

The tables below list issues and proposed changes that will be taken into account in the revision of the “Clean development mechanism project cycle procedure” (PS), “Clean development mechanism validation and verification standard” (VVS) and “Clean development mechanism project cycle procedure” (PCP).

**Table 1. Key issues**

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
K1	VVS	107	Prior consideration of the CDM: the information that project participants are to include in the notification of prior consideration needs further clarification. The current exemption for the notification of prior consideration regarding cases for which a new baseline and monitoring methodology, or a revision of an approved methodology, is proposed, is to be removed.	VVS para 107
	PCP	New		PCP paras 7 <sub>bis</sub> and 7 <sub>ter</sub>
K2	PS	New	Changes before registration to a published PDD that require new publication of the PDD: clarify that the change of all project participants under contractual relationship with the DOE necessitates the new publication of the PDD; further consider the need of introducing such a requirement for changes of DOE or project design (e.g. location, technologies) by assessing the potential impacts of the changes in the project activity.	PS para 79 <sub>bis</sub>
	VVS			VVS para 33 <sub>bis</sub> , 36 <sub>bis</sub> , 36 <sub>ter</sub> and 36 <sub>quinquies</sub>
	PCP			New section 4.2.1 <sub>bis</sub>
K3	PCP	New	Direct communication on specific project activity cases: explore the feasibility of introducing an opportunity for DOEs or project participants to communicate with the secretariat to obtain clarifications via a telephone call on the rulings of the Board rejecting requests for registration, issuance or renewal of crediting period.	PCP paras 105 <sub>bis</sub> , 235 <sub>bis</sub> and 155 <sub>bis</sub> for post-registration changes
K4	PS		Methodology applicability conditions check at implementation: further analyse whether there is a need to introduce a general requirement in regulatory documents for project participants to demonstrate that the applicability conditions of a methodology have been met during the monitoring period (if this is a requirement of the methodology).	No general requirement is introduced in the PS, but the respective methodologies will be revised individually to make this check as a clear requirement.
K5	PS	Section 12.8, Appendix 1	Post-registration change process: analyze the types of changes that require prior approval by the Board (prior approval track) and that may be combined with requests for issuance (issuance track), and if deemed appropriate, propose the changes, including the revision of appendix 1 of the PS, with justification.	Appendix 1, paras 5(c) <sub>bis</sub> -5(c) <sub>quinquies</sub> .
K6	PS	Section 12.7	Withdrawal of monitoring report: introduce a simple process to allow project participants or DOEs to withdraw a published monitoring report.	PS para 207 <sub>bis</sub>
	PCP	New		PCP para 178 <sub>bis</sub>

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
K7	PS	Section 12.7	Withdrawal and resubmission of a request for issuance: the requirement to obtain the approval of the Board to resubmit a request for issuance, when the previous request has been withdrawn, is to be eliminated. Any restriction for project participants to reduce or extend the length of the monitoring period in a resubmission of a request for issuance, if deemed necessary, should aim to protect environmental integrity.	PS para 207 <sub>ter</sub>
	PCP	238-242		PCP para 238-238 <sub>bis</sub> .
K8	PS	Section 12.6	Renewal of crediting period: crediting periods should be consecutive without a gap; whether and how a delay in the notification of the intention to renew the crediting period should impact on claiming CERs needs further consideration. Consider also making publicly available the notification of the intention to renew the crediting period.	PS para 200 <sub>ter</sub>
	VVS	245-246		VVS paras 245(g) and 246(f)
	PCP	243-248		PCP paras 244-final. New section on combined renewal of crediting period with post-registration changes.(section 9.3 <sub>ter</sub> )
K9	PCP		Deregistering/terminating a project activity: the secretariat shall draft a proposal on the rules to allow for the voluntary deregistration of CDM project activities.	To be considered separately

