

## TABLE FOR COMMENTS

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Affiliated organization of the submitter (if any): independent\_\_

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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)
1	Registration and issuance  Duplications between secretariat and EB	PCP		<p>One source of redundant efforts is within the relation between EB and the secretariat. At times, this relation seems to be coloured by distrust, second-guessing and strategic behaviour. EB's political oversight is on occasion contradictory because EB members' views of operational aspects differ and vacillate and, in the opposite direction, the secretariat can fall onto bureaucratic inertia and limited capacity among management. Despite these profound causes, much of the friction is avoidable. On rare occasions, the instability of EB members and the defensiveness of the secretariat can even feed on each other and on both sides the full depth of professional judgment is not used ("the combination is less than the sum"). One possible improvement is reducing the control dimension between the two by introducing more division of work where tasks periodically shift between EB and secretariat.</p> <p>This is relevant for the reviews of a request for registration and the reviews of a request for issuance. Few reviews have clarified relevant operational issues, while more reviews have only resulted in elevating a detail to a matter of principle even so it has little material implications. Perhaps some reviews' outcomes contain more internal concerns between EB and secretariat rather than operational substance. Reducing the number of reviews might have an overall 'softening' impact.</p>	<p>Rather than all reviews being assigned to two RIT members, the normal procedure for reviews could be for the secretariat to produce one assessment report only. It could be optional for the EB members to call for an expanded review involving RIT members and only such an expanded review would involve a RIT member who is specifically qualified for a narrow industrial field, i.e. fertiliser production or a type agricultural produce etc.. Thereby the RIT might become more a source of technical expertise and less an arbiter of CDM rule orthodoxy.</p>