



Designated Operational Entities  
& Independent Entities Association

To CDM Executive Board  
Panel on policy dialog on the CDM  
Address <https://cdm.unfccc.int>

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Subject **Call for input on policy dialog on the CDM**

Ladies and Gentlemen,

DIA as the primary industry voice of DOEs and AIEs welcomes the launch of a call for input on policy dialog to review past CDM experience to meet the challenges of the post-2012 period.

**MRV is a must in any carbon regime – DOEs have built a decade of experience in multicultural and multinational jurisdictions that needs to be preserved**

Even with the assurance on a second commitment period of the Kyoto Protocol the current limited political will for a broad post-2012 regulatory carbon regime and the consequent uncertainty over demand for international emission reduction credits creates a significant risk of losing the considerable experience built up by the new DOE industry over the past decade. Given the limited participation of Parties in the second commitment period of the Kyoto Protocol, and the existence of the 31.12.2012 EU-ETS deadline, a severe drop in demand for validation services, and slowed growth for verification services are expected after 2012. This combined with the increasing cost of accreditation under the CDM and the risks for DOE liability and red tape is in danger of causing a loss of DOE capacity and skills in the post 2012 period.

MRV will have to be a core principle in any regulatory carbon regime. It is therefore of utmost importance to ensure that the institutional knowledge is maintained and that the built competency of the DOEs is kept alive with a critical mass until there is broad political agreement to combat climate change within the Durban Platform on enhanced action.

The concept of DOEs is unique and smart as independent third party assessment of activities induced by governmental multilateral regulation are executed by private sector companies and are able to expand rapidly as demand is driven by commercial market forces. Its functioning has been proven by the CDM.

**DOEs are offering support through DIA**

Given the complexities of carbon regulation and the limitations within a written submission, DIA welcomes the scheduled consultation approach starting as of March 2012. DIA is prepared to actively contribute by any form of consultation the panel wishes to engage in.

Sincerely,

Werner Betzenbichler  
General Manager DIA