



**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 *Modalities and procedures for direct communication with stakeholders*

<i>Name of the stakeholder¹ submitting this form (individual/organization):</i>	Livelihoods Fund
<i>Address and contact details of the individual submitting this form:</i>	Address: 15, Rue de Helder Telephone number: 33 1 44 35 26 08 E-mail address: jprennaud@livelihoods-venture.com
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Mangrove Restoration Program in Senegal :
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<i>Specify whether you want the letter to be treated as confidential²:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<i>Please choose any of the type(s) below³ to describe the purpose of this submission.</i>	
<input type="checkbox"/> Type I: <input checked="" 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 <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 checked="" type="checkbox"/> Type III: Provision of information and suggestions on policy issues	
<i>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</i>	

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>

Dear Mr. Peer Stiansen and members of the Board,

The aim of this letter is to ask you to consider granting an exception to allow the registration of the first A/R PoA project in the world, which will be located in Senegal, one of the Least Developed Countries. The rule concerned by the exception is paragraph 193 of the CDM Validation and Verification Standard.

Background

In paragraph 3 of Annex 26 of EB 60, the Board agreed that the Guidelines for the demonstration and assessment of prior consideration of the CDM do not apply to PoAs because it was expected that no component of the programme would commence prior to the start date of validation. However, recognising that this rule could entail difficulties, the Board requested the Secretariat to provide options for further defining the start date of a programme which would facilitate the prompt start of mitigation activities through programmes.

At EB 70, the CDM Project Standard and the CDM Project Cycle Procedure were revised, introducing the possibility for PoAs to notify prior consideration and allowing CPAs to start on or after the date of notification of this prior consideration of the PoA. The revision also allowed CPAs of A/R PoAs to accrue t-CERs/l-CERs as of the starting date of the CPA under certain conditions.

Obstacle for the development of our PoA

When we started the first CPA of the PoA in 2010, there was no procedure for prior consideration for PoAs. Therefore, we submitted a notification of prior consideration using the Project Activity template indicating it as a PoA with with multiple locations distributed in different years. The notification of prior consideration was submitted within 180 days of the start date of the first CPA, as per the rules in place for project activities.

The revised CDM Project Standard and CDM Project Cycle Procedure only allows CPAs to start on or after the date of notification of prior consideration, which is different from the rule concerning CDM Project Activities and does not allow us to include the first CPA in the PoA as it started 5 months before our notification of prior consideration.

Request

If an exception is not granted by the CDM Executive Board, the first CPA will qualify to be only developed as a Project Activity which is permitted under the current rules, preventing the scaling up of the activity. We have already developed the documentation as a PoA and due to low market price of CERs and high validation costs it will not be feasible to re start the process. Considering the unique scenario of the project, we would like the CDM Executive Board to provide an exception from paragraph 193 of the CDM Validation and Verification Standard, which requires the DOE to confirm that the start date of any CPA is on or after the start date of the PoA, that would prevent the registration of the Mangrove Restoration Program in Senegal as a PoA. Please consider allowing the start date of our PoA to be the start date of our first CPA.

Thanks in advance for your time and consideration.

Best regards,

Jean Pierre Renaud
General Delegate Livihoods Venture

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

18 March 2013

Reference number

2013-243-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		

