

 CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)	
<p>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>	
Name of the stakeholder ¹ submitting this form (individual/organization):	SANDRP [REDACTED]
Address and contact details of the individual submitting this form:	Address: c/o Plot 18, Prabhat Society, Pune Telephone number: +91 9860030742 E-mail address: parineeta.dandekar@gmail.com
Title/Subject (give a short title or specify the subject of your submission)	Request to Review 12.5 MW Nekkiladi Hydro Power Project
Please mention whether the submitter of the form is:	<input type="checkbox"/> Project participant yes <input type="checkbox"/> Other stakeholder, please specify NGO
Specify whether you want the letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input type="checkbox"/> YES To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below ³ 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 Yes <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> .

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A. Breach of Project Standard: CDM-EB65-A05-STAN**Breach of Project Standard: Local Stakeholder Consultation 7.5 (66,67)**

- The Project Design Document does not include the huge and sustained local opposition to the Project from the left bank of the project.
- **The opposition is in fact so strong that the village has not issued an No Objection Certificate to the Proponent for carrying out the activity**
- **The villagers have not allowed the proponent or other institutions to carry out ground survey for land required for the project.**

There are several media reports about the strong local opposition to this project.:(

<http://thecanaratimes.com/epaper/index.php/archives/14770>,

<http://thecanaratimes.com/epaper/index.php/archives/14979>,

<http://thecanaratimes.com/epaper/index.php/archives/15729>,

<http://www.thehindu.com/news/cities/Mangalore/article3024247.ece>,

<http://thecanaratimes.com/epaper/index.php/archives/15985>

<http://thecanaratimes.com/epaper/index.php/archives/22561>)

Despite this fact, the PDD mentions that all stakeholders gave favourable comments about the project and played down the local opposition

B. Breach of Verification and Validation Standards**7.14.3 Reporting Requirements****The DOE states in the Validation Report (Section 3.12 Local Stakeholder Consultation) :**

“The local villagers appreciated the Project activity. There were no negative comments from the stakeholders regarding the project activity.”

This is an entirely incorrect representation of the local opposition that 12.5 Nekkiladi Hydro Power Project is facing.

In fact, village from the left bank has opposed the project very strongly and has not allowed even the survey of its lands.

Validator’s comments above are highly misleading and erroneous, favouring the project proponent.

In doing so, the validator has breached several principles of Validation and Verification Standard including:

7.14.3 :Reporting Requirments**8.4.13 Local Stakeholder Consultation**

7.14.2: Means for Validation: The DOE has not conducted interviews with staekholders opposed to the project and has directly concluded that local villagers appreciated the project, which is misleading the CDM Executive Board

5.1 Independence: The DOE has not remained independat and free of bias while validating the project, as is clarified through representing local stakeholder comments and inteviews

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).

CDM process has an explicit mandate to promote sustainable development.

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

Media Reports about local protests and hardships due to 12.5 MW Nekkildai Hydropower Project:
<http://thecanaratimes.com/epaper/index.php/archives/14770>,
<http://thecanaratimes.com/epaper/index.php/archives/14979>,
<http://thecanaratimes.com/epaper/index.php/archives/15729>,
<http://www.thehindu.com/news/cities/Mangalore/article3024247.ece>, <http://thecanaratimes.com/epaper/index.php/archives/15985>
<http://thecanaratimes.com/epaper/index.php/archives/22561>

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	20 August 2013
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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		