

	<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>Society for Promotion of Wastelands Development <u>Timbaktu Collective</u></p>
<p>Address and contact details of the individual submitting this form:</p>	<p>Address: Vishnu Digamber Marg, Rouse Avenue Lane, New Delhi -110002 Telephone number: +91 11 23236440 E-mail address: ho@spwd.org</p>
<p>Title/Subject (give a short title or specify the subject of your submission)</p>	<p>Local stakeholder consultation concerns regarding Nallakonda windfarm in Andhra Pradesh</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 <u>locally affected stakeholder</u></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 type="checkbox"/> Type I:</p> <p style="padding-left: 40px;"><input type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules</p> <p style="padding-left: 80px;"><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</p> <p><input type="checkbox"/> Type II: Request for Introduction of new rules</p> <p><input checked="" type="checkbox"/> Type III: Provision of information and suggestions on policy issues</p>	
<p>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</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> .

We, representatives of the local communities Shyapuram and Kambalapalli, directly affected by the CDM project 8791: Nallakonda wind farm in Andhra Pradesh, and representatives of civil society organizations in India, would like to draw your attention to several serious concerns related to the proposed CDM project which is currently requesting registration.

Because of the large size of the construction projects hills needed to be removed. This has led to erosion and obstruction of natural waterways, damages that have not yet been fixed. Also the construction of the windmills has led to the lowering of the water level which is putting heavy burden on the ability of the local communities to continue the local farming. Moreover, contrary as to what was explained in the validation report, there are serious environmental and social impacts from the construction which has not yet been fixed. For example, the construction of 15m wide roads in the region has severely damaged the environment in Kalpavalli area.

The validation report states that local jobs would be created. Instead of the 48 jobs promised only six people have actually been employed. They are under continuous work contract without entitlement to leave and a salary far below the average income. Far more tragic, however, is that the communities continue to live without access to electricity.

Most worrying of all is that the local communities Shyapuram and Kambalapalli have not been invited to the local stakeholder consultation although they are directly impacted by the wind farm.

In light of the troubling social and environmental impacts presented above and brought before the Indian Green Tribunal (Kalpavalli vriksha Pempakamdarula ors vs. Union of India & ors Application 92 of 2013), we have urged the Designated National Authority of India to call for an immediate review of this project <https://docs.google.com/document/d/10jCBssNIWpiLxyavBB2CecP8BDDerTmlOgzvqAJ7Na0/edit>. Should the India DNA not request a review of this project, we urge you to review how the local stakeholder consultation of this project has been conducted and to ensure that the human rights of the locally affected people are respected.

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

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

- Letter sent to India DNA on Nallakonda windfarm in Andhra Pradesh

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat 11 July 2013

Reference number 2013-278-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		

**Representation from Civil society Organizations from India
On
Nallakonda wind farms in Andhra Pradesh**

Date: 11th July 2013

To,
Dr. A. DURAISAMY,
Director & Member Secretary
The National CDM Authority (Designated National Authority (DNA))
Ministry of Environment and Forests, Government of India,
Core IV B, 2nd Floor, India Habitat Centre,
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**Sub: Demand to take immediate action for the proposed CDM project
“Nallakonda wind farm in Andhra Pradesh”**

Respected Shri Duraisamyji,

We are writing to you in the name of the affected local community in Kalpavalli, an area in the vicinities of the [Nallakonda wind farm in Andhra Pradesh](#) and representatives of civil society organizations from different parts of India working on environmental issues. We would like to draw your attention to several serious concerns related to the proposed CDM project which is currently requesting registration.

Nallakonda wind farm in Andhra Pradesh is a proposed CDM project of 50.4 MW grid connected wind farm in Anantapur district in Andhra Pradesh state. The project is at validation stage at UNFCCC and is currently requesting registration with the CDM. This project is located in the area regenerated by Kalpavalli Cooperative with the support of Timbaktu Collective. Neighbouring communities to the project have identified several negative environmental impacts, such as deforestation, land degradation, affected water bodies and biodiversity loss already occurring from project activities. Most worrying of all, although directly impacted by the construction of the project, the local community was not consulted on the construction of the CDM project, as mandated by CDM rules. Some of the undersigned organizations below have also submitted comments during the global commenting period from 31st July 2012 – 29th August 2012. However, the project PDD contains several problematic claims and false details.

We would like to draw your attention to several specific points with this project and trust you will take this matter seriously. Major problems related to the project are:

- **Local Stakeholder Consultation**-There are serious deficiencies with the local stakeholder consultation process as there has been deficient communication from the project developers' side with the local communities, absence of information through local newspapers or in the local language.

Two neighbouring villages to the project affected area are not mentioned in the PDD. The villages not mentioned are Shyapuram and Kambalapalli.

