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To CDM Team / UNFCCC secretariate  
From Sven Kolmetz  
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Subject **EB103: proposal to separate CPA issuance requests according to different PoA-DD versions**

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Dear Members of the Executive Board,

The Project Developer Forum (PD Forum) is a collaborative association and collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects worldwide. Our members work on a global scale and evaluate opportunities to deploy climate financing and carbon market instruments to accelerate investments for greenhouse gas mitigation and sustainable development.

Following the request of the EB103, we would like to take the opportunity to share our views on separate CPA issuance requests according to different PoA DD versions.

Principally, we understand the intention to keep the process simple and easy and support this approach. We urge that the process to allow separate requests for issuance against different PoA DD versions should be made as simple as possible in order efficiently process verification requests which will minimise transaction costs on behalf of all parties involved.

We propose, for example, that clear references to the PoA-DD version should be included in each CPA monitoring and verification report. If the reference is clearly stated in the beginning of the documents, all relevant checks can be undertaken. The existence of the according reference may be checked during the completeness check. If the reference is missing the Rfl can be sent back.

Notwithstanding the approach discussed above, we would like to reiterate support of the current practice of grouping multiple CPA issuance requests in a single monitoring report. One suggestion to overcome the complexity of different PoA-DD versions is to cluster the CPAs related to specific PoA-DD versions in different sections of the monitoring report.

In addition, we would like to propose that the serial numbers issued to CPA-CERs be identifiable, or linked to, the underlying CPA. Currently, the PoA CER serial numbers do not distinguish between different CPAs. This practice is limiting the supply of credits in certain markets, such as the South African carbon tax market, where the ineligibility of a single CPA (e.g. due to boundary constraints) disqualifies the full range of CPAs under a PoA, even if the other CPAs meet all the national eligibility criteria.

We wish to thank the members of the Board for the opportunity to provide our inputs, and hope that these are of value to future discussions.

Kind regards,



Dr. Sven Kolmetz  
Chairman, Project Developer Forum