




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
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +44 (0)20 7121 6100 E-mail Address: Rachel.child@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Effective registration date / timeline for issuance
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="border: 1px solid black; padding: 2px;"><input type="checkbox"/> Request Clarification</div> <div style="border: 1px solid black; padding: 2px;"><input checked="" type="checkbox"/> Revision of Existing Rules</div> </div> <ul style="list-style-type: none"> <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <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/revise 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

Project Developer Forum Ltd.
100 New Bridge Street
UK London EC4V 6JA

Europe: +44 (0)20 7121 6100
Asia: +65 6578 9286
Americas: +1 321 775 4870
office@pd-forum.net
www.pd-forum.net

CHAIRMAN: Gareth Phillips
t: +65 65789286
e: office@pd-forum.net

To cdm-info@unfccc.int
From rachel.child@pd-forum.net
Date 16 April 2012
Subject Effective registration date / timeline for issuance

Honorable Members of the CDM Executive Board,
Dear Mr. Duan,

We appreciate the acknowledgement of the tight schedule to register projects by the end of this year to ensure eligibility of credits into the EU ETS and especially want to support all efforts by the Secretariat to comply with the timelines for the scheduling of completeness checks.

However, to reduce the time pressure for all parties involved, we would like to suggest a new definition of the effective registration date and separation of the effective registration date and the start date of the crediting period.

Currently, the effective registration date is defined as the first complete submission of a request for registration. As a result, for projects submitted for registration later this year, questions raised during completeness check or information and reporting check or if a review is requested may not give sufficient time to re-submit before 31/12/2012. The resubmission of the request for registration, responding to the questions raised, may mean that the project meets CDM requirements and can be registered. However, by this point, it may be too late for the credits to be eligible for sale into the EU ETS; thereby discriminating projects that are submitted late this year.

We would like to suggest therefore that the definition of effective registration date is defined as the date of the first submission. Further, we would suggest that the date of the first complete submission determines the start date of the crediting period. In this way, projects that are submitted later this year but which still meet CDM requirements are not discriminated against; while the incentive to submit good quality project documentation remains.

On a related point, we would also like to highlight that many project developers are bound contractually to deliver CERs from the first commitment period (ending on 31/12/2012) by 30/04/2013, as this is the deadline to surrender carbon credits in the European ETS phase 2, the main market for CERs.

This means that for these projects, the CERs from the last months of CP1 have only 120 days from publication of the monitoring report to issuance. Considering that some time is needed for the finalisation of the monitoring report in beginning of January and some time is needed for delivery from the UN registry into the national account, the total time available will be less than 120 days. For those projects that need to wait for invoices to evidence emission reductions or collect data from measurement campaigns, the timeline is even more challenging.



The EB may want to consider therefore not only sticking to the timelines previously set but to reduce the timelines for issuance if the monitoring period covers the 31/12/2012 period. We are convinced that the information and reporting check and the request for review period could be halved without putting environmental integrity at risk, at least for those projects not requesting any revision or deviation or having performed at least one verification before.

Your consideration of these suggestions would be very welcome and we would of course be available to discuss them further with you,

With best wishes,

Rachel Child

Co Vice-Chair, Project Developer 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)

- [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

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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		

