

**CDM-EB88-AA-A04**

## Concept note

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# Revised proposals for simplification and streamlining of the CDM (second batch)

Version 01.0



**United Nations**  
Framework Convention on  
Climate Change

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## 1. Procedural background

1. The Executive Board of the clean development mechanism (CDM) (hereinafter referred to as the Board), at its eighty-sixth meeting (EB 86), considered a concept note on the simplification and streamlining of the CDM. Of the 22 concrete proposals contained in the concept note, the Board:
  - (a) Agreed on the direction in eight proposals, and requested the secretariat to prepare draft revised regulatory documents;
  - (b) Supported the direction in 11 proposals, but requested the secretariat to prepare revised proposals based on the guidance provided by it;
  - (c) Did not support the remaining three proposals, however requested the secretariat to undertake further work and prepare new proposals.
2. Regarding the proposals referred to in paragraph 1(b) and (c) above, the Board, at EB 87, considered a concept note on the first batch of revised proposals of simplification and streamlining of the CDM, and provided guidance on each revised proposal.
3. This work relates to the activity “Simplification and streamlining of the CDM” under objective 1(b) “Operate an effective regulatory framework resulting in reduced transaction costs for participants in the mechanism” with a resource allocation indicated in table 3 of the Management Plan 2016 (EB 87 report, annex 1).

## 2. Purpose

4. The purpose of this concept note is to present the second batch of revised proposals relating to some of the original proposals referred to in paragraph 1(b) and 1(c) above, based on the guidance or request provided by the Board at EB 86 and EB 87. This batch relates to the original proposals of:
  - (a) Clarifying conditions for exemption from on-site inspection at validation and introducing delayed on-site inspection;
  - (b) Clarifying conditions for exemption from on-site inspection at verification;
  - (c) Reducing sample size (for verification) for geographically scattered project activities;
  - (d) Streamlining the registration process;
  - (e) Simplifying the registration process for automatically additional project types;
  - (f) Allowing a DOE to perform both validation and verification for the same project activity.

### 3. Key issues and proposed solutions

#### 3.1. Clarifying conditions for exemption from on-site inspection at validation and introducing delayed on-site inspection, and clarifying conditions for exemption from on-site inspection at verification

##### Issue summary

5. An on-site inspection by a designated operational entity (DOE) constitutes a significant share of validation costs and, in some circumstances, may also affect the length of the validation process depending on the DOE workload and the availability of the DOE validation team members.
6. The current “CDM validation and verification standard” (VVS) makes an on-site inspection at validation mandatory for proposed project activities or component project activities (CPAs) under a programme of activities (PoA) taking place in existing facilities or utilizing existing equipment where the project activity is: (i) large-scale; (ii) small-scale with emission reductions exceeding 15,000 tonnes per year; or (iii) bundled small-scale with emission reductions not exceeding 15,000 tonnes per year.<sup>1</sup> For small-scale project activities where emission reductions are not exceeding 15,000 tonnes per year, a DOE is recommended to conduct an on-site inspection, or provide a justification for not doing so. For all other types of project activities, the DOE shall conduct validation based on review of available designs and feasibility studies, and should conduct comparison analysis with equivalent projects, as appropriate.
7. This means that under the current rules, only ‘greenfield projects’ are automatically exempted from an on-site inspection at validation, and, if justified, small-scale project activities with emission reductions not exceeding 15,000 tonnes per year is also exempted from an on-site inspection. In practice, it has been observed that DOEs conduct an on-site inspection for most greenfield projects and, as much as possible, all small-scale project activities regardless of the scale of emission reductions. On the other hand, the VVS refers to on-site inspection as the means for validation for many validation requirements without differentiating the project scale or type. The tendency of DOEs to conduct on-site inspections for most cases may be attributed to the lack of clarity on the necessity of on-site inspection in the VVS.
8. At verifications, the VVS in principle makes it mandatory for a DOE to conduct an on-site inspection to verify the compliance of the project implementation with the registered project design document (PDD) while leaving the possibility of not conducting an on-site inspection, in which case the DOE has to provide justification. At the same time, the VVS allows for applying a sampling approach to conducting on-site inspections at verification in accordance with the “Standard: Sampling and surveys for CDM project activities and programme of activities” (the sampling standard).

