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To Mr. Piotr Dombrowicki and members of the  
CDM Executive Board  
From Sven Kolmetz  
Date 25 July 2019  
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Subject **Process for renewal of crediting period and penalty of  
“unclaimable period”**

Honourable Members of the CDM Executive Board,  
Dear Mr Piotr Dombrowicki

The Project Developer Forum (PD Forum) is a collaborative association and collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects worldwide. Our members work on a global scale and evaluate opportunities to deploy climate financing and carbon market instruments to accelerate investments for greenhouse gas mitigation and sustainable development.

The PD Forum welcomes and is fully supportive of the decision taken at EB 100 to remove the requirement for notification of crediting period renewal intention from project participants, and to abolish the penalty of "unclaimable period". As the Secretariat and EB guidance noted at that time, the unnecessary requirement caused administrative problems for projects (which already face many issues due to the market situation) and could result in unfair treatment.

We have however noticed an anomaly resulting from the implementation of this decision. Projects for which renewal of crediting period requests were submitted under CDM project standard for project activities version 01 have a published renewed crediting period which follows immediately the expiration of the preceding crediting period - this is both welcome and a reflection of the new guidance. However, once these projects commence verification during the renewed crediting period, the old rules are applied, and a message is provided to DOEs stating:

**In case of project renewal of crediting period delay which results in CERs “un-claimable period” as per the CDM project cycle procedures, please proceed to upload monitoring report from the end of the “un-claimable period” as permitted by the interface. For the “un-claimable period” please submit monitoring report by email to [cdmregistration@unfccc.int](mailto:cdmregistration@unfccc.int)**

The above treatment of projects that applied for renewal of crediting period under CDM project standard for project activities version 01 leads to such projects being penalised for not delaying their request.

This is particularly the case as these projects could have delayed renewal of crediting period (given the grace period), apply for renewal now and not face this penalty. We are sure that this penalisation of early action is an unintended consequence of a welcome rule change.

Considering the above, we request that the Executive Board clarifies that the “un-claimable period” penalty associated with the requirement for notification of renewal of crediting period has been abolished for all project activities. This would then allow DOEs to upload monitoring reports and submit requests for issuance covering the “un-claimable period”



Kind regards,

Dr. Sven Kolmetz  
Chairman, Project Developer Forum