




F-CDM-RtB

 CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1) <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder ¹ submitting this form (individual/organisation):	Project Developer Forum
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +44 1225 816877 E-mail Address: rachel.child@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Clarification on the Implementation Plan for the CDM PS, VVS and PCP (EB65, Annex 6)
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify PD-Forum
Specify whether you want the Letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Purpose of the Letter to the Board: Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission)	
<input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> Request Clarification <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference - EB65, Annex 6 </div> <div style="text-align: center;"> <input type="checkbox"/> Revision of Existing Rules </div> </div>	
<input type="checkbox"/> Type II: Request for Introduction of New Rules <input type="checkbox"/> Type III: Provision of Information and Suggestions on Policy Issues	
Please use the space below to describe in detail the issue that needs to be clarified/ revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	

¹ Note that DNAs and DOEs shall not use this form to submit letter to the Board.

² Note that the Board may decide to make this Letter and the Response publicly available

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To cdm-info@unfccc.int
From rachel.child@pd-forum.net
Date 05 February 2012
Subject **Clarification on the Implementation Plan for the CDM PS,
VVS and PCP (EB65, Annex 6)**

Honorable Members of the CDM Executive Board,

The PD Forum is seeking clarification on the 'Implementation Plan for the Clean Development Mechanism Project Standard, Validation and Verification Standard and Project Cycle Procedure' EB65, Annex 6 ('Implementation Plan').

We note that, according to the Implementation Plan, during the period from 1 May to 30 Sep 2012, DOEs shall "complete validations/verifications based on current rules for those PDDs/MRs published under current rules and submit requests for registration/issuance under current rules." However, in many circumstance during this period, DOEs/PPs may wish to choose to submit a request for registration/issuance under the new rules for projects that were published under current rules.

In order to ensure a smooth transition to the new procedures the PD Forum believes that it is essential that DOEs/PPs are given flexibility during the grace period from 1 May to 30 Sep 2012. As such, we request that for PDDs/MRs published under current rules, the DOEs/PPs should be able to choose whether to submit requests for registration/issuance under the current rules or under the new rules. In such cases, if the DOE/PP chooses to submit under the new procedures, the PDD/MR would be modified to comply with the new rules but re-publication of the PDD/MR under the new rules would not be necessary. This approach would be consistent with the grace period that is applied to revised Approved Methodologies and Tools.

We further note that the grace period 1 May - 30 Sep is only 5 months long; this is much shorter than the 8 months grace period that is standard for Approved Methodologies and Tools. Considering the extent of the changes to the rules (22 documents revised, 9 new documents and 40 documents withdrawn) we would expect that at the very minimum the grace period should extend until 8 months after the date that the revised PDD and MR templates are approved by the Executive Board.

In addition, the PD-Forum is concerned that the Implementation Plan contains no grace period for the procedure for post registration changes and that the Implementation Plan does not provide sufficient time for PP and DOEs to adjust their procedures considering that the relevant forms have not yet been approved by the Executive Board. We therefore request that the Executive Board allows DOEs to choose to submit post registration changes under the current procedures or the new procedures for a period of 8 months after the approval of the forms for the new procedures.

Kind regards,

Rachel Child

Co-Vice Chair, Project Developer Forum



Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

[replace this bracket with text, the field will expand automatically with size of text]

If necessary, list attached files containing relevant information (if any)

- None

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

5 February 2012

2012-071-S

History of document

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		