

	CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2) 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>
Name of the stakeholder ¹ submitting this form (individual/organization):	Alfonso Lanseros CO2 Solutions
Address and contact details of the individual submitting this form:	Address: C/Claudio Coello,76 Bajo C, 28001, Madrid, Spain Telephone number: 00 34 91 781 41 49 E-mail address: infocdm@co2-solutions.com
Title/Subject (give a short title or specify the subject of your submission)	Completeness check and Information and Reporting Check results
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
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)
Please choose any of the type(s) below ³ to describe the purpose of this submission.	
<input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Request for clarification <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference Clean Development Mechanism Project Cycle Procedure and Procedure for Requests for Registration of Proposed CDM Project Activities <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference </div> <div style="text-align: center;"> <input checked="" type="checkbox"/> Revision of existing rules </div> </div> <input checked="" type="checkbox"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

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

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

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

>>

Clean Development Mechanism Project Cycle Procedure v2.0 (EB 66, Annex 64, paragraph 63 and 66) and the Procedure for Requests for Registration of Proposed CDM Project Activities v02 (EB 69, Annex 12, paragraphs 13 and 15) establish that:

“Upon completion of the completeness check, the secretariat will notify the project participant(s), as identified in the Modalities of Communication form, and the DOE of the result of the completeness check, including an elaboration of the underlying reasons, and the secretariat will make the result of the completeness check publicly available by publishing it on the UNFCCC CDM website. If the request for registration does not meet the requirements of the completeness check, then upon submission of the revised documentation the request for registration shall be treated as a new submission of a request for registration.”

“Upon conclusion of the information and reporting check, the secretariat will notify the project participant(s), as identified in the Modalities of Communication form, and the DOE of the result of the information and reporting check, and the secretariat shall make the result, including an elaboration of the underlying reasons of the information and reporting check publicly available by publishing it on the UNFCCC CDM website. If the request for registration does not meet the requirements of the information and reporting check, then upon submission of the revised documentation the request for registration shall be treated as a new submission of a request for registration.”

Even though the current procedures are looking for guaranteeing the quality and additionality of the registered projects, they have limitations that affect significantly the implementation of the projects, because the income from the sale of CERs is crucial for their additionality and the CERs price depends on the registration date.

Normally project participants sell the CERs by the signature of ERPAs (Emission Reduction Purchasing Agreements) and those ERPAs have precedent conditions where the Project must be registered before of December 31 2012, so the credits are eligible for sale into a specific market such as the EU ETS.

The limitations of current procedures are listed below:

- A request for registration could be marked as incomplete, and delay the effective date of registration of a project activity for issues that do not affect project’s additionality and could easily be attended during the crediting period (with the first request for issuance). A very clear example of this could be on the description of a proposed monitoring system, which also has to be meticulously reviewed during the verification process.
- Procedures for obtaining a Letter of Approval differ from one country to another. Because of political or social matters, lack of experience (for a country with very few LoAs issued) or just for changes on internal procedures, the issuance of a Letter of Approval may take too much time. While it is indispensable that all credits come from project activities approved by the host party, project activities could be registered with the issuance of CERs conditioned to obtaining the LoA.

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 strongly believe that possible affectations could be easily mitigated by adding the following paragraphs to existing procedures:

Incompleteness for issues unrelated to additionality

During the completeness check and the Information and Reporting Check, an incomplete on the following matters would not imply a new submission of a request for registration:

- Information on monitoring systems (incomplete or incorrect)
- Operational permits for project activities that have not started
- Corrections on formulae or calculations that affect emissions reduction ex –ante estimations, but do not affect the value that will be obtained once the monitoring systems are implemented
- Letters of Approval
- Editorial mistakes

Issuance of CERs will be conditioned to the adequate amendment of the marked issues, which will be published once the project activity is registered. With the first request for issuance DOEs shall include, if apply: Corrected PDD, pending Letters of Approval, etc.

These changes would help avoiding continuous resubmissions and accumulation of requests for registration. Also, this would not affect the quality of the revisions made to a request for registration.

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

- N/A

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat 6 August 2012

Reference number 2012-143-S

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		