

Call for public inputs – Template for inputs	Document: Draft CDM project cycle procedure (PCP)
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#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph	Proposed change (including proposed text, if any)
1	N/A	General	<p>This call for public input should be used as an opportunity to kick start major and meaningful reform in the entire procedure to match with CMP decisions including for pragmatic institution of elements that would allow proper regional distribution of CDM Projects.</p> <p>The regulatory document “Modalities and procedures for direct communication with stakeholders (version 01),” should also be open in parallel for stakeholders to revise several Para’s to accommodate implication of changes in revised PCP affecting procedure as well as make it consistent with CMP Decisions</p>	<p>We recommend keeping the review progressively open for longer period while implementing amendments in each next EB meeting as per comments received before each EB meeting. We also encourage for the Secretariat to send official letter about the start of the review to ALL DNAs for them to participate in major revision of regulatory documents.</p> <p>The regulatory document “Modalities and procedures for direct communication with stakeholders (version 01),” should also be revised in parallel with the relevant comments below and also open in parallel for stakeholders to revise several Para’s to accommodate changes in revised PCP related to this procedure</p>
2		General	Wherever applicable the Para’s of VVS and PS that will be affected by our comments and proposed amendments may need to also be adjusted	Amend the relevant pages/Para of the VVS and PS in parallel that will be affected by the relevant proposed amendments we put forward below
3		Specific	Please see specific comments in numbers and pages below	

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4	Para 57 and Para 189	Ge/te/ed	<p>The Para 5.1 lacks procedural requirement to assure commitment and verifiable action from the relevant unit of the Secretariat with respect to assurance over “Handling confidentiality of submissions” and “Avoidance of Tampered Process” regarding treatment of any application for registration or issuance</p> <p>It also lacks clause covering what would be the next course in consequence of or as a result of not fulfilling the same</p>	<p>“The Secretariat shall handle each submission and application from PPs very confidentially throughout the complete stages of each relevant process of vetting, except for the sake of the requirement of posting on the public CDM website. This confidentiality shall include the due institution of adequate safeguard to protect leak of any information or document regarding any project neither to any individual employee or non employee of the secretariat that is not involved through the relevant procedural coverage of the PCP “</p> <p>“ if PPs find any evidence that any element or peculiarity of their application has been leaked to any person that is not covered by the procedural standard; they shall be deemed to have adequate and automatic ground to call Objection on ruling over any ruling of the EB later through Direct communication to EB; raising it as a sufficient evidence for “Tampered Process” confirming to a “biased rulling” or “influenced process” thereof”</p>

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5	Para 72	Ge/te/ed	<p>The Para states “If a member of the Board wishes to request a review, he/she shall communicate the request to the Board through the secretariat, using the “CDM project activity/programme of activities registration request review form” (F-CDM-RR) and in accordance with appendix 2.”</p> <p>This phrase doesn’t allow stakeholders to know if the review was actually genuinely originated from the relevant EB member based on self identified concern or it otherwise it would not guarantee abuse of the spirit or Independence of EB.</p>	<p>Proposed amendment of the Para.</p> <p>“As per this Para; although the EB members express request for review through the secretariat; the spirit is only for the sake of facilitation (considering that EB members are not employees of the Secretariat) and hence request should originate from the honest intentional and independent self identified concern of the specific member. The EB member with self identified concern shall send the filled F-CDM-RR to the Secretariat; DOE, PPs and the DNA of the relevant PPs at once through email.”</p> <p>“No member of the secretariat or EB shall lobby or try to influence any member of EB including Chairs; to impose request for review of any CDM Project activity requesting registration. Any EB member including Chairs that has received any informal or formal lobby from any employee of the secretariat shall disclose the same to the Chair of EB and then stated on the report of the EB under each relevant case for the public/stakeholders to know about.”</p>

