

Dear CDM Team,

AENOR would like to thank you the opportunity to send inputs regarding the Call for public inputs on the structure of cornerstone regulatory document of the CDM, the withdrawal of published monitoring report and change of DOE at verification stage, and the voluntary withdrawal of focal point role from a project activity.

Please consider the following comments from AENOR:

1. Structure of cornerstone regulatory documents for the CDM

Regarding the development of a consolidated and streamlined set of provisions for programmes of activities (PoAs) it would be appreciated if all provisions related to PoAs were included in the same document. In this case it would be necessary to include clear information for coordinating entity and proponents of the PoA and the same for DOEs regarding the validation/verification requirements, so each user of the document is able to find the relevant information easily.

Related to the structure of the regulatory documents, please consider that if any changes are done and the requirements for a project activity are in a different document with a different paragraph number, this will have an impact in the processes ongoing that may lead to misunderstandings or lack of compliance with requirements.

2. Withdrawing published monitoring report and changing DOEs at the verification stage

Regarding the issue of withdrawing published monitoring report and changing DOEs at the verification stage, it would be appreciated the inclusion of provisions for the DOEs to have always the opportunity to send comments related to this process apart from the ones sent by the project participants.

Provisions to avoid a unilateral action from the project participant, without an agreement with the DOE selected for verification, should be included in the new procedure.

Best regards.

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