM and his/her appointed committee (Dispute Committee) will evaluate the dispute in light of PJRCDM policies and applicable rules. They will use all reasonable efforts to resolve the dispute. If the dispute cannot be resolved, SPM will advise the interested parties of their right to appeal the dispute decision.
- 5.2 Personnel, including management, should not be employed to investigate any dispute if they have been directly involved in the dispute within the past two years.
- 5.3 All disputes are dealt with in a constructive and timely manner. Where the operation of such procedures has not resulted in the acceptable resolution of the matter or where the proposed procedure is unacceptable to the complainant or other parties involved, SPM provides the following, in writing, to the party submitting the dispute:
 - the opportunity for a formal appeal;
 - provision of a third-party involvement or other means to ensure the impartiality of the dispute;
 - provision to the disputing party of a written statement of the dispute findings including the reasons for the decisions reached.

PJRCDM ensures that all interested parties are made aware, as and when appropriate, of the existence of the appeals/dispute process and the procedures to be followed.

6. Appeals

- 6.1 If an entity wishes to appeal the dispute decision, it must submit a formal written appeal within 15 days. Once the appeal is received, PJRCDM initiates steps necessary to appoint the Appeal Committee.
- 6.2 The Appellant selects an advocate to represent its case and forwards the name, in writing, to the President.
- 6.3 The President selects an appropriate advocate to represent the position of PJRCDM.
- 6.4 The Appeal Committee shall meet and elect a chairperson. The chairperson verifies that the full committee has all needed information regarding the appeal and all other pertinent information.
- 6.5 The chairperson notifies the appellant and the PJRCDM advocate of the make-up of its Appeal Committee, giving either party the opportunity to state objections to the Appeal Committee as constituted. If there are objections, the chairperson of the Appeal Committee will decide on the final make-up of the Appeal Committee.
- 6.6 The Appeal Committee meets at a place and time of mutual consent and holds a private meeting to discuss the merits of the Appellant's case or via teleconference. They will be supplied with any documentation that pertains to the appeal. They may request objective evidence from either side for examination and discussion, such as: relevant documents, PJRCDM procedures, etc. Appellant and PJRCDM advocate are given the opportunity to present whatever evidence and/or oral argument they deem necessary.
- 6.7 At such point as the Appeal Committee believes it has exhausted avenues of consideration, it takes a secret vote in writing. Decisions are reached by a simple voting majority. The ballot shall provide for a vote to affirm the PJRCDM decision under appeal or a vote to reverse said decision.
- 6.8 The Appeal Committee drafts a brief setting forth its decision, including whatever information it feels is worthwhile to disclose, and supplies the appellant's advocate and the PJRCDM advocate with a copy. The Appeal Committee is under no obligation to disclose details of its deliberations.
- 6.9 The decision of the Appeal Committee is forever binding in the matter under appeal.
- 6.10 The Appeal Committee shall issue its brief no longer than 30 days after the President receives in writing the name of the Appellant's advocate.
- 6.11 Should the appellant be still dissatisfied after having gone through the Appeals process then PJRCDM is compelled to advise the appellant of the right to appeal to the appropriate authority like UNFCCC and/or other GHG-ER bodies.

7. Records

- 7.1 Records are kept of all complaints, disputes and appeals for a period of five years.

8. Additional actions

- 8.1 PJRCDM recognizes protests and appeals as a source of data signaling a need for personnel re-training or additional follow-up actions. The SPM or designee is responsible for ensuring that auditor re-training and follow-up activities occur and their effectiveness is verified.