

CDM Executive Board Call For Inputs on the Validation Process

Gujarat Forum on CDM a network of Organisations working on Environmental issue & monitoring of CDM projects in Gujarat, India .We are submitting our comments regarding the CDM Executive Board call for Inputs on the validation process .

Following are the comments regarding the Inputs on the validation process:

- 1) Awareness regarding the CDM public consultation is very low. Affected people don't know about the right and importance of the public consultation. There is no transparency regarding public consultation. The Designated National Authority should hold capacity building mechanism such as training and workshop to create a pool of organisations who would act as an expert in holding these meeting and ensure public participations in stakeholders meetings.
- 2) Project relevant documents should be made available in the local language during the local stakeholders' consultation period including interim technical reports, Environmental Impact Assessments and PDDs.
- 3) Presently, the stakeholder consultation in CDM project is conducted by the Project proponent; which is conflict of interest. For neutral consultation, the DNA or its representative state body should conduct the Stakeholders meeting .It is also suggested that the local Voluntary Organisation should also be made a party which will work to create awareness among local affected people regarding the project and stakeholder consultation.
- 4) Public notice of public consultation should be published in at least 2 newspapers – one must be in the local language and 30 days prior to public consultation and notice should be displayed on the website of the DNA.
- 6) The video grapy of the public consultation should be made mandatory and the stakeholder consultation video should be uploaded during the validation period along with the comments received during validation. It should also be displayed on the website of DNA.
- 7) Social, Economical, Environmental and Technical well being or benefits mentioned in the PDD should be mentioned in easily interpreted language, so that the local affected people can understand it. Appropriate and measurable data should be provided in the PDD in terms of employment, direct and indirect benefits and any others mentioned benefits.
- 8) Pro active discloser by project proponent is needed, such as notice of public consultation, CERs certification and money transaction information. Money transaction should be transparent and it should also be displayed. Information such as No. of CER generated, Buyer of the CER's, money earned by selling of CER's should be disclosed on annual basis in the DNA web.
- 9) 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.

10) 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.

11) Proper assessment of the stakeholders' comments should be done and what ever mitigation measures are promised by the project proponent should be followed up properly before the validation.

12) 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.

13) 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.

15) 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.

16) The provisions for follow up stakeholder's consultation should be included in the CDM project. Stakeholders' consultation should be done in periodical manner such as after ever 5yrs because initially people don't perceive the problems which they would face by the project but once the project is started they realise the unforeseen troubles due to the project. DNA is not effectively monitoring the CDM projects so if the UNFCCC makes it mandatory then people will get chance to raise their concern regarding the project.

17) There should be social audit so the local affected people and concerned authority can together monitor the 2% of the money which is spent by project proponent for community welfare and they can monitor sustainable development as well as socio economic development aspect.

18) After receiving CER, project proponent shall give a public notice in two local newspapers, where earlier announcement is made for the public consultation, regarding the earned CER and zest of community development work and sustainable development work done by the project proponent.

For further information please contact

Email: gujaratforumonCDM@gmail.com