

To,

The UNFCCC secretariat

**Subject:** Public inputs on the draft guidance and the issue of flexibility in the application of the definition of project boundary to A/R CDM project activities.

Dear Secretariat,

Please find our inputs on the draft guidance and the issue of flexibility in the application of the definition of project boundary to A/R CDM project activities.

Words/ lines suggested for deletion are marked in yellow and are striked out. Words/ lines suggested for inclusion are indicated in red.

## **DRAFT GUIDANCE AND THE ISSUE OF FLEXIBILITY IN THE APPLICATION OF THE DEFINITION OF PROJECT BOUNDARY TO A/R CDM PROJECT ACTIVITIES.**

In order to allow for more flexibility in application of the definition of project boundary, for those projects which are not intended to be submitted as a Programme of Activities (PoA), project participants ~~may~~ shall provide evidence of the control over a part of proposed project area after the validation, but not later than ~~5 years after the registration date of the project or~~ the first verification ~~date~~ event of the project, whichever comes first. PPs shall provide information that the total proposed project area meets all other criteria for validation with respect to afforestation/reforestation **CDM project** activities at the validation ~~date of the proposed A/R CDM project activity.~~

This evidence may include, *inter alia*:

MoU /Agreement with land owner/ community for sharing of revenue/emission reductions

Land Lease/ sale-purchase deed

Cadastral/ local land record showing control of PP on land

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In case where at the validation, control cannot be demonstrated ~~in~~ on more than 20% of the total proposed area of the A/R CDM project activities ~~ies~~ project participants shall include in the PDD:

- 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;
- Provisions that increased emissions attributable to the project activity in the areas that have not come under control of PPs **at the time of first verification event** shall be considered as leakage.

In case where at the validation, control cannot be demonstrated for ~~not~~ more than 20% of the total proposed area of the A/R CDM project activities, project participants do not have to provide the information requested in the bullet points above.

**Last Paragraph of the draft guidance is not clear. Does it mean that at validation if PP has control on >20% of proposed area, information required in bullet points above need not to be provided in the PDD at the time of project validation/registration.**

*From,*

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