 <b>CDM: FORM FOR SUBMISSION OF A "LETTER TO THE BOARD" (Version 01.2)</b>	
<p>This form should be used only by project participants and other stakeholders for submitting a "Letter to the Board" in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i></p>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organization):	World Bank Carbon Finance Unit
Address and contact details of the individual submitting this form:	Address: 1818 H Street N.W. Washington DC. 20433, USA Telephone number: (202) 473-6363 E-mail address: koppermann@worldbank.org
Title/Subject (give a short title or specify the subject of your submission)	Implementation Schedule for VVS Track
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Multilateral Development Bank
Specify whether you want the letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below <sup>3</sup> to describe the purpose of this submission.	
<input checked="" type="checkbox"/> <b>Type I:</b> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;">Request for clarification</div> <div style="border: 1px solid black; padding: 2px;">Revision of existing rules</div> </div> <p>Standard</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input checked="" type="checkbox"/> Standards. Please specify reference                             </div> <div style="width: 45%;">Project Standard, Validation and Verification</div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input checked="" type="checkbox"/> Procedures. Please specify reference                             </div> <div style="width: 45%;">Project Cycle Procedures</div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Guidance. Please specify reference                             </div> <div style="width: 45%;"></div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Forms. Please specify reference                             </div> <div style="width: 45%;"></div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Others. Please specify reference                             </div> <div style="width: 45%;"></div> </div>	
<input type="checkbox"/> <b>Type II: Request for introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

<sup>1</sup> DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

<sup>2</sup> As per the applicable modalities and procedures, the Board may make its response publicly available.

<sup>3</sup> Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html>.

**Subject: Proposed implementation schedule for the VVS track**

Dear Members of the CDM Executive Board,

The timeline stipulated in the implementation plan for the CDM Project Standard (PS), Validation and Verification Standard (VVS) and Project Cycle Procedures (PCP) (Annex 6, EB65 Report referred to as the VVS Track) anticipates the enforcement of the new procedures governed as per the VVS track by October 1, 2012, by which date documentation used under the previous track governed by the Validation and Verification Manual (VVM) will no longer be valid.

Whilst we fully commend the development of the VVS track as part of efforts to streamline the process for registration/issuance, we consider its implementation in the course of 2012 as particularly ill-timed. The introduction of the VVS track requires the replacement of existing documentation necessary for registration and issuance, resulting in revisions to a large number of documents, the withdrawal and replacement of several more documents as well as the preparation of new documents. Whilst many of the changes help consolidate existing provisions with few new elements, the redrafting of the documents to ensure consistency with language in the VVS, PS, and PCP may result in misinterpretations by the PP or the DOEs and may lead to additional delays and administration costs. Considering that 2012 is the last year of the first commitment period of the Kyoto Protocol, it is an already very busy year for all stakeholders of the CDM. As a result, the impact of the changes in documentation required by the implementation of the VVS track will impose significant costs on all stakeholders and may lead to significant delays, causing some projects to fail achieving registration by December 31, 2012.

*Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).*


We would therefore suggest that this timeline be postponed until at least January 1, 2013.

Furthermore, to smooth the transition from the existing VVM track to the VVS track, we would recommend that:

- Stakeholders be invited to identify aspects of the VVS track that are unclear,
- The Secretariat publish a list of frequently asked questions and answers at quarterly intervals on the UNFCCC website, and
- That the effectiveness of the VVS track be reviewed after one year of implementation.

We thank you for your consideration.

Yours sincerely,



Joëlle Chassard  
Manager  
Carbon Finance Unit

<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none"> <li>• this bracket with text, the field will expand automatically with size of text]</li> </ul>
<b>Section below to be filled in by UNECCC secretariat</b>	
Date when the form was received at UNECCC secretariat	<b>26 April 2012</b>
Reference number	<b>2012-103-S</b>

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History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		