




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD”</b> (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 <sup>1</sup> submitting this form (individual/organisation):	Adriana Jacintho Berti <a href="#">EQAO</a>
Address and Contact details of the individual submitting this Letter:	Address: <a href="#">Rua Padre João Manuel, 222</a> Telephone number: + 55 (11) 3063-9068 E-mail Address: <a href="mailto:adriana.berth@eqao.com.br">adriana.berth@eqao.com.br</a>
Title/Subject (give a short title or specify the subject of your submission)	<a href="#">Clarification request: Definition of the term 'country specific' of the Guidelines on additionality of first of its kind projects activities</a>
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 <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>	
Request clarification 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"/> <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 checked="" type="checkbox"/> Others. Please specify reference <a href="#">Guidelines on additionality of first of its kind projects activities (EB 63, Annex 11)</a> <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).

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."*

The definition of applicable geographical area is:

*Applicable geographical area covers the entire host country as a default; if the technology applied in the project is not **country specific**, then the applicable geographical area should be extended to other countries. Project participants may provide justification that the applicable geographical area is smaller than the host country for technologies that vary considerably from location to location depending on local conditions.*

In light of the above definition, the following request is raised:

1. We would like to be informed how the referred "country specific" can be characterized under the applicable geographical area definition. What is the Executive Board understanding about this issue, since the applicable geographical area should cover the entire host country as a default and only if the technology applied in the project is not country specific, then the applicable geographical area should be extended to other countries?  
For the best of the PP's understanding, the country specific definition should be related to the technology transfer including information about the project activity technology supplier. Whether the technology is national, the host country is applicable; whether it is not, the PP should apply also the country where the technology is sourced.  
Is this understanding correct?
2. Regarding the extension, the limits should be proposed by the PP or there is any type of procedure for that?

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)

- Not applicable

**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat	30 July 2012
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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.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		