




F-CDM-RtB

 CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1) <i>(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)</i>	
<i>Name of the stakeholder¹ submitting this form (individual/organisation):</i>	Dr N Bhanumathidas Managing Director Eco Carbon Pvt. Ltd.,
<i>Address and Contact details of the individual submitting this Letter:</i>	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
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Program of Activities- Clarification is sought regarding start date of program
<i>Please mention whether the Submitter of the Form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other Stakeholder, please specify
<i>Specify whether you want the Letter to be treated as confidential²):</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> 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 submission)	
<input type="checkbox"/> Type I: <input checked="" type="checkbox"/> Request Clarification <input type="checkbox"/> Revision of Existing Rules <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference EB 47-Annex 29 & EB 55-Annex 38 - Procedure for Registration of Program of Activities as a Single CDM Project Activity and Issuance of CERs for a Program of Activities <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input type="checkbox"/> Type II: Request for Introduction of New Rules <input type="checkbox"/> Type III: Provision of Information and 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



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:

- 1) CDM-PoA-DD
- 2) Generic CDM-CPA-DD
- 3) 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).

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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

**History of document**

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