

 <p>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</p> <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):	Karen M. Nagai Ecopart Assessoria em Negócios Empresariais Ltda. (EQAO)
Address and contact details of the individual submitting this form:	Address: Padre João Manoel, 222 – 01411-000 – São Paulo, SP – Brazil 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)	Procedures for verifications/requests for issuance of PoA with the same DOE that has performed one of the CPAs inclusion
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 checked="" type="checkbox"/> Standards. Please specify reference CDM Validation and Verification Standard <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 <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> .

According to §297 of the “CDM Validation and Verification Standard”:

“A DOE that has not performed validation activities for a PoA (validation of the PoA, inclusion of CPAs, renewal of the PoA, or renewal of crediting period of CPAs)⁴² shall:

(a) Identify those CPAs that it shall consider for verification in accordance with the method/procedure to be used for verification of the amount of reductions of anthropogenic emissions by sources or removals by sinks of greenhouse gases achieved by the CPAs under the PoA and determined in the PoA-DD”

Furthermore, the footnote 42 states:

“The same DOE that has performed validation activities for a PoA (validation of the PoA, inclusion of CPAs, renewal of the PoA or renewal of crediting period of CPAs) may also undertake the verification if this has been approved in advance by the Board”.

Considering the statements above, the Project Participants and the coordinating/managing entity (CME) of 2 (two) Programme of Activities are requesting clarification regarding the Board's procedures to allow the DOE which has already performed the inclusion of a CPA to also perform the verifications and requests for issuance of CERs for the same CPAs.

Since the verification and request for issuance of project activities under a PoA are conducted in the PoA level (maximum of two issuance requests per monitoring period), it is not clear why the DOE that had validated the inclusion of a CPA cannot perform the PoA verification.

The CME's main concern is related to limitations in the management of verifications/requests for issuance with different DOEs performing multiple CPAs inclusion.

In summary, the CME/PP would like to request the following clarification:

- What are the applicable procedure and expected schedule related to the request for approval by the Board of a verification/request for issuance of a PoA considering that the same DOE has performed one or more inclusion of CPAs under the same PoA?

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

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Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	23 September 2013
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History of document

Version	Date	Nature of revision
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01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
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