

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.

Section 1: Communication Header				
Please provide your contact information.				
Title: Mr. Firs	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: United 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	Other	If other: EB 91 Annotated Agenda		
If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).				
Host Country(ies)				
Project/PoA Title				
Technology Type	Other	If other: All		
SECTION 3: YOUR COMMUNICATION				
Title/Subject Maximum 250 characters	PD-Forum Comments re the Annotated Agenda of EB 91			
	Honorable Members of the CDM Executive Board, Dear Mr. Eduardo Calvo;			
Communication Text Include background, details, and conclusion (unlimited length)	like to support the submission of thi probably not solve the issue of vani concept note emphasises the role of achievement of pre-determined goal made. Nevertheless, the use of CDI	mmend the secretariate for this excellent summary and would is concept note to the next CMP. The proposed measures will shing demand as this is a matter of political ambition. But the if the CDM as a tool that can measure and certify the list if the according political decisions regading the goals are M as a tool for other purposes may allow to maintain the curre until demand will increase again and investors will step in.		

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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We are quite optimistic that demand will raise again, simply, because for the implementation of the NDC's market-based mechansims 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_HI kpi.

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 rational 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 years 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

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flexible resources to at least reduce the scheduling time significantly. The PD-Forum would like to thank the secretariate for the continued opportunity to comme annotated agenda and we hope our comments are considered helpful. Supplemental Documents If applicable, list the title(s) of any attached file(s) or link(s)
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flexible resources to at least reduce the scheduling time significantly.
Nevertheless, we appreciate the efforts done by the UNFCCC secretariate in the past year acknowledge the restrictions caused by budget limits. We would like to point out that besid timeline itsself the uncertainty is a problem to investors. If we look into the pending publical issuance requests today (02/09/2016) we see 58 projects waiting to be scheduled. The eld waiting since 4 weeks for scheduling. So, we would like to propose to look at possibilities to
Annex 8: The PD Forum wishes to restate our position that the total time needed for the variable checks by the UNFCCC can be reduced from approximately three months (current average 28 days (as previously stated and explained in the concept note CDM-EB84-AA-AO1, as we the INQ-04373-T2Z2). Please see as well our statement to Annex 4 of EB88. We concluded days to complete the required checks would be more than sufficient. We understand that the 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 finate few projects get reviewed by the board. Hence, it should be possible to flag issues for reviewed during the 28 days during the summary note preparation and only contentious projects after 28 days.

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 :: communications	

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