

Head and Members of the CDM Executive Board
Mr. Lex de Jonge
Chairman
UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D 53153 Bonn
Germany

Project Developer Forum Ltd.
100 New Bridge Street
UK London EC4V 6JA

Mailing address:
Schulstrasse 25
CH 3256 Dieterswil BE

t: +44 20 3286 2520
office@pd-forum.net
www.pd-forum.net

To cdm-info@unfccc.int
From martin.enderlin@pd-forum.net
Date 26 August 2009
Page 1/2
Subject **Current timelines for performing completeness checks of requests for issuance**

CHAIRMAN

Your contact:
Martin Enderlin
m: +41 79 459 81 18
martin.enderlin@pd-forum.net

Honorable Members of the CDM Executive Board,
Dear Mr. de Jonge,

I am writing to you with regard to the issuance completeness check time. Over the last few weeks, we observed that the timeline to perform completeness checks at issuance has increased significantly, reaching in recent cases over 9 weeks, well beyond the timeframe set by the EB in August last year¹.

We acknowledge that the cited instructions to Secretariat by EB41 only apply within the limitation of 40 requests for issuance per month. We would like to stress however, that the current timelines are not marginally, but substantially exceeding what was agreed one year ago. In addition to this, the completeness check procedure adopted at EB48 makes sure to eliminate even the slightest doubts about the required documents and level of detail, and should produce the overall effect of considerably speeding up the checks.

We understand that the CDM unit of the Secretariat has been understaffed since its early start and even though it is self-financed since 2006 it is reported to be under pressure every time there is a conference, meeting, holiday season or methodology deadline. For this reason we would urge you to improve the recruitment process efficiency so as to allow for appropriate resources to be allocated to the various stages of the issuance process. We would also urge you to make sure the Secretariat's assessment team strictly acts within the completeness check's mandate and does not venture into verifying the work of DOEs once again, unnecessarily committing scarce human resources.

Moving further, we would kindly ask you to consider the following constructive solutions:

- a. Allow project participants to pre-pay the Share of Proceeds for adaptation beforehand, so as to speed up the process of exporting the credits from the pending account;
- b. Shift resources from other Secretariat units to the issuance team;
- c. Explore ways to cover temporary staff shortages in the Secretariat with personnel seconded from neutral organisations;
- d. Outsource the completeness check process to a competent external service provider;
- e. Perform a fast track check for projects where DOEs confirm that they have performed the completeness check in line with EB48 procedure.

¹ Para 79, EB41 meeting report [<http://cdm.unfccc.int/EB/041/eb41rep.pdf>], instructs the Secretariat to perform completeness checks of requests for issuances within 20 working days from the submission, within a limit of 40 requests per month.

Date 26 August 2009
Page 2/2
Subject **Current timelines for performing completeness checks of requests for issuance**

These are only some of the possible solutions that could be adopted to reduce the current timelines in processing completeness checks at issuances and we would like to thank you in advance for the consideration that you will want to give them.

We look forward to hearing from you,

Yours sincerely,



Martin Enderlin
Chair of the PD Forum

CC: UNFCCC Secretariat, Daniele Violetti