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<sup>1</sup> For bundled small-scale project activities, each with emission reductions not exceeding 15,000 tonnes per year, the number of on-site inspections may be based on sampling, if the sampling size is justified through statistical analysis in accordance with the “Standard: Sampling and surveys for CDM project activities and programme of activities”.

9. The Board, at EB 87, supported the direction of the proposal presented for that meeting, but requested the secretariat to:
- (a) Prepare a revised proposal further clarifying the conditions under which a DOE may be allowed such exemptions (from conducting on-site inspection at validation and/or verification);
  - (b) Assess possible consequences of identifying issues at verification that are attributable to validation, including the lack of an on-site inspection.

**Proposed solution (revised)**

10. To approach the issue of on-site inspections, it is important to understand the nature and scope of checks that a DOE would normally conduct during the on-site inspection at validation or verification. Thereafter, alternative means that can substitute physical inspection can be explored. During an on-site inspection at validation, a DOE normally examines the project technology, baseline, additionality, monitoring systems, operation and maintenance protocols and the local stakeholder consultation. During an on-site inspection at verification, a DOE normally examines, among other things, the implementation status, actual operation of the project activity, compliance of monitoring systems with the registered monitoring plan and the quality systems as well as cross-checks the monitored data with other sources.
11. Means of gathering information include document reviews, interviews and the DOE's own observations, at both validation and verification. It seems that the on-site document review and interviews done by a DOE could, in large part, be replaced by off-site review of relevant project documentation, electronic information-gathering, telephone interviews and Internet-based meetings. For that, the project participants could be requested to provide all documentation such as site plans, photographs, management plans, policy documents, contact details of project personnel and stakeholders, and other information deemed necessary by the DOE to carry out the audit remotely. Technology such as webcams could be used to allow a DOE to see the project site and its facilities. Telephone interviews with key technicians, local authorities and local stakeholders could replace in-person discussions that normally take place during the on-site visit. It may even be possible and cheaper for the project participants to send one of their key project personnel to the DOE's office for a detailed face-to-face discussion to enhance the DOE's understanding of the project activity, rather than to have a DOE team visit the project site. Therefore, an on-site inspection at validation could be made optional (i.e. non-mandatory), unless there are no alternative means to validate one or more pieces of information provided by the project participants. Nevertheless, if the project design including the application of an approved methodology, the eligibility for the CDM, and the calculation of emission reductions is based on the information that becomes difficult to trace once the project activity is implemented, an on-site visit at validation may be indispensable.
12. On the other hand, an on-site inspection at the first verification should be made mandatory not only for the cases where an on-site inspection at validation has not been conducted, but also for all other cases. This is due to the fact that only through a physical inspection of the project activity and its operation it is possible to verify that the project activity was really implemented in accordance with the registered PDD and to certify that the emission reductions generated are real. Additionally, some elements of an on-site inspection at verification, such as checking the control panels, data transfer

methods and quality systems, may not always be possible remotely. For these reasons, an on-site inspection at the first verification is an important tool to determine the compliance level of a project activity. For subsequent verifications, the DOE could be granted the freedom to decide whether an on-site inspection is necessary and to use alternative means such as those described above.<sup>2</sup>

13. Based on the consideration above, for validation, it is proposed not to make an on-site inspection mandatory for any types of project activities and CPAs (i.e. greenfield and brownfield of all scales and levels of emission reductions), and to allow using alternative means to an on-site inspection to validate any requirements with a proper justification that the alternative means are sufficient for validating the respective validation requirements, except for the cases where, in the judgement of the validating DOE, the pre-project implementation situation including baseline becomes difficult to trace once the project activity is implemented.
14. For verifications, an on-site inspection at the first verification should be made mandatory. For subsequent verifications, whether to conduct an on-site inspection could be left to the discretion of the verifying DOE, who may instead use alternative means to verify respective requirements.
15. Implications of using alternative means to validate and verify a project activity should be considered vis-à-vis potential significant deficiencies in validation and verification, respectively. At present, operational provisions for addressing significant deficiencies in validations and verifications do not exist. When introducing such operational provisions in the future, the implications of exempting DOEs from conducting on-site inspections would need to be taken into account.
16. For the time being, if any issue to the project design, etc. including those attributable to the lack of on-site inspection at validation is identified at the first or any subsequent verifications, the DOE shall address the issue through the post-registration change process.

