

We are quite optimistic that demand will raise again, simply, because for the implementation of the NDC's market-based mechanisms will be key for sourcing the required finance.

Annex 2: In line with annex 1 we are commending to this proposal. It is another excellent opportunity for the use of an existing infrastructure helping to maintain access and credibility for a future market.

Annex 6: The PD-Forum welcomes the detailed and comprehensive concept note as prepared on the CDM Loan Scheme, instead of commenting directly on this annex documentation we would prefer to make reference to our letter INQ-05169-CDM Loan Scheme – Challenges faced and constructive inputs - as previously submitted to the Executive Board on 22/08/2016.

(https://cdm.unfccc.int/filestorage/e/x/t/extfile-20160826155546285-INQ-05169_Project_Developer_Forum_FORM.pdf/INQ-05169_Project%20Developer%20Forum_FORM.pdf?t=SjN8b2QxMm9tfDCKt3T4PUUDHNE6BI_HIKpi).

Annex 7: We welcome the efforts for the revision of the PS, VVS and PCP to simplify and streamline the CDM regulations, as well as to the development of standalone PoA guidance. However, there are some paragraphs which called our attention and raised our concern that were already subject of previous comments provided by the PD Forum.

As per the PS, item "7.5.9. Timing of local stakeholder consultation", paragraph 78 (a) on page 42 of 241, states the following:

"78. The coordinating/managing entity shall complete the local stakeholder consultation process before:

(a) The start date of the PoA or CPA, as determined in accordance with paragraphs 67bis and 71bis above respectively. This condition is not mandatory for the cases where the start date is before 27 November 2015;

(b) Submitting the PoA-DD or CPA-DD of the proposed CDM PoA or CPA to a DOE for validation."

We urge the exclusion of the sub-paragraph (a), as this paragraph generates conceptual conflicts and it is irrational in terms of timeline and practices. Therefore, only the text made available in sub-paragraph (b) should apply. Please, refer to our previous submission (INQ-04392). Similarly, the same exclusion is also requested to be implemented in the VVS, paragraph 162, sub-paragraph (e), item (i), on pages 124 and 125 of 241, as it reflects the same rationale explained above.

As per the PS, item "13.1. General requirements", paragraph 239bis, on page 61 of 241, states the following:

"239bis. If the registered PoA has not proceeded with a request for issuance after two years of its registration, the coordinating/managing entity shall provide an update of the status of the implementation of the PoA in accordance with the "CDM project cycle procedure for programme of activities".

We don't support this requirement as we don't see relevance nor strong reasons for a PoA having to have a CPA performing issuance up to 2 years after the PoA registration. In many cases, projects or CPAs may take a longer period for being implemented, which are also subject of delays in their implementation and/or commencement of operation. In addition, it is usually expected to a project or CPA to start its verification at least one year after its COD (Commercial Operation Date). Therefore, such requirement only adds additional bureaucratic burdens.

According to item "13.7. Verification of implementation of registered programme of activities and monitored emission reductions or net removals", paragraph 258, sub-paragraph (b), on pages 61 of 241, states the following:

"258. The coordinating/managing entity wishing to have the GHG emission reductions or net anthropogenic GHG removals achieved by the implemented registered CDM PoA verified by a DOE shall prepare, for each monitoring period, either a single monitoring report or multiple separate monitoring reports using the valid version of the applicable monitoring report form (CDM-POA-MR-FORM) in the following manner:

(...)

(b) In the case of multiple separate monitoring reports, each CPA shall be included only in one of the monitoring reports and all the monitoring reports shall collectively contain all monitoring results of all CPAs included in the PoA (i.e. all monitoring reports shall contain mutually exclusive batches of CPAs). Also, all monitoring reports shall have the same monitoring period and the start of the first monitoring period shall be the earliest date of the crediting periods of all CPAs in the PoA;"

We request the exclusion of the last sentence as we understand that such measure would harm or prejudice the CERs generation and/or crediting period of some projects or CPAs under the same PoA. In addition, this sentence also goes against the recommendation indicated in Appendix 1, Table 1, item 9, on page 8 of 241, which states: "Providing unlimited flexibility to verification schedules for PoAs". Likewise, we also recommend the elimination of paragraph 380septies, on page 157 of 241, which states: "380septies. If the coordinating/managing entity prepared multiple monitoring reports for the monitoring period, the DOE shall confirm that all the monitoring reports

	<p>have the same start and end-dates.</p> <p>Annex 8: The PD Forum wishes to restate our position that the total time needed for the various checks by the UNFCCC 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). Please see as well our statement to Annex 4 of EB88. 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>Nevertheless, we appreciate the efforts done by the UNFCCC secretariate in the past years and acknowledge the restrictions caused by budget limits. We would like to point out that besides the timeline itself the uncertainty is a problem to investors. If we look into the pending publications for issuance requests today (02/09/2016) we see 58 projects waiting to be scheduled. The eldest is waiting since 4 weeks for scheduling. So, we would like to propose to look at possibilities to use flexible resources to at least reduce the scheduling time significantly.</p> <p>The PD-Forum would like to thank the secretariate for the continued opportunity to comment on the annotated agenda and we hope our comments are considered helpful.</p>
<p>Supplemental Documents If applicable, list the title(s) of any attached file(s) or link(s)</p>	
<p>This communication may be made public</p>	Yes

Document information

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