

Head and Members of the JI Supervisory Committee
Mr. Derrick Oderson
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 ji-info@unfccc.int
From martin.enderlin@pd-forum.net
Date 3 September 2009
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Subject **Call for public input on the establishment of a communication channel between the Joint Implementation Supervisory Committee and joint implementation project participants**

Honorable Members of the JI Supervisory Committee,
Dear Mr. Oderson,

The members of the Project Developer Forum (PD Forum) respectfully provide herewith their submission to your public call for input.

The 23 members of the PD Forum welcome and fully support establishing a formal communications channel between the JISC and project participants. Many members are active developers of JI projects. Over the past few years the flexible mechanisms have experienced enormous growth not only in numbers of projects, but project types, methodologies, tools, guidance, etc. Included in this growth however, is the inherent complexities and misunderstandings project developers experience as they attempt to apply the formal guidance to practical situations. It is that link that is currently still missing in the flexible mechanisms, the link that completes the project development circle and brings all important feedback from the developers to enable continuous process improvement.

Clearly, it is not possible to reach out and respond to every project participant. We feel a focal point should be selected to consolidate and organise the thoughts of all project participants, not unlike other established UNFCCC forums, e.g., DOE Forum and DNA Forum. The selected organisation should be formally established and recognised, work under clear by-laws and rulings and ensure responsible leadership. Further, the organisation should be confident, accessible and affordable to all project participants to ensure widest representation.

The PD Forum, which was incorporated as a not-for-profit organisation earlier this year, was founded under this fundamental concept.¹ We feel that in order to have efficient and smooth running flexible mechanisms, it is imperative that open lines of communication exist between the regulator and regulated organisations. As part of our formal articles of association we strive to:

- interact with regulators at different levels on rules and regulations,
- improve the efficiency, legitimacy and functioning of the regulatory systems governing the development and use of emission reduction projects,

¹ For details pls. see www.pd-forum.net.

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- provide input for the development of policy and regulatory standards related to emission reduction projects,
- interact with carbon offset project regulators, in the very beginning in particular with UNFCCC (CDM-EB/JISC), to address specific issues regarding project developments such as:
 - methodological issues
 - process and procedural challenges
 - recurring issues with registration and issuance
 - clarifying perceived inconsistencies in rulings and decision making,
- continually reach out to all project developers, large and small to provide them with a path and voice before the regulator.

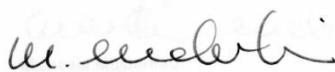
In the above role, the PD Forum has participated in many UNFCCC events, to include regional workshops, DNA Forum meetings, stakeholder's meeting, calls for input, etc, and we feel the Forum's members bring practical experience and value to the discussions at hand. Yet, we could do so much more if accepted as integral part of the process.

In our short existence and without a formal position within the UNFCCC and flexible mechanism structure, the PD Forum has:

- submitted a range of highly focused unsolicited letters on subjects of keen interest to project developers, including investment benchmarks, programme of activities, validation and verification manual, and monitoring plan revisions;
- participated in the DNA Forum in April 2009 in Bonn to speak on evolving issues as well as participate in working groups;
- responded to formal calls for input on various issues, include efficiency in the CDM process;
- developed and adopted a code of conduct which has been the first of its kind in CDM/JI;
- participated in the first two meetings of CDM stakeholders (CDM-EB, Secretariat, Designated National Authorities - DNAs, DOEs) sponsored by the World Bank;
- started an active out-reach program to inform project developers worldwide of their opportunity to join the organisation and share their ideas related to CDM/JI.
- more than doubled its membership to include project developers from numerous developing nations.

The PD Forum looks forward to the JISC setting the precedent and establishing a formal communications link with project participants. If the JISC finds it appropriate, the PD Forum stands ready to act as the project participant focal point by bringing the voice and experience of our membership to improve the functioning of Joint Implementation. As incorporated not-for-profit company, the Forum would also be happy to collaborate with other less formal organisations to fulfill this important official role.

Kind regards,



Martin Enderlin
Chair of the PD Forum