**Table 2. Incorporating the clarifications and guidance adopted by the Board**

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
1	PS	New	Incorporate the “Standard for application of the global warming potentials to CDM project activities and PoAs for the second commitment period of the Kyoto Protocol” (EB 69 report, annex 3) adopted by the Board at EB 69.	PS paras 53 <sub>bis</sub> –53 <sub>quinq</sub> . Also reflected in para 200 <sub>bis</sub> (a)
	VVS	New		VVS paras 4 and 5(c) of section 7.12.8 <sub>bis</sub> and 245(e)
2	PS	New	Incorporate the general guidance on the requirements for the cases where the monitoring period straddles two crediting periods, as provided by the Board at EB 62.	PS para 200 <sub>bis</sub>
	VVS	New		VVS para 245(f) and 246(e)
3	VVS	145(b)	Incorporate the “Clarification: Validation of informing about the progress of a project activity after notification of prior consideration of the CDM” (CDM-EB73-A15-CLAR) issued by the Board at EB 73.	VVS para 145(b), footnote 16 <sub>ter</sub>
4	PCP	158–167	Incorporate the provisions for addressing disputes relating to modalities of communication and emission reduction purchase agreements, as agreed by the Board at EB 74.	PCP para 167 <sub>bis</sub> –167 <sub>quinq</sub>
5	PCP	Appendix 1	Incorporate the “Further guidance related to the registration fee for proposed A/R clean development mechanism project activities” (EB 36 report, annex 21) adopted by the Board at EB 36.	Appendix 1
6	PS	27	Incorporate the “Clarification: Implementation of the prior consideration of the CDM requirement in the absence of the host Party DNA” (CDM-EB72-A05-CLAR) issued by the Board at EB 72.	PS para 27
	VVS	107		VVS para 107
	PCP	7		Not necessary.
7	PS	New	Incorporate the “Clarification: Host Party for project activities and bundled project activities” (CDM-EB70-A38-CLAR) issued by the Board at EB 70.	PS paras 71 <sub>bis</sub> –71 <sub>ter</sub> , footnote 10 <sub>bis</sub> .
	VVS	39		VVS para 40 <sub>bis</sub>
	PCP	14(b)		In PS and VVS, not PCP
8	PS	New	Incorporate the relevant provisions of the “General principles for bundling” (EB 66 report, annex 21) adopted by the Board at EB 66.	Not incorporated into the PS as it would disproportionately make the section long. Also para 86 was removed as it was only one of many provisions in the General principle, which is already referred in para 85.
	VVS	New		VVS section 8.1.1 <sub>bis</sub> and para 287 <sub>ter</sub>

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
9	VVS	New	Introduce the relevant provisions reflecting the “Guideline on the application of materiality in verifications” (EB 69 report, annex 6) in accordance with paragraph 47 of EB 75 report.	VVS section 9.2.1 <sub>bis</sub>
10	PS	New	The Board is currently considering to develop guidelines for situations where project participants do not temporally follow the requirements of methodologies (deviations). Revise the relevant principles in the PS and VVS as appropriate and make a reference to the guidelines once adopted.	To be revised once the guidelines are adopted
	VVS	New		To be revised once the guidelines are adopted
11	PS	New	The Board is currently considering to develop a standard on uncertainty in measurements of parameters relevant to the evaluation of emission reductions. Incorporate or make a reference to the standard once adopted.	To be revised once the standard is adopted
	VVS	New		To be revised once the standard is adopted
12	VVS	New	Incorporate the “Clarification: Validation of post-registration changes and verification by the same DOE for the same project activity or programme of activities” (CDM-EB77-A12-CLAR) issued by the Board at EB 77.	VVS para 208
	PCP	New		PCP para 134 <sub>bis</sub>
13	VVS	New	Incorporate the “Clarification: Verification of reporting of the status of registered project activity or programme of activities” (CDM-EB77-A13-CLAR) issued by the Board at EB 77.	VVS para 284(i), footnote 40 <sub>bis</sub>
14	VVS	New	Incorporate the guidance provided in paragraph 90 of EB 70 report for improvement of global stakeholder consultation process.	VVS paras 34, 34 <sub>bis</sub> and 37(a)
	PCP	New		PCP paras 14(h) and 14(i)
15	PS	New	Incorporate the guidance provided in paragraph 91 of EB 70 report for improvement of local stakeholder consultation process.	PS para 68
	VVS	New		VVS paras 139, 139 <sub>bis</sub> , 139 <sub>ter</sub> and 140(c)

