

PROJECT DEVELOPER FORUM

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To cdm-info@unfccc.int
From gareth.phillips@pd-forum.net
Date 5th September 2011
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Subject **Feedback on Integrated Workshop, Bonn, 24 – 26th
August 2011**

Dear Mr Barry

I am writing on behalf of the Project Developer Forum to express our appreciation and thanks to the UNFCCC Secretariat for organizing and hosting the recent Workshop on Project Standard, Validation and Verification Standard, Project Cycle Procedure and Programme of Activities Standards. We believe that the interaction between our members and the Secretariat has been very useful and we hope that our comments in the revision of the documentation will be adopted. However, our members have also commented on the shortage of time which was available to review the documentation. Whilst we appreciate that the Secretariat was working very hard to compile the documents and that some of the documents were inter-dependent, the publication just prior to the meeting effectively meant that only those attending the meeting were able to comment on the documents whilst other members were excluded. In addition, the shortage of time meant that we were unable to conduct a full and thorough review and cross check the documents.

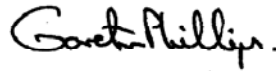
Whilst we believe that the PCP, PS and VVS in particular are important documents and will significantly streamline the process, providing a single repository for all relevant and applicable guidance and decisions, we remain concerned about the details which have been transcribed and the potential to alter the meaning and introduce scope for new interpretation of requirements by DOEs. It will be very difficult to either confirm the accuracy of the transcription or to identify any areas where interpretation may change via a desk review of these documents and it is our view that only time and practice will tell. For this reason, our support for the submission of the documents to the EB in any form is conditional to putting in place a suitable review and adoption process by the UNFCCC. I raised this during my summing up and we consider that such a safeguard does not introduce instability to the process but rather presents a rational approach to the transition. The review process should provide for, for example, a 3 month transition whereby DOEs can revert back to the pre-existing guidance in the event of significant conflicts between the PCP, PS and/or VVS and an expedited procedure to make adjustments to the documents culminating in a formal review and lock-down of final approved versions at the end of the 3 month period. This approach would provide time to, for example, better integrate EB62 Annex 15 on Direct Communication into the documentation without holding the process up now.

One exception to this proposal is the document on significant deficiencies. Our deliberations led us to the conclusion that we do not deem it mature enough in concept to be able to either support it nor provide constructive inputs in the short timeframe given. We believe that the mandates from the CMP are neither clear nor practical and we encourage the EB to prepare a separate stakeholder consultation to gather further input before going back to the CMP to request more practical instructions.

Date ** March 2011
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Subject **Letter A4 / Second Page**

The PD Forum will review the revised documents when they are published with the annotated agenda and we have put plans in place to ensure that we can co-ordinate our input and manage the volume of documents in the short space of time available. However, this does not mean that we have been able to satisfy our expectations for stakeholder consultation.

Yours sincerely

A handwritten signature in black ink that reads "Gareth Phillips." The signature is written in a cursive style with a period at the end.

Gareth Phillips
Chairman