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6	Para 72	Ge/te/ed	If a Party involved wishes to request a review, the relevant DNA shall send the request by email to the Board, through the secretariat, using the “CDM project activity/programme of activities registration request review form” (F-CDM-RR)	<p>We want to amend this Para</p> <p>Replace “Party involved” with “Party involved in the CDM project requesting registration”</p> <p>Amend the Para with the following</p> <p>“As per this Para; although the Parties involved in the CDM project requesting registration; express request for review through the secretariat; the sprit is only for the sake of facilitation and hence request should originate from the honest intentional and self identified concern of the specific Party. The DNA of the party with self identified concern shall send the filled F-CDM-RR to the Secretariat; DOE and the relevant PPs.”</p> <p>“No member of the secretariat or EB shall lobby or try to influence any Party or DNA officer to impose request for review of any CDM Project requesting registration. Any DNA that has received any informal or formal lobby from any employee of the secretariat may disclose the same to the Chair of EB through relevant channel and then stated on the report of the EB under the relevant case for the public to know.”</p> <p>Revision of “Modalities and procedures for direct communication with stakeholders (version 01)”, required</p>

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7	Para 73	Ge/te/ed	<p>The Para reads “The secretariat shall acknowledge receipt of a request for review and promptly make it available to the Board”.</p> <p>This is a only partially transparent phrase and can be wrongly exploited. It should not also keep affected PPs in the dark thereby leaving them to risk of exploitation.</p>	<p>We seek amendment of this Para’</p> <p>“The Secretariat shall make every filled forms of request for review ,from each member of EB or/and Party; available on the UNFCCC-CDM website the same day as it has received each and before it sends the consolidated requests to the EB”</p>
8	Para 74	Ge/te/ed	Requires additional phrase to accommodate comment 3 above	Amendment; “ Any request for review shall not be recognized by the Board if it has not been sent to affected entities at the time each request was made earlier or posted on the UNFCCC site by 5 p.m. GMT of the last day of the 28-day period following the publication of the request for registration.”
9	Para 75	Ge/te/ed	<p>Para reads; “A request for review shall provide, inter alia, the reasons for the request for review based on the “Clean development mechanism project standard”, “Clean development mechanism validation and verification standard” or any other applicable CDM requirements.”</p> <p>This Para would not fulfil requirement of specificity (Para 7b of “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism”) ; conformity to and accountability to those same ones stated earlier when referring later on ruling notes</p>	<p>Add: “However; the points leading to request for review shall be the specific points that the relevant person (EB member or Party) has self identified concerns/issues about and why he believes the PP’s specific approach is wrong. No vague points should serve as a basis to trigger call for review”</p> <p>Add: “ The review issues and later assessment should be clearly stated under separate headings i.e “Additionality”, “Baseline Scenario”, “Baseline”, “Leakage” etc”</p>

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10	Para 79.a	Ge/te/ed	<p>Pare reads; “Notify the project participants or the coordinating/managing entity, and the DOE, that validated the proposed CDM project activity or PoA, that a Party involved in a proposed CDM project activity or PoA, or at least three members of the Board have requested a review of the request for registration;”</p> <p>This is incomplete notification procedure and would not guarantee affected parties with what exactly was the concern of the relevant person at the exact moment in time leading to a review process and whether the final ruling note would not reveal “rationale” that deviate from these points.</p>	<p>Amendment;</p> <p style="background-color: yellow;">Refer comment 3 above to be repeated</p>

