

CDM Executive Board  
Martin Luther King Strasse 8  
P.O. Box 260124  
D-53153

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

22 June 2011

Dear Mr Hession,

Over nine months ago, in late summer 2010, CDM Watch made two submissions to the Secretariat:

- 1) A request for clarification of the approved methodology AM0001 "Use of historical data if the key components of HCFC-22 plants have been retrofitted or replaced" (AM\_CLA\_0191) was formally accepted by the Secretariat on 13 September 2010. However, the Meth Panel has so far not addressed the issue. Paragraph 17 of the annotated draft agenda of the 61th CDM Executive Board meeting stated "*The Board may wish to take note that Meth Panel could not conclude its consideration of request for clarification AM\_CLA\_0191 due to time constrains*".
- 2) A request for revision of ACM13 "Amendment of the methodology to account for the vintage of data used" submitted on 27 August 2010 was rejected by the Secretariat stating that the revision request cannot be considered by the Meth Panel (without providing any further explanation).

At its 55<sup>th</sup> meeting in July 2010, the Board announced to clarify the requirements that stipulate who is allowed to make such submissions (55 EB meeting report, para 26) and requested that the Secretariat to prepare a clarification on this. We were further informed that the discussion on this matter was scheduled to take place at EB58. However, the Board has not yet discussed the issue and the Secretariat informed us that it is of the view that it should wait until the Board provides clear guidance on how to proceed.

We therefore urge you as the Chair of the CDM Executive Board to place this issue on the agenda of the upcoming 62<sup>nd</sup> Board meeting with the aim to clarify who can make clarification requests and revision requests. We further highlight that such submissions must be allowed from all stakeholders and not just from project participants in order to restore trust and credibility in the CDM as a climate mitigation mechanism. A limitation would undermine the balance and integrity of the CDM. As both of our submissions show: well researched and substantiated submissions from parties with no financial interest in projects provide much needed input to close loopholes in existing methodologies. Given the relevance of our submissions, we urge the Board to address the flaws that we have detected in AM0001 and ACM13 with no further delay.

Yours sincerely,



Eva Filzmoser  
Programme Director CDM Watch