

The World Bank

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT
INTERNATIONAL DEVELOPMENT ASSOCIATION

1818 H Street N.W.
Washington, D.C. 20433
U.S.A.

(202) 473-1000
Cable Address: INTBAFRAD
Cable Address: INDEVAS

October 29, 2016

CDM Executive Board
c/o UNFCCC Secretariat
D-53153 Bonn
Germany

Re: Issues included in the annotated agenda and related annexes of the ninety-second meeting of the CDM Executive Board

Honorable Members of the CDM Executive Board,

We welcome the opportunity to comment on the elements of the annotated agenda of the 92nd CDM Executive Board meeting relating to the Annex 4 - Revision of CDM project standard, validation and verification standard, and project cycle procedure, particularly its Appendixes 3 and 4. We would like to apologize for the late submission and hope your Honorable Members would consider the issue submitted during this meeting.

We would like to commend the CDM Executive Board for carrying out its work program to streamline the CDM regulations, especially the CDM Project Standard, the Project Cycle Procedure and the Validation and Verification Standard. We support the recommendation to allow changes to the project design as stated in para 270 (g) of the PS (Appendix 3 of Annex 4 of the annotated agenda) and in para 298 of the VVS (Appendix 3 of Annex 4 of the annotated agenda) which allow for "*Voluntary update of the applied methodology to a later valid version of the same methodology or voluntary change to another methodology, as long as all requirements in the updated/changed methodology are met*" in the PS.

This is a timely improvement in the CDM rules which would help to streamline many methodological provisions, mainly monitoring requirements, in many registered project activities. In application of the above mentioned recommendation, we would like to kindly request the CDM Executive Board to allow **for the immediate entry into force** of this provision as it is a voluntary action that Project Participants can use and submit immediately through Post Registration Changes that could benefit the projects that are ready for such changes.

We look forward to continued co-operation on these issues with both the EB and its secretariat. Should further information be required, please do not hesitate to contact us.

Sincerely,



Harikumar Gadde
Carbon Finance Specialist
Climate and Carbon Finance Unit