

 <p>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <p>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></p>	
Name of the stakeholder ¹ submitting this form (individual/organization):	Econergy Brasil Ltda
Address and contact details of the individual submitting this form:	Address: Angelica Avenue, 2530 cj 35 Telephone number: +55 11 3555-5700 Francisco do Espirito Santo Filho E-mail address: francisco.santo@econergy.com.br
Title/Subject (give a short title or specify the subject of your submission)	Landfill gas use for other purposes not defined in the registered Project Design Document
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.	
<input type="checkbox"/> Type I: <input type="checkbox"/> Request for 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 <input type="checkbox"/> Type II: Request for Introduction of new rules <input checked="" 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> .

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Dear all,

Econergy is a CDM consultancy with a huge experience in CDM Market since 2005. In our portfolio has around 50 registered CDM project with more than 7 million of issued CERs.

In one of our landfill gas projects, the registered PDD defines that the collected landfill gas will be combusted in enclosed flares only.

The PP has the opportunity to deliver and sell part of the project landfill gas to a captive industrial plant near to the project activity which is outside the project boundary and not defined in the registered Project Design Document.

We need a clarification under the possibly to carry out the project activity considering the other landfill gas use defined above keeping the current project activity described in the registered PDD. Obviously this portion of landfill gas which would be used for other purposes will not be accounted for the ERs calculation requested in the monitoring periods. To guarantee this configuration, a separated flow meter will be installed in order to register the amount of delivered landfill gas outside the project boundary.

The main question is:

- 1) Considering the situation described above, is there any hurdle to request CERs issuance taking in consideration the current registered PDD and monitoring plan?
- 2) If not possible, is there any possibility to use part of the landfill gas for other purposes (not mentioned in this query) and not affecting the CERs issuance?

Yours faithfully,

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)

- [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	26 September 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.
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