### **3.2. Reducing sample size for geographically scattered project activities**

#### **Issue summary**

17. If verification involves on-site inspections by a DOE, the cost and time required for the verification largely depend on the geographical distribution and the accessibility of the sites. For geographically scattered project activities and PoAs with a small amount of emission reductions at each site (e.g. project activities introducing compact fluorescent lights, cookstoves or biodigesters), a large number of on-site visits for verification could increase the cost for verification.
18. The Board, at EB 86, supported the direction in the proposal presented for that meeting, but requested the secretariat to prepare a revised proposal by analysing the issue holistically, including a review of the “Standard: Sampling and surveys for CDM project activities and programmes of activities” (the sampling standard) and alternative means to conduct on-site inspection.

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<sup>2</sup> The situations that would require on-site inspection at subsequent verifications may include, for example, for the cases where the project activity is implemented in phases.

19. The current VVS allows for applying a sampling approach to conducting on-site inspections at verification. When the project participant has undertaken sampling for monitoring of emission reductions, which is usually the case for geographically scattered project activities, the DOE is allowed to implement “acceptance sampling”, taking random samples out of the samples chosen by the project participant. The sample number for verification varies from 8 to 38, depending on the level of assurance and error tolerance.<sup>3</sup> Under certain conditions specified in the sampling standard,<sup>4</sup> a higher error tolerance and lower level of assurance is accepted, which results in a smaller sample size. Nevertheless, the current sampling standard does not clearly distinguish between the sampling for verification and of which proportion should be based on on-site inspection. It appears to assume that on-site inspection is to be conducted at all sites in the sample for verification.<sup>5</sup>
20. In the meantime, at EB 86, the Board adopted revised “Guidelines for sampling and surveys for CDM project activities and programme of activities” (version 04.0) (the sampling guidelines), which elaborated approaches to conducting survey, data collection and data processing for monitoring and verification.<sup>6</sup> It describes various data collection methods, including on-site visit and/or remote survey, and sets applicability conditions and an order of preference of such methods.<sup>7</sup> It states that on-site visit is one method of survey and data collection and may not be necessarily the best in all cases. For example, for simple parameters such as retention rates monitored through data sensors or pay-as-you-go systems, there may be no need for site visits for monitoring or verifications.
21. However, to date, the various approaches referred to in paragraph 20 above have not been reflected in the sampling standard. Therefore there appears to be some inconsistency between the VVS, the sampling standard and the sampling guidelines with regard to the necessity of on-site inspection for verification.

#### **Proposed solution (revised)**

22. In the sampling standard and the in VVS as appropriate, reflect the various approaches to conducting survey, data collection and data processing for monitoring and verification, which have been elaborated in the latest version of the sampling guidelines. This would clarify that on-site inspection is not the only method that a DOE can apply to conduct verification, and therefore address the issue of the costs of verification of geographically scattered project activities and PoAs.
23. The above approach would be applicable also to the necessity of on-site inspection at the validation stage.

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<sup>3</sup> The sampling standard, table 1.

<sup>4</sup> The sampling standard, paragraph 31.

<sup>5</sup> For example, paragraph 27 of the sampling standard can be read as the field/on-site check being mandatory for the samples selected by the DOE for verification.

<sup>6</sup> The sampling guidelines, section 9.

<sup>7</sup> Various survey and data collection methods available, such as hard-copy questionnaires, smartphone app modules connected to data clouds, data sensors, e-mail or web-based platforms or SMS, telephone, or mailing (post) are indicated in the sampling guidelines (see table 2 of the sampling guidelines).

### 3.3. Streamlining the registration process

#### Issue summary

24. Currently, a request for registration has to go through the steps of: (i) basic checks of the submission by the secretariat (completeness check, information and reporting check, and summary note preparation);<sup>8</sup> (ii) request for review period; (iii) preparation of independent assessment reports by the secretariat and the Registration and Issuance Team for the cases placed under review; and (iv) possible review by the Board, before the project activity is registered under the CDM. According to the timeline defined in the procedure, the minimum time required for registration is around two months. If an issue is identified in the documentation of the request for registration during the basic checks by the secretariat, or the request is placed under review by the Board, the timeline will become longer. The average time in the last 12 months was 2.9 months.<sup>9</sup>
25. The Board, at EB 86, agreed to maintain the current registration process for now, but requested the secretariat to consult with the Project Developer Forum and the DOE/AIE Coordination Forum on whether it is important to shorten the current registration process and report back to the Board at a future meeting on their feedback with, if appropriate, a revised proposal and relevant information on the operation of the process.
26. The Project Developer Forum provided its view on this issue as contained in the appendix. The forum thinks that the current registration process (and the issuance process) is unreasonably long and unpredictable due to the scheduling time in the beginning and the remedy processes if a mistake is detected, and proposes to merge or skip some of the steps (e.g. merge the completeness check and the information and reporting check) while allowing project participants and DOEs to respond quickly in case minor issues are raised without having to move back to scheduling again. It further suggests that the secretariat focus on supervision and sample checks instead of detailed checks.

