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From [office@pd-forum.net](mailto:office@pd-forum.net)  
Date 30 September 2015  
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Subject **Call for public inputs on the annotated agenda of EB86**

Dear Members of the EB,

Regarding your "Call for input on "Issues included in the annotated agenda of the eighty-sixth meeting of the CDM Executive Board" (28 September to 4 October 2015, 24:00 GMT)" we would like to comment as follows:

## 1. Annex 1 – proposals for simplification and streamlining

The Project Developer Forum appreciates the efforts achieved and intended to simplify the procedures. We encourage the secretariat and the Board to move forward and implement the suggestions short term. The current situation of the carbon market requires fast steps to make offsets cheaper without endangering environmental integrity.

While all proposals will help to accelerate and streamline the process, special focus should be given to the following proposals that have been observed by project developers more frequently:

- Proposal #3 "Clarify the conditions for exemption and scope of an on-site inspection during validation, and introduce a requirement to check the physical features of the project activity at the latest by the first verification."
- Proposal #4 "Allow to include more than one technology/measure or combination thereof in one generic CPA, provided that they share the same methodology or combination thereof and the applicability of the information provided in the generic CPA - DD to each technology/measure or combination thereof is clearly identifiable."
- Proposal #9 "Expand the list of types of post-registration changes that may follow the issuance track to any permanent change to the monitoring plan and temporary deviation that propose alternative monitoring arrangements"
- Proposal #14 "allow unlimited number of batches for verification and issuance for a monitoring period" (ie. Remove the limit of 10 CPA batches)
- Proposal #16 "Clarify under what conditions an on-site inspection may be optional (e.g. high security risk in conducting on-site inspections due to the force majeure such as natural disasters or conflicts". And "Introduce modalities to reduce the sample size for geographically-scattered project activities with small amount of emission reductions at each site

## 2. Annex 9 - Draft guidelines for sampling and surveys.

The Project Developer Forums welcomes the move to allow latest technology to be used for sampling and surveys. We expect that this will leapfrog PoA in rural areas and allow for smoother proofs for real and verifiable emission reductions as indicated in:

- Para 48 includes a new provision to allow data collection to occur via remote surveys such as “smartphones or tablet app modules connected to data clouds, data sensors, email or web-based platform or SMS, telephone”. In addition, smartphone or tablet app modules are given equal priority as more traditional hard-copy questionnaires. Further elaboration of these are given in paragraphs 47 through 53.
- Para 63 endorses using an online database to analyse monitored data, rather than manually copying information.

### **3. Annex 15 – stakeholder consultation process**

The Project Developer Forum welcomes the clarifications regarding the local stakeholder consultation process. Nevertheless, we would like to point out that the prescribed process should not create contradictions to national processes and national law – if available – should prevail. Regarding the proposals for the extension of the global stakeholder process our concern is that investors need certainty for their investment and delays during the verification period or issuance due to stakeholder comments may be critical. Sometimes it may be difficult to judge if a comment is justified or not – especially for those not directly involved on-site. Hence, we urge the Board to consider these suggestions carefully and limit delays in the issuance process to obvious human rights issues. Violation of human rights is unacceptable under all circumstances and human rights have to have higher priority than economic interests.

#### **About the PD Forum**

Project Developer Forum (PD Forum) is a collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects in all regions of our globe. Our knowledge and experience with global carbon market, climate finance instruments, country specific policies and NAMAs, make PD Forum a unique platform and stakeholder for discussions around the reform and creation of policies and mechanisms to mitigate climate change.

Kind regards,



Dr. Sven Kolmetz  
Chair, Project Developer Forum