

	CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2) This form should be used only by project participants and other stakeholders for submitting a “Letter to the Board” in accordance with the latest version of the <i>Modalities and procedures for direct communication with stakeholders</i>
Name of the stakeholder ¹ submitting this form (individual/organization):	Ecopart Assessoria em Negócios Empresariais Ltda. (EQAO)
Address and contact details of the individual submitting this form:	Address: Padre João Manoel, 222 – 01411-000 – São Paulo, SP – Brazil Telephone number: +55 (11) 3063-9068 E-mail address: karen.nagai@eqao.com.br
Title/Subject (give a short title or specify the subject of your submission)	Republication of PDD/PoA-DD/CPA-DD using the new form required under VVS Track
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)
Please choose any of the type(s) below ³ to describe the purpose of this submission.	
<p><input type="checkbox"/> Type I:</p> <p style="margin-left: 40px;"> <input checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules </p> <p style="margin-left: 80px;"> <input checked="" type="checkbox"/> Standards. Please specify reference VVS Track <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 </p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	
Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).	

¹ DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

² As per the applicable modalities and procedures, the Board may make its response publicly available.

³ Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

According to EB65, annex 6 (“Implementation timeline”, page 3): “Any requests for registration/issuance submitted under current rules before 30 September 2012 but “kicked out” from the process resulting from a completeness check or information and reporting check would have to be modified to comply with new rules if the resubmission is made after 30 September 2012”.

To the best of our understanding this means that the PDD/PoA-DD/CPA-DD/MR will have to be modified before being resubmitted. Nevertheless it is not clear if in this case the PDD/PoA-DD/CPA-DD/MR needs to be re-published using the new form required under VVS Track. Therefore, in case of receiving requests during the completeness check, reporting check or request for review, the PDD/PoA-DD/CPA-DD has to be republished for GSP? In the case of receiving a request for review, how we should proceed taking into account the deadline for the PPs to respond the request for review? A new submission for registration and the repayment of the registration fee are required?

The PPs are analyzing the impacts of switching from the VVM Track to the VVS Track for projects that already started the validation process. Since projects we are analyzing are located in Brazil and the LoA issuance takes at least four months to be issued after receiving the final Validation Report, these clarifications are really important for us to analyze the impact of switching now or not.

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

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

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Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	29 March 2012
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History of document

Version	Date	Nature of revision
01.2	08 February 2012	Editorial revision.
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
Decision Class: Regulatory Document Type: Form Business Function: Governance		