



Japan Carbon Finance, Ltd.
1-3, KUDANKITA 4-CHOME
CHIYODA-KU, TOKYO 102-0073, JAPAN

5th March, 2010

Dear UNFCCC Secretariat,

The Public Comment on the Review of the Registration and Issuance Process

This is to submit the public comment on behalf of Japan Carbon Finance, Ltd. against (A) the “DRAFT PROCEDURES FOR REVIEW FOR REQUESTS FOR REGISTRATION” and (B) the “DRAFT PROCEDURES FOR REVIEW FOR REQUESTS FOR ISSUANCE”, which were up on the EB52, as follows,

I understand that the aim of these draft rules is to shorten the assessment process with more discretion to the secretariat. However, I regard they would be more effective if the following comments are adopted. At the same time, I expect that some other countermeasures --- for example, to realize shorter-term completeness check work --- will be implemented.

● **The number of the EB Assessment chances should be twice**

- First of all, it is not clear about what the PDD will then deal with on/after “the request for registration on the agenda of the next meeting of the Executive Board” (paragraph 25 of each of (A) and (B) above). Our interest is whether or not another assessment by EB will take place in addition to the EB (paragraph 20 of each of (A) and (B)). In this regards, it is not clear what the “final ruling” assessment (paragraph 26 of each of (A) and (B)) means.
- If the EB assessment is only one time on the whole document, it is not agreeable and the EB assessment chance is desired to be twice as the current rule. Such change of rule will lead to lose fair assessment because, as a matter of course, CDM projects are hard to be assessed fairly even now.
- In the case it is mentioned that the EB assessment chances are twice, the detailed rules as well as described from the paragraph 11 to the paragraph 23 (of each of (A) and (B)), should also be written up for further public understanding.

● **The secretariat should not make any request (in 5 weeks : paragraph 12)**

- The paragraph 12 (of each of (A) and (B)) tells that “the secretariat may request to provide further clarification on additional issues” within the period of 5 weeks after the notification of the review.



Japan Carbon Finance, Ltd.
1-3, KUDANKITA 4-CHOME
CHIYODA-KU, TOKYO 102-0073, JAPAN

- Such rule should not be put in effect, because it contradicts the “Guidelines for the consideration of request for review and review cases” (EB49 repan21) which is ruling that the register/issue is to be decided “where the initial comments provided by the PP/DOE to the matters in the request for review” (paragraph 9 of EB49 repan21), and/or “where the clarification provided by the PP/DOE to the matters raised in the review” (paragraph13 of EB49 repan21).
 - Moreover, such rule gives the secretariat the discretion to provide the request to the PP/DOE without transparency. For example, the secretariat can provide all the issues at once for one project, whereas, on the other case, provide issues one by one during 5 weeks. The true cause of secretariat’s requirement cannot be examined by anyone. All the more, secretariat is required to be fair and transparent.
- **The term for PP’s revision should not be shorten to 9 weeks (paragraph 13)**
- The paragraph 13 (of each of (A) and (B)) tells that “any responses and additional information shall be received by the secretariat” within the period of 9 weeks after the notification of the review.
 - However, such ruling out the shorter response term (at least 3 weeks shortened compared to the current rules), as a whole, leads to the quality degradation --- quality, is also mentioned by the EB Chair --- of CDM-PDDs. Moreover, it also lead to the broadened gap between a few of the host country that is maintained in good-condition for response, and other countries that are not.

Sincerely yours,

Hiroaki Gosha

Deal Manager / Japan Carbon Finance

後舎宏昭