



 <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 [Redacted]
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +44 (0)20 7121 6100 E-mail Address: <a href="mailto:Rachel.child@pd-forum.net">Rachel.child@pd-forum.net</a>
Title/Subject (give a short title or specify the subject of your submission)	Grace period of documents used to assess additionality
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 checked="" 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 checked="" 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 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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From [rachel.child@pd-forum.net](mailto:rachel.child@pd-forum.net)  
Date 24 August 2012  
Subject Grace period of documents used to assess additionality

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

The PD Forum wishes to alert you to an inconsistency in the grace period for different documents used to assess the additionality of projects.

According to the "Procedure for the submission and consideration of requests for revision of approved baseline and monitoring methodologies and tools for large scale CDM project activities" (EB54, annex 2), para 36:

*"DOEs may upload for registration the PDDs of project activities in which the previous version of an AM or an AT has been applied not later than the calendar day (2400 hours GMT) eight months from the publication date of the report of the Board meeting at which the revised AM or AT was approved".*

It is clear therefore that for projects where additionality is assessed using the "Tool for the demonstration and assessment of additionality", an eight month grace period is applied for projects using the previous version of the Tool following introduction of a new version.

However, many small scale projects do not apply the "Tool for the demonstration and assessment of additionality". Rather, they apply the "Guidelines on the demonstration of additionality of small-scale project activities" (latest version is version 9, EB68, annex 27)<sup>3</sup> or the "Guidelines for demonstrating additionality of microscale Project activities" (latest version is version 4, EB68, annex 26).

According to the "CDM EB document and decision framework"<sup>4</sup>, for documents issued by the Board (that are not methodologies or tools) where substantive changes are made so that there is a new version number then *"The latest version of the document becomes effective, unless otherwise stated in the meeting report or in the document itself, on the date of publication of the meeting report in which the document was revised"*. It is our understanding therefore that new versions of the Guidelines for assessing the additionality of small and microscale projects become effective immediately and no grace period is given for projects using the previous version.

We ask the Board to clarify therefore if a similar grace period of 8 months will be given for the documents used to assess the additionality of small scale projects as is given for large scale projects. And to further clarify that

<sup>3</sup> Previously referred to as "Attachment A of Appendix B"

<sup>4</sup> [http://cdm.unfccc.int/Reference/Notes/gov/info\\_note02.pdf](http://cdm.unfccc.int/Reference/Notes/gov/info_note02.pdf)



this applies to the new documents introduced at EB68 i.e. that a grace period of 8 months is available for the “Guidelines on the demonstration of additionality of small-scale project activities” version 8 and the “Guidelines for demonstrating additionality of microscale Project activities” version 3.

Your consideration of this issue would be very welcome and we would of course be available to discuss it further with you,

With best wishes,

Rachel Child

Co Vice-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)

- [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

Empty input field for date

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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.

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