**Table 3. Improving the consistency and removing duplications of provisions**

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
16	PS	30–34	Review the wording of requirements relating to the description of a project activity, and make it consistent with the PDD guidelines.	PS para 31. Also para 32 was removed to avoid duplication with section 7.2.5.
17	PS	52	Adjust the text to make it consistent with the current wording of the corresponding instruction in the PDD guidelines.	PS para 52
18	PS	197–199	Introduce the relevant monitoring requirements in the PS that correspond to the required information in the monitoring report for project activities using the sampling approach to monitoring (section D.3).	PS para 198 <sub>bis</sub>
19	PS	209–228	Introduce the relevant requirements in the PS that corresponds to the requirement in the VVS regarding post-registration changes using a later version of a methodology (para 264).	PS para 221 <sub>bis</sub>
20	PS	233	Change the phrase “for determining GHG emission reductions” to “for determining the original baseline” to make it consistent with the tool referred to in the same paragraph regarding the requirement of renewal of crediting period.	PS para 233
21	VVS	30–33	Consolidate section 7.4 “General reporting requirements” into section 7.15 “Validation status and outcomes, opinion and report” to remove the duplication.	VVS section 7.4 and paras 145(a), 147 <sub>bis</sub> and 147 <sub>ter</sub>
22	VVS	35	Remove the requirement to “take into account all the comments received during the validation” from section 7.5 to avoid duplication of the requirement on global stakeholder consultation (para 34), and convert it as a reporting requirement in the validation report (para 148).	VVS paras 35 and 37(c)
23	VVS	147(c)	Add the reference to “forward action requests” (FARs) in the requirement on the validation report to make it consistent with the requirements on the means of validation (paras 27 and 29).	VVS para 148(a) <sub>bis</sub>
24	VVS	148(b)–(c)	Restructure the paragraphs to make them consistent with the reporting requirements in sections 7.2–7.14.	VVS para 148(b)
25	VVS	160	Insert the missing phrase “(or the appropriate equivalent)” for the thresholds of Type I and Type II of small-scale CDM project activities, as defined in paragraph 28 of decision 1/CMP.2.	VVS para 160
26	VVS	210, 227, 284	Introduce the relevant requirements in the VVS to further operationalize the sampling approach in validation and verification in accordance with the “Standard: Sampling and surveys for CDM project activities and programme of activities” (CDM-EB50-A30-STAN).	VVS paras 18, 22(e), 65(c), 131–133, 210, 217(c), 234 <sub>bis</sub> and 284(c), as well as paras 1, 3(b) and 5(f) of section 7.12.8 <sub>bis</sub> .

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
27	VVS	230	Paragraph 230 of the VVS states “The DOE shall determine whether the project implementation is in accordance with the provisions of the registered PDD and/or an approved revised PDD”. This requirement is in section 9.4.2 “Compliance of the monitoring plan with the monitoring methodology including applicable tool(s)”. On the other hand, the requirement to verify the compliance of the project implementation with the registered PDD already exists in section 9.4.1 “Compliance of the project implementation with the registered project design document”. It is therefore proposed to modify the text to limit the requirement to verify the compliance of the monitoring plan with the monitoring methodology including applicable tool(s).	VVS para 230
28	VVS	245(e), footnote 39	Remove footnote 39 to make the requirements on the data vintage consistent with the “Tool to calculate emission factor for an electricity system”.	VVS para 245(e), footnote 39
29	VVS	246	Introduce the relevant verification requirements in the VVS that correspond to the requirement in the PS (para 202) and the monitoring report (section E.6) regarding the difference from estimated value in the registered PDD.	VVS para 228(d)
30	VVS	247–282	Introduce the relevant requirements in the VVS that correspond to the requirement in the PS, the monitoring report guidelines and the post-registration change request form, regarding specific changes to A/R project activities.	VVS section 9.5.5 <sub>bis</sub>
31	VVS	New	Introduce the relevant validation requirements in the VVS that correspond to the project design requirements in the PS on duration and crediting period (section 7.3).	VVS section 7.12 <sub>bis</sub>
32	PCP	77	Incorporate the clarification on the date of receipt of request for registration as contained in paragraph 3(b) of the “Procedures for registration of a proposed CDM project activity” (EB 09 report, annex 5).	PCP para 77
33	PS	47–49	Make the document structure consistent between the PS and the VVS in the areas of demonstration of additionality (PS section 7.2.6 and VVS sections 7.12.8–7.12.13).	PS structure not changed
	VVS	101–130		VVS sections 7.12.8.1, 7.12.8.2, 7.12.8.3, 7.12.8.4, 7.12.8.5, and 7.12.8.6
34	PS	New	Introduce the relevant project design and validation requirements in the PS and the VVS that correspond to the requirements in the PCP regarding the request for deviation from an approved methodology before registration (section 4.5).	PS para 24(b) <sub>bis</sub>
	VVS	New		VVS paras 79 and 81

