

	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 <i>Modalities and procedures for direct communication with stakeholders</i>
Name of the stakeholder ¹ submitting this form (individual/organization):	Dr N Bhanumathidas
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; +91-9848369930 E-mail address: nbhanumathidas@co2credits.biz
Title/Subject (give a short title or specify the subject of your submission)	Request for permission to resubmit our rejected project, India FaL-G Bricks & Block Project No. 04 with ref. No. 5348 for Registration.
Please mention whether the submitter of the form is:	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
Specify whether you want the letter to be treated as confidential ² :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> 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 checked="" type="checkbox"/> Request for clarification <input type="checkbox"/> Revision of existing rules <input type="checkbox"/> Standards. Please specify reference <input checked="" type="checkbox"/> Procedures. Please specify reference <input checked="" 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> .

Our India-FaL-G Brick & Blocks Project No. 4 (Ref No. 5348) got rejected on debundling issue as below:

“ The CDM-Executive Board decided to reject the above proposed project activity on 8 March 2013, in accordance with “Procedures for review of requests for registration”, version 01.1, EB 55, Annex 40, paragraphs 23, 24 and 28 (the procedures). In accordance with paragraph 27 of the procedures, the rulings shall contain an explanation of the reasons and rationale for the final decision, which are as follows:

- 1) The DOE (DNV) failed to demonstrate that the project activity is not a de-bundled component from a large scale project activity, in accordance with “Guidelines on assessment of de-bundling for SSC project activities” (EB 54, annex 13) and CDM Glossary of Terms (version 03.0)”.

In view of uncertainty cropped up due to debundling issue, DOE (DNV) has withheld the submission of Validation Reports of our further Projects India-FaL-G Brick & Blocks Project No. 5 & 6 because bundle 4 got stuck.

We have submitted a letter to the Board on 28.3.2013 (Ref. No. 2013-248-S), requesting to draw a deviding line between the definitions of ‘Bundling’ and ‘Debundling Assessment’ which was duly responded by EB on 15.7.2013. Since EB seems to have seen the point of justice in our submission, it has given certain directions to Secretariat as well as SSC-WG vide EB 73, paragraph 66, as follows:

“ The Board agreed to further consider the request for revision of the “Guidelines on assessment of debundling for SSC project activities”, in the context of submission SSC_680 at a future meeting. In this regard, the Board requested the secretariat to provide legal interpretation of the definition of a project participant and requested the SSC WG to continue analysing the issue at its future meetings and make a recommendation to the Board.”

Since the subject is taking considerable time, pending the processing of subject at EB’s end, in order to gain time ECPL request EB to accord permission for resubmitting Project No. 4 (Ref No. 5348) for Registration.

Once this permission is accorded, it would clear decks to submit Project No. 5 & 6 also for Registration.

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).

Pursuant to the request from ECPL for drawing dividing line between bundling and debundling, the process is reconfirmed by the Board at EB 74, para 58, as follows:

‘The Board informed the observers that work on bundling and debundling is currently underway’.

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	2 September 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.
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