



CDM Executive Board
Martin Luther King Strasse 8
P.O. Box 260124
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Germany

28 July 2011

Subject: Concerns over the failure to consider our request for review of the additionality of CDM Project 4533: *Greenhouse Gas Emission Reductions Through Super Critical Technology – Coastal Andhra Power Ltd., India*

Dear Mr. Hession,

We are writing to object to the CDM Secretariat's handling of our letter of 28 June 2011, which asked the CDM Executive Board to review the request for registration of Project Activity 4533: *Greenhouse Gas Emission Reductions Through Super Critical Technology - Coastal Andhra Power Ltd., India*. (see attached letter).

We submitted this letter to the CDM Secretariat on the 28th of June to give to the members of the CDM Executive Board well in advance of the 3 July deadline. The CDM Secretariat took no action on the letter until 7 July, four days after the deadline for the CDM Executive Board to request review of the project registration. At that time, the CDM Secretariat informed us that they had decided to "disregard this submission" (our letter) due to a minor error: the letter cited the wrong project number in one instance. This single error was inconsequential, since the subject line clearly identified the project by its correct project number and title.

We do not believe that CDM rules or procedures allow submissions to be disregarded on such grounds. In addition, we could have quickly corrected the minor error before the deadline, had the CDM Secretariat informed us in a timely manner. As a result, the CDM Executive Board was not given its rightful opportunity to consider the issues raised in our letter. This is unfortunate, as the letter would have alerted the CDM Executive Board to a number of severe deficiencies in the project's Validation Report and request for registration. We are confident that had the CDM Executive Board been able to read our letter, it would have agreed that there are compelling reasons to doubt that this project is additional under CDM rules, and would have requested a review.



An effective and accessible mechanism for public concerns is vital to ensuring that the CDM Executive Board hears a range of views on the eligibility of a project applying for registration. Failing to do so not only violates current rules of stakeholder engagement, it also undermines the CDM's credibility.

The CDM Executive Board should closely scrutinise all projects that pose large risks to the CDM's integrity. Coastal Andhra seeks a very high volume of CERs (over 12 million during the 10 year crediting period) while generating almost 20 times as many project emissions (215 million tons of CO₂). Given previous experience with DOEs that have recommended registration despite serious deficiencies, such large projects should be reviewed by the CDM Executive Board as a matter of course.

Withholding letters of public concern about controversial projects from the CDM Executive Board hampers the credibility and transparency of the CDM and reduces the ability of the CDM Executive Board to make informed decisions. We ask for the following specific questions to be answered within the next 4 weeks:

- How can we ensure that letters we submit are being forwarded to the CDM Executive Board in time?
- Are there guidelines and rules about what happens if the Secretariat fails to forward the letter to the CDM Executive Board in time?
- What are the guidelines for when and how CDM Executive Board members have to be alerted in order to request a review? Whose responsibility is it to investigate concerns about a project?
- Is it possible to reconsider the registration when serious concerns are raised by stakeholders, as is the case with the Coastal Andhra project?

We hope this letter will help catalyse further action from the CDM Executive Board and Secretariat to address the shortcomings of the current stakeholder engagement process. We welcome the CDM Executive Board's recent call for public input on the validation process. We are looking forward to engage in a constructive dialogue on how the public commenting system can be improved.

Sincerely yours,

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