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February 20, 2007

CDM Executive Board
UNFCCC Secretariat
Martin Luther King Strasse 8
P.O. Box 260124
D-53153 Bonn
Germany

RE: Comments On Proposed Procedures to Demonstrate the Eligibility of Lands for A/R Activities

Dear Executive Board Chair:

We respectfully submit the following comments on behalf of our client, RainTree International, Ltd. ("RainTree"), which is an integrated reforestation, forest conservation, timber service and emission credit marketing and sales company.

RainTree is keenly interested in the continued development of rigorous, sensible and effective rules and guidelines for establishing robust methods for including A/R activities under the CDM. To that end, RainTree thanks the Executive Board and the A/R Work Group for their continued efforts in this area.

RainTree has reviewed the Proposed Procedures To Demonstrate The Eligibility of Lands for Afforestation and Deforestation Activities from the perspective of a company that intends to make a substantial difference in mitigating climate change through large-scale reforestation and forest conservation projects in CDM countries. RainTree has a concern over the express inclusion of the width criteria as part of country-specific forest definition within these procedures for the following three reasons:

1. The addition of the width criteria to the underlying definition of forest creates a substantive difference in the basic eligibility criteria, not merely a "good guidance" practice. The definition of forest was expressly established in the Marrakech Accords and contains specific parameters that each country must decide upon and adhere to. As it currently stands, different countries can define for themselves, *within the ranges established by the COP*, what constitutes a forest. Any substantive changes to the underlying definition of forest should be made through COP decisions, not by guidance documents.
2. To date, the additional consideration of width has not been included in the country-specific forest definitions. Accordingly, certain prospective projects that are eligible today based on existing forest definitions could potentially become

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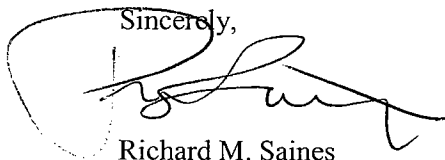
ineligible if a new width criteria is imposed. RainTree believes this would be a negative result and would hinder further substantial investment in A/R activities in countries that desperately need such investment. A practical example of the perverse outcome would be a potential exclusion from the definition of "forest" those stream bed and riparian areas where substantial reforestation could occur benefiting not only the atmospheric concentration of carbon dioxide, but improving water quality and native biological diversity.

3. While RainTree understands the need to develop country-specific definitions of forest within certain parameters, in general the Executive Board should work to promote consistency throughout the CDM. Consistency should provide greater comfort to project developers, investors and Host Countries alike. Adding another criteria that has no specific ranges will lead to greater inconsistencies between countries in the definition of forest. RainTree believes strongly that further inconsistencies will have negative impacts on the ability to successfully deliver meaningful A/R credits to the market.

RainTree respectfully requests that the Executive Board consider the above comments and thanks the Executive Board for its time and consideration.

Finally, while not the topic of the day, RainTree wants to encourage further progress toward the recognition of avoided deforestation as a vital component of the CDM in the future. The dramatic rate of deforestation throughout the tropics could be mitigated by leadership from the COP and Executive Board. RainTree intends to work with all parties to achieve an environmentally sound, sustainable solution to what is the greatest LULUCF challenge faced in non-Annex I countries – deforestation.

Sincerely,



Richard M. Saines

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