#### Proposed solution (revised)

27. Maintain the current steps and timeframe in the regulatory provisions of the PCP, but make operational efforts to:
  - (a) Reduce the waiting time for requests for registration to start the completeness check;

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<sup>8</sup> Information and reporting check (IRC) and summary note have different objectives: the IRC attempts to obtain more information on issues that might not have been completely clarified in the documentation submitted; while the summary note provides an overview of the reasons for deserving the registration or requiring a review that have been identified during the assessment of the documentation (irrespective of whether a resubmission of documentation during the IRC has been required). If there is a need to interact with the DOE during the IRC, the finalization of the summary note will have to wait until the documentation is provided by the DOE, as it can impact the summary of the case.

<sup>9</sup> Measured as the time between the submission of a request for registration and the decision by the Board. The historical average time is 3.1 months. See the statistics in more detail at <http://cdm.unfccc.int/Statistics/Public/CDMinsights/index.html#val>.



- (b) Give priority in scheduling the process to the requests for registration that are resubmitted with revised documentation or clarification subsequent to the unsuccessful conclusion of the completeness check or the information and reporting check, provided that the resubmission is made within a reasonable timeframe (e.g. 14 days of receipt of the notification of the unsuccessful conclusion);
  - (c) Reduce the actual process time at each step of the completeness check and information and reporting check.
28. The idea of merging the completeness check and the information and reporting check as proposed by the Project Developer Forum (see paragraph 26 above) is not recommended, as it could delay the effective registration date for some cases. According to a decision by the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP), the effective registration date, and therefore the possible start date of the crediting period, is determined by the date on which a “complete” request for registration of has been submitted by the DOE.<sup>10</sup> If the completeness check is merged with the information and reporting check, the deadline for determining when such a “complete” request has been submitted would be extended.
29. The idea of reducing the nominal timeframe of each step before the process of review of a request for registration (i.e. seven days for completeness check, 23 days for information and reporting check and 28 days for request for review period) is also not recommended, since possible gain in the overall timeframe would not be much (e.g. by seven days at information and reporting check), which could be easily absorbed if there is an issue in the request for registration hence requires the submission of revised documentation during that stage.
30. The proposed solution presented in paragraph 27 above, if agreed by the Board, should also apply to the issuance process regarding processing requests for issuance.

### **3.4. Simplifying the registration process for automatically additional project types**

#### **Issue summary**

31. Currently, the majority of time in processing a request for registration is spent on the assessment of additionality and baseline of the project activity in the request, and the reasons for review and rejections of most requests have been on these issues. In comparison, when a project activity implements a technology that is deemed automatically additional, the assessment timeline is largely reduced and, if used in combination with a pre-approved baseline, it can drop further. Moreover, such project activity has a low risk of compromising environmental integrity and therefore could be subject to simplified validation checks.
32. The Board has identified technologies and conditions with which a project activity can be deemed automatically additional, in so-called “positive lists”.<sup>11</sup> It also introduced a

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<sup>10</sup> Decision 3/CMP.6, paragraph 56. This rule applies to the cases where the project activity has been registered automatically (i.e. without having being placed under review by the Board).

<sup>11</sup> See the “Methodological tool: Demonstrating additionality of small-scale project activities” and the “Methodological tool: Demonstrating additionality of microscale project activities”.

procedure for proposing and approving a microscale renewable energy technology that confers automatic additionality to a project activity that applies the technology.<sup>12</sup> The Board further developed a procedure for developing and approving a standardized baseline.

33. The Board, at EB 86, supported the direction in the proposal presented for that meeting, but requested the secretariat to prepare a revised proposal, by limiting the scope of analysis to shortening the timeline of the registration process and to simplifying validation requirements, including on-site inspections for these project types.

