

Compilation of inputs received to the document “Revision of regulatory documents due to introduction of or changes to provisions related to PoAs”

1. Stakeholders provided feedback at the 8th CDM Round Table on the draft revised sampling standard and PoA standard. The table below provides an overview of the feedback received. The table provides a summary of the comments, the rationale for inclusion or not of the comment in the document and how it has been incorporated. The table is divided by subject areas to group the comments received in a more practical way.

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#	Comment (including proposed change and justification for change)	Submitter/ Source	Inclusion in the proposal (yes/no) If comment included, reference of inclusion in the documents (paragraph, table)	Assessment of comment (rationale of inclusion or not)
General comments				
Subject area ##				
	Issue 1. Pragmatic approaches to meet predefined reliability targets: Proposed approaches in the draft revised sampling standard were supported and further it was suggested to clarify applicability to registered PoAs that there is no requirement for prior approval of post-registration changes (PRC);	The 8 th CDM Round Table	Yes, it is included in paragraph 2 of Appendix 6. Amendments to the “Standard for sampling and surveys for CDM project activities and programme of activities (version 03.0)”.	Reasonable. Requiring PRC for this issue would entail additional efforts for the CMEs, DOEs and the secretariat, however the additional efforts are unlikely to contribute to more precise estimates of emission reductions. EB74 adopted a revision of the sampling standard.
	Issue 2 Application of the sampling standard to early-mover PoAs: For the grace period for the use of precision in absolute term in registered PoAs, three years from the date of approval of version 3.0 of the sampling standard was recommended, i.e. registered PoAs are required to switch to relative precision requirements by September 2015;	The 8 th CDM Round Table	Yes, it is included as one option in paragraph 1 of Appendix 6. Amendments to the “Standard for sampling and surveys for CDM project activities and programme of activities (version 03.0)”.	Two options (i.e. [25 November 2014] [13 September 2015]) are provided for the Board’s consideration. As requirements for relative precision was included in version 2.0 of the sampling standard, a three-year grace period from the date of approval of version 2.0 would lead to a cut-off date of 25 November 2014; it would not be unreasonable to adopt that date. However given that some early movers to register PoAs have expressed difficulty in complying with sampling requirements, the Board may also consider the latter date (i.e. [13 September 2015]) EB74 adopted a revision of the sampling standard, by selecting 13 September 2015 as the end date of the grace period.
	Issues 3, 4, 6 and 7 i.e. Sampling for DOE validation/verification, multiple small-scale and large scale CDM methodologies, eligibility criteria, CME management system: Proposed approaches in the draft revised sampling standard or PoA standard were supported;	The 8 th CDM Round Table	N/A	N/A

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	<p>Issue 5 Additionality at PoA level and at CPA level: Proposed approaches were supported and it was recommended to further clarify that there is no mandatory requirement to include input values for investment analysis in the PoA-DD when the option chosen is to evaluate CPAs for inclusion using the approach indicated in the PoA-DD.</p>	The 8 th CDM Round Table	Yes, it is included in paragraph 2 of Appendix 4. Amendments to the “Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities (version 02.1)”.	<p>Reasonable. During the early phase of the development of PoA rules it was foreseen that for applying investment analysis, a range of values for technical and economic parameters (costs, revenues etc.) would be provided in the PoA-DD as eligibility criteria that would be updated regularly, needing only a check list approach during CPA inclusion. However in practice it was difficult for the PoA developers to provide the range of values upfront in the PoA-DD instead CMEs have chosen do a full check of additionality at the time of inclusion of CPAs.</p> <p>EB74 adopted a revision of the PoA standard.</p>
	<p>Issue 13 Synchronized issuance request for the CPAs of a PoA: Recommended that utmost priority be placed on finding an urgent solution to difficulties with requirements for synchronized issuance requests for CPAs of a PoA. For example options may include three issuance requests per monitoring period of PoA, relaxation of time between issuance requests, CPAs are eligible to be assigned to one of the two groups i.e. biannual and annual issuance track.</p>	The 8 th CDM Round Table	An option to submit issuance requests in two batches is now proposed. No change has been proposed for relaxation of time between issuance requests. Amendments are included in paragraph 185 of project cycle procedure and paragraph 236 of project standard.	<p>A Group of CPAs included in a registered PoA was foreseen to be functioning as one project just as the case of bundling of projects. Also issuance of CERs to a PoA and CPA level information is not included. From those perspectives as well in view of avoiding double counting, ensuring operational simplicity, the Board had stipulated synchronised issuance requests for all the CPAs of PoA. However, given the practical limitations such a requirement would impose, it would be reasonable to relax the requirement to be included at least two issuances for the same monitoring period if not more. A web based workflow would ensure no double counting occurs.</p> <p>EB74 requested the secretariat to prepare a proposal on allowing more than one issuance request for CPAs for a single monitoring period of PoAs, for consideration by the Board at its seventy-fifth meeting, if feasible, including a possible implementation timeline. In preparing the proposal, the secretariat should work on the basis of allowing for a maximum of two issuance requests per monitoring period and should assess any consequent impact on the sampling plan of PoAs.</p>

