




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1)</b> <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organisation):	Project Developer Forum
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: <a href="mailto:gareth.phillips@pd-forum.net">gareth.phillips@pd-forum.net</a>
Title/Subject (give a short title or specify the subject of your submission)	Input on EB65 Annotated Agenda, Annex 9 - Proposed Implementation Plan for the CDM PS, VVS and PCP
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify <a href="#">PD-Forum</a>
Specify whether you want the Letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b>Purpose of the Letter to the Board:</b>	
Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission )	
<input type="checkbox"/> <b>Type I:</b> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; padding: 2px;"><input type="checkbox"/> Request Clarification</div> <div style="border: 1px solid black; padding: 2px;"><input type="checkbox"/> Revision of Existing Rules</div> </div> <ul style="list-style-type: none"> <li><input type="checkbox"/> Standards. Please specify reference</li> <li><input type="checkbox"/> Procedures. Please specify reference</li> <li><input type="checkbox"/> Guidance. Please specify reference</li> <li><input type="checkbox"/> Forms. Please specify reference</li> <li><input checked="" type="checkbox"/> Others. Please specify reference EB65 Annotated Agenda, Annex 9</li> </ul>	
<input type="checkbox"/> <b>Type II: Request for Introduction of New Rules</b> <input type="checkbox"/> <b>Type III: Provision of Information and Suggestions on Policy Issues</b>	
Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	

<sup>1</sup> Note that DNAs and DOEs shall not use this form to submit letter to the Board.

<sup>2</sup> Note that the Board may decide to make this Letter and the Response publicly available



## PROJECT DEVELOPER FORUM

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**To** cdm-info@unfccc.int  
**From** gareth.phillips@pd-forum.net  
**Date** 08 Nov 2011  
**Subject** **Input on EB65 Annotated Agenda: Annex 9 - Proposed Implementation Plan for the CDM PS, VVS and PCP**

Mr. Martin Hession,  
Honorable Members of the CDM Executive Board,

The Project Developer Forum (PD Forum) welcomes the effort to prepare the PS, VVS and PCP standards and would like these **standards to be made effective immediately upon adoption**. It is essential for project proponents to be able to **use either existing regulations (procedures and forms) or new standards for the normal grace period of eight months** for much-needed flexibility and to avoid any undue disruptive impact on their work. These fundamental points are included in our recommendation on Annex 9 below.

### **Annex 9: Proposed Implementation Plan for the CDM PS, VVS and PCP**

**Para 4:** Of significant concern is the use of the term “may” versus “shall” or “will” when referring to transitional measures. Furthermore, clarification needs to be made here that the new standards need to be made effective immediately (as in on adoption) and both old and new regulations need to run in parallel until the end of the normal grace period.

**Para 6** states only two work streams but three work streams, (a), (b), and (c) are listed. Also, the second work stream, point (b) absolutely necessary and a priority as running existing and new regulations immediately in parallel on adoption of the standards is required as the arrangement for transition.

**Para 9a** recognizes that there are new provisions in the documents. Therefore, the normal grace period of eight months where current procedures and forms can be used in parallel with the new standards and forms is required as mentioned in PD Forum recommendations in para 4 above.

**Para 11:** PD Forum recommends that the new standards be effective as of their adoption and be used in parallel with existing standards until the end of the normal grace period for new procedures of eight months. An effective date of 1 May 2012 is too late in the year to allow the various new provisions to impact timelines on what is expected to be a massive influx of requests for registrations and issuances.

Please do contact us for further clarification if need be.

Kind regards,

Gareth Phillips  
**Chair, Project Developer Forum**



Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

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

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**History of document**

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		