




F-CDM-RtB

|  CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1) <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i> | |
|---|--|
| <i>Name of the stakeholder¹ submitting this form (individual/organisation):</i> | Project Developer Forum [Redacted] |
| <i>Address and Contact details of the individual submitting this Letter:</i> | Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: office@pd-forum.net |
| <i>Title/Subject (give a short title or specify the subject of your submission)</i> | Unsolicited letter relating to the common practice and FoiK as per additionality tool version 6 |
| <i>Please mention whether the Submitter of the Form is:</i> | <input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other Stakeholder, please specify |
| <i>Specify whether you want the Letter to be treated as confidential²:</i> | <input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site) |
| Purpose of the Letter to the Board: | |
| Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission) | |
| <input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> Request Clarification <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference Additionality tool 6.0.0 </div> <div style="text-align: center;"> <input type="checkbox"/> Revision of Existing Rules </div> </div> <input type="checkbox"/> Type II: Request for Introduction of New Rules <input type="checkbox"/> Type III: Provision of Information and Suggestions on Policy Issues | |
| Please use the space below to describe in detail the issue that needs to be clarified/revise or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any). | |
| | |

¹ Note that DNAs and DOEs shall not use this form to submit letter to the Board.

² Note that the Board may decide to make this Letter and the Response publicly available



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To cdm-info@unfccc.int
From office@pd-forum.net
Date 5/4/2012
Subject **Unsolicited letter relating to the common practice and
FoiK as per additionality tool version 6**

Dear Mr. Maosheng Duan,
Honorable Members of the CDM Executive Board,

The Project Developer Forum (PD Forum) welcomes the new additionality tool 6.0.0. However, there are some issues on which we seek further clarification in order to achieve a common understanding for all project developers and DOE's.

- 1) According to the webcast of EB 65 the new tool version 6.0.0 must be used only for projects with GSP after publication of the tool. All other projects can use the old version 5.2.1. of the tool up to 25 July 2012. The new additionality tool supersedes the guidelines as the guidelines are now incorporated within the tool. We would request the EB / secretariat to please kindly confirm this decision in writing as some DOE are still requesting the use of the new tool 6.0.0 for projects that started GSP before EB 65. Some DOEs also still demand the application of the guidelines even if the previous version of the Additionality Tool 5.2.1 is used, despite the EB's acceptance at EB65 that the guidelines and the old version of the tool are not compatible.
- 2) Please also confirm that it is sufficient to resolve the inequation $F < 20\% = 1 - N_{diff} / N_{all}$ without having to investigate the statistics of N_{all} / N_{diff} . E.g. if it can be shown that there is no similar project, then $N_{diff} = N_{all}$; $F = 0\%$ and $F < 20\%$; so the project is not common practise. The reason we ask for this clarification is that many countries do not provide detailed data to quantify N_{all} and N_{diff} and very often it is only possible to make a conservative estimation. PD Forum has raised this concern in our previous submissions on this topic.
- 3) According to the CP section of the additionality tool 6.0.0, only measures including a fuel or technology switch as well as methane destruction and avoidance are covered by this tool. Our understanding is that greenfield projects such as new hydro or wind projects have to use this tool as well. However, we note that an alternative interpretation is that the tool is not applicable for greenfield projects and that these type of projects should use an alternative approach. The current wording is not completely clear. Could you please revise the tool or issue a statement to clarify this point?
- 4) We have a number of questions concerning prior consideration:
 - a. Can compliance with the guidelines be shown if there is evidence that the initial notification or the subsequent notification after two years has been signed and sent in time but – for some reason - not received in time?
 - b. What is the requirement for the subsequent notification if the project start date has still not happened? For example, what happens if the subsequent notification was not sent within the two years, but was still submitted prior to the project start date? Would that invalidate the whole prior notification? What would happen if the subsequent notification was not sent within the two



- years, but was sent within 6 months of the project start date?
- c. Can compliance be shown with other evidences such as DOE contracts, notification to the DNA, ERPA for a project that sent in the second notification within 2 years and e.g. one month?

Thank you for taking the time to consider our comments with regards to the new tool and if you need further clarification with regards to the areas outlined above then please let us know.

Kind regards,

Gareth Phillips
Chair, Project Developer Forum

Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

[replace this bracket with text, the field will expand automatically with size of text]

If necessary, list attached files containing relevant information (if any)

- [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

History of document

| Version | Date | Nature of revision |
|---|----------------|---------------------------|
| 01.1 | 09 August 2011 | Editorial revision. |
| 01 | 04 August 2011 | Initial publication date. |
| Decision Class: Regulatory Document Type: Form Business Function: Governance | | |