### **Proposed solution (revised)**

34. In addition to the operational efforts in processing requests for registration as proposed in section 3.3 above, requests for registration of project activities that are deemed automatically additional and apply an approved standardized baseline<sup>13</sup> could be processed faster in practice supported by a simpler checklist. Such a treatment should be introduced as an operational practice rather than creating a separate process with different timelines, since the latter would require a different IT workflow and make the administration of the entire CDM registration process complicated.
35. Also for this type of project activities, validation requirements regarding baseline setting and additionality could be simplified to confirming the eligibility of the project activity. An on-site inspection at validation stage could also be made optional for this type of project activities. All in all, the time and cost required for validation for this type of project activities should be less than other types.

## **3.5. Allowing a DOE to perform both validation and verification for the same project activity**

### **Issue summary**

36. Currently it is not allowed for a DOE to conduct both validation and verification functions for the same project activity unless it is a small-scale project activity or the Board allows the DOE to do so based on individual requests. In the latest revision of the PCP, the Board made this process more transparent, by clarifying the steps and the information to be provided for permission requests and decisions. Also, while “validation functions”

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<sup>12</sup> “Procedure: Submission and consideration of microscale renewable energy technologies for automatic additionality”.

<sup>13</sup> The conditions for deeming a project activity eligible for the simplified treatment under this section could be the following (the conditions can be further elaborated and expanded as appropriate):

- (a) The technology/measure qualifies for automatic additionality as it is included in the positive list of technologies for additionality specified in:
  - (i) Tool for demonstration of additionality of small-scale and/or microscale project activities;
  - (ii) Technology as approved by the Board;
  - (iii) Applied methodology; or
  - (iv) Standardized baseline; and
- (b) The applied methodology or the standardized baseline or combination of both provides a specific baseline and baseline emission factor for the project technology/measure.

include validations for registration, post-registration changes, renewal of crediting period, and inclusion of CPAs in a PoA, the Board has already exempted validation for post-registration changes from this restriction (i.e. the Board's permission is not required to conduct verification for the project activity for which it has conducted validation for post-registration change).

37. While this restriction, derived from a CMP decision,<sup>14</sup> appears to be intended to mitigate the risk of partiality of DOEs in their validation and verification activities, it is still not clear under what circumstances such risk could be regarded minimal, and hence permission should be granted. Also, the current regulations do not explicitly refer to all cases under various possible scenarios whether the permission process also applies to those cases (e.g. the opposite sequence cases where a DOE has performed verification first, then wishes to perform validation, or the cases where a DOE wishing to perform verification has not performed validation for the latest renewal of crediting period, but has performed the initial validation or validation for previous renewal of crediting period). In the case of PoAs, the existence of different CPAs under a PoA makes this issue even more complicated.
38. At the same time, the CDM accreditation standard has placed various requirements upon DOEs to safeguard impartiality in their validation and verification activities in general, without which an entity cannot be accredited to perform as a DOE under the CDM. The requirements to safeguard impartiality and prevent conflict of interest are extensive and the key requirements are contained in the CDM accreditation standard. DOEs are scrutinized in this aspect not only before but also after accreditation through various accreditation assessments.
39. Based on the above, it is apparent that there is a need to clarify and, if appropriate, simplify or streamline this rule.
40. The Board, at EB 86, agreed to maintain the general principle that a DOE may perform either validation or verification/certification function for the same project activity (except for small-scale project activity) or PoA, but examine specific conditions under which a DOE may perform both functions and, as appropriate, any changes needed to the relevant provisions in the CDM accreditation standard, as a joint recommendation of the secretariat and the CDM Accreditation Panel (CDM-AP).
41. Based on this, the secretariat consulted with the CDM-AP on this issue at its seventy-third and seventy-fourth meetings. Upon the request from the CDM-AP, the secretariat conducted and presented to the CDM-AP an analysis on the added-value of having different DOEs doing validation and verification and on the quality of DOE work in the cases where the same DOE performed both validation and verification for the same small-scale project activity.

### **Proposed solution**

42. Automatically allow (i.e. without the necessity of receiving permission from the Board) a DOE to perform both validation and verification functions for the same project activity of any scale or for the same PoA, regardless of the past validation or verification history for the project activity or PoA.

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<sup>14</sup> CDM modalities and procedures, paragraph 27(e).