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11	Para 79 and Para 79c	Ge/te/ed	<p>“If a Party involved in a proposed CDM project activity or PoA, or at least three members of the Board request a review of the request for registration, the secretariat shall.....(c) Establish a team comprising two experts selected from the Registration and Issuance Team (RIT Team) to conduct an assessment of the request for review.”</p> <ul style="list-style-type: none"> • This procedure didn’t implement “representation” through regional balance of the three EB members requesting review • This procedure is not supported by the Para 10 of the “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism” which is approved by CMP and is legally governing over all other lower level decisions. This shouldn’t have been done in first place and this Para should still be respected and reinstated; • It should be preceded by the manner and diversity of how the relevant team of the secretariat assigns experts (from itself and RIT) who conduct the review. As the Secretariat employs human beings (not God) and to avoid risk of exposure to unfavourable human nature; new paragraph requiring assurance of organizational diversity of identity for conformity with avoidance of <ul style="list-style-type: none"> a. potential field of conflict of interest or b. biased decision towards a case/project or c. preferential treatment of a case/project or a combination thereof <p>Amend the Para by inserting; “.....or at least three members of the Board from/of three different regional representation request a review of the request for registration....”</p> <p>Insert back Para 10 of the referenced CMP decision;</p> <p>“The Executive Board shall consider, at its next meeting, a request for review, and either decide to undertake a review of the proposed project activity or register it as a CDM project activity.”</p> <p>Add; “ if the board decides to undertake review; it shall; subject to provisions of Para 11 of the “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism”; assign two EB members or direct the Secretariat to assign two expert members of RIT and two experts of the Secretariat” then.....Para 79 of PCP</p> <p>Then Add the following qualifier to Para 79 C and Para ;</p> <p>“No two RIT members or no one RIT member shall be selected with the same ethnic/racial profile or/and national/regional identity with any one member in the relevant unit of the secretariat involved in any stage of vetting of the project requesting registration including heads of the relevant unit.”</p> <p>“The Secretariat shall assign two experts of the relevant unit taking into account the requirement of regional balance and conflict of interest such that no any such two members of the registration/ issuance unit of the secretariat involved in internal review or any stage of internal vetting shall have the same ethnic/racial profile, national or regional identity.” Moreover; none of such members shall have the same ethnic profile or national identity as the head of the relevant unit. This diversity rule on execution of any process shall be binding even in cases where Secretariat engages temporary external experts. In short no single project application/case shall be handled/vetted by any two individuals of the same racial/ethnic profile or national identity (be it in parallel or in line) during the whole range of the process of secretariat’s role of vetting until the final ruling is issued by the Board. ”</p> <p>This item should be repeated in Issuance section too.</p>

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12	Para 80		This Para has effectively short circuited the EB's CMP approved responsibility and role under Para 12 and Para 16 to closely supervise the review process and effectively disconnected it until it is too late; giving room for sole indulgence by secretariat	Amend the Para by reflecting the EB's CMP approved responsible role as supervisor of the review process; effective communication with PPs AND DOE; as well as its involvement through the two EB members or expert RIT members representing it in the process:
13	Para 83	Ge/te/ed	<p>“The secretariat shall schedule the commencement of the review of the request for registration in accordance with its operational plans and any relevant instructions by the Board.”</p> <p>Stakeholders require publicly available assurance on the basic principle of an unwavering right of entitlement to “first come first serve” unless was an interrupted process</p>	<p>Amendment</p> <p>“However; no other project activity shall be scheduled earlier than another project activity for whose the request for registration from DOE was submitted to the secretariat before it”</p>
14	Para 85	Ge/te/ed	Reads “The secretariat shall conduct an assessment of the request for registration in the context of the reasons for the request for review provided in the “CDM project activity/programme of activities registration request review form” (F-CDM-RR) and the CDM requirements, taking into account the responses from the project participants or the coordinating/managing entity, and the DOE.”	<p>Amendment we seek</p> <p>“in the context of each of the specific reasons for the request for review”</p>

