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TÜV SÜD Industrie Service GmbH · 80684 München · Deutschland

UNFCCC CDM Team

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Dear CDM Team,

Please find enclosed our comments on the review of the registration and issuance process.

We agree that our comments are made publicly available on the UNFCCC interface.

We are always open for further discussions and comments.

Kind regards,

Thomas Kleiser  
Head of Certification Body "climate and energy"

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## **Comments on the review of the registration and issuance process**

### **Procedures for request for registration:**

B.7.:

We would highly appreciate if this point can be re-considered as:

- It is out of the scope of a DOE
- DOEs cannot act as a bank take over financial risks of the payment process
- It would extend the registration process for the PPs (double step payment)

### **Procedures for request for issuance:**

D.14.:

We would appreciate that also, as now usual, the DOE will be informed about the issuance of CERs and not only the PP.

### **Review for requests for registration / Issuance:**

In general we appreciate the new procedure of the review of a project activity as it seems that this makes the process more clear and smoother. Nevertheless we see some further need for explanation of the procedure:

- Is it correct that it is now only a (extended) “one step” process not as before a “two step” process with “Request for Review” and “Under Review” (if necessary).
- It also seems that former procedures as “minor” or “other” issues do now no longer exist.

D.15 / 16:

- It is not fully clear what happens if the independent technical assessment comes to another conclusion than the secretariat

G.27 / 28:

- We see the need to have a final independent panel / appeal process to decide finally if a DOE repeatedly failed and thus has to pay costs for this review as it seems that there might a conflict of interest.