




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>	
Name of the stakeholder ¹ submitting this form (individual/organisation):	Bruna Marigheto EQAO
Address and Contact details of the individual submitting this Letter:	Address: Rua Padre João Manuel, 222 Telephone number: + 55 (11) 3063-9068 E-mail Address: bruna.marigheto@eqao.com.br
Title/Subject (give a short title or specify the subject of your submission)	Calrification request: Additionality of first of its kind project activities under PoA
Please mention whether the Submitter of the Form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other Stakeholder, please specify
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: Request clarifcartion concerning the additionality of first of its kind project activities applying the Guidelines approved on EB63. (Please tick only one of the four types in each submission)	
<input checked="" 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 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 Guidelines on additionality of first of its kind projects activities (EB 63, Annex 11) <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).

According to the “Guidelines on additionality of first-of-its-kind project activities” (Annex 12, EB 63), the identification of a First-of-its-kind project activity is given below:

- A proposed project activity is the First-of-its-kind in the applicable geographical area if :*
- (a) The project is the first in the applicable geographical area that applies a technology that is different from any other technologies able to deliver the same output and that have started commercial operation in the applicable geographical area before the start date of the project; and*
 - (b) Project participants selected a crediting period for the project activity that is “a maximum of 10 years with no option of renewal.”*

In light of the above definition, the following requests are raised:

1. Is it possible to base the additionality analysis for CPAs under a Programme of Activities on the Guidelines on additionality of first-of-its-kind project activities? The main issue is that first-of-its-kind projects using the same technology, excluding CDM activities, will continue being FOIK projects. Is it reasonable and possible, then, to apply FOIK guidelines for each CPA under a PoA?
2. Regarding paragraph (b) mentioned above, is it possible a project activity considered as first-of-its-kind choose a renewable seven-year crediting period? What were the criteria for this determination? Is it not possible to renew the period reevaluating the baseline and, as suggestion, the additionality for this specific case of FOIK projects?

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)	<ul style="list-style-type: none"> • Not applicable
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Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	2 December 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.
Decision Class: Regulatory Document Type: Form Business Function: Governance		