

 <p>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <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 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)	Registration date
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: <input type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules <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 <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 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> .

>>

According to Clean Development Mechanism Project Cycle Procedure v2.0 (EB 66, Annex 64, paragraph 77): “For requests for registration, for which the initial submission was made on or after 11 December 2010, the effective date of registration in the case referred to in paragraph 76 above shall be the date on which the DOE submitted a complete request for registration”

According to the Procedure for Requests for Registration of Proposed CDM Project Activities v02 (EB 69, Annex 12, paragraph 25): “The effective date of registration for the proposed project activity referred to in paragraph 24 above shall be the date that the DOE had submitted a complete 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:

- The nature and location of the project activities is very dissimilar. Even though CDM regulations are very extensive, the reasons for declaring a submission as incomplete during the “information and reporting check” are so difficult to standardize and depending on reviewers’ criteria, that it is not possible for a DOE to guarantee that a submission of a request for registration is complete.
- Any typographical mistake or an error by the DOE, (totally out of the control of the Project Participant) will delay the effective registration date, putting on risk the project.
- A submission of a request for registration can be declared as incomplete more than one time, demonstrating that it is not possible to standardize reviewers’ criteria and severely affecting registration times.
- Project developers may be penalized by mistakes made by a DOE, which has been accredited by the CDM Executive Board, or by an erroneous declaration of incomplete submission.
- A request for registration of a project activity using a new methodology has lower possibilities to be declared as complete because of the lack of valid references.

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 changing the definition of effective date of registration to:

The date when the Board has received from the DOE the proof of payment of the registration fee, or has confirmed to it that no registration fee is due.

This proposal matches the date when the status of a request for registration changes from “Awaiting fee” to “Awaiting scheduling”; also would not affect the quality of the revisions made to a request for registration and is representative of the date when the validation process with the DOE has finished.

<i>If necessary, list attached files containing relevant information (if any)</i>	• 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	2012-142-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		