

	<p>- takes away flexibility in following and responding to changing market prices;</p> <p>- increases risks for further delay due to the expiration of the validity date of versions of methodologies, forms or standards; and</p> <p>- affects the attractiveness of the CDM.</p> <p>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 DOE's and really focus on supervision and sample checks instead of detailed checks. In this case 28 days would be more than sufficient.</p> <p>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.</p> <p>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.</p>
<p>Supplemental Documents If applicable, list the title(s) of any attached file(s) or link(s)</p>	
<p>This communication may be made public</p>	<p>Yes</p>

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Document information

Version	Date	Description
01.0	02 March 2015	<p>This form supersedes and replaces the following:</p> <ul style="list-style-type: none"> • F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2) • F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1) • CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)

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