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**To** info@unfccc.int  
**From** Gareth.Phillips@pd-forum.net  
**Date** 28 September 2011  
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**Subject** **Letter relating to PD Forum concerns on issuance of Letters of Approval for CDM project activities**

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Members of the DNA Forum,

From this point forward through the end of the year 2012, the PD Forum anticipates there will be a considerable influx of requests for Letters of Approval (LoAs) from project participants hoping to have their projects registered prior to January 1, 2013. This push, of course, is based on the EU policy not to accept CERs from projects registered outside Least Developed Countries, post 2012. Most projects not registered in 2012 will not have a market to sell CERs, hence they will not happen.

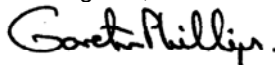
We have noted in the past that DOE and secretariat services are normally overextended during the last months of any year. However, this coming year we expect a much higher than normal demand for DOE services and UNFCCC processing for both validations/registrations and verifications/issuances. This demand will be compounded by an expected rush for verification/issuances from projects who CERs will not be accepted into the EU-ETS in 2013 and beyond. For this reason we believe the earlier that submissions are made for registration, the better the chances to become registered in 2012.

With the aforementioned in mind, we humbly request the Co-Chairman of the DNA Forum please pass on our concerns to member Designated National Authorities (DNAs) requesting they review their timelines and where appropriate add more meetings or streamline processes to assist developers in achieving project approvals for qualified projects as soon as possible during the last quarter of 2011 and the first six months of 2012.

While we fully understand and appreciate it is the prerogative of DNAs to decide on internal procedures for approvals, of particular concern to the PD Forum members are the host countries where face-to-face inter-ministerial or inter-departmental meetings are required as part of their internal process, but not always scheduled quickly or frequently. Further, several host countries require validation reports before considering requests for LOAs, which is not required under the CDM rules. Both of these issues often lead to significant delays, the type of delays we are hoping to mitigate moving forward.

Your consideration and action in this matter is greatly appreciated.

Kind regards,



Gareth Phillips  
Chair, Project Developer Forum

Cc: Conor Barry, UNFCCC Secretariat SDM