Compilation of inputs received to the document “Revision of regulatory documents due to introduction of standardized baselines”

1. At its seventy-third meeting, the Board considered a concept note on the further revision of the standardized baseline regulatory framework and agreed to develop a standard on the application of standardized baselines. The Board also requested the secretariat to explore the possibility of developing a separate chapter on standardized baselines in the PS. After the 8th CDM Round Table on 17 June 2013, the secretariat assessed that a separate standard for the application of standardized baselines was not necessary, and thus consolidated into the PS/VVS/PCP the requirements which were planned to be included in the separate standard such as principles of standardized baselines.
2. At the 8th CDM Roundtable, the secretariat received comments on the draft standard on the application of standardized baselines, which were addressed in the Annex 5 of the annotated agenda for EB74. The secretariat received one comment from the public on the Annex 5.
3. The table below provides an overview of the key feedback received. The table provides a summary of the comments, the rationale for inclusion or not of the comment in the document and how it has been incorporated. The table is divided by subject areas to group the comments received in a more practical way.

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Subject area 1: Selection of ASBM/ASB vis-à-vis approved baseline and monitoring methodology				
	Support was split between giving PPs free choice between SB and methodology and making it mandatory to always use an approved SB; as both options may be applicable, further definition of which circumstances would apply in each case is needed. Mandatory application would be preferred if the SB realistically represents the sector.	The 8th CDM Round Table	Yes (Para 4 of Appendix 1)	An option of completely voluntary choice by PPs was deleted since the option cannot ensure conservativeness and could lead to a pick and choose situation.
Subject area 2: Treatment of proposed CDM project activities with technology/fuel/feedstock that is already in the positive list				
	On treatment of positive-list facilities, participants expressed a preference for using the positive list for additionality demonstration in which case historical emissions should be used to claim CERs. The option of full use of a SB including the positive list and baseline emission factor under special circumstances needed further consideration.	The 8th CDM Round Table	Yes (Para 5 of Appendix 1, Para 5 of Appendix 2)	The two options have been added.
Subject area 3: Validity of a SB to project activities and PoAs				
	Different stakeholders supported different options for validity of SB , and pros and cons of each option taking into account predictability and complexity. Analysis of options for treating a scenario of a registered PoA using a specific methodology, if use of SB becomes mandatory by the time of inclusion of a CPA.	The 8th CDM Round Table	No	Specific requirements for PoAs will be developed in the future.
Subject area 4: Issues with double counting of emissions reductions if a project activity has been registered prior to using an SB				
	Issues related to double counting of emissions reductions if a project activity is implemented using an SB in a plant that already has a CDM project that has been taken into account when developing the SB were discussed, and It was considered that the issue was not specific to SB but to the CDM in general and should not be discussed at this particular time.	The 8th CDM Round Table	No	The issue was not included in the revision as it is a cross cutting issue in CDM not only related to SB and it would need further discussion.
Subject area 5: DOE's requirement on preparing an assessment report				

