

**PUBLIC INPUTS ON DRAFT PROCEDURES TO DEMONSTRATE  
THE ELIGIBILITY OF LANDS FOR A/R PROJECT ACTIVITIES  
UNDER THE CDM AS PROPOSED BY EB 31**

1. While demonstrating that the vegetation on the land was below the forest thresholds adopted by the host country for defining forest, it is not required to consider minimum land area. Minimum land area could be constrain in deciding whether a land can be termed as forest, but it can not be used for the demonstrating that the land was *not* a forest.
  
2. *If the land was forested after 31 December 1989 and converted to non-forest land before commencement of an A/R CDM project activity then provide transparent information that demonstrates that the land was not intentionally converted to non-forest land for the purpose of implementing an A/R CDM project activity.*

In the clause 1 (b) i, this is not clear that **what could be the maximum admissible time of conversion to non forest land (unintentional for CDM implementation) before the project start date.**

Furthermore, this is not clear that what could be those *transparent information sources* that can demonstrate that the land was not *intentionally* converted to non forest land for implementing A/R CDM project activity.

No information sources listed in clause 2 could be good enough for demonstrating the *intention* behind conversion of the land to non forest.

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