¹ As defined in any relevant International Journal

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15	Para 88.	Ge/te/ed	<p>Para reads; “Both the secretariat and the RIT Team shall, in each of their assessments, include a proposed decision taking into account appendix 2. Each proposed decision shall suggest either to:</p> <p>(a) Register the proposed project activity or PoA; or (b) Reject the request for registration....”</p> <ul style="list-style-type: none"> The Para is a truncated version of the relevant CMP Decision (Para 18 of the “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism” and illegally removed one more decision path approved by the CMP. The Para lacks the details of communication/reporting requirement of subscribing to specific elements of review; the concern of each reviewer as well as what SPECIFIC element PP did or didn’t address that each feels should have been addressed; which ones are used as a basis for arriving at either of the above proposal options. No list of redundant, repetitive or unspecified list of “Devil’s accusation” should be stated in the report for the sake of avoiding room for intentional bias on the EB or give impression of “project with many issues” to EB or stakeholders. 	<p>Add Amendment;</p> <p>Reinstate the previously illegally removed decision option</p> <p>“(b) To request the DOE and project participants to make corrections based on the findings from the review before proceeding with registration;”</p> <p>Add;</p> <p>“ As part of the report ushering any choice of proposed decision among the three options; Both the secretariat and the RIT Team shall list each specific point reviewed; what each understands and should have been done and what the PPs did or didn’t comply with no redundant, repetitive or unspecified list of flags allowed”</p> <p>“Proposal of rejection is not permitted in case of LDC’s unless the issue was concern of Additionality considering the EB’s option under Para 18 of the ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism” to request for revision of the PDD before registration”</p>

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16	Para 89.	Ge/te/ed	<p>Para reads; “If a proposed decision is to reject the request for registration, then the assessment report shall include a proposed ruling. The proposed ruling shall contain an explanation of the reasons and rationale for the proposed decision, including, but not limited to:</p> <p>(a) The facts and any interpretation of the facts that formed the basis of the proposed decision;</p> <p>(b) The CDM requirements applied to the facts;</p> <p>(c) The interpretation of the CDM requirements as applied to the facts.”</p> <ul style="list-style-type: none"> • It doesn’t emphasize the requirement of sticking only to the specific points leading to review, • For the sake of transparency and awareness of affected parties; provision must be included to send the proposal to the affected parties the same time as the EB receives 	<p>Amendment</p> <ul style="list-style-type: none"> • Add amendment “None of the above shall diverge from the specific points that triggered the review process or zoom out to a general concern. Moreover none of them shall repeat review points unless the specific substance or concern is different”. • Add; “After conducting its review; if the proposal of the relevant unit of the secretariats is to “reject” the project requesting registration; it should send a report with outline of the specific points that it has concerns about and why it believes the PP’s approach is wrong. No vague points should serve as a basis of proposal to EB or communication to PPs.” • Amendment; “The Secretariat shall send the proposal of both the RIT and its own as well as the Oath to the PPs, DOE and respective DNA the same time as it sends it to EB members so that they would be aware of the conditions and level of information under which the EB makes decision affecting PPs”.

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17	Para 90.	Ge/te/ed	<p>“In addition, both the secretariat and the RIT Team shall, in their assessment reports, highlight any issues of significant importance related to the policies and goals of the CDM arising from the assessment.”</p> <p>For the sake of avoiding/checking double standard; it requires inclusion of reports regarding conformity with consistency requirements over secretariat’s decision on other similar registered projects with respect to specific points used in the review.</p> <p>A venue for affected PPs to hint the EB with existence of Double standard or biased process before the EB makes its initial decision.</p>	<p>Add Amendment: “Together with the report, the Secretariat shall send a letter of oath signed by the specific officer (s) in charge of approval of the Secretariats outcome/recommendation; assuring that the proposal is genuine, free of conflict of interest and that there is no other CDM project registered or exists in the secretariats pipeline without the same exact points of concerns being raised or addressed in same way as the unit demanded from the PP requesting registration. The board shall approve a form of oath for this purpose taking into account input from the public. The oath should also state that the unit and the head of the unit would take the full responsibility if Double Standard is discovered later.</p> <p>Similarly; in the report of the selected members of the RIT; assigned members should report their proposal together with any project they have identified that has previously been registered with the same concerns not raised against or any in the secretariat pipeline, to the extent publicly available, for which the secretariat is not actively raising the same flag about.”</p> <p>“If affected PPs finds existence of precedence and hence existence of Double Standard by virtue of any one other project being granted registration earlier with the same points of review concern having not been raised or registered project not having to require confirming PDD with it; then it shall send the matter to the EB through a direct communication with a copy to the DNA. The secretariat shall present the same to the EB as part of the review report together with the above procedural outcome of the two Parallel assessments. The secretariat shall not respond to such communications without the case being presented to the EB meeting.”</p> <p>Amendment of “Modalities and procedures for direct communication with stakeholders (version 01)”, required to accommodate this</p>

