



## 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.*

<b>Title:</b> Mr.	<b>First Name:</b> Naveen	<b>Last Name:</b> Dhingra
<b>Name of Organization:</b> Independent		<b>E-mail Address:</b> naveenenvironment12@gmail.com
<b>Postal Address:</b> NA <b>Country:</b> India		<b>Phone Number:</b> -0 <small>Include country code (e.g. +49-228-815-1999)</small>
<b>Stakeholder Type:</b> General Public		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).*

<b>Project/PoA Ref. Number</b>	<small>5-digit# format 01234</small>	If applicable, CPA Ref. Number:	<small>8-digit# format 0123-4567</small>
<b>Project Cycle Stage</b>	[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).*

<b>Host Country(ies)</b>			
<b>Project/PoA Title</b>			
<b>Technology Type</b>	[Choose an item]	If other:	

### SECTION 3: YOUR COMMUNICATION

<b>Title/Subject</b> <small>Maximum 250 characters</small>			
<b>Communication Text</b> <small>Include background, details, and conclusion (unlimited length)</small>	<p>Re.: Your letter dated 23 September 2020, INQ-10224</p> <p>Dear CDM Team,</p> <p>Thank you for your reply.</p> <p>I would like to highlight that the reply does not relate to the requirements and loophole by UNFCCC in considering prior consideration of CPA for PoA developed by a Consultant.</p> <p>You have given the reference of rules and regulations and i am clearly stating the the Current prior consideration rule is; CPA addition in PoA:</p>		

<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>For a PoA the rules state that prior consideration has to be demonstrated at PoA level and not at CPA level. This loophole is currently being exploited.</p> <p>A Consultant develops a project and then it is free to add any individual IPPS's project into the POA stating that since there is no prior consideration requirement, all projects which are already commissioned and ongoing can also be added.</p> <p>Thus i request CDM EB to revise the rule for CPA addition for projects in which the PoA developer is different than the CPA developer to demonstrate prior consideration requirements similar to a individual CDM project activity.</p> <p>Why is the CDM Team so hesitant to modify the rules so that such loopholes are not exploited.</p> <p>Do you really want me to take this to international journalists who have been criticising the whole mechanisms which i really do not appreciate.</p> <p>I want to save this mechanism and you being the team working on it, deliberately are not willing to cover the loophole. Do you want projects to exploit this loophole? The DOE would be helpless unless the CDM EB address the loophole and makes the rule correct.</p> <p>I know PoA from India which is already exploiting this loophole and i don't want Project proponents to fall in the trap. The day any one of the CPA comes online I intend to write the story as how i had brought the loophole to the notice of CDM EB and how you people ignored the loophole.</p> <p>It pains me that CDM EB is just a mute spectator.</p> <p>This is totally unacceptable. My intention is very clear, it is to stop non eligible projects in getting registered and i will not be sitting idle as the CDM EB team.</p> <p>I expect the CDM EB to come out with a notification immediately stoping new CPA additions which do not demonstrate Prior Consideration requirements.</p>
<p><b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p>	
<p><b>This communication may be made public</b></p>	<p>Yes</p>

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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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