

Call For Inputs on the Validation Process

To
CDM Executive Board
UNFCCC

Sub: comments for call for public input regarding how local and global stakeholder consultations can be better implemented during the validation stage

I like to submit these comments in response to a call for public input by the Clean Development Mechanism (“CDM”) Executive Board (“EB”).

The CDM Executive Board has launched a call for public input¹ regarding how local and global stakeholder consultations can be better implemented during the validation stage. Comments are due by 15 August 2011.

Recommendations to improve the validation process and enhance the sustainable development components in the CDM

- Global stakeholders’ consultation should be extended from 30 days to 60 days.
- Commenting period on methodologies should be extended from 15 days to 60 days.
- The EB through DNA should hold public capacity building trainings and workshops for local affected people and relevant NGOs to create awareness about CDM process and why public participation is important during the process.
- Project relevant documents should be made available in the local language during the local stakeholder consultation period including interim technical reports, Environmental Impact Assessments and PDDs.

¹ http://cdm.unfccc.int/public_inputs/2011/eb62_02/index.html

- Public notice should be published in at least 2 newspapers – one must be in the local language and 30 days prior to public consultation.
- Notice should be displayed on the website of the DNA.
- Comments received during validation also should be displayed on the website of DNA.
- Details of approved projects should be made available to the public and should be displayed on the website of the DNA.
- Money transaction should be transparent and it should also be displayed. Pro active disclosure by project proponent is needed, such as notice of public consultation, CER certification and money transaction information
- The consultation process should consist on several meetings and follow-up meeting in the local language and should include communication in less technical language to safeguard a real inclusionary participatory process.
- Stakeholders should be clearly defined by the EB in order to achieve full participation. We believe that the following groups are to be included as stakeholders: 1) local populations potentially affected by the project activity, 2) local authorities, 3) at least 1 person from the DNA, 4) relevant local NGOs working on the issue and 5) at least 1 person from the DOE undertaking the validation of the project to ensure objectivity. All defined stakeholders must be invited for local stakeholder meetings. Follow-up meetings should serve to clarify how potential problems will be mitigated and addressed. Such meetings shall take place before the project is submitted to the UNFCCC for validation and 30-day global commenting period.
- More transparency needed: after the local consultation process has ended the EB should create clear guidelines on how to assess comments by the DOE. Comments and names of participants should be disclosed such that their particular concerns and their assessments are transparent.
- During Validation process, all relevant documents such as PDD, EIAs and other evaluations should be 1) disclosed and uploaded to the UNFCCC site and 2) in the language of the host country. Likewise, comments submitted during the global stakeholder consultation period should at least be allowed in the language of the host country.

- Communication with the UNFCCC: the secretariat needs to improve its communication system and submit clear deadlines and step-by-step indications on how to submit comments. We and many other stakeholders have experienced numerous technical problems when submitting comments to the UNFCCC, such as early closing of deadlines, rejection when trying to log in, etc. We urge the UNFCCC to also introduce an easier submission process such as by means of email submissions.
- Stakeholders' inputs are also important throughout the validation process: we believe that more transparency is also needed after validation such that decision-making processes within and between the secretariat, the EB and its panels is available to stakeholder and the public. This shall occur prior to issuance of actual CERs.
- Given the inherent problematic of CDM projects and the potential to affect people's livelihoods, stakeholders concerns should be allowed throughout the CDM process, i.e. also after registration. Our recommendation foresees the need of a recourse mechanism along with more transparency to address concerns also after the project has been registered. This could be included as a requirement for the monitoring and verification process to include those who feel their comments and concerns have not been adequately considered.

Submitted by

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