




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>	
<i>Name of the stakeholder¹ submitting this form (individual/organisation):</i>	Ms. Lisa Jacobson Business Council for Sustainable Energy (BCSE)
<i>Address and Contact details of the individual submitting this Letter:</i>	Address: 1620 I Street NW, Suite 501, Washington, DC 20006 USA Telephone number: +1 202-785-0507 E-mail Address: ljacobson@bcse.org
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	BCSE Response to Call for Inputs on CDM Policy Dialogue
<i>Please mention whether the Submitter of the Form is:</i>	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify Business Trade Association
<i>Specify whether you want the Letter to be treated as confidential²:</i>	<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 type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Request Clarification <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 </div> <div style="text-align: center;"> <input type="checkbox"/> Revision of Existing Rules </div> </div>	
<input type="checkbox"/> Type II: Request for Introduction of New Rules	
<input checked="" type="checkbox"/> Type III: Provision of Information and Suggestions on Policy Issues	

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



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).



RE: Call for inputs on CDM policy dialogue (http://cdm.unfccc.int/public_inputs/2011/eb64_02/index.html)

The Business Council for Sustainable Energy (BCSE, the Council) thanks the Clean Development Mechanism Executive Board (CDM EB, the Board) for the opportunity to provide input ahead of the CDM Policy Dialogue tasked with reviewing past CDM experience and helping ensure the readiness and positioning of the CDM to meet the challenges of the post-2012 period. The Council supports the mission of the Policy Dialogue and commends the Board for initiating this stakeholder process.

The BCSE is a United States-based business organization representing interests from the energy efficiency, natural gas and renewable energy sectors. The Council also includes independent electric power producers, investor-owned utilities, public power, commercial end-users and project developers and service providers for environmental markets. The BCSE was founded in 1992 and advocates for policies at state, national, and international levels that increase the use of commercially-available clean energy technologies, products, and services.

As BCSE is a diverse coalition, not all BCSE members endorse or take positions on the issues included in these comments. These comments represent the position of BCSE as an organization, but not necessarily the view of any particular member with respect to any specific issue.

Ahead of the CDM Policy Dialogue, the Council offers four recommendations:

1. Maintain the environmental integrity of the CDM;
2. Look for innovative approaches to make the CDM more efficient and to reduce transaction costs;
3. To the extent possible and given the high costs of approving new methodologies, consider approaches to utilize existing methodologies to lower costs;
4. Look to other models and programs from around the world for new and successful approaches to managing high quality carbon offsets programs at low cost.

Environmental Integrity

The BCSE has long-supported carbon offset programs that facilitate emissions reductions that are cost-effective and efficient can help promote technological innovation, encourage participation of non-capped sectors and activities, lower costs for consumers, and generate immediate environmental benefits. An emphasis must be placed on the environmental integrity of all CDM projects and methodologies to ensure real emissions reductions and confidence in the larger program. The Policy Dialogue should maintain as a priority the environmental integrity CDM projects and the CDM mission as a whole.

Innovative Approaches

A more efficient transaction process will lead to greater emissions reductions at lower cost. The Policy Dialogue should focus attention at increasing the efficiency of the CDM transaction process, searching for new and innovative organizational structures, approaches, and other actions that could streamline administrative functions and timelines without impacting environmental integrity.

Utilizing Existing Methodologies to Lower Costs

Approving new methodologies is a costly process that, at times, can limit the development of cost-effective emissions reductions. Where reasonable, minor alterations to existing methodologies or development of new methodologies that build from or incorporate components of existing methodologies should not require a complete reevaluation of those unchanged elements that have already been vetted by the CDM approval process. The Policy Dialogue should consider possible ways to better utilize existing sound methodologies or components of methodologies to streamline the approval process for new or modified methodologies while maintaining environmental integrity.

Look to Other Models Around the World for Innovative Ideas

As more nations, provinces, and states adopt and build-out programs to combat climate change, many new and potentially useful approaches are being developed, including novel offset methodologies, organization mechanisms, and other important components of a successful carbon offset program. The BCSE encourages the CDM to review, evaluate and, where appropriate, draw from these efforts occurring around the world.



Please use the space below to 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).	
If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> • Not applicable
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	

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		