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CDM Executive Board
UNFCCC Secretariat
Martin Luther King Strasse 8
P.O. Box 260124
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Germany

Re: Call for inputs on draft procedures considered by the CDM Executive Board at its 52nd meeting

Dear Mr. Mahlung,

We thank you for the opportunity to comment on the draft procedures and are pleased to submit our comments regarding each document hereafter.

Draft Procedures for requests for registration of a proposed CDM project activity

- *Paragraph 7.* The DOE rarely pays the fee.
- *Paragraph 10 and 11.* The lack of clear timelines project developers and DOEs can rely on for completeness checks has been a significant challenge. These Procedures shall include a timeline.
- *Paragraph 14.* The registration date should be the day following the date when the secretariat determines the request for registration submission is complete.

Draft Procedures for review for requests for registration

- *Paragraph 11.* In case the clarifications provided under paragraph 10(c) are satisfactory, an accelerated track shall be formalised to ensure that the review process does not continue more than necessary. Under the Procedures as currently drafted, nothing directs the secretariat to issue its final recommendation before the end of the 12 week period.
- *Paragraph 17.* The Procedures shall establish a timeline for initiating the independent technical assessment. For instance, the selection of the expert that will carry out the assessment could be initiated at the same time the request for information referred to in paragraph 12 is launched. Under the current drafting, there is no indication as to when the assessment will be effectively carried out, which means there is no set timeline for when the project will be reviewed by the Board (as, under paragraph 19, finalisation of the RIT assessment drives the timing).
- *Paragraph 19.* This should read "Each recommendation shall be placed on the agenda of the next Board meeting [...]". "next" is missing in the current drafting.
- *Paragraph 21.* The registration date should be the day following the date when the secretariat determines the request for registration submission is complete.
- *Paragraph 23.* This should read "[...] within three weeks of the submission of the corrections [...]"

- *Paragraph 27.* This is much too vague. The current drafting effectively gives the possibility to the Board to recover the costs of the review for any rejected project. In addition, there is no element in these Procedures describing the process under which such costs would be assessed and recovered. Provisions under this paragraph should be dropped altogether: the registration fee already account for the cost of review.

Draft Procedures for requests for issuance of certified emissions

- *Paragraph 8.* The lack of clear timelines project developers and DOEs can rely on for completeness checks has been a significant challenge. These Procedures shall include a timeline.

Draft Procedures for requests for review for requests for issuance

- Relevant comments made regarding the “Draft Procedures for review for requests for registration” apply here.
- *Paragraph 28.* Comments on paragraph 27 of the “Draft Procedures for review for requests for registration” apply with the share of proceeds replacing the registration fee.

Yours truly,



Alexandre Marty
Head of Policy – Carbon and Environmental Markets
