



Mr. Christopher Brandt  
Climate Concept Foundation  
c/o Fisher Field Waterhouse LLP,  
Am Sandtorkai 68,  
20457 Hamburg, Germany

Date: 10 February 2012  
Reference: 2012-061-S  
Direct line: +49 228 815 1687

*Sent by e-mail to: brandt@climate-concept-  
foundation.org*

**Re.: Comment on CDM project proposal currently requesting registration (period for requesting review ends 25th January 2012)**

Dear Mr. Christopher Brandt,

Thank you for your letter received on 18 January 2012, which has been made available to the Board. On behalf of the Chair of the Board, I would like to thank you for communicating your concerns regarding the baseline identification of the CDM project activity Ref. No. 5361.

The Board appreciates that you bring to its attention your concerns on project activities that you think may not be in compliance with the CDM rules and procedures. Nevertheless, the responsibility to assess the comments provided during the global stakeholder consultation process rests primarily with the validating DOE and it shall report the details of the actions taken to take due account of all the comments received during the validation process. In this case, the DOE has assessed the comments and justified its assessment in its validation report.

The request for registration was deemed complete throughout the assessment process and was registered in accordance with the Board's relevant rules and procedures on 26 January 2012, as no objections were received from the Board members or Parties involved.

I would like to inform you that currently, following a mandate of the Board, the secretariat is carrying out an analysis on the adequacy of the stakeholder consultation process in order to prepare a proposal with options for improvements, taking into account the inputs received from the dedicated call for inputs launched by the Board at its sixty-second meeting.

If you are not satisfied with how the DOE has validated your comments during the global stakeholder consultation process, please be aware that there is a mechanism in place to raise a complaint under the current Procedures for accrediting operational entities by the Executive Board of the CDM (Handling of Complaints against an AE/DOE, Appendix 3 of the Annex 2 to the EB 56 Report<sup>1</sup>), for any entity that has submitted comments during the global stakeholder consultation process.

---

<sup>1</sup> [https://cdm.unfccc.int/Reference/Procedures/accr\\_proc01.pdf](https://cdm.unfccc.int/Reference/Procedures/accr_proc01.pdf)



Page 2

At present there are no provisions to reconsider the registration of a CDM project activity. However, work is underway on means of addressing significant deficiencies in validation and verification reports which lead to registration/issuance. A draft procedure on this matter has been developed based on guidance from the Board, and stakeholder inputs were considered by the Board at its sixty-fifth meeting to be incorporated into further work in this area in the coming year.

Thank you once again for contacting the Board with your concerns.

Yours sincerely,

Andrew Howard  
Secretary to the CDM Executive Board