



 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>	
Name of the stakeholder ¹ submitting this form (individual/organisation):	Anja Kollmuss / CDM Watch
Address and Contact details of the individual submitting this Letter:	Address: Rue d’Edimbourg 26 Telephone number: +41 77 485 3667 E-mail Address: anja.kollmuss@cdm-watch.org
Title/Subject (give a short title or specify the subject of your submission)	Request for discussion on how findings of SEI study will be incorporated into ACM0013
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify NGOs
Specify whether you want the Letter to be treated as confidential ² :	<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)	
x Type I: <input type="checkbox"/> Request Clarification <input type="checkbox"/> Revision of Existing Rules <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input checked="" type="checkbox"/> Others. Please specify reference Concerns about ACM0013	
<input type="checkbox"/> Type II: Request for Introduction of New Rules	
<input checked="" 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 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).

The Stockholm Environment Institute recently released a study that analysed ACM0013 and associate coal projects. The findings of the study are quite troubling:

- The study shows that it is highly unlikely that any of the coal power projects in the current pipeline are additional.
- The study furthermore identifies flaws in the methodology and its application and estimates these issues could lead to an overcrediting of up to 250%. This could result in an overissuance over 300 million CERs, putting additionality issues aside.

We would like to request the Board to study the findings of this new research and to discuss how they will impact how the Board handles ACM0013 and projects submitted under this methodology.

The study and the executive summary can be downloaded here:

<http://sei-international.org/publications?pid=1974>

If necessary, list attached files containing relevant information (if any)

- SEI Study: Coal Power in the CDM: Issues and Options
- Execuvite summary of the study

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

4 November 2011

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		