


|  CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2) | |
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| 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 stakeholder¹ submitting this form (individual/organization): | Dr N Bhanumathidas, Eco Carbon Pvt. Ltd. |
| Address and contact details of the individual submitting this form: | Address: INSWAREB Lab Building, 32-10-55 Shri Venkateswara Colony, Visakhapatnam 530012 Telephone number: +91-891-2516411; +91-98481-91453 E-mail address: info@co2credits.biz ; bhanukali@vsnl.com |
| Title/Subject (give a short title or specify the subject of your submission) | Drawing dividing line between the definitions of ‘Bundling’ and ‘Debundling Assessment’ in order to avoid rejection of projects on technical misinterpretation. |
| Please mention whether the submitter of the form is: | <input type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify |
| Specify whether you want the letter to be treated as confidential²: | <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) below³ 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 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> .

Objectives and agenda of framing Bundling Program is vetoed by imposition of debundling assessment, necessitating a clear demarcation between these two issues as explained below:

1. Based on provisions of 'Bundling' offered by CDM-EB vide SSC-WG 3 Annex 2, duly fortified by EB 21 Annex 21, we have launched bundling activity in 2005 by enrolling tiny and small scale entrepreneurs for eight bundles as signed with the World Bank. EB 66 Annex 21 and Glossary of terms in EB 70 uphold the objective and scope of 'Bundling'.
2. Then CDM-EB seemed to have apprehended that large scale projects may fragment their activities and sneak into SSC-Bundle, and came out with certain check mechanism. EB 54 has clearly defined 'Debundling' as the fragmentation of large project activity into smaller parts, in order to prohibit them from using simplified modalities and procedures for SSC CDM project activities. Even the latest glossary vide EB 70 dt. 23rd November 2012 repeated the same expression.
3. Based on the definition of 'Debundling', 'Debundling Assessment' means 'the assessment of fragmented/separated large scale projectivity into smaller parts'.
4. But, the reviewers/validators at EB are applying debundling assessment, on the premise of 'rule-based mechanism', to genuine bundles constituted of individually licenced, independently owned and operated units, which have nothing to do with fragmentation or separation.
5. In the process, the object of CDM-EB in encouraging the SSC units through 'Bundling Program' got vetoed.
6. Brick production is globally conducted, by and large, by small scale units. Thus AMS III.Z which is applicable to walling materials needs to serve small scale units, so much so bundling program. However, this is being hampered by debundling assessment, discouraging genuine 'Aggregators' like us.
7. Technology providers like us, who encourage promotion of small scale units, are well positioned to bundle them in quick succession. But, incidentally, such activity attracts conditions such as: a) the PP is same for good number of bundles; b) bundles are submitted for registration within one year; c) small scale units, which do proliferate in mushrooming like clusters, do fall within one km radius. But none of these issues should hamper the genuinity of the bundle as each bundle is constituted of independently operated individual units.
8. Hence we request CDM-EB to provide a clear demarcation between 'Bundle' and 'Debundle Assessment'. In order to simplify the issues, we provide the following text for the consideration of CDM-EB:

'As long as a SSC-Bundling CDM project demonstrates in PDD the constitution of independently owned individual production units with holistic production activity as described by technology, satisfying the criteria of bundling vide EB 21 Annex 21 and EB 66 Annex 21, such bundle need not be subjected to debundling assessment, and the provisions of paragraph 4 and 4(a) of EB 54 Annex 13 are equally applicable to type III.Z also.'

'As long as a SSC-Bundling CDM project, under AMS III.Z, demonstrates in PDD the constitution of independently owned individual production units with holistic production activity as described by technology, satisfying the criteria of bundling as per rules, though such bundle incidentally falls within the provisions of debundling assessment on one or multiple counts, these provisions are not applicable, thereby precluding such bundle from debundling assessment.'

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).

SSC-WG 3 Annex 2; EB 21 Annex 21; EB 54 Annex 13 Paragraph 4 and 4(a); EB 66 Annex 21 and Glossary of terms in EB 70.

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

-Nil-

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

28 March 2013

Reference number

2012-248 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 | | |