

3 September 2008

The Chairman and the Members of the CDM Executive Board  
c/o UNFCCC Secretariat  
P. O. Box 260124  
D-53153 Bonn  
Germany

Dear Madam or Sir,

**RE: Comments on draft "Guidance on the application of the definition of project boundary to A/R CDM project activities"**

We welcome efforts made by the AR Working Group and the Executive Board to develop a draft "Guidance on the application of the definition of project boundary to A/R CDM project activities". To respond to call for public input, we would like to make comments on the draft guidance.

We would like to request clarity in the terms used in the draft guidance as such the project participants (PPs) have unambiguous understanding of the same. We made three comments on the draft guidance and would greatly appreciate your kind consideration.

**Comment 1:**

In the fifth line of the first paragraph of the draft guidance, PPs are requested to provide "information that the total proposed project area meets all other criteria for validation...".

We suggest that all other criteria be limited to eligibility criteria of the proposed area for A/R CDM project activity. If all other criteria are not intended to be eligibility criteria, we kindly ask for clarification.

**Comment 2:**

In the first bullet point of the draft guidance, PPs are requested to include "Demonstration that the additionality of the project activity will not be affected by the lack of control on all or part of the project area".

We suggest that the term be more specified in such way that PPs and validators would have the same understanding of the guidance (e.g. the lack of control on all or part of the project area where PPs do not have control over etc)

**Comment 3:**

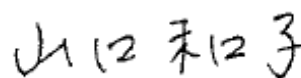
In the second bullet point of the guidance, PPs are requested to consider "increased emissions attributable to the project activity in the areas that have not come under control of PPs" as leakage. However, as the draft guidance allows to include areas which are not under control of PPs in the project boundary of a proposed project activity, emissions occurring in such areas shall be considered as project emissions as opposed to leakage.

We would greatly appreciate if the AR Working Group and the CDM Executive Board could consider abovementioned comments at their next meetings.

Sincerely yours,



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