





## CLIMATE FOCUS

We would like to raise two issues that we see as problematic in the current practice of methodology assessment:

- *Lack of planning security and the risk to be caught in an endless loop of (new) questions.* Currently there is a continuation of raising new questions and queries in each review and assessment round. The number of review cycles is unlimited. This situation results in an undefined period of legal and planning insecurity in which project participants have (i) to retain resources to answer new questions, and (ii) no indication on whether they can move ahead with the development of the corresponding CDM project activities. In addition, it is not always clear whether the WG has accepted an answer provided by the project participants. Instead, the WG often introduces new and unrelated comments in the group's subsequent meetings that have not been raised on first discussing the methodology.  
⇒ **We recommend that approval of a methodology be made contingent on the satisfactory answer to queries raised during the first round of assessment by the SSC WG but that no new comments are raised following subsequent assessment rounds.**
- *Lack of direct communication between the author of a methodology and the assessors of the methodology.* Currently all communication between the WG and the developer of the methodology is in written form. This causes loss in efficiency in the communication, occasional misunderstandings and a disregard for the practical implications of certain rulings. Consequently the proponent of a methodology experiences frustration related to the inability of clarifying the underlying arguments of the methodology directly to the reviewing experts.  
⇒ **We propose that the author of the methodology receives the opportunity to participate in a full hearing in the WG.**

Understanding that the assessment of SSC projects does not follow the same formal procedure as regular size projects we would like to encourage the SSC WG to use the given flexibility wisely. The flexibility should allow the WG to promote small scale CDM projects which inherently face greater development hurdles and relatively higher transaction cost than regular size projects. It should not lead to a lack of planning security for project proponents but be used to promote a more efficient communication and a greater level of interaction between methodology developers and lead assessors.

Please accept our comments in light of a constructive input into the process.

Kind regards,

Climate Focus,

Sandra Greiner

Adriaan Korthuis