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**To** secretariat@unfccc.int  
**From** rachel.child@pd-forum.net  
**Date** 29 January 2012  
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**Subject** **Thank you – Re.: Prior consideration issues following  
EB60 discussions**

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Dear Mr. Howard,

The Project Developer Forum (PD Forum) would like to thank you for the clear and comprehensive response to our submission. This letter addresses each of the points raised by us clearly, with the answers able to be applied directly in the validation and registration process. The PD Forum appreciates the time taken to respond.

While we appreciate the overall response, we are disappointed by the interpretation of the required format of the prior notification governed by version 01 of the guideline. As explained previously, some project developers took both the request for host country approval and the publication of the PDD for global stakeholder consultation as a notification in the absence of an unambiguous definition, in particular because this complies with the conceptual underpinnings of the requirement to notify the intent of the project of aspiring CDM registration, because:

- an official third party, part of the UNFCCC infrastructure, is engaged, the DOE;
- all project information, required by the prior consideration form, is included in the published PDD;
- the intent to achieve CDM status is made, and related costs are incurred; and
- publication of the PDD for global stakeholder consultation or a proposal for a new methodology prior to the project start date is already considered to be proof of prior consideration (para 2).

We would request that the EB further consider this point and are happy to discuss this further,

With kind regards,



Rachel Child  
Co Vice Chairperson of the PD Forum