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To cdm-info@unfccc.int
From rachel.child@pd-forum.net
Date 20 July 2011
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Subject **Unsolicited letter on delays in processing requests to revisions to monitoring plans and requests for deviations**

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Dear Mr. Hession, dear Mr. Gwage

We would like to acknowledge and express our appreciation for the tremendous progress that has been achieved in accelerating the registration and issuance process in the past months and would like to thank you for these achievements and your efforts.

Nevertheless we would like to bring to your attention an area that still needs further improvement. According to the UNEP Risoe CDM pipeline, the time between the end of the monitoring period and issuance of CERs has now reached 300 – 350 days, almost one year. One of the reasons for this is the time taken to respond to


- requests for revision of monitoring plans
- requests for deviation
- notifications of changes to a project activity as described in the registered PDD.

Responses are not currently meeting the timelines outlined in the relevant procedures and Project Developer Forum members are currently experiencing delays of several months. Similarly, the lead time for changing the start date of crediting period is also very long, currently exceeding 3 months.

Since these lead times are not monitored, or at least not reported, it is not easy to keep track of the time taken to respond to these requests. We would like to suggest therefore that these processes are monitored in the future in order to ensure that they are brought into line with the time-scales outlined in the relevant procedures. Further, we suggest that you may want to consider - in light of your immense work load - if these requests have to be finally approved by you as per the current procedure or if this competency may be delegated to someone else.

As project developers, we are working on reducing the need to make changes to project documentation after registration. In addition, as you may have seen in our previous inputs, we have provided suggestions to you on ways to simplify the procedure for the acceptance of minor changes. Currently, we understand that the relevant procedures are being adopted and we hope that with further joint efforts we can reduce the lead time between submission of monitoring reports to issuance of CERs to a reasonable time period. We are convinced that these efforts are vitally important to ensure timely cash flow to projects.

Kind regards,



Rachel Child
Co Vice Chair of the PD Forum