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18	Para 90	Ge/te/ed	<p>“The secretariat, in consultation with the Chair of the Board, shall bring these issues to the attention of the Board by preparing background notes and policy options and presenting them to the Board at its meetings.”</p> <p>Assurance for all the issues including those affecting issue of double standard to be part of the agenda of the meeting</p>	<p style="background-color: yellow;">Amendment: “The Board may not need to consult the secretariat when it finds an issue that was not included or mentioned among the list of issues as per the above provision. Moreover; issues related to double standard or preferential treatment should necessarily be raised on the relevant meeting whether presented by the relevant unit of secretariat or not as far as found from the report or stakeholder direct communication to EB as per the relevant Para 90” (amendment of Para 90 is requested in number 12 above</p> <p style="background-color: yellow;">Amendment of “Modalities and procedures for direct communication with stakeholders (version 01)”, required to accommodate this</p>
19	Para 93		<p>“If the respective assessment reports of the secretariat and the RIT Team contain the same proposed decision (i.e. both are to register the proposed CDM project activity or PoA, or both are to reject the request for registration),...”</p> <p>The Para is a truncated version of the relevant CMP Decision (Para 18 of the “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism” and illegally removed one more decision path approved by the CMP</p>	<p style="background-color: yellow;">Add “or to request the DOE and project participants to make corrections based on the findings from the review before proceeding with registration;”</p>

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20	Para 97	Ge/te/ed	<p>Reads: “At the Board meeting for which the case is placed on the agenda, the Board shall, in accordance with appendix 2, decide to either:.....”</p> <ul style="list-style-type: none"> The Para is a truncated version of the relevant CMP Decision (Para 18 of the “ANNEX III Procedures for review as referred to in paragraph 41 of the modalities and Procedures for a clean development mechanism” and illegally removed one more decision path approved by the CMP Requires clause of assurance for decision independence and avoidance of any form of informal influence from a person or the Secretariat on the Board or its members. The Board already has the RIT as expert advice and if only needs very specific advice it should be covered with a formal procedure including accompanied by oath. 	<p>Reinstate the option;</p> <p style="background-color: yellow;">“To request the DOE and project participants to make corrections based on the findings from the review before proceeding with registration;” for the Board.</p> <p>Amendment;</p> <p style="background-color: yellow;">“The Board shall not advise any individual employee of any unit of the secretariat during the meeting. No individual member of the secretariat of any unit shall be allowed to utter any words about any project requesting registration and the Board shall have independence and unbiased venue for decision making; based only on the parallel reports of the RIT (which is the officially known source of technical support to Board) and that of the written report of the relevant unit of the Secretariat. If the Board has any issue that requires explanation; both the relevant members of the RIT and the Secretariat shall have the chance to explain; including through physical presence. None of these two bodies shall be considered as the closest advisor to the Board. If the Board requires additional expert advice on specific issue of methodological significance related to the case and in the event the RIT member didn't sufficiently clarify; it shall only request in written clarification or recorded explanation from the head of the relevant unit of the secretariat related to methodologies accompanied with signed Oath of “Double Standard, Conflict of interest and rule of diversity”. However; such explanation shall not still be sufficient to invalidate PPs concerns later of double standard nature, if any; as per Para XX (amendment proposed). “</p>

