

Public Communication to the Chair of the Executive Board

16 Mar 2011

The Chair of the CDM Executive Board

c/o UNFCCC Secretariat

Martin Luther King Strasse 8

D-53153 Bonn

Germany

Sub: Feedback regarding the Direct Communication between stakeholders and the EB

Dear Sir,

We would like to appreciate the Board for its continuing efforts to improve the CDM process. We would like to humbly submit the following for the consideration of the Board:

Point 1: Hyper-conservative interpretation of some of the guidelines by the DOEs

Though the various CDM guidelines and Tools are helpful for a DOE in validation, their interpretation is left to the DOEs. Further, some of the aspects are still left to the subjective decision of the DOE.

Many of the DOEs are too narrow and hyper-conservative in their interpretation of the CDM guidelines due to the fear of "Review Requests" and subsequent spot checks. This results in hurdles to many eligible CDM projects.

For example, during the verification of a project activity, one of the monitoring parameters needed a “Request for Deviation” and one other parameter needed a “Request for Revision in the Monitoring Plan”. In this scenario, the DOE insisted that first a “Request for Deviation” be taken and after which a “Request for Revision” shall be applied.

As per available guidance, only a “Request for Revision” is sufficient to cover both the parameters. However, due to the wrong interpretation of the DOE, the project participants had to spend an additional time of 6 months to commence the verification. This is typical case of time wastage for the UNFCCC, DOE and the PP. We fail to understand whether this a “gimmick” of the DOE to extract “additional fee” from the PP or to delay the process due to their internal lack of resources to complete the tasks.

Time delay by validators, mainly for Technical Review:

For many projects, the time taken by the DOEs for “technical review” is between 3 months to 6 months and as high as one year for certain projects. Any question by the PP is replied as “the project is in queue”. The Pps don't have any mechanism to enforce timely delivery of the DOEs. Further, Pps are reluctant to engage in enforcing the DOEs in the fear of antagonising their projects.

- Many projects are being painfully stalled by such stand of the DOEs. Even if projects qualify as per the guidelines, they are rejected due to the narrow and hyper-conservative assumptions of the DOEs. In the absence of any procedures to appeal against such things to the UNFCCC, many projects are stuck.
- It would be helpful if a “Project Assessment Committee” is set up by the UNFCCC for Pps to directly seek clarification on such matters. Most Pps are willing to pay reasonable fees to the UNFCCC for this service if such provision is made available. This would help in allaying the fears of the DOEs and convincing them that the assumption is acceptable to the UNFCCC.

Thanking you

Yours truly,

Common Climate Experts