

DOE/AE Forum | *Werner Betzenbichler* | *April 2011*

EB-60

Relations with Designated Operational and Applicant Entities

# Topics

- Inputs to EB-60
- AP interaction
- Review of the CDM MAP 2011
- Comments to the annotated agenda

## Inputs to EB-60

- 3 inputs made via dedicated upload tool since EB-59
  - Suggestion for Changes in Procedures to be applied before Requesting Issuance
  - CDM Accreditation Standard
  - Outstanding update of the tariff list

## **AP interaction**

- The DOE/AIE Forum welcomes the recommendations made by the AP on direct interactions with the DOE/AIE Forum
- The DOE/AIE Forum looks forward to having the suggested discussion on scarcity of qualified personnel in complex technical areas at the next AP meeting (if accepted by the Board)
- The DOE/AIE Forum requests to include furthermore the issues of “AT calibration” on the agenda of the envisioned interaction; we intend to present results of an internal survey on this topic by that point in time

## Review of the CDM MAP 2011

- *“introduce appropriate incentives for improving the quality of submissions from DOE” (para. 6)*

The DOE/AIE Forum wants to raise concerns on the tendentious mindset in such expressions which leave the impression that measures for quality improvement have to be placed at DOE level exclusively

More important from DOE's perspective:

- reducing ambiguity
- calibrate all actors for a common understanding
- respect each others competences and capabilities

## Review of the CDM MAP 2011 (cont.)

- The DOE/AIE Forum welcomes all the identified objectives
- Question mark behind balance in objective
  - “1 a) Review the CDM operations and develop innovative measures for improving efficiencies in its process cycle”*
  - 86 % of time efforts to be spent on quality assessments (projects and DOEs)
  - <2 % to be spent on standardized templates and digitized project information
  - perceived as disproportionateness as the later has a large potential to deliver greater efficiency

## Review of the CDM MAP 2011 (cont.)

- Timelines under “*Objective 3 – Improved objectivity, clarity and integrity in the CDM*”, which includes VVS, Standards for PoAs, Standard for Project Participants
  - most targets towards end of the year
  - implementation will require several months of internal trainings or trainings by secr. in workshops --> will run in 2012
  - with regard to expected supply shortfalls in 2012 an earlier enacting of whatever possible is considered favorable

## Review of the CDM MAP 2011 (cont.)

- Strong concern on missing item in “*Objective 3 – Improved objectivity, clarity and integrity in the CDM*”
  - appendix 1 (activities) makes reference to Para 25 of the CMP guidance (significant deficiencies, DOE liability) and indicates that this is reflected objective 3b (i)
  - no further reference to these issues within table 3
  - key issue for DOEs/AEs
  - we see the need for allocating resources within the secr. for identifying solutions within this year --> we will offer our suggestions by EB-61 (or should input be given to AP?)

## Review of the CDM MAP 2011 (cont.)

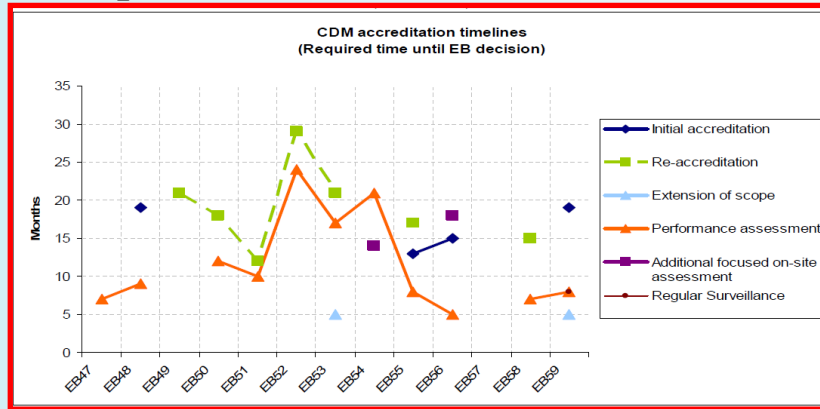
- *“Objective 4 – Enhanced Transparency of the CDM”*
  - The DOE/AIE Forum welcomes the post-EB conference calls arranged by the UNFCCC secr.
  - The DOE/AIE Forum requests to establish direct communication on project-specific issues which is not yet reflected in the MAP **(but in annex to annotated agenda)**
  - potential for time savings at all sides without losses in transparency

# Comments to the annotated agenda

- Methodologies & SSC activities: expected new sampling guidance & reported difficulties in the application of sampling procedures
  - Reminder that training for “calibration of understanding” in new guidance is required for all involved parties that assess project documentation
- Registration & Issuance (Requests for Review & Rejections)
  - Still more than 60% of RfR belong to Chinese Wind and Hydro Power Projects
  - Differences in proposed decisions (therefore decision by Board) show urgent need of further guidance

# Comments to the annotated agenda (cont.)

- Compliance with indicated timelines



- Concerns on timeframe and belonging internal efforts
- Inherent potential of de-linking decision context and recent situation
- Request to discuss options for improvement
- Request of considering longer re-accreditation intervals

## Comments to the annotated agenda (cont.)

- Annex 11: measures to enhance communication with stakeholders
  - We look forward to being informed on topics to which the Board would like to views of the AEs/DOEs (para. 19)
  - Request to fix second AP meeting for “regular” interaction in 2011 latest at AP-54 (para. 21)
  - Requests a second round of regional calibration workshops to be completed in 2011 after release of the VVS (para. 24)
  - The DOE Forum welcomes the recently improved communication lines on non-case specific submissions (para. 41 and para. 42)
  - The DOE Forum misses the objective to allow better understanding by RIT and secretariat staff in case-specific submission (para. 51)
  - The DOE Forum expresses concerns that fast solutions are only offered to minor editorial issues based on a classification done beforehand

## Comments to the annotated agenda (cont.)

- Annex 11: measures to enhance communication (cont.)
  - Inconsistency with regard to the requirement of communication via the focal point and the fact that this person is not determined when requesting deviation from an approved methodology (para. 60)
  - Not clear in which cases secretariat will initiate communication prior to decision making --> essential step (para. 61)
  - Missing communication by secretariat for discussing technical issues, unidirectional set-up (table)
  - 36 h reaction time for DOEs/PPs is too short, considering weekends, holidays, global coverage ( table)

direct communication delivers feedback to all involved parties

**Thank you for your attention!**

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on behalf of TÜV NORD

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