

Stakeholder Communication Form

(Version 01.0)

This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.

The completed form and any supplemental documents shall be submitted electronically to cdm-info@unfccc.int, or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.

via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.			
Section 1: Communication Header			
Please provide your contact information.			
Title: Mr. First Name: Sven		Last Name: Kolmetz	
Name of Organization: Project Developer Forum		E-mail Address: sven.kolmetz@pd-forum.net	
Postal Address: 100 New Bridge Street, UK London EC4V 6JA Country: Unite Kingdom		Phone Number: 491712798223 Include country code (e.g. +49-228-815-1999)	
Stakeholder Type: Non-Gove	ernmental Organization (NGO)	If other:	
	Please indicate from whom you	would like to get an answer.	
This communication is addressed to ¹ : Chair of CDM Executive Board (normal track)			
SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (POA)			
If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).			
Project/PoA Ref. Number	5-digit# format 01234	If applicable, CPA Ref. Number: 8-digit# format 0123-4567	
Project Cycle Stage	Registration	If other:	
If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).			
Host Country(ies)	All Non-Annex I		
Project/PoA Title			
Technology Type	Other	If other: All	
SECTION 3: YOUR COMMUNICATION			
Title/Subject Maximum 250 characters	Complementary comments on Annex 4 of EB88 Agenda		
Communication Text Include background, details, and conclusion (unlimited length)	Following our previous submission (Case Reference Number: INQ-04373-T2Z2: Streamlining the registration process), we would like to present additional and complementary comments to the Call for Input on "Issues included in the annotated agenda and related annexes of the eighty-eighth meeting of the CDM Executive Board". We refer to section "3.3. Streamlining the registration process", paragraphs 24 to 30, of the "Annex 4 - Concept note: Revised proposals for simplification and streamlining of the CDM (second batch)", in which the Project Developer Forum's previous submission is presented in the "Appendix. Input from stakeholders" of the referred "Annex 4". We appreciate the opportunity given by the UNFCCC Secretariat and the CDM-EB to the Project Developer Forum (PD Forum) to express its opinions on these important procedural questions. The PD Forum welcomes and recognizes efforts by the UNFCCC Secretariat and the CDM-EB to improve efficiency in registration and issuance request processes. However, we believe additional		

¹ In accordance with the "*Procedure: Direct communication with stakeholders"* (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

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steps must be taken to reduce the overall processing time for both registration and issuance requests. 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: 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. 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". 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. 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. 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. 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.

Supplemental DocumentsIf applicable, list the title(s) of any attached file(s) or link(s)

This communication may

be made public

Yes

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Document information

Version	Date	Description
01.0	02 March 2015	 This form supersedes and replaces the following: F-CDM-RtB: Form for submission of Letters to the Board (version 01.2) F-CDM-RtB-DOE: Form for communication on policy issues initiated by AEs/DOEs (version 01.1) CDM-RtB-DNA: Form for communication on policy issues initiated by DNAs (version 01.1)
Documen Business	Class: Regulatory t Type: Form Function: Governance s: communications	

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