



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, 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: Mr. **First Name:** Raja Gopal Reddy **Last Name:** Kolagani
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Include country code (e.g. +49-228-815-1999)
Country: India

Stakeholder Type: Organization If other:

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

This communication is addressed to¹: 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 Registration If other: Submission of new CDM methodology

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

Host Country(ies) India

Project/PoA Title Saving forests: Last Rites Cow Dung Cremation Project in India

Technology Type Waste management/wastewater If other:

SECTION 3: YOUR COMMUNICATION

Title/Subject
Maximum 250 characters LAST RITES COW DUNG CREMATION PROJECT IN INDIA

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

The initial assessment was completed on 8th April, 2020. The reason for disqualification is the existing CDM rule (CMP in November 2006) that limits project activities involving renewable biomass to small scale methodologies - to cooking and water boiling. It is not applicable to large scale methodologies. Hence this appeal.

1. The proposed methodology covers all sections outlined in the applicable guidelines. The language used is transparent, precise and unambiguous.
2. The proposed methodology is in compliance with applicable conditions and can be demonstrated and validated.
3. The proposed methodology covers all GHG emission sources and types related to project activities, programme of activities (PoA). The project boundary is clearly defined. The component of the project activities is covered and the method proposed to achieve emission reductions are

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.

clearly described. It is also clear that the project activities covered by proposed methodology deliver services that are comparable to baseline.

4. Our proposed methodology is consistent with the baseline approach, applicability conditions, project boundaries, baseline emission estimations approach, project emission estimation approach, leakage, monitoring methodology.

5. The methodological basis for the proposed baseline submitted was clear and concise. The application of the methodology resulting in baseline scenario showcasing the anthropogenic emissions are clearly described. The methodological basis addresses environmental integrity concerns. The approach for assessment and demonstration of additionality are clearly defined. There are no threats to environmental integrity.

6. The sections dealing with parameters (to be monitored and not to be monitored) cover all relevant variables used in the equation. Monitoring tables are provided.

Thus, in our proposed new methodology, all issues are properly addressed. However, the CDM team rejected our proposed new methodology unqualified for a non-reason! It is non-reason as the conference of parties (CoP) did not define the eligibility of land use, land-use change and forestry project activities in an appropriate manner. According to CoP, the CDM activities are limited to afforestation and reforestation. What about saving trees to ensure continued forestation? The CMP in November 2006 limited the project activities which propose switch from non-renewable biomass to renewable biomass to small scale methodologies limiting to cooking and water boiling etc.

If the renewable biomass can be used for cooking and water boiling and can be used to calculate carbon emissions, then it is also possible to use renewable biomass for cremations for large scale project activities. The CDM team assures of their adherence to guidelines. However, the intent of CoP is absent in CDM team interpretation for the following reasons:

a) Cremations using renewable biomass / cow dung is an ancient practice in India, Nepal, Pakistan, Sri Lanka, Thailand, Myanmar, Bangladesh etc. The renewable biomass is used not only cooking and water boiling (small part of human activity), but also used for cremations. This usage is approved by culture, religion and beliefs.

b) It is believed that the body cremated using renewable biomass / cow dung assures liberation of departed soul.

c) In this part of world, vast majority does not opt for electric or CNG cremation due to religious prohibition – electric or CNG cremation - the soul is not liberated.

d) Nearly 8 million cremations per year use wood – which is another culturally approved method. Wood implies trees which in turn implies extinction of forests. When wood is burnt CO₂ is released. Thus, our activity solely deals with safeguarding trees, very much falls under the definition of afforestation.

e) It is essential to revise or reinterpret the definition of using renewable biomass only to small scale activities such as cooking and water boiling activities. It must be interpreted in a wider all-encompassing environmentally beneficial way.

f) The issue is NOT small scale or large scale activities...but is saving Planet Earth. Our inability to interpret rules should not make the proposed new methodology not qualified! The literal interpretation of the decision of COP is, for example, like - following the law in letter but violating it in spirit. Surgery successful, but patient died! The essence / spirit of CoP decision is absent in your 8th April interpretation. If the CoP were to meet today, it would not have interpreted the way the CDM team has interpreted. While disagreeing with your interpretation, we request for a re-examine of earlier decision. There are two known theories of interpretation of Law:

1) Originalism is a theory which states that the law should be interpreted according to the original intent of its authors.

	<p>2) Constructivism is a theory which states that the law should be interpreted beyond the original intent of its authors.</p> <p>Unfortunately, your interpretation does not fall under either of the categories. In other words, the CDM team did follow the law in letter, violated it in spirit!</p> <p>We did not invent a new method or are we asking people to cremate their dear ones with cow dung. What is being proposed is being practiced by some. We wish and work for its adoption by all so that they can contribute positively to the environment – hence this proposed methodology. The activity suggested in our proposed methodology was projected by BBC, CNN, Reuters etc. in their reports. Please find references for immediate perusal.</p> <p>http://news.bbc.co.uk/2/hi/south_asia/8269289.stm https://edition.cnn.com/2011/09/12/world/asia/india-funeral-pyres-emissions/index.html https://www.projectarth.org/ s://www.aljazeera.com/programmes/earthrise/2018/05/eco-cremation-india-climate-friendly-death-180524052734769.html</p> <p>Culturally, it is difficult to understand the practice of cow dung cremations. It is approved by religion; by culture and it reduces CO2 emissions. Probably, the people in Africa, Australia and America use renewable biomass for cooking & heating water etc. In Asia cow dung is also used for cremations. We want to help planet, save forests, reduce CO2 emissions through this compulsory culturally approved activity – cremations. People do not opt for cow dung cremations for carbon credits; they do it for religion, belief and culture. In view of the above we request you to re-examine and approve our proposed new methodology.</p> <p>Finally, it would be our good fortune to personally defend the proposed methodology before the examination panel. Leaving the travel cost burden (we will bear to save planet earth), things will be clear when discussed in person with corroborative vindications. Emails, conference calls etc., have increased the speed of information while slowing down communication. We would be glad to personally present and defend our case. In the light of the above, we request the learned executive committee to review our proposed methodology and give an opportunity to defend it for the well-being of planet earth.</p>
Supplemental Documents <i>If applicable, list the title(s) of any attached file(s) or link(s)</i>	NIL
This communication may be made public	Yes

Document information

Version	Date	Description
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		