	<p align="center">CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <p align="center">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>
<p>Name of the stakeholder¹ submitting this form (individual/organization):</p>	<p>World Bank, Carbon Finance Unit Klaus Oppermann</p>
<p>Address and contact details of the individual submitting this form:</p>	<p>Address: 1818 H Street N.W. Washington, D.C. 20433, USA Telephone number: (202) 4 73-6363 E-mail address: koppermann@worldbank.org</p>
<p>Title/Subject (give a short title or specify the subject of your submission)</p>	<p>Determining “Project Participant” in the application of “Guidelines on assessment of debundling for SSC project activities” (Annex 13, EB 54)</p>
<p>Please mention whether the submitter of the form is:</p>	<p><input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other stakeholder, please specify Multilateral Financial Instituion</p>
<p>Specify whether you want the letter to be treated as confidential²:</p>	<p><input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)</p>
<p>Please choose any of the type(s) below³ to describe the purpose of this submission.</p>	
<p><input checked="" type="checkbox"/> Type I:</p> <p><input type="checkbox"/> Request for clarification <input checked="" type="checkbox"/> Revision of existing rules</p> <p><input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input checked="" type="checkbox"/> Guidance. Please specify reference “Guidelines on assessment of debundling for SSC project activities ”(Annex 13, EB 54) <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference</p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	

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> .

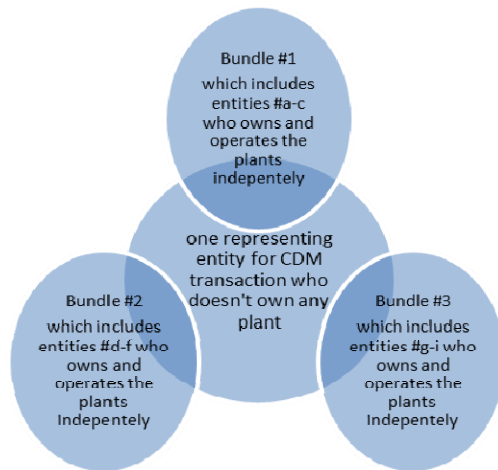
Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

Dear Members of the Executive Board,

We would like to bring to your attention an inconsistency between the General Principles of Bundling (Annex 21, EB66) and “Guidelines on assessment of debundling for SSC project activities” (debundling guidelines, Annex 13, EB 54), as well as the difficulties encountered by projects in applying the guidelines for bundling projects.

Per the paragraph 2(a) of the debundling Guidelines, a proposed small-scale project activity shall be deemed to be a debundled component of a large project activity if it has the same project participants as other small scale projects. As shown in Figure 1 below, bundles that comprise different project participants who own and operate plants independently and are coordinated by the same participant entity for communications with the UNFCCC are interpreted by the UNFCCC Secretariat to be non-compliant of the debundling guidelines.

Figure 1: different bundles with one representing entity for CDM transaction



In the above context, the following provisions related to bundling are relevant.

- 1) Para 18 (a) of “General Principles for Bundling” (version 2.0 Annex 21, EB 66) : project entities who submitted a written agreement to bundle their individual project activities are deemed to be project participants;
- 2) Para 18 (b) of “General Principles for Bundling” (version 2.0 Annex 21, EB 66): one project participant will represent all the project participants to communicate with the Board.
- 3) “Glossary of CDM terms” (Version 6.0, Annex 63, EB 66): project participant is “a Party involved that intends to participate, or a private and/or public entity authorized by the DNA of a Party involved to participate in a CDM project activity or PoA, as applicable.”

To be consistent with the above provisions, we would like to request the revision of the project participant definition under the “Glossary of terms” when it applies to bundled projects, the multiple project participants should be viewed as authorized when their presence are fully acknowledged by DNA’s authorisation.

The SSC-WG 40 noted that “the SSC WG understands that there may be cases when project participants listed in the PDD do not have operational or financial control of a project activity....it is out of the scope of the SSC WG to modify the definition or to create sub-categories for various types of project participants.” (Referring to paragraph 46 of the meeting report of the SSC WG 40)”. Considering that SSC-WG has acknowledged that the matter is out of its scope, we request the EB to review the consistency of the provisions of bundling and debundling guidelines and update the definition of project participant under the glossary of CDM terms so facilitate its application to bundled projects. We look forward to providing relevant information as necessary.

<i>If necessary, list attached files containing relevant information (if any)</i>	<ul style="list-style-type: none"> • [replace this bracket with text, the field will expand automatically with size of text]
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Section below to be filled in by UNFCCC secretariat	
Date when the form was received at UNFCCC secretariat	22 May 2013
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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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