



**CDM: FORM FOR SUBMISSION OF A "LETTER TO THE BOARD"  
(Version 01.2)**

This form should be used only by project participants and other stakeholders for submitting a "Letter to the Board" in accordance with the latest version of the *Modalities and procedures for direct communication with stakeholders*

Name of the stakeholder <sup>1</sup> submitting this form (individual/organization):	World Bank Carbon Finance Unit
Address and contact details of the individual submitting this form:	Address: 1818 H Street N.W. Washington, D.C. 20433, USA Telephone number: (202) 473-6363 E-mail address: koppermann@worldbank.org
Title/Subject (give a short title or specify the subject of your submission)	Registration procedures for Project Activities under VVM and expiry of methodologies
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Multilateral Development Bank
Specify whether you want the letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below <sup>3</sup> to describe the purpose of this submission.	
<input checked="" type="checkbox"/> <b>Type I:</b> <input type="checkbox"/> <b>Request for clarification</b> <input checked="" type="checkbox"/> <b>Revision of existing rules</b> <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference      Procedures for Requests for Registration of proposed CDM project activities (V.2)" (EB 59, Annex 12); and Procedures for Registration of a Programme of Activities as a single CDM project activity and Issuance of Certified emission reductions for a Programme of Activities <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference  <input type="checkbox"/> <b>Type II: Request for Introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

<sup>1</sup> DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

<sup>2</sup> As per the applicable modalities and procedures, the Board may make its response publicly available.

<sup>3</sup> Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html>.

&gt;&gt;

Dear Members of the CDM Executive Board,

We would like to express our concern regarding unclear practices for the interpretation of the registration procedures for project activities submitted under the VVM rules and procedures, and the expiry of methodologies after the resubmission of documents attending to an incomplete message from the secretariat.

Within the procedures under the VVM the relevant paragraph on this issue is on the "Procedures for Requests for Registration of proposed CDM project activities (V.2)" (EB 59, Annex 12), para.15, and it says:

"(...) If the request for registration does not meet the requirements of the information and reporting check, then upon submission of the revised documentation the request for registration *shall be treated as a new submission* of a request for registration." (emphasis added)

However we have found that this last clause is quite unclear for all, including DOEs, as there are mixed opinions between DOEs if the methodology version needs to be updated on the projects documentation after there is an incomplete message which does not ask for the update of the methodology on the projects documentation.

Some DOEs are of the opinion that the version of the methodology does not have to be updated unless the incomplete message specifically asks for it.

However, some projects that we have been involved with have received a second incomplete message, this time requesting the update of the methodology, even though the resubmission after the first incomplete message was addressed in less than 48 hours. This has brought significant delays and negative impacts on projects.

Moreover, one DOE informed us that it tried to update the version of the methodology after receiving the first incompleteness message, but could not because any attempt to do so generated an inconsistency on the interface where the project documentation needed to be uploaded; the interface did not allow changing the version of the methodology when resubmitting.

We would like to point out the critical importance of the remaining months in 2012 for the eligibility of credits under the EU-ETS, and the impact and frustration it would bring for project entities that have been undergoing the validation and registration process under the CDM for years, if they were to miss the 2012 deadline for registration due to delays resulting from the need to change the version of the methodology being used when resubmitting after receiving an incompleteness message, while many other projects similarly submitted initially before the expiration of the methodology have been registered.

We kindly request the Board to grant an exemption up to the end of 2012 for those project activities that are resubmitting their documentation addressing the concerns of the secretariat on an incomplete message, and allow them to resubmit only addressing those issues requested by the secretariat with the version of the methodology and tools with which it was initially submitted.

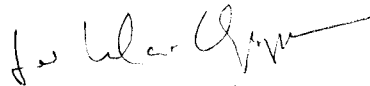
Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

>>

We would therefore request that project activities that submit or have submitted their documentation for registration be allowed an exemption up to the 31<sup>st</sup> of December 2012 to continue the registration process with the version of the methodology applicable at the time of the initial submission, so that they can reach the registration milestone before the end of 2012 if all substantive points raised by the secretariat are addressed.

We thank you for your consideration,

Yours Sincerely,



Joelle Chassard  
 Manager  
 Carbon Finance Unit

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**

Date when the form was received at UNFCCC secretariat	24 October 2012
Reference number	2012-180-S

-----

**History of document**

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		