

1. General positive remarks on all draft procedures open for public comments:

- A two stage review process has been merged to one stage
- Time periods for assessment, review and approval have been shortened
- Notifications in the approval process are directed to all involved stakeholders, the project participants, the DOE and where relevant also to the DNA.

2. Comments on „Draft procedures for request for registration of a proposed CDM project activity“

- Section B, §5: it should be further clarified what is exactly meant with “other CDM requirements”.
- Section C, §11: the paragraph should rather contain a time limit until when the completeness check will be completed rather than using vague terminology ‘upon a determination’.
- Section C, §13: it is not clearly enough explained what information the ‘Summary Note’ will contain. It remains unclear whether other outside expertise as e.g. through the RIT will be called in for preparing the Summary Notes. The mentioned time frame of 14 days seem to be valid for small and large scale projects, however, for small-scale projects the period for preparing the Summary Note may be further shortened, e.g. 8-10 days.

3. Comments on “Draft procedures for review for request for registration”

- Section B, §7: It is unclear what exactly is made available to the EB once the secretariat acknowledges the receipt of a request for review. This should be further clarified.
- Section B, §9b: a catalogue of potential reasons for which a review can be requested should be formulated and included here as e.g. a footnote
- Section B, §10b: It remains unclear who is preparing the registration review form. Responsibility/ies should be clarified.
- Section B, §10c: it remains unclear who may approach the project participants/DOE for a conference call, the secretariat and/or those EB members having requested the review?
- Section D, §16: this sentence is not very clear and requires further explanations in order a reader can precisely understand what the RIT member is exactly meant to do/check.
- Section F, §21: Why shall the effective date of registration be the day after the end of the original period for requesting a review? In some cases and in particular for projects that can already start operation valuable time for which CERs could already be generated may pass by unused for the disadvantage of the project proponent. It would be better the effective date of registration is also the first working day subsequent to the finalization to the ruling. This would also give project proponents/DOEs a clear incentive to submit clarifications/responses as soon as possible.
- Section G, §27: the possible magnitude of review costs the DOE “may recover” should be included here in order a DOE can better understand the possible monetary consequences. The wording “may recover” is, however, very vague. There should be the same consequences for the same reasons for failure to comply with the requirements. A clear catalogue of facts/reasons that would require recovering the costs should be formulated instead and included here.

4. Comments on “Draft procedures for request for issuance of certified emissions reductions” and “Draft procedures for review for requests for issuance”

Comments as provided above in section 2 and 3 are valid likewise for procedures related to issuance since the wording is the same (except comment on §21).

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