



Santiago, June 12th, 2008

Secretariat of the CDM Executive Board

Ref.: Poch Ambiental comments on the draft CDM validation and verification manual (CDM-VVM)

Dear UNFCCC Secretariat:

Regarding the Board invitation for public comments on the draft CDM validation and verification manual, we want to comment on CDM-VVM, Chapter VII, Communication with secretariat, Section A, Registration-request for registration, paragraph 233 and 234.

Paragraph 233 states *“Upon receipt of the fee the secretariat will undertake a check to confirm that all necessary documents have been submitted and that cross references, dates and other information contained therein is complete and consistent.”*

Paragraph 234 states *“ A number of recurring issues have been identified during such completeness checks which DOEs are therefore requested to pay particular attention to in order to facilitate the timely publication of registration requests.. ”*

We propose to establish a maximum time limit to perform the completeness check. By establishing time, the request for registration procedure will be completely transparent and unambiguous.

Currently, the completeness check procedure is not an expeditious process and gives uncertainty to project proponents regarding registration. Therefore, it is necessary to regulate this procedure in order to continuously improve CDM development.

Best regards,

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