- **Environmental Impact Assessment (Social impact assessment)**-Though Indian Government has not stipulated submission of EIA for wind power projects, it will be useful to list the possible impact the project may have on biodiversity, noise and other environmental factors, and the measures taken to minimize any impact to the local population.

Our research shows strong dissatisfaction from locals with the project. Therefore, details of the land where the wind farm is located need to be described in the PDD to demonstrate that it is not implemented on forest land or agricultural land. If it is and activities have cause substantial forest loss and land degradation, an option would be to consider improving local participation, social compensation and consideration of resulting emissions in the calculations within the project boundary.

Moreover, contrary as to what was explained in the validation report, there are serious environmental and social impacts from the construction which has not yet been fixed. For example, the construction of 15m wide roads in the region has severely damaged the environment in Kalpavalli area.

- **Additionality of the project**- There are serious concerns about the additionality of the project. This was also the reason why the UNFCCC had already requested a review of the additionality. There are at least 10 other similar wind farms in the same area which is a reason why the Nallakonda project is common practice, and is not eligible under the CDM.

In light of the troubling social and environmental impacts presented above and brought before Indian Green Tribunal (Kalpavalli vriksha Pempakamdarula & Ors Vs. Union of India & Ors, Application 92 of 2013), we urge you to call for an immediate review of this project under UNFCCC guidelines. We urge you, as a director of the Designated National Authority of India, to initiate an investigation into the project proponents misleading activities that will bring about a favorable outcome for all local communities affected, state or otherwise by the PDD.

We will be happy to provide more details and ready to meet you personally, should you need them. We trust that you will take this matter seriously and look forward to your timely response.

Thanking you,

Representatives of different organizations,

- Jairam Reddy, Kalpavalli MACS president, Anantpur, Andhra Pradesh
- K Srinivasulu, SBRpalli village BMC president, Anantpur, Andhra Pradesh
- M C Gopal, Shyapuram village BMC president, Anantpur, Andhra Pradesh
- S Subbaraiudu, Ramagiri mandal BMC president, Anantpur, Andhra Pradesh
- N Gopal, Mustikovilla village BMC president, Anantpur, Andhra Pradesh
- P Ramanjanelu, C K Palli mandal BMC president, Anantpur, Andhra Pradesh
- R Obileshu, Roddam mandal BMC president, Anantpur, Andhra Pradesh
- M Onnurappa, GGPalli village BMC president, Anantpur, Andhra Pradesh
- K Anandappa, Beedanpalli village BMC president, Anantpur, Andhra Pradesh
- Ms. Marry Vattamatam, Timbaktu Collective, Anantapur, Andhra Pradesh
- C.K. Ganguly (Bablu), Timbaktu Collective, Anantapur, Andhra Pradesh
- Viren Lobo, Society for Promotion of Wasteland Development (SPWD), New Delhi
- Dr. Leena Gupta, Society for Promotion of Wasteland Development (SPWD), Andhra Pradesh
- Ms.Falguni Joshi, Gujarat Forum on CDM, Ahmedabad
- Mahesh Pandya, ParyavaranMitra, Gujarat
- Himanshu Banker, Vikalp, Gujarat
- Tushar Pancholi, Paryavarniya Vikas Kendra, Rajkot, Gujarat
- Ms. Alpana Sharma, Paryavaran Jagrukata Abhiyan, New Delhi
- Vijay Pratap Singh, Harit Swaraj, New Delhi
- Ms. G. Vijayalaxmi, Centre for Environment And Development, Visakhapatnam, Andhra Pradesh
- Atal Behari Sharma, Ganga Seva Sankalap, Uttar Pradesh
- Debejeet Sarangi, Living Farms, Odisha
- Dr. Subash Mohapatra, Global Human Rights Communications, Bhubaneswar
- Kanchan Kumar Agrawal, Centre for Science and Environment(CSE), New Delhi
- Krishnakant, National Alliance for People's Movements (NAPM), Gujarat
- Aurélien Berings, Hyderabad, Andhra Pradesh
- Vijay Bharatiya, South Asia Peace Alliance, New Delhi
- Dr.Onkar Mittal, Society For Action In Community Health (SACH), New Delhi
- Dr.Bharat Patel, Machimar Adhikar Sangharsh Samiti, Kachchh, Gujarat
- Dr.Sunil Dubey, Member IUCN World Commission on Environment, Economics & Social Policy, Udaipur, Rajasthan
- Prabhat Sinha, All India Majdoor Kisan Sangharsh Samiti, Chittorgarh, Rajasthan
- Naveen Chhabaria, Timbaktu Collective, Andhra Pradesh
- L.C.Nagraj, Bengaluru, Karnataka
- Ovais Sultan Khan, New Delhi