TABLE FOR COMMENTS

Name of submitter:	_Richard Iliffe

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0	1	2	3	4	5
#	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	Other project cycle step	CDM Procedures		The timelines for Scheduling are inconsistent and in any case are not communicated clearly. This step in the project development cycle has in our experience been the longest, yet no formal limit is imposed on it. Implications: PP cannot inform investors of realistic timelines	Scheduling become a consistent timeline under various conditions of demand for Secretariat project review. (red – high demand, long wait e.g. 2 weeks; orange – medium demand; etc)
2	Other project cycle step	CDM Procedures		DNA approval of projects can take up to 2 years; UNFCCC has no ability to influence DNAs to make a decision. Implications: DNAs can effectively hold PPs to ransom.	DNAs are required to report on what projects they are reviewing and reasons for indecision to UNFCCC/COP/RCC regularly.

*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.