

September 2, 2008

To Mr.
Rajesh Kumar Sethi
Chair
Executive Board of the Clean Development Mechanism

Dear Sir,

We are writing to you as project participants and members of the International Emissions Trading Association (IETA) and of the Carbon Market International Association (CMIA).

Regarding the Call for Public Comments on four issues, issued at the 42nd meeting of the Executive Board, we have the pleasure to submit to your consideration our contribution in the issue of Draft standardization of the format of the modalities of communications between project participants and the Executive Board, as follows:

A. Background

- Among the definitions, there is no clarification to the fact that the majority of focal points are not project participants, and this should be made clear, being common and accepted practice
- In the definition of scope of focal point authority, there are three types of scope:
 - a) Communicate on any matter for registration and issuance purposes; and/or,
 - b) Communicate in relation to requests for forwarding of CERs to individual accounts of project participants; and/or,
 - c) Communicate in relation to requests for addition and/or voluntary withdrawal of project participants.

We understand that the first one encompasses all other forms of communication, so it's either one or joint focal points for:

"Communicate on any matter for registration and issuance purposes", or differentiated focal points for the following scopes:

- a) Communicate on any matter for registration and issuance **processes**;
- b) Communicate in relation to requests for forwarding of CERs to individual accounts of project participants;
- c) Communicate in relation to requests for addition and/or voluntary withdrawal of project participants

Forms

We have the impression that the format for designating focal points is too complicated as it stands. In Section 2 for "nomination of Focal Points" the approach should be by scopes, rather than by entities, as presently. For example, list the "general" scope mentioned above in **A** (in which case you don't need any further

differentiation of scopes), then define if the focal point is "sole" or "joint", and right after that give the details for the "sole" FP or for all joint FPs.

In case that the PP want to differentiate the FP by scope, then leave the "general" scope unchecked and go to the next one (*Communicate on any matter for registration and issuance **processes***), then define if it has a sole or a joint FP, and then give the details for the sole or joint FP(s). And proceed similarly with the remaining two scopes. That approach seems more logical and less confusing than the present one.

We thank you for the opportunity to share this input with you. We hope our comments are useful to improve the corresponding documents and processes. We also look forward to continue supporting your work and the continuous development of the CDM

Best regards,



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