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
35	VVS	208, 297, footnote 30, 42	Move the procedural requirements restricting the same DOE to perform both validation (including inclusion of CPAs and renewal of crediting period) and verification for a same PoA from the VVS to the PCP.	VVS para 208
	PCP	New		PCP paras 177 <sub>bis</sub> -177 <sub>quater</sub> and 134 <sub>bis</sub> (for post registration changes).
36	VVS	142	Remove the procedural requirements in the VVS on reporting the validation status to avoid duplication with the PCP.	VVS paras 141-142
	PCP	22		PCP para 22 kept
37	VVS	New	Introduce the relevant validation and procedural requirements in the VVS and the PCP respectively that correspond to the requirements in the PS regarding the cases where, at the renewal of crediting period, the methodology is no longer applicable due to the revision or update of the baseline (para 230(c)).	VVS paras 305 <sub>bis</sub> , 305 <sub>ter</sub> , 305 <sub>quater</sub> and 306
	PCP	New		PCP para 245 <sub>ter</sub>

**Table 4. Other issues**

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
38	PS	19	Consider introducing provisions that further deal with how confidential information is to be omitted from public information.	PS para 19
39	PS	28(a)	Consider to include emails as secondary supporting evidence.	PS footnote 5
	VVS	108(b)		VVS para 108(b)
40	PS	30–34	An input has been received pointing out that in some PDDs, the description of the project activity and the technology applied is not precise enough. Key parameters, such as the size of the plants installed, the manufacturer, the type of equipment applied are not always described. In addition, in some cases there might be a need to know which other existing or new equipment was installed at the site prior to the implementation of the project activity (e.g. to understand to what extent the project is a greenfield or brownfield activity). Also, the commenter feels that the use of the word “scenario” in paragraph 32 of the PS is confusing, as this refers to a historical situation rather than a future “scenario”. It is therefore recommended to amend the current language of respective requirements.	PS not changed. To be addressed by the PDD guidelines.
41	PS	36	Methodologies may refer to the documents that have been superseded by the PS. Therefore, an analysis will be done to determine whether it should be clarified in the PS that the compliance with such superseded documents is not required.	Not to introduce a general principle in PS. The respective methodologies will be revised individually to update the references.
42	PS	56(b)	Consider deleting “electronically”, as It appears that “kept and archived electronically” is not easy for some project owners, especially the project owners of small projects.	PS para 56(b)
43	PS	70–71	Clarify the text regarding the Parties that PPs are required to obtain LoAs from.	PS para 71 <sub>ter</sub> and footnotes 10 and 10 <sub>bis</sub>
44	PS	81–82	Clarify the text regarding the eligibility to be classified as small-scale project activities.	PS paras 81 (merged with 82) and 84
45	PS	83	For the monitoring periods of small-scale project activities where the maximum output or the emission reductions has exceeded the threshold of Type II or Type III in the definitions of small-scale project activities, change the cap of emission reductions that can be claimed for such monitoring periods from “at the maximum GHG emission reductions estimated in the registered PDD for that year” to “at the limit of the (respective small-scale project activity) type”.	PS para 238 <sub>bis</sub>
46	PS	194(b)	Clarify the term “continued operation periods” in paragraph 194(b) of the PS, which states “Information on the implementation and actual operation of the project activity, including relevant dates (e.g. construction, commissioning, continued operation periods, etc.)” as a required element in the description of the implemented registered project activity.	PS para 194(b)

