

05 March 2010

UNFCCC Secretariat
Martine-Luther-King-Strasse 8
53175 Bonn Germany

Re: Comments on the Review of the Registration and Issuance Process

Dear CDM team,

As per your request based on the EB's decision to seek inputs on the draft revised review procedures for registration and issuance prepared by the secretariat, JQA hereby provides you comments on (1) the draft Procedures for Requests for Registration of a Proposed CDM Project Activity and (2) the draft Procedures for Review for Requests for Registration and (3) the draft Procedures for Review for Requests for Issuance, as follows.

(1) Draft Procedures for Requests for Registration of a Proposed CDM Project Activity:

Para. 7 proposed that "The DOE shall pay any required registration fee by bank transfer identifying the unique reference number (referred to in paragraph 9 of this document). The DOE shall, using the submission tool, submit proof of payment."

Under the current procedures the project participant shall pay the required registration fee to the designated bank account of the UNFCCC CDM registry, and the DOE, after confirming the payment by the project participant, shall submit the proof of payment on the UNFCCC CDM website. To our understanding on the above procedures we don't find out any procedural issues. As the project participant duly manages to take the above payment procedures by itself, JQA cannot understand the reason why the DOE, that is not a financial agency of the project participant but a third-party certification entity, shall pay the required registration fee on behalf of the project participant. JQA would ask the Executive Board of the UNFCCC CDM to explain the specific reason why the DOE shall pay such fee on behalf of the project participant. Without any specific reason we would ask the EB to withdraw this paragraph of the proposed draft.

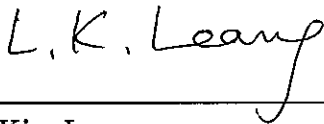
- (2) Draft Procedures for Review for Requests for Registration and
(3) Draft Procedures for Review for Requests for Issuance

Para. 10 through Para. 20: Compared to the proposed responding period (namely, two weeks after the notification of the review) within which the DOE shall provide responses to the request for review by the EB, the whole procedures from the secretariat's assessment of the DOE and project participant's responses through the proposed final ruling of the EB or the proposed Project Assessment Committee seem to take too long. JQA would ask the EB to explain the reason why the review procedures shall take so long time and reduce such long period to a reasonable extent as much as possible.

As the draft of "Guidelines for decision-making in request for review and review cases" has not yet been proposed, JQA has no idea with the proposed Project Assessment Committee. JQA would ask the EB to disclose the draft immediately, and explain the composition of the Committee, the competence of the Committee's members and how fairness and transparency of the Committee shall be achieved and kept.

We will appreciate very much if you could take into consideration our comments.

Yours sincerely,



Lao Kim Leang
Manager of CDMJI Assessment Division
Japan Quality Assurance Organization