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#	Area*	Related CDM regulatory document (if any)	Para no. (if any)	Issue (Description of an issue concerning a specific CDM rule or operation that you consider results in unnecessarily high burdens or transaction costs on stakeholders, together with a description of the observed burdens or costs and their implications)	Proposed change (Description of an idea for simplification/streamlining of a particular CDM rule or operation and expected implications on the efficiency and integrity of the CDM)
5	Registrations			Determination if a project activity is additional. Currently the project participant has to justify that the project is additional and they almost always succeed in this as they can manipulate values. This results in too many projects being approved and an oversupply of credits in the market. This also damage the reputation of the Clean Development Mechanism, as it is not perceived as true that none of the projects registered as CDM project activities would not have been implemented anyway even without the additional income from carton credits.	UNFCCC should engage an independent 3 rd party consultant to carry out evaluations to determine if a proposed projects is determined as additional. This should be done independently from project participant and should be paid in full by UNFCCC. If the project participant disagree with the recommendation of the consultant, then they shall have the right to have a new consultant do a new and independent evaluation, and if so, they should pay UNFCCC for the cost of having a new consultant conducting the evaluation on behalf of UNFCCC.
6	Registrations			Determine of a project activity is receiving ODA. This simply increases the transaction cost associated with the Clean Development Mechanism, and it increases the cost of the donor to determine where their funding is allocated. This provide no value to the clean development mechanism or to the projects.	This requirement should be removed altogether. Alternatively a independent 3 rd party should determine of projects receive ODA as part of the process to determine of projects is additional. If projects to receive ODA, stricter requirements should be required before a project is perceived as additional.
7	Registrations			Determine if there are any legal barrier to the proposed project activity. This constitutes an unnecessarily burden and increase transaction cost and provide no value to the project or the Clean Development Mechanism. If a project activity is not allowed to be implemented, host countries should prevent the project from being implemented and this should be done irrespectively of any carbon credit program.	The request for proving that there is no legal barriers to the project activity should be removed. DNA should however be allowed to report to UNFCCC if any project activity that is generating carbon credits is illegal. The DNA would then have to prove why the project activity is illegal, and they have to provide reference to the law that specify that the project activity is illegal. It must them be documented that the project activity was perceived as illegal at the time of CDM registration and at the time that DNA report this to UNFCCC.
8	Registration			If the project contribute to development. This is an objective statement and it is not quantified how substantial the development value have to be. As such all project can justify that they contribute to development value, and as such this simply adds to the cost of applying for CDM approval and increase the transaction cost without providing any value to the program. The fact that all projects can justify that they contribute to development reduce the faith in the Clean Development Mechanism and is the main reason why alternative carbon programs have been developed.	UNFCCC should specify how much development value that should be required for project to be approved as a CDM project. This value should be relative to the expected number of carbon credits to be issued from the proposed project activity. UNFCCC could rule that project has to have a net development value in addition to reduction of GHG emission of no less than \$xx for each CER to be expected to be issued from the program. UNFCCC should engage an independent 3 rd party consultant to carry out evaluations to determine the development value of the proposed project. This should be done independently from project participant and should be paid in full by UNFCCC.

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9	Issuance			UNFCCC take at least 3 months to issue carbon credits after emission has been verified DOE. In some cases it will take substantially longer. This is an unnecessary burden to projects, particularly projects in which income from carbon credits is a substantial part of the income for the project.	<p>UNFCCC should simplify their processes.</p> <ul style="list-style-type: none"> UNFCCC should aim at reducing the time from receiving a verification report to the carbon credits is issued. The average time should not be more than 30 days. UNFCCC should aim at NEVER using the maximum time allowed according to guidelines. UNFCCC should have simplified approval processes for prioritized projects. For such projects the UNFCCC should guarantee that the time from receiving a verification report from DOE until the carbon credits is issued should not take more than 30 days. Such project could include: <ul style="list-style-type: none"> Projects in Least Developed Countries Small and micro scale projects Projects with very high development value.
10	General			DOEs are currently restricted to validating and verifying reports from project participants. DOEs are not allowed to provide consultancy services, and this prevents projects to utilize available expertise. Due to the crises in the market for carbon credits, a number of DOEs has back out and the cost of compliance with the UNFCCC requirement for DOEs is becoming a big transaction cost to DOE and this cost then have to be forwarded to Project Participant adding transaction cost for projects.	<p>A number of changes should be made to DOEs roles and responsibilities.</p> <ul style="list-style-type: none"> The requirements on DOEs should be reduced. The UNFCCC should be required to justify all requirements on DOE with a cost / benefit justification on all requirements on DOEs. DOEs should get new roles and responsibilities, including acting as consultants for project participants. DOE should however be require to report to UNFCCC on which projects they are providing CDM related consulting, and they should not be allowed to engage as a DOE for the projects which they are also providing consulting services. DOE should also be engaged by UNFCCC to carry out consultancy work for UNFCCC, including doing stakeholder consultations, environmental assessment etc. for projects on behalf of UNFCCC. This should be done separate from their roles as DOEs, and they should not do such consultancy work for UNFCCC for projects which they have been private consultant or a DOE.

*Area: Please choose from the following categories:

General; Registration; Issuance; Post-registration changes; Renewal of crediting period; Other project cycle step; Methodology development; Methodology revision; Methodology clarification; Accreditation; Other specific process.

Please divide your inputs on issue by issue using different rows. Please create as many rows as needed.