



## 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:** Mr. **First Name:** Nuno **Last Name:** Barbosa

**Name of Organization:** UniCarbo - Energia e Biogás Ltda. **E-mail Address:** nuno@unicarbo.com.br

**Postal Address:** 01403-000 **Phone Number:** 5511985960950  
**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** *5-digit# format 01234* **If applicable, CPA Ref. Number:** *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)**

**Project/PoA Title**

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

### SECTION 3: YOUR COMMUNICATION

**Title/Subject**  
*Maximum 250 characters*

Suggestion of extending the currently valid 31/08/2020 deadline for DOEs to submit requests for approval of permanent changes to the project design of project activities (PAs) or component project activities (CPAs) related to increase in the capacity

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

We at UniCarbo - Energia e Biogás Ltda. (UniCarbo) act as CDM consultancy/advisory service providers (with special focus in initiatives/project activities (PAs) promoting renewable energy and collection, destruction and/or utilization of landfill gas (LFG) and other types of biogas). Like other practitioners of the CDM, in December/2019 we were very thankful with the decision of the CDM Executive Board (CDM-EB) on its 105th meeting (EB 105) of extending to 30/09/2020 the previously agreed 31/12/2019 deadline for the submission of requests of renewal of crediting period for project activities (PAs) and component project activities (CPAs) (of which crediting period has expired prior or on 30/09/2019 (i.e. "overdue cases").

<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>We however respectfully bring to the attention of Board that due (i) to all travelling and business related restrictions caused by the COVID-19 pandemic and also due to (ii) perceived limited available working resources from DOEs willing to perform validation opinion assessments for post registration changes for project activities (PAs) and component project activities (CPAs) located in the regions we normally perform our activities; and budgeting restrictions caused by the economic crisis brought by the pandemic; we are unfortunately facing severe challenge on successfully meeting the 31/08/2020 deadline for the submission of request for approval of permanent changes to the project design for a particular PA and for a particular CPA which are both related to increase in the capacity and/or addition of technologies/measures that occurred before 31/08/2018 (as established by the CDM Project Cycle Procedure (CDM-PCP) for PAs and also by the CDM-PCP for CPAs).</p> <p>Although the Board has recently agreed to relax mandatory site visits by DOEs for a period of three months (23/03/2020 to 23/06/2020) because of COVID-19, we hereby call attention that in most of the cases, for completing documentation (i.e. elaboration of revised PDD/ PoA-DD and CPA-DD addressing post-registration changes) and/or performing tasks which are required for the process of validating such changes by a DOE (e.g. confirming project implementation status, addressing monitoring issues, assessing impacts over previously identified baseline scenarios and previously demonstrated additionality, etc.), travelling to project sites are often required to be performed or by our team or by collaborators of companies to which we offer our services prior to having a selected DOE initiating any CDM validation opinion assessment for post-registration changes. Due to these aspects, UniCarbo's on-going time plans for addressing post-registration changes of a PA and a CPA (both related to increase in the capacity and/or addition of technologies/measures that occurred before 31 August 2018) were negatively affected. Moreover, for both cases, we could not meet time plans previously agreed with DOEs for initiating related validation assessment because completing revised PDDs/CPA-DDs on-time will not possible due to restrictions caused by the above-summarized reasons.</p> <p>In light of all these circumstances, we would like to suggest to the Board to consider having the currently applicable 31/08/2020 deadline for DOEs to submit requests for approval of permanent changes to the project design of PAs or CPAs (related to increase in the capacity and/or addition of technologies/measures that occurred before 31 August 2018) being extended. A decision in this direction would definitely contribute for the successful continuation of different PAs / CPAs (from which project participants and Coordinating Managing Entities (CMEs) and related CDM consultants/advisors are struggling on meeting a deadline that unfortunately seems not to be achievable due to a pandemic that is sadly affecting all of us worldwide).</p>
<b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i>	
<b>This communication may be made public</b>	Yes

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### 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>
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