

CDM – Executive Board

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F-CDM-RtB

CDM: FORM FOR SUBMISSION OF "LETTER TO THE BOARD" (Version 01.1) (To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)		
Managing Director		
Eco Carbon Pvt. Ltd.,		
Address and Contact details of the individual submitting this Letter:	Address: 32-10-55, 1st Floor, Shri Venkateswara Colony,	
	Sheila Nagar, Visakhapatnam -530 012, India	
	Telephone number: +91-891-2516411; Fax: +91-891-2517429	
	Mobile: +91-98483 69930	
	E-mail Address: nbhanumathidas@co2credits.biz	
Title/Subject (give a short title or specify the subject of your submission)	Program of Activities- Clarification is sought regarding start date of program	
Please mention whether the Submitter	⊠ Project participant	
of the Form is:	Other Stakeholder, please specify	
Specify whether you want the Letter to	To be treated as confidential	
be treated as confidential ²):	☐ To be publicly available (UNFCCC CDM web site)	
Purpose of the Letter to the Board:		
Please use the space below to describe	the purpose for submitting Letter to the Board.	
(Please tick only one of the four types in each submiss	ion)	
□ Туре I:		
Request Clarification	Revision of Existing Rules	
Standards. Please sp	-	
	pecify reference EB 47-Annex 29 &EB 55-Annex 38 - Procedure for	
	ram of Activities as a Single CDM Project Activity and Issuance of	
CERs for a Program		
Guidance. Please peo		
Others. Please specif		
☐ Type II: Request for Introduction of New Rules		
Type III: Provision of Information a	nd Suggestions on Policy Issues	

¹ Note that DNAs and DOEs shall not use this form to submit letter to the Board. ² Note that the Board may decide to make this Letter and the Response publicly available



2011-032-S, EB65-12,

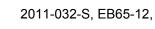
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Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).			
EB 47 Annex 29 and EB 55 Annex 38 speak about procedures for PoA.			
Accordingly we understand that we have to submit three docs for Validation as follows:			
 CDM-PoA-DD Generic CDM-CPA-DD Completed CDM-CPA-DD to one real case. 			
7(d) of EB 55 Annex 38 says, "Confirmation that the start date of any CPA is not, or will not be, prior to the commencement of validation of the program of activities, i.e. the date of which the CDM-POA-DD is first published for global stakeholder consultation;"			
Clarification is sought with reference to real case CDM-CPA-DD, where the CPA has to be enrolled based on real activity that sets some start date. When the CPA is composition of 'Bundle' consisting of various small scale units, all of them set in some start date. Without surety of project activity the units cannot be enrolled into 'real case CPA' and real case CPA-DD cannot be submitted.			
Either submission of real case CPA-DD may be deferred to a subsequent schedule after submitting CDM-POA-DD or restriction on 'Start date of CPA' vide 7(d) of EB 55 - Annex 38 should be vacated. Both of them are contradictory to each other putting the project entity to ambiguity.			
We appreciate the initiation of EB in taking up this issue vide point 3 of EB60 – Annex26 as below:			
"The Board agreed that the .Guidelines for the demonstration and assessment of prior consideration of the CDM do not apply to PoAs, as at present it is expected that no component of the programme will commence prior to the start date of validation. However, recognising that this may indicate difficulties , the Board requested the secretariat to provide options for further defining the start date of a programme and facilitating the prompt start of mitigation activities through programmes".			
While awaiting the outcome of above efforts, we request EB to come out with clear cut clarification since POA with CPA, consisting of bundled small scale units, need to be registered quickly as 2012 deadline is fast approaching.			
Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).			
>>			
If necessary, list attached files containing relevant information (if any)• [replace this bracket with text, the field will expand automatically with size of text]			
Section below to be filled in by UNFCCC secretariat			
Date when the form was received at UNFCCC secretariat			

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History of document

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Document	Class: Regulatory Type: Form Function: Governence	