




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>	Rachel Child Project Developer Forum Ltd. [REDACTED]
<i>Address and Contact details of the individual submitting this Letter:</i>	Address: 100 New Bridge Street, London EC4V 6JA, UK Telephone number: 0044 1225 816877 E-mail Address: Rachel.child@pd-forum.net
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Letter on Information Note (version 02) on highest tariffs in China
<i>Please mention whether the Submitter of the Form is:</i>	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify Project Developer
<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 type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid gray; padding: 2px;"><input type="checkbox"/> Request Clarification</div> <div style="border: 1px solid gray; padding: 2px;"><input type="checkbox"/> Revision of Existing Rules</div> </div> <ul style="list-style-type: none"> <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 type="checkbox"/> Others. Please specify reference <input type="checkbox"/> Type II: Request for Introduction of New Rules <input checked="" 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).	
>> [replace this bracket with text, the field will expand automatically with size of text]	

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



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).

The Project Developer Forum (PD Forum) would like to thank the EB for the updated “Information note on the highest tariffs applied by the Executive Board in its decisions on registration of projects in the People’s Republic of China” (Version 02)³, published on 4 July 2011.

The PD Forum does not believe that the concept of using the highest historical tariff is justified under CDM rules; however, the information note provides very clear information for project developers with regards to the EB’s demands in the additionality assessment. The PD Forum believes that the second version of this Information Note corrects the main mistakes in the earlier version.

The earlier mistakes had been pointed out to the EB on several occasions by the PD Forum, as well as by several other stakeholders, including by PPs whose projects were under review. Unfortunately many of these PPs’ arguments were not accepted and their projects consequently rejected. On the basis of the corrected Information Note, some of these projects should not have been rejected. While some PPs have resubmitted their projects, and have subsequently achieved registration of their projects, the rejected projects have lost a year or more of credits.

Following the discussions of EB61, it was apparent that mistakes were made in the preparation of the first Information Note. While EB members understood that demonstration and/or ODA-funded projects should be excluded from the lists, they were in fact included. Each of the corrections for wind are due to this mistake. The PD Forum, in its previous submissions, clearly and unambiguously showed the evidence that these tariffs were only available for demonstration and/or ODA-funded projects, including with references of verifications of these evidences.

The PD Forum hopes the EB will enable projects that would have been registered earlier if the EB’s direction regarding demonstration projects had been followed, to have their registration backdated, and duplicate registration fees refunded. Also, we believe that further improvements in the interaction with stakeholders are needed in order to help avoid similar situations in the future.

If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> [replace this bracket with text, the field will expand automatically with size of text]
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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.

³ EB61 para 78, 03 June 2011



01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		