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21	Para 100.	Ge/te/ed	<p>Para reads; “The proposed ruling shall contain an explanation of the reasons and rationale for the final decision, including, but not limited to:</p> <p>(a) The facts and any interpretation of the facts that formed the basis of the proposed decision;</p> <p>(b) The CDM requirements applied to the facts;</p> <p>(c) The interpretation of the CDM requirements as applied to the facts.”</p> <p>Our concern;</p> <ul style="list-style-type: none"> • It doesn’t emphasize the requirement of sticking only to the points leading to review, • It doesn’t give requirement of clear and specific statement for PPs either to learn what was wrong or for the EB or whoever proposed it to take the responsibility • It doesn’t give assurance of non-existence of Doubles standard and preferential treatment • For the sake of transparency and awareness of affected parties; provision must be included to send the proposal to the affected parties the same time as the EB receives. The current setting has “initial ruling” and then “final ruling” which are neither properly covered in the PCP document nor make sense if they are not used as opportunity to correct mistakes, if any (See proposed amendment on next row) 	<p>Amendment</p> <ul style="list-style-type: none"> • Add amendment “None of the above shall diverge from the specific points that triggered the review process or zoom out to a general concern. Moreover none of them shall repeat any review issue unless the specific substance or concern is different”. • “As part of the ruling of the EB; the ruling note should include EB’s decision to register a project for which there exists a precedent for the sake of avoiding Double Standard; by virtue of finding any other CDM project already registered in the same technology or type of project activity as the one under current EB ruling” • “if the ruling of the EB is to “reject” the project requesting registration; it should indicate the specific points that it has concerns about and why it believes the PP’s approach is wrong so that it would allow PPs to get accurate reason for the rejection or learn lessons. No vague points should serve as a basis of rejection or communication to PPs.” • “As part of the ruling of the EB; the ruling note should include EB’s assurance that it has checked non-existence of Double Standard on the project requesting registration or any Preferential treatment offered by virtue of double standard to others already registered in the same technology or type of project activity as the one under current EB ruling”

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22	New Para	Ge/te/ed	<ul style="list-style-type: none"> To redress errors between “initial ruling” and “final ruling”. Existing procedure doesn’t also provide channels for appealing as well as stages of hierarchy of appeal. The affected PPs need to be given a chance to object ruling or thank the EB in between the two ruling time slot and after the final ruling too. The procedural document misses some crucial wings for a complete circle of transparency and accountability 	<p>Add new Para;</p> <p>“The EB shall invite affected PPs in its communication letter of initial ruling; to provide information or express their objection, if any, with specific facts they feel have not been addressed; not been presented to EB by reviewers or evidence of any precedent that they prove by virtue of indicating any other registered project with the same issue not being raised against; serving as sufficient proof for existence of Double Standard.”</p> <p>“ if the affected PP has point of objection on the initial ruling of the EB; based on facts it alleges have not been considered or are of Double Standard nature or lacks personnel diversity ; It can send the letter to the EB as a direct communiqué 14 days before the next EB meeting; through a channel prepared for such communication. The Secretariat shall avail such channel appropriately and inform DNAs as well as stakeholders about the same. The EB shall consider the same letter of objection before issuing the final ruling”;</p> <p>“The EB shall review letter from affected PPs including existence of double standard, internally at the immediately next EB meeting and if proven; propose registration of the CDM project. If the EB couldn’t register the project on whose alleged Double Standard surfaced; it shall launch an independent enquiry through forming a small group of five people whose composition would be one each from the DNA of the affected PP; the DOE involved; the DNA of any volunteer Annex I country; a member of the relevant RIT team assigned before or a new RIT member and the secretariat to review and propose recommendation within 60 days of the issuance of the final EB ruling. If the group cannot agree by consensus; vote will be the final decision maker with one-man-one-vote rule”</p> <p>“Project Participants who have evidence of the existence of this practice of non diversity in process on his application shall raise the issue as sufficient reason for Objection of ruling of the EB through a Direct Communiqué.” And “If the affected PP has not agreed with the point of the final ruling; it can send a Direct communiqué to the EB and proceed to finding a channel for presenting the case to the CMP through the relevant DNA”. The Secretariat shall inform DNAs about the matter and facilitate venues and agenda in the CMP where such cases can be presented.</p>

