




F-CDM-RtB

 CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1) <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder ¹ submitting this form (individual/organisation):	Project Developer Forum [Redacted]
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: Rachel.child@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Response to reply from Andrew Howard on PD Forum letter entitled “Prior consideration issues following EB60 discussions”
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify PD Forum
Specify whether you want the Letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Purpose of the Letter to the Board: Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission)	
<input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> Request Clarification <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input checked="" type="checkbox"/> Guidance. Please specify reference assessment of prior consideration of the CDM <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference </div> <div style="text-align: center;"> <input type="checkbox"/> Revision of Existing Rules Guidelines for the demonstration and </div> </div>	
<input type="checkbox"/> Type II: Request for Introduction of New Rules	
<input type="checkbox"/> Type III: Provision of Information and Suggestions on Policy Issues	
Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	

¹ Note that DNAs and DOEs shall not use this form to submit letter to the Board.

² Note that the Board may decide to make this Letter and the Response publicly available

**PROJECT
DEVELOPER
FORUM**

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To cdm-info@unfccc.int
From rachel.child@pd-forum.net
Date 24 Jan 2012
Subject **Thank you – Re.: Prior consideration issues following
EB60 discussions**

Dear Mr. Howard,

The Project Developer Forum (PD Forum) would like to thank you for the clear and comprehensive response to our submission. This letter addresses each of the points raised by us clearly, with the answers able to be applied directly in the validation and registration process. The PD Forum appreciates the time taken to respond.

While we appreciate the overall response, we are disappointed by the interpretation of the required format of the prior notification governed by version 01 of the guideline. As explained previously, some project developers took both the request for host country approval and the publication of the PDD for global stakeholder consultation as a notification in the absence of an unambiguous definition, in particular because this complies with the conceptual underpinnings of the requirement to notify the intent of the project of aspiring CDM registration, because:

- an official third party, part of the UNFCCC infrastructure, is engaged, the DOE;
- all project information, required by the prior consideration form, is included in the published PDD;
- the intent to achieve CDM status is made, and related costs are incurred; and
- publication of the PDD for global stakeholder consultation or a proposal for a new methodology prior to the project start date is already considered to be proof of prior consideration (para 2).

We would request that the EB further consider this point and are happy to discuss this further,

With kind regards,

Rachel Child
Co Vice Chairperson of the PD Forum



Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).	
[replace this bracket with text, the field will expand automatically with size of text]	
If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> [replace this bracket with text, the field will expand automatically with size of text]
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	26 February 2012
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History of document

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		