
	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):	Gujarat Forum on CDM 
Address and contact details of the individual submitting this form:	Address: 502 Raj Avenue Bhaikakanagar Road Thaltej Ahmedabad, Gujarat, India Telephone number: 91-79-40009068 E-mail address: gujaratforumoncdm@gmail.com
Title/Subject (give a short title or specify the subject of your submission)	Suggestions to improve local stakeholder consultation
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify civil society network
Specify whether you want the letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input 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.	
<input type="checkbox"/> Type I: <input type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference local stakeholder consultation <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input type="checkbox"/> Type II: Request for Introduction of new rules <input type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
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> .

> >

[> We are representing Gujarat Forum On CDM - which is a network of Individuals & Organisations working on Environmental issue & Monitoring of CDM projects in Gujarat, India.

We would like to put forward following suggestions for better implementation of Local Stakeholder Consultation process in CDM process cycle:

Local Stakeholder Consultation Meetings

- i) The notice of the local stakeholder consultation meeting to be given one month in advance, in at least two local daily in two different language – one in vernacular language and other in English
- ii) Also the stakeholders are to be identified – ranging from Government agencies involved in land acquisition, environmental protection to local self governing bodies and notice for the meeting to be sent to them separately. Such a procedure to be stipulated by the government to ensure that such a provision is carried on.

Responsibility of Local Stakeholder Consultation

The responsibility of the local stakeholder consultation meetings currently lies with project proponent itself. In case of negative comments or outcome of the meeting, it is obvious that, a fair picture of the meeting would not be portrayed. Hence, the procedure to be carried out not only by the project proponent, but the local selfgovernment

and the SPCB (State Pollution Control Board) should be given an equal involvement. As per EIA notification 2006, SPCB is responsible to organize the Environment Public Hearing. In the same manner, responsibility should be given to the same authority.

Executive summary and availability of documents

- i) An executive summary of PCN (Project Concept Note) should be mandatorily circulated among the local stakeholders and authorities (local self governing bodies, SPCB) so that it is in reach of local people who can read it and be aware about concerned information.
- ii) Also, the procedure of public consultation to be made available to anyone who is seeking for it.

DNA-Host Country Approval Authority

- i) In case of situations where a concerned party has missed out attending the local stakeholder consultation meeting due to unavoidable circumstances, a provision should be made in such a way, that the projects which have been proposed for host country approval should be displayed on DNA's website at least one month in advance. This would facilitate a chance for people who have missed the meeting, to present their views before the host country approval.
- ii) Even though the host country has authority to give approval for carbon credits, it has no power of revocation of such approval in case if the project proponent violates the terms and conditions.

Hence, the host country to be given power to revoke the approval in case of violation of terms by the project proponent

Monitoring Authority – Social Audit

The approval by the host country is given only after reviewing the activities of the project proponent which are going to result in social development in the near future. But unfortunately, after giving the approval, there exist no monitoring body to check if the activities are actually resulting in social development or not and if the objectives based on which approval is being given are met.

At present, DOE is responsible to monitor project implementation. But as per our National Rural Employment Guarantee scheme – provision of social audit exists – which is very admirable step to check the effectiveness.

Similarly, a Social Audit mechanism should be implemented along with DOE for CDM projects.]

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).

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

- [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	23 August 2012
Reference number	2012-152-S

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		