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23	New Para		<ul style="list-style-type: none"> The procedural document misses some crucial wings for a complete circle accountability 	<p>“When issues of Precedence, Double Standard, Confidentiality and rule of Diversity are identified or communicated to the Board through direct communication; it shall only be dealt with as a single agenda on a specific EB meeting and the outcome stated on the report of the EB meeting and shall not be responded to PPs or DNAs from any other person including representing the EB or its Chair”</p> <p>“If the presence of precedent is proven existed by virtue of just another registered project with the same issue serving as evidence; the EB will revoke its past ruling and register the project activity. This will be applicable to any affected project even in backdates; in respect of fundamental principles of law of precedence and non-existence of Double Standard at the United Nations”</p> <p>“In the presence of such circumstance where a project has been rejected any time earlier and later found out to be an error of double standard nature at any time; the EB will immediately register the affected project as soon as communicated by affected PPs or stakeholders.”</p> <p>“However; if any Doubles Standard is implemented after the date of publication of the new version; the affected PPs will in addition be entitled to coverage for damage occurred thereby the market value of the CERs that could have been generated between the effective date of registration previously denied and the new date of registration would be the value of the compensation. The EB may order to recoup this public money paid for damage; from the remuneration of the head of the relevant unit that signed the Oath of “Double Standard, Conflict of interest and rule of diversity”.</p>

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24	New Para		In case the EB decides to request the DOE and project participants to make corrections based on the findings from the review before proceeding with registration;”	Insert appropriate and pragmatic procedure how to institute this decision option until the registration Considering including timelines and whether DOE engagement would still be required in this decision path towards registration
25	Para 105 _{bis}		“After the publication of the ruling, the DOE, the project participants or the coordinating/managing entity may request the secretariat, by e-mail through a dedicated e-mail address, to make a telephone call to them to provide clarifications on the ruling. Only one such request shall be allowed per ruling. In this case, the project participants, the coordinating/managing entity or the DOE shall provide the contact details of the person to be called with preferred time slots. The secretariat shall fix a call appointment within three (3) days of receipt of the request. The secretariat shall record the call.”	Add; “ In all cases the secretariat shall be pro active to and responsible to exhaustively explain’ a. in case of rejection; the specific points of rejection and what the PPs should have done and b. in case of PPs being requested to correct based on findings; what PPs should correct in the PDD/spreadsheets to subsequently register the project”

