

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

CHAIRMAN

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

To cdm-info@unfccc.int
From martin.enderlin@pd-forum.net
Date 20 August 2009
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Subject **Reasons for 'incomplete' messages at completeness check to be made publicly available**

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

On behalf of the members of the PD-Forum I am writing to you with regard to the completeness check process and, in particular, with regard to the consequences of an 'incomplete' submission, as included in Para 13 of Annex 60 to the EB48 meeting report.

The above guidance specifies that the validity of the selected approved methodology will be determined according to the date on which a final complete submission is made. Therefore, a determination of 'incomplete' can have a very significant impact for Project Developers. A request for registration submitted prior to the expiration date of an existing approved methodology version could still prove insufficient to grant the Project Developer the right to use the expiring version of the selected methodology. Should the submission be regarded as 'incomplete', the Project Developer will be forced to revise all submitted documents to the newest version of the methodology. Our concern is that this may occur even in cases where the reason for an 'incomplete' determination may be superficial or trivial¹.

As incomplete messages currently are only transmitted to the project participants and the DOEs associated with the project and there is no public transparency otherwise, it can be very difficult to effectively prevent submissions from being regarded as 'incomplete' and to take proactive steps to improve the quality of the project documentation.

¹ Examples of 'incomplete' messages collected within the PD-Forum membership include:

- "Appendix 5 uploaded in the project view page is a blank document", and the issue was that the documents submitted could not be correctly seen by Secretariat due to the fact that a more recent version of the PDF reader software was required;
- "The PDD template does not appear in its complete form", and the issue was that the header stated PDD template version "03.1" while it should have stated "03", leading to a 2-month delay.

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For this reasons, **the PD-Forum would like to ask that the reasons for 'incomplete' messages at completeness check be made publicly available.** This could be achieved, for example, by:

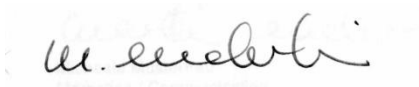
- listing the 'incomplete' messages on the UNFCCC/CDM website; or
- through periodic publication by Secretariat of a catalogue of reasons triggering 'incomplete' messages; or
- through any other means available to ensure that project participants and DOEs have the best possible understanding of what is to be considered as being 'incomplete'.

This effort could have a far reaching effect in improving submissions, preventing unnecessary delays, and reducing the Secretariat's workload.

Moreover, this would help small-to-medium Project Developers and DOEs to reduce the knowledge gap they have towards organizations with larger market shares, which have a much larger number of previous submissions to extract information from on what could be regarded as 'incomplete' by the Secretariat.

We hope that you will appreciate the rationale behind this request, and we look forward to hearing from you on this matter.

Yours Truly,



Martin Enderlin
Chair of the PD Forum

CC: - UNFCCC Secretariat, Daniele Violetti