




## 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: +44 (0)1225 816877 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)	Clarification of “issues of an editorial nature”
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 checked="" type="checkbox"/> Procedures. Please specify reference: PCP (paras 41, 62, 65, 141, 189, 192)</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/revise 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

**Project Developer Forum Ltd.**  
100 New Bridge Street  
UK London EC4V 6JA

Europe: +44 1225 816877  
Asia: +65 6578 9286  
Americas: +1 321 775 4870  
[office@pd-forum.net](mailto:office@pd-forum.net)  
[www.pd-forum.net](http://www.pd-forum.net)

CHAIRMAN: Gareth Phillips  
t: +65 65789286  
e: [office@pd-forum.net](mailto:office@pd-forum.net)

**To** cdm-info@unfccc.int  
**From** rachel.child@pd-forum.net  
**Date** 23 April 2012  
**Subject** **Clarification of “issues of an editorial nature”**

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

The PD Forum is happy that the new Project Cycle Procedure allows for “issues of an editorial nature” to be dealt with much more efficiently by the DOE without being considered incomplete.

We believe a quick email or call with the PP or DOE about minor incompletenesses is likely to resolve a large proportion of these issues. If issues can be corrected/completed or explained to be correct already, this would significantly reduce transaction costs and delays.

However, the PD Forum understands there is a difference of opinion with regards to what is considered to be “issues of an editorial nature”. While all actors in the CDM, including PPs and DOEs, are striving to minimise any mistakes, we are all human, so mistakes will occur in a complex process such as the CDM with documents frequently exceeding 100 pages (including in the documents of RIT, UNFCCC and EB).

We would like to present a non-exhaustive list of issues here, which are still holding up projects, but which we consider to be “issues of an editorial nature”. We hope the EB agrees.

- *Typographical error (typo) where the actual meaning is clear. This is particularly the case where there is duplication of information (which is still prevalent throughout the requirements) in any document. This is also relevant for the online list of prior considerations, where project titles and company names may be incorrect due to typos, or slightly different due to translations, or indeed where the submitted form is correct but the online information is not.*
- *Reference to the correct procedure but old version. This is going to be particularly important with the implementation of the new “VVS Track” and the fact that everyone, including PPs and DOEs, will be operating both old and new procedures in parallel.*
- *Wrong version, protected version, or failed to upload a document. Or in some cases files in older or newer versions of software may not be supported by the UNFCCC system.*
- *Non-english language maps, figures, and spreadsheets; non-SI units; the use of a decimal comma, etc.. With much information only available in the local language, and PP, consultants and validators often communicating in the local language, as well as many DNAs requiring documents in the local language for obtaining the LOA, it is possible that some (detailed) maps used have non-english language, some figures explaining the project/process are taken from the (local language) documents with non-english captions, and some of the calculation spreadsheets may have some remarks or notes listed in non-english language.*
- *Geo-co-ordinates. There is no absolute requirement to include GPS co-ordinates in the project*



documentation, as long as the information allows for the unique identification of the project activity. In some cases an address could be sufficient. Some countries operate different co-ordinate systems. Some systems operate co-ordinates in degrees, minutes, seconds, while others use a decimal notation. Some DOEs demand a conversion to a different format. Additionally, the co-ordinates are often listed in the PDD, validation report and also in the “project view page”, unnecessarily duplicating information.

- Weblinks that no longer work. The preparation of the CDM documentation often takes a long time. And with many websites not having permanent links, the weblinks are not always valid anymore at the time of submission. If the DOE has confirmed the information referenced, the PP should not be penalized for the fact that the weblink to a third party source of information has expired.
- Lack of submission date on the MOC. The process of getting the MOC signed by all relevant Parties is often a long process, with signatories at opposite sides of the world. Also, often the date may be completed, but the form used to have light grey text in the date cell, which becomes impossible to read after scanning the form.
- LOAs or other attachments in multiple PDF documents. This is not a substantive requirement and thus doesn't change anything in the final conclusion.
- Anything on the “project view page”, as this is not a public or official page. This is purely an interface between DOE and UNFCCC, which replicates information already presented elsewhere.

While some the issues listed above could go uncorrected without affecting the decision, once issues of an editorial nature are found they should be corrected. However, the issues listed above are minor, can be corrected quickly and often do not affect the understanding of the meaning and thus would not affect the final decision.

Therefore, we would like to request the EB to consider issues such as those listed above as “issues of an editorial nature” which can be more efficiently dealt with in accordance with the new procedures, saving significant work for RIT, UNFCCC as well as DOEs and PPs.

Kind regards,

Gareth Phillips  
Chairman, 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).

[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



-----

**History of document**

<b>Version</b>	<b>Date</b>	<b>Nature of revision</b>
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		