

Chairman and Members of the CDM Executive Board
Mr. Clifford Mahlung
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To cdm-info@unfccc.int
From andrew.prag@pd-forum.net
Date 5th March 2010
Subject **Methodology revision procedure**

CHAIRMAN

Your contact:
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Dear Mr. Mahlung,
Honourable Members of the CDM Executive Board,


A new revision of AM0034 was proposed by MP42 and published on January 28 2010. This version was discussed and approved by EB52 starting on February 8, less than two weeks after its publication. It is our view that the new version 4 contains several inconsistencies and technical flaws which are likely to make the practical application of this new version difficult. Since the timeframe between publication of version 4 and its approval by EB52 was too short to allow for comment from stakeholders, the PD Forum kindly asks the EB to consider the comments on AM0034 version 4 prepared by N.Serve, original authors of the methodology, provided in the Annex to this letter. We hope that the EB will consider opening this methodology for further amendments with the aim of deriving an improved version 4.1.

The comments provided raise several general issues concerning revisions to methodologies as well as dealing with detailed concerns specific to AM0034. We would like to draw the Board's attention to the following points:

- Whilst we are grateful for the hard work of the experts on the Meth Panel, we see it as a lost opportunity that a revision be approved by the EB without any time for input from industry experts, including the authors of the methodology. Expertise would often be willingly offered and this is likely to make the process more efficient. We recommend that revisions proposed by the MP are always opened to public input before being brought before the EB for approval.
- It is often not clear for what reason the MP has recommended particular changes to methodologies. For an outside observer, it can be time-consuming and difficult to work out the reasons behind proposed changes. We recommend that for all proposed revisions, the MP provides a short paragraph outlining the rationale behind and justification for the changes.
- In general, the PD Forum would like to encourage the EB to enhance its communications with stakeholders in line with the CMP5 guidance and take into account input from relevant technical experts in its decision making. Input of this nature and improved understanding between the EB, Meth Panel, stakeholders and experts would assist continuing methodology improvements and ensure transparency and consistency. For example, we understand that the SSC WG has suggested that a call for input be opened at EB53 to address, among other things, technical questions related to lighting methodologies. We believe that it is not appropriate to use this channel to obtain expert input on specific technical meth issues. Efficient lighting experts would be happy to provide input, but there should be a dedicated and direct channel for the EB and its panels to interact with expert practitioners. This would lead to better and more timely outcomes.

We hope that you find these general comments and the attached detailed annex useful.

Yours sincerely,



Andrew Prag, Co-vice Chairman, Project Developer Forum

Annex: Detailed comments on AM0034 ver4, provided by N.Serve Environmental Services GmbH