

UNFCCC Secretariat

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### Submission on registration and issuance procedures

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The increasing time spent by CDM projects in the registration and issuance process requires action to enable more efficient processing of registration and issuance requests, while at the same time safeguarding the environmental integrity of the CDM. To achieve this, we propose the following steps in the registration procedure:

- Instead of the UNFCCC Secretariat, **DOEs should be responsible for the completeness of documentation** submitted. This would be consistent with the original role of the DOEs as guardians of CDM integrity. To provide an incentive for good work by DOEs, **DOEs should have to bear all costs of a request for review launched due to incomplete documentation**. An even better incentive would be if DOEs were hired by the UNFCCC Secretariat instead by the project participants, because then the Secretariat could retain a share of the validation / verification fee if the DOE work is found to be sloppy.

- The **RIT should continue to assess all submissions** during the period in which a request for review can be launched. Such RIT input provides a perspective of CDM experts independent of the UNFCCC Secretariat and does not contribute to a prolongation of the period between submission and registration / issuance. To improve consistency of RIT assessments, the **RIT should get clear guidance by the EB** and be enabled to **directly interact with the EB and the Secretariat on critical cases**. Moreover, RIT members should specialize on specific sectors / host countries.

- It is critical that the EB workload on project-specific request for review and review cases is reduced. This could be achieved by the following procedure:

1. **Both RIT and Secretariat provide a recommendation on each submission** during the period in which a request for review can be launched. This recommendation includes an assessment of the completeness of documentation.

2a. If **both recommendations are positive**, the projects are **automatically registered / receive CER issuance**.

2b. In case both recommendations **propose corrections**, the RIT member and Secretariat staff agree on a **joint correction request** within 10 working days (for registration) / 5 working days (for issuance) after the end of the period in which a request for review can be launched. The project has to implement these corrections before being resubmitted to the same RIT member / Secretariat staff for reassessment.

2.c. If **both recommendations are negative, registration / issuance is automatically rejected unless at least five EB members request consideration of the case by the EB**.

2d. If one recommendation is negative and the other positive, the RIT member and Secretariat staff try to **agree on a joint recommendation** within 10 working days (for registration) / 5 working days (for issuance) after the end of the period in which a request for review can be launched. If they are **unable to do so, the case is automatically referred to the EB.**

Best regards,

*A. Michaelowa*