



**United Nations**  
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Ms. Adriana Berti  
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Date: 09 May 2012  
Reference: 2011-089-S  
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*Sent by e-mail to: [adriana.beriti@eqao.com.br](mailto:adriana.beriti@eqao.com.br)*

**Re.: Clarification request on the VVM (version 1.2) paragraphs 132 and 133 for projects with EIA under development**

Dear Ms. Berti,

Thank you for your letter received on 28 March 2012, which has been made available to the Chair of the Board.

On behalf of the Chair of the Board, I would like to thank you for your question on the Validation and Verification Manual (VVM - version 1.2) paragraphs 132 and 133 for projects with an environmental impact assessment (EIA) under development.

Firstly, I would like to state that it is not the intent of this letter to infer any judgment regarding specific issues of the validation work of a particular designated operational entity (DOE).

Nevertheless, the lack of an analysis of environmental impacts and, if required by the host Party, an EIA is a reason for a corrective action request (CAR) to be raised by a DOE. As per VVM paragraph 35 "The DOE shall raise a CAR if ...: (b) The CDM requirements have not been met".

Moreover, a forward action request (FAR) could be raised by a DOE to underline, for example, when it is not clear up till the time of the validation if the EIA is going to be required or not by the host Party. As per VVM paragraph 37 "The DOE shall raise a FAR during validation to highlight issues related to project implementation that require review during the first verification of the project activity".

On a general note, please be informed that the CDM Accreditation Standard includes requirements for DOEs concerning the handling of complaints and disputes. Should project participants



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have complaints regarding the assessment of a DOE, they may elect to make use of the DOE's complaints and disputes handling procedures, to raise the concerns detailed in your letter directly with the validating and/or verifying entity.

I hope this letter suitably addresses all your concerns.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Andrew Howard', written in a cursive style.

Andrew Howard  
Secretary to the CDM Executive Board