



Stakeholder Communication Form
(Version 01.0)

This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.

The completed form and any supplemental documents shall be submitted electronically to cdm-info@unfccc.int, or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.

SECTION 1: COMMUNICATION HEADER

Please provide your contact information.

Title: Mr. **First Name:** Sven **Last Name:** Dr. Kolmetz

Name of Organization: Projekt Developer Forum **E-mail Address:** office@pd-forum.net

Postal Address: **Phone Number:**
Country: *Include country code (e.g. +49-228-815-1999)*

Stakeholder Type: Non-Governmental Organization (NGO) If other:

Please indicate from whom you would like to get an answer.

This communication is addressed to¹: Chair of CDM Executive Board (normal track)

SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)

If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).

Project/PoA Ref. Number If applicable, CPA Ref. Number:
5-digit# format 01234 *8-digit# format 0123-4567*

Project Cycle Stage [Choose an item] If other:

If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).

Host Country(ies)

Project/PoA Title

Technology Type [Choose an item] If other:

SECTION 3: YOUR COMMUNICATION

Title/Subject
Maximum 250 characters Process for renewal of crediting period and penalty of "unclaimable period"

Communication Text
Include background, details, and conclusion (unlimited length)

The Project Developer Forum (PD Forum) is a collaborative association and collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects worldwide. Our members work on a global scale and evaluate opportunities to deploy climate financing and carbon market instruments to accelerate investments for greenhouse gas mitigation and sustainable development.

The PD Forum welcomes and is fully supportive of the decision taken at EB 100 to remove the requirement for notification of crediting period renewal intention from project participants, and to abolish the penalty of "unclaimable period". As the Secretariat and EB guidance noted at that time, the unnecessary requirement caused administrative problems for projects (which already face

¹ In accordance with the "Procedure: Direct communication with stakeholders" (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

	<p>many issues due to the market situation) and could result in unfair treatment.</p> <p>We have however noticed an anomaly resulting from the implementation of this decision. Projects for which renewal of crediting period requests were submitted under CDM project standard for project activities version 01 have a published renewed crediting period which follows immediately the expiration of the preceding crediting period - this is both welcome and a reflection of the new guidance. However, once these projects commence verification during the renewed crediting period, the old rules are applied, and a message is provided to DOEs stating:</p> <p>In case of project renewal of crediting period delay which results in CERs “un-claimable period” as per the CDM project cycle procedures, please proceed to upload monitoring report from the end of the “un-claimable period” as permitted by the interface. For the “un-claimable period” please submit monitoring report by email to cdmregistration@unfccc.int</p> <p>The above treatment of projects that applied for renewal of crediting period under CDM project standard for project activities version 01 leads to such projects being penalised for not delaying their request.</p> <p>This is particularly the case as these projects could have delayed renewal of crediting period (given the grace period), apply for renewal now and not face this penalty. We are sure that this penalisation of early action is an unintended consequence of a welcome rule change.</p> <p>Considering the above, we request that the Executive Board clarifies that the “un-claimable period” penalty associated with the requirement for notification of renewal of crediting period has been abolished for all project activities. This would then allow DOEs to upload monitoring reports and submit requests for issuance covering the “un-claimable period”</p>
Supplemental Documents <i>If applicable, list the title(s) of any attached file(s) or link(s)</i>	letter dated 25.7.2019
This communication may be made public	Yes

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Document information

Version	Date	Description
01.0	02 March 2015	This form supersedes and replaces the following: <ul style="list-style-type: none"> • F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2) • F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1) • CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)

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To Mr. Piotr Dombrowicki and members of the
CDM Executive Board
From Sven Kolmetz
Date 25 July 2019
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Subject **Process for renewal of crediting period and penalty of
“unclaimable period”**

Honourable Members of the CDM Executive Board,
Dear Mr Piotr Dombrowicki

The Project Developer Forum (PD Forum) is a collaborative association and collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects worldwide. Our members work on a global scale and evaluate opportunities to deploy climate financing and carbon market instruments to accelerate investments for greenhouse gas mitigation and sustainable development.

The PD Forum welcomes and is fully supportive of the decision taken at EB 100 to remove the requirement for notification of crediting period renewal intention from project participants, and to abolish the penalty of "unclaimable period". As the Secretariat and EB guidance noted at that time, the unnecessary requirement caused administrative problems for projects (which already face many issues due to the market situation) and could result in unfair treatment.

We have however noticed an anomaly resulting from the implementation of this decision. Projects for which renewal of crediting period requests were submitted under CDM project standard for project activities version 01 have a published renewed crediting period which follows immediately the expiration of the preceding crediting period - this is both welcome and a reflection of the new guidance. However, once these projects commence verification during the renewed crediting period, the old rules are applied, and a message is provided to DOEs stating:

In case of project renewal of crediting period delay which results in CERs “un-claimable period” as per the CDM project cycle procedures, please proceed to upload monitoring report from the end of the “un-claimable period” as permitted by the interface. For the “un-claimable period” please submit monitoring report by email to cdmregistration@unfccc.int

The above treatment of projects that applied for renewal of crediting period under CDM project standard for project activities version 01 leads to such projects being penalised for not delaying their request.

This is particularly the case as these projects could have delayed renewal of crediting period (given the grace period), apply for renewal now and not face this penalty. We are sure that this penalisation of early action is an unintended consequence of a welcome rule change.

Considering the above, we request that the Executive Board clarifies that the “un-claimable period” penalty associated with the requirement for notification of renewal of crediting period has been abolished for all project activities. This would then allow DOEs to upload monitoring reports and submit requests for issuance covering the “un-claimable period”



Kind regards,

Dr. Sven Kolmetz
Chairman, Project Developer Forum