

PROJECT DEVELOPER FORUM

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To cdm-info@unfccc.int
From leo.perkowski@pd-forum.net
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Page 1/1
Subject **Verification and Validation Standard**

Honourable Members of the CDM Executive Board,
Dear Mr. Hession,

With great appreciation the Project Developer Forum acknowledges the work which is currently being undertaken by the Board and the Secretariat of the UNFCCC to improve and streamline the processes by creating a new Standard for Validation and Verification (VVS). Being aware that the draft standard is currently shaped to be commented in a call for input later this year we wish to bring to the attention of the board and the secretariat some key features that could leverage the efficiency of the current system, without compromising its integrity:

- Currently, developers face the situation that ambiguous guidance or a lack of definition leads to delays by the DOEs. We are convinced that a fall-back provision defining the principles on how to identify the most appropriate interpretation, in cases where no clear guidance is provided, would allow the DOE to do their designated work in a more efficient way. A fall back provision could mean, e.g. a rule that in case of doubts the alternative interpretations are defined and listed and the DOE is allowed to choose and justify the most appropriate alternative.
- Further to a fall-back procedure, a list of endorsed interpretations by the Secretariat linked to the Catalogue of Decisions would support the DOEs in fulfilling their role. This list would define e.g. what concrete changes were deemed "permanent" and which not.
- We would like to see a differentiated procedural treatment for minor and major issues including guidance for the DOEs on how to determine what constitutes a major issue with all other issues being treated as minor. As an example the DOEs should be able to make greater use of Forward Action Requests (FARs) as a way of dealing with minor issues without delaying a current validation / verification.

Please do not hesitate to contact us for further information and/or discussions.

Kind regards,



Leo Perkowski
Co Vice Chair of the PD Forum