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	Appendix 2 (Amendment to the VVS) misses requirements for preparing an assessment report on the quality of the data collection, processing and compilation to establish the proposed standardized baselines.	DOE/AE Forum	No	The scope of the PS, VVS and PCP starts from project designing activities or validation activities. The preparation of the assessment report is not a project designing activity or validation activity, but a methodology development activity. Therefore, the requirement to prepare assessment reports does not fit with the VVS and PCP. The SB procedure (Annex 9) addresses the DOE's requirement.
Subject area 6: Guidelines on data vintage and frequency of updates of SB				
	Re: requirements for primary and secondary data - include requirements for primary data and a tiered approach (criteria suggested for 1 year / 3 year requirements) for secondary data	The 8th CDM Round Table	These inputs are being taken into consideration in the draft guidelines to be presented to EB 75.	
	Re: currentness of data, the proposed approach (3 years, 5 years, with improvement factor) may be applied for the initial submission of the SB.			
	Re: update of SBs - devise an indicative table showing applicability of 3 years or 5 years to different sectors and keep predictability as an important general principle			
	Re: update of SBs - devise an indicative table showing applicability of 3 years or 5 years to different sectors and keep predictability as an important general principle			
	Re: validity of SB - use internal checks on the data variation to ensure validity of SB			
	Re: validity of SB - allow a longer validity period if fast-changing sectors adopt dynamic baselines			
	Re: validity of SB - develop a monitoring tool including key indicators to facilitate ex-ante assessment of validity			
	Refer to EU environmental footprint guides for reference on secondary data use criteria and QA/QC issues			
	Develop further guidance on treatment of inconsistent data (e.g., from different sources)			
Subject area 7: Revision to the SB guidelines				
	Keep guidelines generic to allow for different approaches	The 8th CDM Round Table	These inputs are being taken into consideration in the revised draft guidelines to be presented to EB 75.	
	Remove two-step additionality requirements and maintaining the possibility of having different thresholds for baseline and additionality			
	On the definition of "technology: use of a term derived from emissions performance			
	Proponents should describe how suppressed demand was taken into account			

Compilation of inputs received to the document “Draft Procedure for development, revision, clarification and update of standardized baselines”

1. At its seventy-third meeting, the CDM Executive Board considered an initial draft of the “Procedure for development, revision, clarification and update of standardized baselines” and requested the secretariat to consult with designated national authorities (DNAs) and launch a call for public inputs. The secretariat conducted consultation with DNAs as well as a public call for inputs on the draft procedure open from 3 to 16 June 2013. The secretariat also organized the 8th CDM Round Table on 17 June 2013 and the SB practitioners’ workshop on 9 July 2013 and received feedback from the participants on the draft procedure. The secretariat received no comment from the public on the Annex 9 of the annotated agenda for EB74.
2. Based on this, the table below provides an overview of the key feedback received. The table provides a summary of the comments, the rationale for inclusion or not of the comment in the document and how it has been incorporated. The table is divided by subject areas to group the comments received in a more practical way.

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Subject area 1: SBM and SB or SB only				
1	<ul style="list-style-type: none"> - Frequent revisions of global methodologies should be avoided. - Using SBM was seen as an option only where necessary. - Further simplification and clarification of concepts are required. 	The 8th CDM Round Table	Yes	Based on the necessity of SBMs such as prevention of frequent revisions of global methodologies, the draft procedure includes the concept of SBMs as an option. Further clarification of the SBM is provided in the PPT slides for Annex 9 of the annotated agenda for EB74.
2	Proposed change of definitions of SBM/SB based on case-specific situations.	Ambachew F. Admassie, Ethan Bio-Fuels PLC	No	The current definitions of SBM/SB comprehensively cover all cases provided left in a succinct manner. As a general rule, the definitions should not be case-specific and complex.
3	PSB using new/approved methodology(ies) should be submitted as SBM/SB by the DNAs as decided by the CMP	Practitioners workshop on standardized baselines	Yes	The proposed draft already takes into account DNAs’ option for selecting SBM/SB
4	Top-down development of SBM/SB should be done in close collaboration with DNAs.	Practitioners workshop on standardized baselines	Yes	The proposed draft already highlights the importance of collaboration with DNAs

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5	-Shorter time should be required for consideration of PSBs. -DOEs assessment may be completely excluded from the procedure and performed by the secretariat.	Practitioners workshop on standardized baselines	No	Comments were received later, so could not be considered in the proposed draft. However, the secretariat will continue reviewing the procedure, improving the efficiency and enhancing supports for DNAs whenever applicable and necessary.
Subject area 2: Definition of Panel/WG to consider submissions				
6	The term "Panel/ WG" requires clarity on who they are.	Abdullah Al-Sarhan, DNA Saudi Arabia	Yes (footnote 3)	Clarified who the relevant Panel/WGs are by listing all possible relevant Panel/WGs in the footnote.
Subject area 3: Submission of LoA				
7	-If a DNA proposes an SBM/SB, it automatically indicates the approval of the SBM/SB from the DNA. Is the LoA from the DNA necessary? -LoA for SB to should be obtained from all countries to which the SB applies	Abdullah Al-Sarhan, DNA Saudi Arabia Practitioners workshop on standardized baselines	Yes(14(d), 68(e), 153(e))	Clarified that LoAs from all DNAs are required only when the SBM/SB applies to a group of countries.