43. The joint recommendation of the CDM-AP and the secretariat presented in paragraph 42 above is based on the findings by the secretariat that:
- (a) Based on interviews with relatively active DOEs, it is very rare that a DOE performing a verification has found errors in the validation done by a different DOE for the same project activity, therefore the perceived benefit of having a “different eye” of a different DOE is actually very small;
  - (b) Based on the analysis of past cases, there is no evidence that the quality of validation or verification might have been compromised due to a same DOE having performed both validation and verification for the same small-scale project activity.

## **4. Impacts**

44. The proposals in this concept note pertain to various stages of the CDM project cycle and aim to reduce transaction costs encountered by largely reducing the process time and increasing the flexibility of CDM regulations. The proposed revised solutions in this concept note are part of a larger package of proposals which, when combined, would have a positive impact on the overall cost and time reduction and the uptake of the CDM.

## **5. Subsequent work and timelines**

45. Subsequent work under this project includes the preparation of the third batch of revised proposals for simplification and streamlining of the CDM. The revised proposals to be included in the third batch relate to the original proposals of:
- (a) Revising rules for generic CPAs and specific-case CPAs;
  - (b) Simplifying re-inclusion of excluded CPAs or qualifying them as single CDM project activities;
  - (c) Allowing a DOE to perform both validation and verification for the same project activity.
46. A revised proposal relating to the original proposal of “Expanding the application of the concept of materiality to validation” will be developed separately from the third batch, as it would require deep analysis and innovative deliberations, possibly involving external expertise.
47. Once the Board agrees on the direction of all proposals for simplification and streamlining of the CDM, the work of reflecting them in CDM regulatory documents will follow. This work will be done in conjunction with the development of stand-alone regulatory documents on PoAs as mandated by the CMP at its eleventh session.<sup>15</sup>
48. All in all, it is expected that the first drafts of revised CDM regulatory documents will be presented to the Board mid-2016.

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<sup>15</sup> Decision 6/CMP.11, paragraph 18.

## **6. Recommendations to the Board**

49. The secretariat recommends that the Board agree on the revised proposals for simplification and streamlining of the CDM presented in section 3 above.

## Appendix . Input from stakeholders

1. Based on the request from the Board as agreed at its eighty-seventh meeting, the Project Developer Forum provided the following input regarding possible streamlining of the registration process:

*“The current registration process - and similar the issuance process - is unreasonably long and unpredictable due to the scheduling time in the beginning and the remedy processes if a mistake is detected.*

*We propose reducing the total time needed for the checks by the UNFCCC from about three months to 28 days. As individual steps are already tightly budgeted this would mean either merging or skipping steps. More effectiveness could be reached by merging CC and IRC into a single step whilst allowing project participants and DOEs to respond quickly in case minor issues are raised regarding completeness without having to move back to scheduling again. Also the time demanded for scheduling and review could be integrated into this step, which would then define a maximum duration for the time from uploading until the start of the review period. While it may seem that the duration of the UNFCCC’s review process has no cost impact, a longer process time:*

- takes away flexibility in following and responding to changing market prices;*
- increases risks for further delay due to the expiration of the validity date of versions of methodologies, forms or standards; and*
- affects the attractiveness of the CDM.*

*The EU ETS runs some automatic checks at submission and performs further checks only when peculiarities occur along these automatic checks. These checks do not cause any delays because if mistakes in the emission reports are detected the installation has to correct these mistakes and surrender the according certificates. As the CDM became more mature over the time and DOEs have been trained and properly accredited it may be the time now to give responsibilities back to the DOEs and really focus on supervision and sample checks instead of detailed checks. In this case 28 days would be more than sufficient.*

*Timelines in the CDM were set at a time when a large number of projects entered the pipeline, which is not the case today. Therefore the shortening of the process, e.g. by merging CC and IRC, may well be feasible without requiring additional resources at the UNFCCC secretariat. Please see also the concept note CDM-EB84-AA-A01, where a lot of suggestions have been made for the simplification especially of the registration timeline.*

*Besides the procedures we think it is also important to have sufficient trained staff and a working IT. Some of our members reported that recently many processes are delayed and mistakes are happening due to IT issues resp. new and unexperienced staff.”*

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### Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	22 February 2016	Initial publication as an annex to the annotated agenda of EB 88.
Decision Class: Regulatory		
Document Type: Information note		
Business Function: Issuance, Registration		
Keywords: management of official documentation, streamline		