Comments on 'Call for inputs on CDM policy dialogue'

Dear Sirs

I am happy with the work initiated on standardised baselines, microscale additionality and simplification of rules for LDCs in terms of emission factor calculation etc.

What still bothers is

(1) increasing timelines after RfR – due to build up in awaiting scheduling and unclear criteria during completeness (repeated comments like 'reproducible excel sheets'

(2) no public reporting of validation progress – DOEs should be made to report progress on projects under validation preferably in public availability/ reports should be considered for DOEs performance assessment. Some validators take too long for review of responses to validation reports and technical review process

Further points for process development could be

1) Addition of more project types in microscale additionality and simplifying monitoring requirements
2) Standardised baselines for common project types – emission factors from host country NCDMA's could be published and recognised by UNFCCC to avoid delay in developing and validating/ reviewing same to reduce registration timelines
3) Changes in project design/ monitoring plan – could be confirmed first by verifiers if it does not impact basic conservativeness principles. There are significant number of registered projects that are stuck due to limited scope to verifiers in this regard
4) There should also be sectoral expertise requirement to financial experts of DOEs. There are significant variations in the stands taken by different validators and also delays are observed due to lack of proper expertise
5) The 'information and reporting check process' in pending publication of RfR should cover points like review on input values – project cost, tax rates etc. These points come later in review request making that earlier process redundant and thus delay registration process.
6) Accelerating work/ recommending changes to methodology revision/ clarification work

Yours Sincerely,

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