

**Comments on**  
**Draft new Procedures for Registration, Issuance and Review of registration and issuances**

- It is noted that in the process of registration, maximum time is taken during completeness check. This can be reduced substantially, if the PDD is made a "**Form Based**" submission. Unless the text in all fields is filled up the PDD cannot be uploaded at all. This will reduce the work of the Secretariat. They will have to only check the substantive aspects of the CDM requirements then.
- It is noted that the Review processes has now proposed to be made one stage in place of the previous two stages involving "Request for review" and "Under review". Thus, the PP/DOE will get only one opportunity to respond, explain and make corrections.
- The function of assessment of PP/DOE response has been delegated to the Secretariat, whose work will be assessed by a member of RIT.
- Since the procedure is presented in just text form, the time line of various steps and responses is not clear. It is, therefore, requested that a bar chart be included in both procedures for review of registration and issuance to further clarify the deadlines by the members of EB, PP, DOE, Secretariat, RIT etc.
- It is not clear at what stage the Secretariat will refer their Final assessment to the RIT member. From the notes it seems to be no later than 11<sup>th</sup> week after the notification of review to the PP/DOE. This may please be clarified.

**Vinay Deodhar**  
**Mumbai, India**