

UNFCCC secretariate
Stakeholder Participation

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To
From office@pd-forum.net
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Subject **Call for public inputs on the structure of cornerstone
regulatory document of the CDM**

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Dear Sirs,

Regarding your "Call for public inputs on the structure of cornerstone regulatory document of the CDM, the withdrawal of published monitoring report and change of DOE at verification stage, and the voluntary withdrawal of focal point role from a project activity" (Deadline 27 August to 16 September, 24:00 GMT) we would like to comment as follows:

The Project Developer Forum (PD Forum) commends

1. Structure of cornerstone regulatory documents for the CDM

The Project Developer Forum appreciates the efforts to consolidate and streamline the documents to make the process easier and reduce redundancies (and sometimes even contradictions). For us the most important step is the merger of the PS and the VVS. Furthermore, it is proposed to merge the PCP, PS and VVS into a single document that could be divided into different sections to address different issues. Proposed name: "Guidelines for CDM Activities". Text repetitions and redundancies would be eliminated to create a single reference document. Such a document can still offer specific information where necessary and applicable for different processes, e.g. for stand-alone CDM project activities and for PoAs/CPAs.

2. Withdrawing published monitoring report and changing DOEs at the verification stage

The Project Developer Forum supports the request of EKI Energy Services Limited to allow the change of the monitoring period during verification, either via withdrawal of the monitoring report or even via changing the monitoring period during the verification process. Alternatively, and simpler in this context, it would be ideal to allow batched issuances during one verified monitoring period after the verification process has been finished. We assume that in most of the cases a withdrawal would be obsolete if batched issuances were possible as the project owner could sell his credits step by step and issue on demand. This way he would pay the issuance fee only for those batches that he can actually sell. The cost for the DOE is almost independent from the length of the monitoring period. Hence, verification costs could be minimized while the payment of the issuance fee could be optimised.

3. Voluntary withdrawal of focal point role from a project activity

The issue on the withdrawal of the focal point is an important one for us. If the focal point withdraws (unilaterally), then it should automatically fall to the local project partners. With many of the European buyers pulling out, this may be critical for some projects in order to get some control back. Also, quite a

few carbon market players no longer exist, which is also an issue. Same solution: it may have to fall back to the local entity on the ground.

About the PD Forum

Project Developer Forum (PD Forum) is a collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects in all regions of our globe. Our knowledge and experience with global carbon market, climate finance instruments, country specific policies and NAMAs, make PD Forum a unique platform and stakeholder for discussions around the reform and creation of policies and mechanisms to mitigate climate change.

Kind regards,



Dr. Svæn Kolmetz
Chair, Project Developer Forum