




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1)</b> (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)	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organisation):	Project Developer Forum / Designated Operational Entities and Independent Entities Association  [Redacted]
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:
Title/Subject (give a short title or specify the subject of your submission)	<b>Unsolicited letter relating to the integration of Requests for Changes into the Request for Issuance</b>
Please mention whether the Submitter of the Form is:	<input checked="" type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify <b>DIA</b>
Specify whether you want the Letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b><u>Purpose of the Letter to the Board:</u></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 checked="" type="checkbox"/> <b>Type I:</b> <div style="display: flex; justify-content: space-around;"> <span><input type="checkbox"/> <b>Request Clarification</b></span> <span><input checked="" type="checkbox"/> <b>Revision of Existing Rules</b></span> </div> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Standards. Please specify reference <a href="#">Project Cycle Procedure</a></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 type="checkbox"/> Others. Please specify reference</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 Leo Perkowski@pd-forum.net  
Date 11 April 2012

Subject **Unsolicited letter relating to the integration of Requests for Changes into the Request for Issuance**

Dear Mr. Maosheng Duan,  
Honorable Members of the CDM Executive Board,

The Designated Operational Entities and Independent Entities Association (DIA) as well as the Project Developer Forum (PD Forum) welcome the new project cycle procedure, especially regarding the post registration changes. We learned during our joint DOE and project developer workshop that the UN secretariat is currently working on shifting more responsibility back to the DOE's. We consider the approval of changes as one area where this concept could be applied easily and would like to ask if the request for deviation, design change and monitoring plan changes could be integrated into the request for issuance in a way that the DOE can decide and approve those changes – at least as an option for the DOE. That means, if the DOE does not feel confident to make a decision it can ask for the approval of changes as described in the current procedure, or, even more easily, through simple request for clarification procedures embracing all these individual change types. Otherwise, the DOE either accepts or rejects the request for changes and documents this transparently in the verification report.

Changing the PCP accordingly would provide two-fold benefits. If the changes are well-known in the beginning of the verification period the project developer would receive early information on risks, requirements or the acceptability regarding the technical implementation. If changes are coming up at short notice the project developer has the chance to get this approved more quickly by the DOE (provided the project is still additional and fulfils all relevant criteria). The UNFCCC secretariat will benefit because less requests for approval of changes would have to be processed.

Thank you for taking the time to consider our comments with regards to the PCP, and if you need further clarification with regards to the areas outlined above then please let us know.

Kind regards,

Leo Perkowski  
Vice-Chair, Project Developer Forum

Werner Betzenbichler  
General Manager, D.I.A.



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).

[replace this bracket with text, the field will expand automatically with size of text]

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

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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		