

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

| Name of the stakeholder ¹ submitting | Karen M. Nagai |
|--|---|
| this form (individual/organization): | Ecopart Assessoria em Negócios Empresariais Ltda. (EQAO) |
| | Address: Padre João Manoel, 222 – 01411-000 – São Paulo, SP |
| Address and contact details of the | – Brazil |
| individual submitting this form: | Telephone number: +55 (11) 3063-9068 |
| | E-mail address: karen.nagai@eqao.com.br |
| Title/Subject (give a short title or specify the subject of your submission) | |
| Please mention whether the submitter | |
| of the form is: | Other stakeholder, please specify |
| Specify whether you want the letter to | To be treated as confidential |
| be treated as confidential ² : | ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ |
| Please choose any of the type(s) below ³ | to describe the purpose of this submission. |
| ☐ Type I: | |
| ⊠Request for clarificati | on Revision of existing rules |
| ☐ Standards. F | Please specify reference |
| ⊠ Procedures. | Please specify reference CDM Project Cycle Procedure |
| ☐ Guidance. P | lease specify reference |
| ☐ Forms. Plea: | se specify reference |
| ☐ Others. Plea | ase specify reference |
| ☐ Type II: Request for Introduc | ction of new rules |
| ☐ Type III: Provision of inform | ation and suggestions on policy issues |
| Please describe in detail the issue on whe exact reference source and version (if as | nich you request a response from the Board, including the |

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.

According to §112 of the "CDM Project Cycle Procedure":

"To include a CPA in a registered CDM PoA, the coordinating/managing entity shall forward the completed specific case CPA-DD to any DOE, after having ensured that the CPA and the specific case CPA-DD meet the eligibility criteria for inclusion in the PoA defined in the PoA-DD and its generic CPA-DD. The coordinating/managing entity may forward more than one specific case CPA-DD at one time. Only upon the approval of the first specific case CPA-DD corresponding to a generic CPA-DD by the Board, CPAs corresponding to that generic CPA-DD may be included in the registered CDM PoA".

However, the statement above does not clarify about the inclusion of more projects/components in a single CPA. Also, in the "CDM Project Standard", there is no information regarding the inclusion of more than one component/project in a CPA, but the inclusion of CPAs in a registered PoA.

According to the glossary of CDM terms (version 7.0), CPA is:

"a <u>single measure</u>, or a set of interrelated measures under a PoA, to reduce GHG emissions by sources or result in net anthropogenic GHG removals by sinks, applied within a designated area defined in the baseline methodology(ies)".

To the best understanding of the Project Participants (PPs), there is no CDM rule that prohibit the inclusion of more than one component/project applying the same measure in a CPA.

Therefore, the PPs would like to request the following clarifications considering <u>no limitations in the</u> eligibility criteria of the registered PoA for the inclusion of more than one component in a CPA:

- 1. Is it possibile to include more than one component (plant) applying the same measure in a CPA?
- 2. In the case of small scale PoA, it can be included CPAs considering the limitations of small scale projects. Thus, is there a limit in respect to installed capacity for large scale projects to be included in a CPA?

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).

>>

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

| 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 | 23 July 2013 | | |
| Reference number | 2013-280-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 | | |