



	<p>steps must be taken to reduce the overall processing time for both registration and issuance requests.</p> <p>We do not agree with and are disappointed to see a number of the recommendations made. We set forth our objections to these recommendations below:</p> <p>The recommendation in paragraph 27, to “maintain the current steps and timeframe in the regulatory provisions of the PCP” should be changed. The PD Forum understands that the operational efforts suggested in the sub-items (a) to (c) are valid, but they are, unfortunately, not enough. The solutions proposed are clearly not adequate to solve the well documented and frequent delays experienced in these processes.</p> <p>The statement in paragraph 28, which suggests that merging the completeness check and the information and reporting check could delay the effective registration date in some cases, we find to be incorrect and unfounded. This statement refers to a decision by the CMP, that the effective registration date, and therefore the possible start date of the crediting period, is determined by the date on which a “complete” request for registration has been submitted by the DOE. It goes on to conclude, wrongly in our view, that “If the completeness check is merged with the information and reporting check, the deadline for determining when such a “complete” request has been submitted would be extended”.</p> <p>We say “wrongly” as it is our understanding that when a request for registration is submitted to the UNFCCC and no flaws are identified during the completeness check and the information and reporting check, which happens in most cases, the registration date of a project, a project activity or PoA is deemed to be the date on which the request for registration was submitted (i.e. before the completeness check and the information and reporting check). Therefore, the argument above regarding the extension of the deadline is not consistent with current practice or this language. The PD Forum believes that the conclusion in statement 28, is incorrect.</p> <p>The statement in paragraph 29, which concludes that reducing the nominal timeframe of each step before the process of review of a request for registration would not represent a significant gain in the overall timeframe, we find to be incorrect. The PD Forum wishes to restate emphatically our position that the total time needed for the various checks by the UNFCCC should and can be reduced from approximately three months (current average time) to 28 days (as previously stated and explained in the concept note CDM-EB84-AA-A01, as well as in the INQ-04373-T2Z2). We conclude that 28 days to complete the required checks would be more than sufficient. We understand that the final request for review period is in the majority of cases not necessary because all issues can be clarified in the steps before. Nevertheless, all projects have to wait for 28 days despite finally only a few projects get reviewed by the board. Hence, it should be possible to flag issues for review already during the 28 days during the summary note preparation and only contentious projects should then be reviewed while the unquestioned project may go directly to issuance or registration after 28 days.</p> <p>We respectfully request that the CDM-EB reconsider the recommendations noted above, taking into account the opinions expressed and supported herein by The PD Forum. Our proposed changes are intended, and we believe required, to improve the efficiency of both registration and issuance requests processes under the CDM, which shall serve as the basis for the new SDM.</p> <p>We appreciate the opportunity to provide our views, based on many years of collective experience with CDM projects around the world, to the UNFCCC Secretariat and the CDM-EB. We remain at your full disposal for further clarifications, if necessary.</p>
<p><b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p>	
<p><b>This communication may be made public</b></p>	<p>Yes</p>

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**Document information**

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<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	02 March 2015	This form supersedes and replaces the following: <ul style="list-style-type: none"><li>• F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2)</li><li>• F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1)</li><li>• CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)</li></ul>

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