

Head and Members of the CDM Executive Board  
Mr. Clifford Mahlung  
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**To** cdm-info@unfccc.int  
**From** leo.perkowski@pd-forum.net  
**Date** 9 July 2009  
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**Subject** **Unsolicited Letter on current timelines for requests for issuance and resource requirement**

**RE** 1. UNFCCC letter dated 18 May 10, <http://www.pd-forum.net/files/26438a61a11e2df078c2d858be22963f.pdf>  
2. PD Forum letter dated 13 Nov 09, <http://www.pd-forum.net/files/442c9d626d925856862dd3022d99f404.pdf>  
3. PD Forum letter dated 26 Aug 09, <http://www.pd-forum.net/files/892fd29f272d4619ae95aa8d5b526efe.pdf>

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

On behalf of the membership of the Project Developer Forum, I am writing to you to follow-up on our earlier letters to the Executive Board regarding the excessive amount of time it takes to process requests for issuance.

Since our previous letter the procedures have changed, presumably to improve the process. However, we have observed increases in both the length of time for completeness check and the period of time for requesting review. While the target limit for the whole completeness check used to be 20 days, it is now taking 30 days from the scheduled date, which is currently more than 3 months after submission!

There is still a limitation on the number of requests the secretariat is expected to process per month, but the secretariat/EB has not stated whether the limit has increased from the inadequate level of 40 requests per month. The current rate, if this could be continued, would be significantly higher. However, even at this higher rate, it would take 5 months to work through the backlog of requests, at which time there is likely to be a new backlog of several hundreds of requests.

In this second follow-up letter we would again like to further inform you of our forecasted number of requests for issuance, based on the actual monitoring activities and planned verifications in the pipeline from the PD Forum membership. The summary table below provides both the actual number of verifications planned from by participating companies, and extrapolates this number to the whole CDM pipeline using the share they represent according to the UNEP Risoe CDM Pipeline (22.8%). We forecast there will be more than 270 requests for issuance per month over the next 18 months, which is more than 13 per working day.

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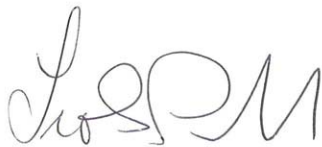
Period	2010		2011				Average
	Q3	Q4	Q1	Q2	Q3	Q4	
Average expected number of requests per month from participating companies only	59	49	50	55	80	75	61
Average forecasted number of requests per month for the whole CDM pipeline	261	214	220	243	350	331	270

The estimate from the PD Forum membership can also be compared to a very simple forecast: one request for issuance for each registered project in each calendar year. With the number of registered projects at 2,275 as of 5 July 2010, the expected requests for issuance on this basis would be 190 per month.

Our major concern is that the resources are not in place to deal with the actual number of requests for issuance that should be expected. Currently only 6 requests are scheduled to be started three working days per week (which includes resubmissions), however, even if this rate is maintained, this is less than half the forecasted required number of more than 13 every working day (which excludes resubmissions) to keep up with new requests for issuance.

We hope you treat this issue with the importance it deserves for the carbon market and look forward to hearing from you.

Best regards,



Leo Perkowski  
Co-Vice Chairman, PD Forum