



**United Nations**  
Climate Change Secretariat

**Nations Unies**  
Secrétariat de Changements Climatiques

Ms. Eva Filzmoser  
Programme Director  
CDM Watch  
26 rue d'Edimbourg  
B-1050 Brussels, Belgium  
*Sent by e-mail to: [Eva.Filzmoser@cdm-watch.org](mailto:Eva.Filzmoser@cdm-watch.org)*  
*CC: [info@cdm-watch.org](mailto:info@cdm-watch.org)*

Date: 20 December 2011  
Reference: 63-1  
Direct line: +49 228 815-1687

**Re.: Clarifying requirements that stipulate who is allowed to make submissions for revision and clarification requests of approved methodologies**

Dear Ms. Filzmoser,

Thank you for your letter dated 22 June 2011, which has been made available to the CDM Executive Board. On behalf of the Chair of the Board, please accept my apologies for the delayed response.

I inform you that the current "Procedures for the submission and consideration of requests for revision of approved baseline and monitoring methodologies and tools for large scale CDM project activities" provide that, other than the Executive Board, the Meth Panel and the secretariat, revisions can be initiated by requests for revision submitted by project participants through DOEs. The procedure, therefore, does not provide for such requests to be submitted by DOEs on their own behalf or on behalf of anyone other than project participants.

The "Procedure for the submission and consideration of queries regarding the application of approved methodologies and methodological tools by designated operational entities (DNA) to the Meth Panel", on the other hand, provides that such requests can be submitted, first and foremost, by DOEs (paragraph 1). Project participants might also seek clarifications but they would have to do so through a DOE who determines whether to forward the request to the secretariat (paragraph 2). This procedure therefore indicates that it is at a DOE's discretion whether or not to make a request for clarification. Such discretion can be exercised regardless of how the issue originally comes to the attention of the DOE, because, unless it does so on behalf of project participants, the DOE would be seeking clarification from the Meth Panel on its own behalf.

On the contrary, the current "Procedure for the submission and consideration of request for clarification on the application of approved small scale methodologies and the Procedures for the revision of an approved small scale methodology by the Executive Board", explicitly mention that project participants, DOEs, DNAs or stakeholders may submit a request for revision/clarification of approved small scale methodologies.

As you mention in your letter, the Board has requested the secretariat to propose a clarification to the procedures for revision of approved methodologies regarding the requirements on the nature of the entity which may request revision. The secretariat will report back to the Board on this issue at a future meeting. In this context, we will duly inform the Board of your comments.

In addition, the secretariat has developed a commenting system, which is available at <https://cdm.unfccc.int/methodologies/PAmethodologies/approved> (large scale methodologies and tools) and at <https://cdm.unfccc.int/methodologies/SSCmethodologies/approved> (small scale methodologies and tools), in order to allow the submission and to consider comments from any stakeholder registered in the UNFCCC CDM website.



Page 2

Comments can be submitted on any of the approved methodologies and tools (large scale, small scale and A/R). The comments received are first assessed by the secretariat. The comments are considered following the Board's priorities for revision of methodologies, when methodology revision/editorial improvements are initiated by the secretariat, or when a methodology is revised anyhow.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Howard'. The signature is fluid and stylized, with a large initial 'A' and 'H'.

Andrew Howard  
Secretary to the CDM Executive Board