

 <h2 style="text-align: center;">Stakeholder Communication Form (Version 01.0)</h2>	
<p><i>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, 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.</i></p>	
SECTION 1: COMMUNICATION HEADER	
<i>Please provide your contact information.</i>	
Title: Mr.	First Name: Ambachew Fekadeneh
	Last Name: Admassie
Name of Organization: Ethan Bio-Fuels PLC	
E-mail Address: ethanbiofuelsltd@gmail.com	
Postal Address: 81210	Phone Number: +251-911-218626
Country: Ethiopia	<i>Include country code (e.g. +49-228-815-1999)</i>
Stakeholder Type: CDM Project Participant (PP)	If other: 17/06/2016
<i>Please indicate from whom you would like to get an answer.</i>	
This communication is addressed to¹: Chair of CDM Executive Board (normal track)	
SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)	
<i>If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).</i>	
Project/PoA Ref. Number	10258 <i>5-digit# format 01234</i>
	If applicable, CPA Ref. Number: <i>8-digit# format 0123-4567</i>
Project Cycle Stage	Registration
	If other:
<i>If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).</i>	
Host Country(ies)	Ethiopia
Project/PoA Title	
Technology Type	Feedstock switch
	If other:
SECTION 3: YOUR COMMUNICATION	
Title/Subject <i>Maximum 250 characters</i>	PCP rules, their differential application on applicants requesting registration from CDM's severely underrepresented region
Communication Text <i>Include background, details, and conclusion (unlimited length)</i>	<p>I am writing about project #10258 "Clinker optimization in cement types' production at Derba MIDROC Cement Plant" previously rejected as # 7632. Project # has an unparalleled achievement of sustainable development, environmental integrity and even net mitigation benefit as shown in the supplementary document.</p> <p>After fully addressing ALL "issues" that led to previous rejection under #7632; we have requested registration of #10258 in late 2015 and completed the Information and Reporting Check (IRC) process with no issue or comment from Secretariat. There is no issue of Additionality still. Yet the project has been sent to undergo review through a procedure that is not understandable and not transparent. The two "issues" raised are also not genuine and are obviously applied on our project differentially.</p>
Supplemental Documents <i>If applicable, list the title(s) of any attached file(s) or link(s)</i>	1.5 pages only (Attached below)
This communication may be made public	Yes

¹ 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.



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Ethan Bio-Fuels Pvt. Ltd. Co

Date (dd/mm/yyyy): 17/06/2016

Ref.No: EBF/ CDMEB-001/ 2016

**Dear Honorable Chair of the CDM Executive Board (EB) &
Hon. EB members**

I am writing about project #10258 "Clinker optimization in cement types' production at Derba MIDROC Cement Plant" previously rejected as # 7632. It has the following unparalleled achievement of environmental integrity.

In ¹Europe cement is being produced at average around 0.78tCO₂/ton-cement. The Global average carbon intensity is 0.83 t CO₂/ton-cement. ²Ethiopian average carbon intensity of cement is 0.78 tCO₂/ ton-cement. Even all of the ³registered/credited cement sector CDM projects produce cement at well above carbon intensity of 0.7 tCO₂/ ton-cement. All of these are available publicly.

On contrary; our CDM project plant (#10258), through the specific CDM-PA blending (feedstock switch), will produce cement all having carbon intensity lower than 0.55 tCO₂e/ ton-cement (easily seen in the submitted PDD & spreadsheet). Yet still from the 0.23tCO₂/t-cement emissions saving, project claims credit only partially (0.11 tCO₂/t-cement); for the blending measure; clearly even contributing equal amount to net mitigation benefit to the atmosphere. There is no Additionality issue raised in both previous and this request for registration.

After fully addressing ALL "issues" that led to previous rejection under #7632; we have requested registration of #10258 in late 2015 and completed the Information and Reporting Check (IRC) process with no issue or comment from Secretariat. Yet the project has still been sent to "Review".

Our request

The following request refers to inconsistency in implementation of PCP Para 82-93. Project Cycle Procedure was instituted by EB to "improve the consistency and clarity in processing" (Para 4a) and "enhance integrity" (Para 4b).

