

Head and Members of the CDM Executive Board
Mr. Martin Hession
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To cdm-info@unfccc.int
From gareth.phillips@pd-forum.net
Date 17th September 2011
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Subject **Unsolicited letter relating to Completeness Check
timelines for Request for Issuance**

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

The PD-Forum recognizes the significant improvements in the length of completeness checks performed by the UNFCCC Secretariat throughout the first semester of 2011. The overall average duration of the completeness check process was below the targeted limit of 45 days set by the Secretariat.¹

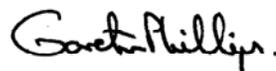
However, the PD-Forum stresses the need to improve the process by enabling it to react to the number of files entering the pipeline. Since April 2011 the number of files entering has exceeded the number of files processed. Hence during August, the backlog reached the 2011 maximum. The impact is starting to show and the overall duration of the completeness check process for some files has recently increased to as much as 55 days.

We would like to further raise your attention to the forecasted timelines for 2012. Based on data from the Secretariat and the PD Forum on expected submissions in 2011 and 2012, the estimated length of completeness checks is likely to reach 18 weeks (126 days) next year. Please see attached presentation for the complete forecast and its underlying assumptions.

To counteract these alarming tendencies, the PD Forum encourages the Secretariat to implement the sampling of submissions. We also encourage the Secretariat to implement proactive actions to ensure that timelines remain sustainable at current levels. Currently, issuance requests are scheduled the same week (if not on the same day) that the completeness check actually starts. The PD Forum would like to have longer term visibility on the scheduling and hence the processing rate of issuance requests. In addition, the recruitment of external consultants should be pushed one step further. It should be carried out on a regular basis in order to maintain the stability of the completeness check pipeline and to prevent the uneven supply of carbon credits to the market.

This issue is of highest importance. We look forward to seeing you tackle this challenge and take the necessary actions to avoid shift of volumes due to unexpected increases in timelines.

Kind regards,



Gareth Phillips
Chair, Project Developer Forum

¹ Completeness Check timelines: Commencement of Completeness Check based on CMP6 request / Awaiting Scheduling (15 days) + Completeness Check (7 days) + Information and Reporting Check (23 days)