

Call for public inputs – Template for inputs	Recommendations for possible changes to the modalities and procedures of the CDM
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Date: _____ 23/01/2013

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Issue No.	Issue to be addressed (including need for change)	Proposed change (including proposed text, if applicable)
1	<p>“B. Role of CMP” and “C. CDM Executive Board”</p> <p>I consider it should be clarified whether the CDM EB can make “political decision” or not. I think such political decision can be made only by the CMP. It should be clarified in the roles of the CMP and the CDM EB (section B and C).</p>	<p>Para 5.</p> <p>... the Executive Board shall:</p> <p>(_) not make political consideration in its decisions but make technical aspects pursuant to other supervisory roles of the clean development mechanism specified in this paragraph.</p>
2	<p>“C. CDM Executive Board” and “D. Accreditation and designation of operational entities” with “Appendix A: Standards for accreditation of operational entities”</p> <p>I consider that the quality of the validation/verification by DOEs is based on the assessors’ personal expertise for these processes (in addition to the institutional arrangements by the DOE as an entity). For this purpose, some qualification process such as examination can be introduced for (at least lead) assessors AND mitigate the procedures/requirements of the current accreditation process.</p>	
3	<p>“F. Participation requirements” and “Appendix D: clean development mechanism registry requirements”</p> <p>This section and appendix shall be modified to be consistent with the relevant decision of CMP 8.</p>	
4	<p>“G. Validation and registration”</p> <p>In the process of validation, the project participants (as non-experts of CDM) frequently face difficulties related to the procedures and “CDM way-of-thing”. In that case, I believe that the DOE can help them to provide appropriate suggestions or information based on its expertise on CDM as far as the independency is secured.</p> <p>This makes the process smoother and makes the validated PDD as more sophisticated one with higher quality.</p>	<p>One paragraph can be added:</p> <p>_. The designated operational entity may provide relevant unbiased suggestions and/or information so that the project participants, who are unfamiliar with the clean development mechanism, can prepare better project design document as far as the independency is secured.</p>
5	<p>“G. Validation and registration”</p> <p>It is better to have a separate section for the baseline and monitoring methodologies</p>	

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6	<p>“G. Validation and registration” and “Appendix C: Terms of reference for establishing guidelines on baseline and monitoring methodologies”</p> <p>The concept of “accuracy” shall be incorporate in para. 45. Otherwise, “conservativeness” concept dominates. (Ultimately, ZERO emission reduction methodology is almighty) In theory, the conservativeness concept shall be applicable “within the range of uncertainties”, i.e., more accurate method can deliver more emission reductions.</p>	
7	<p>“G. Validation and registration”, “Appendix B: Project design document” and “Appendix C: Terms of reference for establishing guidelines on baseline and monitoring methodologies”</p> <p>The “materiality concept” shall be incorporated into the methodology as well as its application in the PDD (i.e., on-site reality). Otherwise, many project participants will struggle to meet all monitoring/sampling requirements for insignificant parameters in the calculation of emission reductions. We see that this blocks many potential CDM projects to be realized. The Meth Panel tends to incorporate minor (insignificant) emission sources with stringent monitoring/sampling requirements because they do not know the reality of the projects.</p>	
8	<p style="text-align: center;">“G. Validation and registration”</p> <p>The “selection” of “baseline approaches” is no more relevant, however, such methods can be appropriate for the calculation method (or approach?) specified in the baseline methodologies.</p>	