




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1)</b> <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 <sup>1</sup> submitting this form (individual/organisation):	Sandeep Kota Core CarbonX Solutions Private Limited
Address and Contact details of the individual submitting this Letter:	Address: 6-3-903/A/4/1, Vani Nilayam, Somajiguda, Hyderabad 500080 Telephone number: +91-40-23410367 E-mail Address: <a href="mailto:skota@corecarbonx.com">skota@corecarbonx.com</a>
Title/Subject (give a short title or specify the subject of your submission)	Queries on investment decision and prior consideration
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify <a href="#">Consultant</a>
Specify whether you want the Letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b>Purpose of the Letter to the Board:</b>	
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 checked="" type="checkbox"/> <b>Type I:</b> <input checked="" type="checkbox"/> <b>Request Clarification</b> <input type="checkbox"/> <b>Revision of Existing Rules</b> <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 type="checkbox"/> Others. Please specify reference Draft Clean Development Mechanism Validation and Verification Standard Version 2.0 as the part of Proposed Agenda – Annotations, Annex 7 to EB 65. <input type="checkbox"/> <b>Type II: Request for Introduction of New Rules</b> <input type="checkbox"/> <b>Type III: Provision of Information and Suggestions on Policy Issues</b>	

<sup>1</sup> Note that DNAs and DOEs shall not use this form to submit letter to the Board.

<sup>2</sup> 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).

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We are thankful to the meth panel and the board of UNFCCC for publishing the Draft Clean Development Mechanism Validation and Verification Standard Version 2.0 as the part of Proposed Agenda – Annotations, Annex 7 to EB 65.

The paragraph No. 107 states that “For a project activity with a start date on or after 2 August 2008, for which a PDD has not been published for global stakeholder consultation or a new methodology proposed to the Board before the project activity start date, the DOE shall confirm by referring to the list of prior consideration notifications from the UNFCCC website and communication between the project proponent, the secretariat and the host Party DNA regarding the commencement of a new project activity.”

However in the initial adoption of the Guidance on the demonstration and assessment of the Prior consideration of the CMD EB41, Annex 46 paragraph 2 “the Board that for project activities with a starting date on or after 02 August 2008, the project participant must inform a Host Party DNA and/or the UNFCCC secretariat in writing<sup>1</sup> of the commencement of the project activity and of their intention to seek CDM status. Such notification must be made within six months of the project activity start date and shall contain the precise geographical location and a brief description of the proposed project activity.”

In line with the above decision the Project Proponents intimated either the UNFCCC Secretariat or the Host Party DNA of the commencement of the project activity and the intention to seek CDM status. It was deemed not necessary for the Project Proponents to intimate both the UNFCCC Secretariat and the Host party DNA due to and/or clause inserted in the guidance. Hence it was understood that the intimation to UNFCCC secretariat and the Host Party was exclusive and not inclusive.

The guidance was subsequently revised in EB 48 on 17th July 2009 by deleting or clause and mandating the project proponents to send the notifications to both the UNFCCC secretariat and the host party DNA.

Subsequently all the projects with the start date after 17th July 2009 intimated both the UNFCCC secretariat and the Host Party DNA.

The inclusion of only “and” in the paragraph 107 of the Draft Validation and Verification Standard Version 2.0 will necessitate that the Project Proponents had to inform both the UNFCCC secretariat and the Host party DNA also for the past projects with the start date between 02nd August 2008 and 17th July 2009 and this will place many project activities in jeopardy.

Hence it is requested to the Board to retain the and/or clause for the project activities with the start date between 02nd August 2008 and 17th July 2009.

The change from 6 months to 180 days is also of relevance as some of the project proponents had to send the Prior Consideration form at the fag end of six months due to the unavailability of the geographical coordinates. As the 6 months deadline invariably extends over 180 days, it is also requested to the Board to retain the six months deadline in the paragraph No. 107 of the Draft Validation and Verification Standard Version 2.0 at least for the old projects which have already send the Prior Consideration Form before the adoption of the Validation and Verification Standard Version 2.0.



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)	<ul style="list-style-type: none"> <li>[replace this bracket with text, the field will expand automatically with size of text]</li> </ul>
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**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat	22 November 2011
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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.

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