

Umweltbundesamt | Deutsche Emissionshandelsstelle
Postfach 33 00 22 | 14191 Berlin

UNFCCC Secretariat
P.O. Box 260124
D-53153 Bonn
Germany

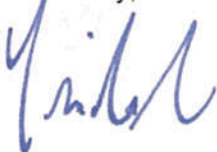
Berlin, 08.10.2010
Bearbeiter/in: Malin Ahlberg
Telefon: (0 30) 89 03 – 50 50
Telefax: (0 30) 89 03 – 50 10
E-Mail: German.DNA.DFP@dehst.de
Geschäftszeichen: E 1.5 – 18100/0

Ref: Call for public inputs on the draft “Procedures for regarding the correction of significant deficiencies and the excess issuance of CERs”

Dear Sir or Madam,

Please find the enclosed input from the German DNA in response to the call for public inputs referred to above.

Yours sincerely,



Wolfgang Seidel
Head of Unit German DNA/DFP
German Emissions Trading Authority
Federal Environment Agency

Enclosure

We request that the "Procedures for regarding the correction of significant deficiencies and the excess issuance of CERs" (version 01), contained in **Annex 1** of **EB 56** report should be revised taking into account the recommendation below.

Proposal for amendment:

II. Definition No. 6: "Significant deficiency means a deficiency in a validation, verification, or certification report that may lead to, or may have led to, the excess issuance of CERs above the thresholds defined in the concept of materiality."

Explanation:

The proposed concept of materiality could provide a comprehensive definition of deficiency of a validation, verification, or certification report. From this it follows that a significant deficiency is a deficiency which lead to, or may have led to, the excess issuance of CERs above the thresholds defined in the concept of materiality.