

 <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>	
<i>Name of the stakeholder¹ submitting this form (individual/organization):</i>	Yasuhiro TAMIDA General Manager, Global Environment Projects Dept, Marubeni Corporation
<i>Address and contact details of the individual submitting this form:</i>	Address: 4-2 Ohtemachi 1-Chome, Chiyoda-ku, Tokyo, Japan Telephone number: +81-3-3282-2865 E-mail address: Tamida-Y@jpn.marubeni.com
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Deadline of notification of the intention to request a renewal of crediting period
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<i>Specify whether you want the letter to be treated as confidential²:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<i>Please choose any of the type(s) below³ to describe the purpose of this submission.</i>	
<input checked="" type="checkbox"/> Type I: <input checked="" type="checkbox"/> Request for clarification <input 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, Version 03.2 <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	
<i>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</i>	

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> .

>> We understand that project participants can request a renewal of the crediting period of the registered CDM project or PoA as per provisions specified at section 9. (Renewal of crediting period) of the “Clean development project cycle procedure” (to be abbreviated to P-C-P).

For the CDM projects, the project participants shall notify the secretariat of their intention to request a renewal of crediting period of the registered CDM project activity by submitting an updated PDD,, within 270 to 180 days prior to the date of expiration of the current crediting period as per paragraph 243 of P-C-P.

Under such provision, it is understood that there is no way for the project participants to request of renewal of the crediting period after passing this 180 days.

On the other hand, it is explained at the latter half of the paragraph 247 that “If the notification of the intension to request a renewal of crediting period is not received by the secretariat 180 days prior to the date of expiration of the current crediting period, the project participants or the coordinating/management entity shall not be entitled to claim the issuance of CERs for the period from the expiration date of the current crediting period until the last date before the crediting period is deemed renewed”.

It is therefore understood from the paragraph 247 quoted above that there is still possible for the project participants to request of renewal of the crediting period even after the 180 days prior to the date of expiration of the crediting period and to request issuance of CERs for the period from the expiration date of the current crediting period at any time after the approval of renewal of the crediting period by the CDM Executive Board, CDM-EB, if “the last date before the crediting period” means “the last date of the current crediting period”.

Under such context of the provisions of paragraphs 243 and 247 of C-P-C, we would like to ask CDM-EB to clarify followings,

- 1) is it possible for the project participants to request of renewal of the crediting period even after passing 180 days prior to the date of expiration of the current crediting period?
- 2) is it possible to understand that “the last date before the crediting period” included in the paragraph 247 means “the last date of the current crediting period”?
- 3) is it possible for the project participants to request issuance CERs for the period from the expiration date of the current crediting period at any time after the approval of the renewal of the crediting period by CDM-EB?

<case specific information> Project activity, “HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P. R. China” (reference No. 0193) was originally registered as a CDM project with renewable crediting period, apaning 01 Aug 06 - 31 Jul 13. Conrtact person of the project apecified in MoC was informed by the secretariat of the potential necessity of Notification nine months prior to the expirationof the crediting period as per paragraph 247 of P-C-P. Due to the difficult situation for resaling CER and rather complex sturcture within Japanese side participants in dicision making, deadline for notification of the renewal of the crediting period to the secretariat that is 01 Feb 2013 was missed. However, project participants now seriously consider the renewal of the crediting period and are exploring the possibility to notify its renewal under the current provisions of P-C-P.

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).

>> The period for the request the renewal of crediting period specified at the aragraph 243, i.e. within 270 to 180 days, should be associated with extra explanations to make project participants understand the situations in case they fail to meet such timeline specified.

We believe that the timing of requesting renewal of the crediting period as specified at paragraph 243, i.e within 270 to 180 days, could be specified for the purpose of avoiding the delay of issuance of CERs due to processing of the request of renewl of the crediting period. However, the extension of the date of submission of the request for renewal of the crediting period , i.e. some time shorted than 180 days prior to or even after the date of expiration of the current crediting period may deteriorate neither the CDM rule nor the ultimate purpose of the CDM.

<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none"> [replace this bracket with text, the field will expand automatically with size of text]
Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	06 August 2013
Reference number	2013-284-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		