



## Stakeholder Communication Form (Version 01.0)

*This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.  
The completed form and any supplemental documents shall be submitted electronically to [cdm-info@unfccc.int](mailto:cdm-info@unfccc.int), or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.*

### SECTION 1: COMMUNICATION HEADER

*Please provide your contact information.*

**Title:** Ms.                      **First Name:** Karen                      **Last Name:** Nagai  
**Name of Organization:** EQAO                      **E-mail Address:** karen.nagai@eqao.com.br  
**Postal Address:** 01411-000                      **Phone Number:** +55-11-3063-9068  
**Country:** Brazil                      *Include country code (e.g. +49-228-815-1999)*  
**Stakeholder Type:** Consultant                      If other:

*Please indicate from whom you would like to get an answer.*

**This communication is addressed to<sup>1</sup>:** Chair of CDM Executive Board (normal track)

### SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)

*If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).*

**Project/PoA Ref. Number**                      If applicable, CPA Ref. Number:  
5-digit# format 01234                      8-digit# format 0123-4567

**Project Cycle Stage**                      [Choose an item]                      If other:

*If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).*

**Host Country(ies)**                      Brazil

**Project/PoA Title**

**Technology Type**                      [Choose an item]                      If other:

### SECTION 3: YOUR COMMUNICATION

**Title/Subject**  
Maximum 250 characters                      DOE selection for renewing the crediting period

**Communication Text**  
Include background, details, and conclusion (unlimited length)

The CDM Project Cycle Procedure (version 9.0) states the following: "294. The project participants or the coordinating/managing entity shall submit the updated PDD or PoA-DD to a DOE for its validation. For this purpose, the project participants or the coordinating/managing entity may not appoint a DOE that has performed a verification for the same project activity or PoA unless the project activity is a small-scale one or the DOE is authorized by the Board to do so in accordance with paragraphs 209–212 above".

Paragraphs 209-212 establish the procedures to request authorization from the Board to consider a DOE for verification, which has also performed validation. Then, it is our understanding that the same procedure applies to renewal of the crediting period in case the same DOE - that has performed validation or verification of the 1<sup>st</sup> crediting period - has now been chosen to conduct the validation of the renewal of the crediting period.

If our understanding is correct, considering the current very low demand of CDM services, many DOEs have been shutted down activities in Brazil. For this reason, project developers have been facing difficulties while mapping DOEs to perform validation, verification and renewal of the crediting period in the light of paragraph 294 of the CDM Project Cycle Procedure. It is not uncommon that the few DOEs that did not perform validation or verification of a specific project are

<sup>1</sup> In accordance with the "Procedure: Direct communication with stakeholders" (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

	<p>the few ones with very expensive prices. Also, the actual exchange rate is extremely unfavorable for services carried out abroad. One option available to the project participants would be choose DOE outside Brazil, however, travel expenses required for on-site visit are prohibitively expensive.</p> <p>For that reason, I would like to confirm the required rules for DOE selection to perform the renewal of the crediting period, considering the above mentioned current scenario. The project developers are actually asking to proceed as explained in the Board response to the Letter 2013-320-S, INQ-01231-G8Q1. Although the EB response refers to the PS, PCP and VVS (version 5.0), it reflects exactly the wish of most project participants, namely, "Please note that a DOE, having performed a validation function for a request for registration, is allowed to perform another validation function for any subsequent request for renewal of crediting period for the same project activity. Similarly, having performed a verification function for a crediting period for a project activity, a DOE is allowed to perform another verification function for any subsequent crediting period of the project activity". Additionally, it seems reanosable to us that a DOE performing verification function for a project in a previous crediting period (but not validation), should also be allowed to perform the validation of a subsequent crediting period (but then no verification anymore in the case of large scale projects.</p> <p>We understand that a project may ask for flexibility to specific projects and validations, nevertheless such process demands direct request to the Board and naming specific DOEs, making the whole process very time consuming. For that reason we would like to try to find a general solution to this complex situation. Would you be so kind to confirm which combination of functions is acceptable?</p>
<p><b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p>	<p>Letter to the Board 2013-320-S, INQ-01231-G8Q1 dated 23/10/2013: <a href="https://cdm.unfccc.int/filestorage/e/x/t/extfile-20131025150150715-320_INQ-01231-G8Q1_Unicarbo_FORM.pdf/320_INQ-01231-G8Q1_Unicarbo_FORM.pdf?t=VUR8bnVmZHozfDC_fVqTRhzNLydzxVgUDUgc">https://cdm.unfccc.int/filestorage/e/x/t/extfile-20131025150150715-320_INQ-01231-G8Q1_Unicarbo_FORM.pdf/320_INQ-01231-G8Q1_Unicarbo_FORM.pdf?t=VUR8bnVmZHozfDC_fVqTRhzNLydzxVgUDUgc</a></p> <p>EB Response dated 20/12/2013: <a href="https://cdm.unfccc.int/filestorage/e/x/t/extfile-20131220113003559-320_INQ-1231-G8Q1_Unicarbo_Response.pdf/320_INQ-1231-G8Q1_Unicarbo_Response.pdf?t=WWt8bnVleXRrfDC_y8mQKuV3PHUD6j0Xuny7">https://cdm.unfccc.int/filestorage/e/x/t/extfile-20131220113003559-320_INQ-1231-G8Q1_Unicarbo_Response.pdf/320_INQ-1231-G8Q1_Unicarbo_Response.pdf?t=WWt8bnVleXRrfDC_y8mQKuV3PHUD6j0Xuny7</a></p>
<p><b>This communication may be made public</b></p>	<p>Yes</p>

-----

### Document information

Version	Date	Description
01.0	02 March 2015	<p>This form supersedes and replaces the following:</p> <ul style="list-style-type: none"> <li>• F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2)</li> <li>• F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1)</li> <li>• CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)</li> </ul>

Decision Class: Regulatory  
Document Type: Form  
Business Function: Governance  
Keywords: communications