Call for public inputs – Template for inputs	Document: Draft CDM project cycle procedure (PCP)
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26	Para 105 _{ter}	Ge/te/ed	<p>“If project participants or the coordinating/managing entity want to request the registration of a project activity or PoA that has been rejected by the Board, the validation activity for the project activity or PoA shall recommence, including the publication of the revised PDD or PoA-DD for global stakeholder consultation in accordance with paragraphs 13 and 14 above.”</p> <ul style="list-style-type: none"> • This procedure is insensitive to the current market circumstance • It doesn’t recognize the fact that a rejected project would already have undergone all of the steps in the first round and that in many cases it is only few elements that may cause rejection (including unreasonable ones in the eyes of PPs) while the actual project may not change significantly or may not change anyway. • It opens unfavourable route in case the ruling was influenced by a “Tampered Process” with several different motives intentionality putting applications on a cycle of lengthy rollercoaster • Moreover; it doesn’t have specific provisions for projects in Host countries with less than 10 CDM projects registered or are LDC/SIDS • It doesn’t provide safeguard for PPs of such rejected projects against systematic or non intentional change of regulatory documents (that should in principle only be relevant to new applicants) thereby subjecting old PPs to moving targets ex: changed methodologies; tools, guidelines; start date; commissioning date etc 	<p>Proposed amendment with Addition of new paragraph;</p> <p>“However; If project participants or the coordinating/managing entity want to request the registration of a project activity or PoA that has been rejected by the Board, on any other ground than Additionality as stated on final ruling note; the validation activity for the project activity or PoA shall recommence, starting by validation but without the requirement of site visits by DOE; without changing the previously uncontested start date; without the publication of the revised PDD or PoA-DD for global stakeholder consultation ; and without being mandatorily required to change version of any regulatory document (Versions of Methodology; tools and guidelines used in the rejected PDD) in the new submissions; unless the PP voluntarily prefers so or changed project location or wished to voluntarily change status of plant (Greenfield or existing) from what it applied in the previous PDD”</p> <p>Note: The relevant elements in the VVS and Project Standard need also be revised to confirm with this”</p> <p>“In case of rejected projects wishing resubmission from Host countries with Less than 10 CDM projects registered; LDCs and SIDs/ the Secretariat shall prepare a separate “expedite track” and schedule each step of the internal vetting process on a separate track without requiring them queuing or the compliance with “first come first serve”. No such submitted application shall take any more than three months in the secretariat’s hand; from initial submission date of the Validation report to the Secretariat to the date submitted for EB vetting”</p>

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#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph	Proposed change (including proposed text, if any)
27	New Para	Ge/te/ed	EB report to the CMP	<p style="background-color: yellow;">“The EB together with its annual report to the CMP; shall include reports regarding qualities of registration/issuance proposals of the Secretariat that it found contradicts with principles of non existence of Double Standard or indicates Preferential treatment on the same issue or didn’t implement assignment in diversity of personnel in vetting process. It shall also identify those that it has found have been flagged by the RIT but have not in parallel been informed about from the Secretariat before the relevant EB meeting. It shall also state Direct communication letters from PPs that include objections to EB ruling with causes alleged to be of Double Standard nature by virtue of identifying any precedent”</p>
28	Para 189	Ge/te/ed	<p>With a rationale that the Secretariat employs human beings (not God) and to avoid risk of exposure to unfavourable human action (like actions that are leading to climate change); new paragraph to accommodate “Rule of Diversity” thereby requiring assurance of organizational/process split to avoid presence of “the Contractor and the Supervisor in the same room or on the same table” for avoidance of;</p> <ul style="list-style-type: none"> a. potential field of conflict of interest (personal/national/regional/involuntary) or b. biased decision towards a case/project or c. preferential treatment of a case/project or d. a combination thereof 	<p style="background-color: yellow;">“The secretariat shall re-organize itself in the next three months from publication of this PCP version into an “issuance unit” separate from the “registration unit” there by assigning employees/experts and managers exclusively for each of these activities. No any member of the secretariat shall be assigned to perform both duties of registration and issuance at any stage of vetting including approval. Moreover; in forming the separate units; the Secretariat shall assure the EB that no employee that has been involved in handling/vetting registration of a specific project shall have also been engaged earlier in issuance of credits from the same project activity and vice versa”</p> <p style="background-color: yellow;">Para amendment in comment 9 regarding diversity of personnel shall be repeated here for issuance stage as well.</p>

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#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph	Proposed change (including proposed text, if any)
29	New Para		An Independent M & E Auditor needs to be assigned to monitor and advise EB on several matters related to operational integrity of the mechanism	<p style="background-color: yellow;">“An independent M&E Auditor shall be assigned who monitors compliance with the spirit of operational codes; and in relation to conflict of interest, diversity on a case and personnel symmetry in each of the main units of the Secretariat related to the CDM and reports to the EB quarterly. The EB shall design/approve the specific requirement/guideline of the M & E Auditor including through public inputs”</p> <p style="background-color: yellow;">“The report of the M&E Auditor shall be publicly posted before each subsequent EB meeting that considers it as input for decision making”</p>

Note: Please add rows as necessary.