

 <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):	Project Developer Forum
Address and contact details of the individual submitting this form:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail address: office@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Equal handling of start notification for CPAs and project activities
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify BINGO
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 checked="" type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <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>.

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To cdm-info@unfccc.int

From Rachel.child@pd-forum.net

Date 19th December 2012

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Subject Equal handling of start notification for CPAs and project activities

Dear Mr. Maosheng Duan,

Honorable Members of the CDM Executive Board,

The PD Forum welcomes the effort which is being made by the Board and the Secretariat to improve the rules related to Programmes of Activities (PoAs). However, we believe that it is important to revise one of the rules introduced in EB 70 to harmonize the rules for programmes and project activities.

According to paragraph 107 of the *CDM Validation and Verification Standard (version 3, EB 70)*, PPs can demonstrate that CDM was seriously considered in the decision to implement a project when its starting date is within 180 days of the prior consideration notification.

In contrast, in line with paragraph 193 of the same document, the start date of any CPA needs to be on or after the start date of the PoA, which is determined either through the prior consideration notification or the date of publication of the PoA-DD for global stakeholder consultation.

This means that for project activities, the earliest date at which implementation/construction/real action begins can be up to six months before the prior consideration notification. This measure allows some flexibility for project owners who are not aware of all the administrative requirements of the CDM when they start their projects.

For PoAs, the six month flexibility before the date of notification is not allowed. The starting date of the first CPA needs to be on or after the PoA prior consideration notification.

The PD Forum would like to see the approach harmonized since there is no reason why PoA rules should be different from those of project activities regarding starting dates. Thus, we suggest that paragraph 193 of the *CDM Validation and Verification Standard* is revised to require CPAs to start within 180 days of the start date of the PoA (meaning up to 6 months before or anytime after the prior notification form).

We would of course be happy to discuss this issue further with you,

Kind regards,



Rachel Child

Co-Vice Chair

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).

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If necessary, list attached files containing relevant information (if any)

- [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

Reference number

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.
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