

 <p><b>CDM: FORM FOR SUBMISSION OF A “LETTER TO THE BOARD” (Version 01.2)</b></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>	
<i>Name of the stakeholder<sup>1</sup> submitting this form (individual/organization):</i>	EKI Energy Services Limited
<i>Address and contact details of the individual submitting this form:</i>	Address: EKI Energy Services Limited, 325-Block C, Prem Trade Centre, Maharani Road, Indore - 452007 State: Madhya Pradesh, India Telephone number: +91 9993577610 E-mail address: <a href="mailto:jimmy@enkingint.org">jimmy@enkingint.org</a>
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Change in Project participants
<i>Please mention whether the submitter of the form is:</i>	<input checked="" type="checkbox"/> Project participant <input type="checkbox"/> Other stakeholder, please specify
<i>Specify whether you want the letter to be treated as confidential<sup>2</sup>:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<i>Please choose any of the type(s) below<sup>3</sup> to describe the purpose of this submission.</i>	
<input checked="" type="checkbox"/> <b>Type I:</b> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> <b>Request for clarification</b>  <input checked="" type="checkbox"/> Standards. Please specify reference paragraph 6 of VVS version 5  <input checked="" type="checkbox"/> Procedures. Please specify reference paragraph 15 of Project cycle procedure version 6 .  <input type="checkbox"/> Guidance. Please specify reference  <input type="checkbox"/> Forms. Please specify reference  <input type="checkbox"/> Others. Please specify reference         </div> <div style="text-align: center;"> <input checked="" type="checkbox"/> <b>Revision of existing rules</b> </div> </div> <input checked="" type="checkbox"/> <b>Type II: Request for Introduction of new rules</b> <input type="checkbox"/> <b>Type III: Provision of information and suggestions on policy issues</b>	
<i>Please describe in detail the issue on which you request a response from the Board, including the exact reference source and version (if applicable).</i>	

<sup>1</sup> DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

<sup>2</sup> As per the applicable modalities and procedures, the Board may make its response publicly available.

<sup>3</sup> Latest CDM regulatory documents and information are available at: <http://cdm.unfccc.int/Reference/index.html> .

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Change in project participant for **Bundled projects**.

**Issue:** Due to the recent fluctuations in Carbon markets and its subsequent impacts, various carbon consultancies which are project proponents of various CDM project activities have closed down their business. Hence, for such projects there is no further communication from the consultant leading to a stand still CDM project. In such cases the individual PP's listed in the project are facing problems to interact with DOE/ CDM EB as the project participant listed in the webhosted PDD is a Carbon consultant which has closed its business. And the DOE/CDM EB communicates only with the registered entities.

Thus we request you to kindly address the issue by considering the communications by one of the PPs listed in the registered PDD to act as the PP taking the consent of all the listed PP in the registered PDD.

Moreover in cases where the projects are still stuck in Validation, the individual PPs are not able to break away from the bundle as the DOE does not accept the communication from the individual PPs, thus not allowing them to form a part of a new bundle. DOE recognizes only the communication from the managing entity (which is no longer active). In such cases the individual PP is neither able to start the validation process nor able to move to a new project and start afresh.

*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).*

**Rationale:** The current carbon market scenario has seen a drastic fluctuation thus resulting in closing of business by many entities in the carbon market. There are many carbon consultants who do not own the project but are listed as Project participants/managing entities in many of the projects and they closed down the business. In such scenario the project owner is not able to take the project forward as the DOE/CDM EB communicates only with the registered Project participant.

**Guideline:** As per VVS version 5, paragraph 6, the VVM is applicable to the DOE which is in direct contractual relation with the Project participant, thus the DOE does not consider any direct communication with the individual PPs listed for bundle projects.

**Suggestion:**

- Requesting the CDM board to consider the communication from individual PPs listed in the webhosted PDD of the struckup project & also to guide the DOE to accept the communication from individual PPs listed in the webhosted PDD of the struckup project
- All or part of the project bundle partners must be allowed to break away from the struckup project & must be allowed to start a fresh project activity
- The DOE must agree the request of individual bundle partners by accepting the given contract termination letters with the current managing entity (i.e., which closed down its business and no more active) & must terminate their validation contract, by which struckup project shall be identified in the list of "Validation contract has been terminated" at UNFCCC website.

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

- [none]

**Section below to be filled in by UNFCCC secretariat**

Date when the form was received at UNFCCC secretariat

5 May 2014

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**History of document**

<b>Version</b>	<b>Date</b>	<b>Nature of revision</b>
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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