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Date March 20, 2009  
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Subject **Comments on timelines for approval of requests  
of revision of Monitoring Plans**

Dear EB Members,

I am writing to you on behalf of the Project Developer Forum (PD Forum), which is a not-for-profit organization established to be a collective voice for companies developing greenhouse gas (GHG) emission reduction projects in international carbon markets. In light of CMP's request ex §10, decision -/CMP.4<sup>1</sup>, the PD Forum would like to take this opportunity to provide inputs into the process of establishing timelines for the revision of monitoring plans (MPs) by the CDM Executive Board.

Some members of the project developer community have been experiencing long delays in the processing of requests of revisions of MPs. When the MP revision process was originally released, DOEs and project participants were informed the decision process would take only a few weeks. In our experience over the last months, however, the time taken on average for such requests to be processed has been over 15 weeks, peaking in one case to 29 weeks. Please, refer to Annex I to this letter for project specific timelines, on which these figures are based.

Section B.7 of the CDM Project Design Documents (PDD) is prepared on the basis of the best available information at the time of the validation of the project activity. Accuracy and completeness are the most important criteria utilised in the preparation of the MP. However, discrepancies between section B.7 of the PDD (monitoring '*plan*') and the on-site monitoring system sometimes do occur as systems evolve and technology changes, even when best endeavours have been made to ensure consistency. We understand that some of the Board feels that changes to the monitoring plan at time of verification are seen as being caused by a "mistake" made during validation and the project owner is to be blamed for his "oversights". However, as noted earlier real world situations are constantly changing and we would hope the EB could see the approval of monitoring reports as an acknowledgment of this basic condition of life, i.e. continuous change.

For this reason, the PD Forum views the current procedures<sup>2</sup> to revise MPs included in registered PDD as vital to the successful functioning of the CDM. These procedures provide an important opportunity to improve both the transparency and quality of information from a project activity, which ultimately ensures that a project's emission reductions are real and measurable. Both the current timeframe and the uncertainty

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<sup>1</sup> Decision -/CMP.4, '*Further guidance relating to the clean development mechanism*'.

<sup>2</sup> §57 of the modalities and procedures for the CDM and Annex34, EB26 meeting report.

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about the time it takes for the approval of monitoring plan revisions however, represent a considerable disincentive for Project Developers to be pro-active and submit revision requests and therefore, a barrier to improving transparency and taking preventative action.

In light of the above, we trust that you will be able to introduce tight and clear timelines for the consideration of requests of MP revisions, addressing these concerns in line with the CMP's decision recalled above. We suggest the introduction of a 6 week timeframe (30 working days) to start, with the aim to decrease the timeframe to 2 weeks (10 working days) by the third quarter of this year.

Yours truly,



Martin Enderlin  
Chairman

Attachment

**ANNEX I**

**Table A. Projects for which members of the PD Forum have submitted a request of revision of the monitoring plan**

<b>Project name</b>	<b>ID</b>	<b>MP Revision Submission Date</b>	<b>Request for additional info from Secretariat</b>	<b>Submission of additional info</b>	<b>Approval of the revision</b>	<b>Duration (Days)</b>	<b>Duration (Weeks)</b>	<b>Reason</b>
<b>Sahabat Empty Fruit Bunch Biomass Project</b>	288	17/06/2008	26/11/2008	09/12/2008	09/01/2009	<b>206</b>	<b>29</b>	According to the methodology version used in the registered PDD, the amount of biomass combusted does not need to be accounted for. However, the original monitoring plan had included mention of this parameter. Hence, the monitoring plan had to be revised to align it to the wording of the methodology version used in the registered PDD.
<b>Youshuishiti Hydroelectric Project</b>	1226	21/07/2008	-	-	01/12/2008	<b>133</b>	<b>19</b>	The company in charge of the calibration listed in the monitoring plan used personnel authorised to carry out the relevant calibration activities. However, the relevant regulations required that the whole company should be licensed to carry out calibration activities (the individual technician not being enough). Hence, the need to revise the monitoring plan.
<b>Process Waste Heat utilization for power generation at Phillips Carbon Black Limited, Gujarat</b>	309	24/10/2008	-	-	21/02/2009	<b>120</b>	<b>17</b>	Explicit mentioning of NCV, carbon emission factor and oxidation factor in the monitoring plan, which has always been monitored (you have to, in order to get to the baseline emissions).
<b>Grid connected bagasse based cogeneration project of Ugar Sugar Works Limited (USWL).</b>	189	22/08/2008	-	-	19/12/2008	<b>119</b>	<b>17</b>	Change from ex-post to ex-ante grid emission factor.

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<b>Bundled Wind power project in Tamilnadu, India co-ordinated by the TamilNadu Spinning Mills Association (TASMA)</b>	991	02/04/2008	27/05/2008	17/06/2008	14/07/2008	<b>103</b>	<b>15</b>	Change of meter accuracy from 0.2 to 0.5 and calibration frequency to 5 years: no influence on emission reductions, in line with national standards.
<b>Ganluo Kaijianqiao Hydropower Project, P.R.China</b>	1432	19/11/2008	-	-	02/03/2009	<b>103</b>	<b>15</b>	Change necessary because grid company attached another project to the same main meter, nothing the PO can influence.
<b>Yuzaikou Small Hydropower Station</b>	126	08/09/2008	-	-	11/12/2008	<b>94</b>	<b>13</b>	Inclusion in the monitoring plan of an ex-post addition of electricity import from a small hydropower plant connected to the project site but not part (nor proposed part) of the CDM project activity.
<b>KMS Power 6 MW Renewable Sources Biomass Power Project.</b>	374	17/10/2008	-	-	09/01/2009	<b>84</b>	<b>12</b>	Inclusion of diesel consumption as project emissions, which was not even a requirement by AMS-I.D. V.7 and has already been included in previous verifications for conservativeness.
<b>Electricity generation at 8 MW captive power plant using enthalpy of flue gases from blast furnace operations of Kalyani Steels Limited, in Karnataka state of India.</b>	427	10/11/2008	-	-	17/01/2009	<b>68</b>	<b>10</b>	Change from ex-post to ex-ante grid emission factor.
<b>Irani Wastewater Methane Avoidance Project</b>	1410	29/10/2008	-	-	30/12/2008	<b>62</b>	<b>9</b>	Clarification regarding crosscheck and new description of how the crosscheck will be done. Change the main flow measurement device from flow meter to parshall flume.
<b>Tambun LPG Associated Gas Recovery and Utilisation Project</b>	1144	09/01/2008	21/01/2009	04/02/2009	awaiting	-	-	

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