¹ Energy Efficiency and CO₂ Emissions: Prospective scenarios for cement Industry (JRC/EC:2010) setis.ec.europa.eu

² Ethiopia's climate change strategy

³ UNFCCC/CDM site

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Ethan Bio-Fuels Pvt. Ltd. Co

1. The deadline for IRC was on April 28, 2016. While projects lined behind us passed to “requesting registration” on April 29th; our project was posted “requesting registration” on May 5, 2016 (seven days later). Yet the deadline for EB objection was arbitrarily set on June 1, 2016, than the legal date of May 25th, 2016. How can the EB insure consistency with rule based execution and deadline setting than arbitrary assignments by the relevant unit? Is June 1st the legally appropriate deadline? Or who is accountable for the seven days delay after April 28th?
2. By the time June 1st has passed we have not received any objection to registration. Instead 18 hours after the deadline, on 1PM June 2nd, 2016, we received secretariat email saying “request for review”. How can this be in line with predictability of the CDM registration undertaking?
3. The secretariat registration unit says that it has received three EB members objection on June 1, 2016 (its arbitrary deadline). The CDM-RR-FORM for EB objection attached in Email for us is a generic one with exactly the same “two issues” for all “three EB members”. How can the Honourable EB Chair assure us;
 - a. Whether three EB members; residing across the globe, each actually sent objection to secretariat on the arbitrary deadline (June 1) by checking the email sent to secretariat from members
 - b. How three EB members; residing across the globe, can raise the same two identical issues.
 - c. How can this enhance integrity? How can the Board maintain independence from the Unit? How can the Board understand the motives behind and can allow adequate check and balance?
4. Having seen the “two issues” that are tailed in CDM-RR-FORM as reasons for “requesting review” we assure EB that the first is an issue of Double Standard in reading the methodology (two projects with same issue already registered without requesting deviation) and the second is negligence from the unit of the secretariat to check the year written in the relevant column.

We fully trust in the tested leadership of the current Honorable EB Chair who will never allow this kind of undertaking and also know has the personality to reach at the bottom of issues. For this yet, we believe for the sake of independence of the Board’s discussion & decision ; request the venue and agenda where EB discusses our issues be free from presence of any employee of the secretariat involved at any stage in the registration process or is not covered by the relevant procedures, whosoever. This is even crucial for the future lesson from CDM.



Best regards;

Ambachew F. Admassie
President; Advisory on Green Growth and
Cooperative Mechanisms

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Document information

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

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



**CDM project activity/programme of activities registration request review form (F-CDM-RR)
(Version 02.1)**

Section 1. General Information

Designated national authority/Executive Board member submitting this form (Name in print)	
Reference number of the proposed CDM project activity/programme of activities (PoA) submitted for registration	10258
Title of the proposed CDM project activity/PoA submitted for registration	Clinker Optimization in cement types production at Derba MIDROC cement plant

Section 2. Basis for review request

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review. Including any supporting documentation.

The following are requirements derived from paragraph 37 of the CDM modalities and procedures:

- The participation requirements as set out in paragraph 28 to 30 of the CDM modalities and procedures are satisfied;
- Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received;
- Project Participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;
- The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures;
- The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;
- Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP;
- The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board.

The following are requirements derived from paragraph 40 of the CDM modalities and procedures:

- The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development;
- In accordance with provisions on confidentiality contained in paragraph 27(h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document;
- The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available;
- After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated;
- The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board;

- The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including of the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received.
- There are only minor issues which should be addressed by the DOE/project participants prior to the registration of the project.

Additional information

- 1) The DOE is requested to further explain how it was validated that the determination of the baseline benchmark values of share of clinker for the cement types PLC and PC was done in accordance to the applied methodology, (Step 2.1.), considering that the two mentioned types of blended cement have never been produced or used in the host country and the applied methodology only provides for the use of existing statistical data of mass fraction of clinker for each relevant cement type. In doing so, the DOE shall also explain why a request for deviation of the methodology was not submitted prior to the submission of a request for registration or publication of the PDD for global stakeholder consultation, in accordance with Para 49 and 50 of the PCP, Version 9, in order to address this issue.
- 2) The DOE is requested to confirm the correctness of the input data used by the PP to determine the baseline benchmark of share of clinker per tonne of BC for the cement type PPC. When comparing the current submitted data with the data provided at the first request for registration, inconsistent values were found applying to the “Annual historical production in 2008” of Mughher plant (662,278 tonnes in the current Request for Registration and 603,375 tonnes in the first Request for Registration).

Section below to be filled in by UNFCCC secretariat

Date received at UNFCCC secretariat

01 Jun 16