

CDM Executive Board  
UNFCCC Secretariat  
Martin Luther King  
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Germany

**Subject: Additionality doubts about Hangzhou Huadian Banshan Power Generation Co., Ltd.'s Natural Gas Power Generation Project (2705)**

9 July 2010

Dear Mr Mahlung,

I am writing to you on behalf of CDM Watch in relation to the request for registration of Hangzhou Huadian Banshan Power Generation Co., Ltd.'s Natural Gas Power Generation Project (project reference 2705).

The CDM Watch network in China has thoroughly followed the validation history of this project and has informed CDM Watch about serious doubts related to the authenticity of documents attempting to prove the prior consideration of the CDM.

These doubts have previously been shared by the DOE who issued a negative validation opinion on 4 July 2008 on grounds that the project developer could not provide the evidence to demonstrate that CDM benefits were seriously considered in the decision to proceed with the project activity before March 2003. However, a new project developer has now provided evidence about the prior consideration of the CDM and is requesting registration (deadline for requesting review is 11 July).

As per CDM requirements, the authenticity of evidences related to prior CDM consideration shall be verified and reflected in the validation report. We therefore call on the Executive Board to request a review of this project, requesting the DOE to demonstrate how they have verified the credibility of the information provided by project developer given the previous negative validation report. This information should also be included in the validation report and supporting documents must be made available. To confirm whether the evidences are authentic the validation report should include:

- Confirmation from original approval authorities that the project approval has been taken into account of CDM considerations in the FSR report. ie NDRC.
- An ink texting through a third party laboratory could prove when the original documents were printed at time of project decision stage (I.e. 2003) or later project validation stage (i.e. 2008).

Given the above doubts about the additionality of the project which is expected to generate about 1,5 Mio CERs annually, the Board should request a review of this project and request that the credibility of the evidences related to prior CDM considerations be proven.

We trust that you take our concerns seriously.

Best wishes,



Eva Filzmoser  
CDM Watch Programme Director