




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>	
Name of the stakeholder ¹ submitting this form (individual/organisation):	Project Developer Forum
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: gareth.phillips@pd-forum.net
Title/Subject (give a short title or specify the subject of your submission)	Revision of paragraph 160 of the CDM Project Standard on the start date of CPAs
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify PD-Forum
Specify whether you want the Letter to be treated as confidential ² :	<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 type="checkbox"/> Request Clarification <input checked="" type="checkbox"/> Standards. Please specify reference CDM Project Standard, version 1, paragraph 160 <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 </div> <div style="text-align: center;"> <input checked="" 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	

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 describe in detail the issue that needs to be clarified/ revised 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).

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To cdm-info@unfccc.int
From gareth.phillips@pd-forum.net
Date 20th June 2012
Subject Revision of paragraph 160 of the CDM Project Standard
on the start date of CPAs

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

In EB 60, the Board agreed that the "*Guidelines for the demonstration and assessment of prior consideration of the CDM*" did not apply to Programmes of Activities (PoAs) and therefore no Component Project Activity (CPA) could commence prior to the start date of validation of a programme. In that same meeting, the Board recognised that this rule may cause difficulties and requested the Secretariat to provide options for further defining the start date of a programme and facilitating the prompt start of mitigation activities through programmes (paragraph 3, Annex 26, EB 60). Nonetheless, the rules regarding the starting date of CPAs have not been revised and the Project Developer Forum (PD Forum) would like to ask the Secretariat to re-consider its position on this issue to facilitate the development of PoAs.

In particular, the PD Forum is concerned about the impact that this rule might have on the development of afforestation and reforestation (AR) projects in LDCs.

Defining the project boundary has always been a major challenge for AR projects and, very often, the boundary is determined after the plantation has taken place. However, the length of the process to define the boundary has not been an obstacle for AR project development because project activities can start before the commencement of validation provided that they demonstrate prior consideration of CDM (paragraph 26, CDM Project Standard (PS), version 1).

Nonetheless, the current PoA rules present obstacles for the development of AR PoAs. To start a PoA validation, PPs need to provide the DOE with a CPA-DD based on the application of the programme to an actual CPA (paragraph 177, PS, version 1). In line with paragraph 160 of the PS,



the start date of CPAs has to take place after the commencement of validation of the programme. Thus, any CPA with plots already planted upon commencement of validation is unable to be included in the PoA. Since, as mentioned above, plantation is often necessary to define the boundary and write the CPA-DD; PPs either opt out of AR PoAs in favour of single project activities (when this option is financially viable) or abandon their intention to seek CDM registration completely (which is often the case for small projects in poor rural areas).

AR projects contribute to sustainable development and are valuable assets for local communities since they enhance biodiversity, control erosion and contribute to alleviate poverty. We believe that AR-PoAs should play a major in the effort to scale up mitigation activities and increase the participation of LDCs in the CDM. Therefore, we would like to request the EB to enable the first CPAs of AR-PoAs to start before the start date of validation of the programme and demonstrate prior consideration of CDM by informing the host Party's Designated National Authority (DNA) and the Secretariat of their intention to seek CDM status as CPAs of a forthcoming Programme of Activities.

Kind regards,

Gareth Phillips
Chairman, 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).

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

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01	04 August 2011	Initial publication date.



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