

April 30, 2009

CDM Executive Board  
c/o UNFCCC Secretariat  
Martin Luther King Strasse 8  
53175 Bonn  
Germany

Dear Members of the CDM Executive Board,

In response to your call for public comments on efficiency in the operation of the CDM and opportunities for improvement, Ecopart Assessoria, CDM project developer with 37 registered CDM projects experience, would like to call your attention to the following considerations:

- The process culminating with the submission for registration or request for issuance involves various stakeholders and is usually long time consuming and costly;
- A good amount of issues raised at "request for review" and "review" of submissions is caused by misunderstanding not only by the PPs but also by the accredited DOEs of the application of methodologies and guidance;
- The rejection of a submission is traumatic for all stakeholders in the process;
- Less than 10% of the registration/issuance requests are rejected;
- In process of "learning by doing", to know in detail the reasons leading requests to be rejected would greatly facilitate a better understanding of the whole process by all stakeholders;
- In order to elaborate clear and fully evidenced answers to "request for review" and "review" requirements PPs have to prepare the response, translate it into English, frequently collect new evidences and translate them into English, take into account different time zones working hours to finally submit the clarifications to the DOE. Still within the given deadline the DOE in its turn has to revise the documents, validate them and, frequently request from the PPs revisions of the submitted documents;
- The risk of preparing poorly elaborated documents under extreme time constraints is relatively high, which might lead to misunderstanding of the clarifications;
- Most of the "request for review" and "review" processes are triggered shortly after the EB meetings and in a short period of time;
- Shorter deadlines to complete CERs transference would reduce projects exposure to market risks.

In order to increase the quality of PPs and DOEs clarifications and submissions, we would like to suggest the following:

- To create a forum to effectively interact with PPs;
- To implement a hotline, or similar mechanisms, to accelerate the interaction of PPs with the Panels and Secretariat in the request for clarifications;
- To publish all documents submitted in all "request for review" and "review" processes;
- To increase the period to submit clarifications in the "review" process to two weeks, as it is in the "request for review" processes, or longer. An even better alternative would be setting two weeks period to submit clarifications for the PPs and afterwards and additional and appropriate time period for the DOE in order to avoid arbitrary decisions on how to split the period between DOE and PPs;
- In case of failure to accomplish deadline for submitting clarifications in the "request for review" and "review" processes, an automatic extension to the next EB meeting would be granted to the project;
- To effectively carry out conference calls (or an appropriate real time conference system preserving the anonymity of the reviewers) as last chance for clarifications in review processes. The same is applicable in the case of new methodologies submission;
- To implement a communication mechanism with the Accreditation Panel to receive from PPs and its advisors comments / suggestions / complains about the DOEs.
- In the few situations when rejection decision is unavoidable, to make public a thoroughly and detailed explanation of the rationale of the decision;
- To implement an appeal procedure, or similar process, for rejected submissions.

Thanking in advance for your kind attention to the presented above.

Yours sincerely,

Melissa Sawaya Hirschheimer