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
47	PS	230	Clarify that, at the time of renewal of crediting period, additionality does not have to be re-assessed.	PS para 230 (chapeau)
48	PS	230	Clarify which version of the PDD form shall be used when project participants update the PDD at the time of renewal of crediting period, to make this point consistent with the relevant requirement in the PCP.	PS para 230 (chapeau)
49	VVS	39(d), 63, 107	Over the time the secretariat has received a number of queries related to the consistency in pre-registration documents, such as LoA, prior consideration notification, PDD published for global stakeholder consultation as to how precisely they have to be consistent with regard to the title of the project activity. It is proposed to clarify the required degree of the “preciseness”.	VVS para 39(d)
50	VVS	132(b)	Modify the text to read “To assess the feasibility of the implementation of” the monitoring plan, to remove the obvious contradiction that the DOE cannot assess the implementation of the monitoring plan at the validation stage.	VVS para 132(a)
51	VVS	284(a)	Introduce a new reporting requirement to include a summary of its conclusion in a verification report, based on the good practice by DOEs observed to date.	VVS para 284(a)
52	PCP	9	Include a timeframe for the update of the status of the proposed project activity (e.g. within two months of every second anniversary of the initial notification), by creating a simple process to allow PPs to easily comply with this obligation.	PCP para 9
53	PCP	178	Change the minimum time gap between the publication of the monitoring report and the DOE’s site-visit for verification from 14 days to 21 days, to allow sufficient time for the establishment and travel arrangement for the CDM assessment team members in case the verification is chosen for a performance assessment in accordance with the CDM accreditation procedure.	PCP para 178
54	PCP	182	Consider creating a simple process to allow PPs to easily comply with the obligation of updating the status of the project activity.	PCP para 182
55	PCP	229–235	Consider revising the timeframe for publication of the rulings on the rejected requests for issuance.	PCP para 235
56	PCP	New	Clarify that if a request for registration is rejected after the review, and if the project participants still wish to register the project activity, the process have to be restarted from the publication of the (revised) PDD for global stakeholder consultation.	PCP para 105 <sub>ter</sub>
57	PCP	New	Mention in the PCP the reference dates on which the relevant CDM requirements must be applied to a project activity unless otherwise stated in the requirements (e.g. the publication date of the PDD for project participants and the submission date of request for registration or issuance for DOE).	To be incorporated in regulatory framework.

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/ section
58	PCP	20-21	Clarify the role of the secretariat in the treatment of public comments in the global stakeholder consultation (PCP paragraphs 20-21), in particular in relation with the comments which authenticity is questioned. It should be clearly stated that the DOE should provide the secretariat with instructions about which comments have to be removed. Modify the VVS (paragraphs 34-36) accordingly to make it consistent with the PCP.	PCP para 20
	VVS	34-36		VVS paras 34, 34 <sub>ter</sub> and 37(b)

**Table 5. Additional issues included after EB75**

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
59	PS	Many	Refer to “PoA(s)” and “the coordinating/managing entity” in all applicable paragraphs for PoAs.	PS many paras
	VVS	Many		VVS many paras
60	PS	22(e)	For PoAs, remove the distinction between large-scale, small-scale, large-scale A/R and small-scale A/R.	PS para 22(e)
61	PS	29	Add a provision on prior consideration of the CDM for PoAs that mirrors the corresponding provision in the PCP.	PS para 29
62	PS	73, 181, 182, 203, 230	Clarify which version of PDD, PoA-DD, CPA-DD, monitoring report form, F-CDM-MOC, methodology, completeness checklist, Guidelines on the assessment of investment analysis, Guidelines for objective demonstration and assessment of barriers and General guidelines to SSC methodologies can be used by changing the phrase “latest version” to “valid version”.	PS paras 73, 181, 182, 203 and 230
	VVS	60(a), 62, 74, 118, 225(b), 302, 306(a), 119, 124(a), 152(b)		VVS paras 60(a), 62, 74, 118, 119, 124(a) and 152(b), 225(b), 302 and 306(a)
63	PS	89	Remove para 89 due to the duplication with para 81.	PS para 89
64	PS	100	Move para 100 to section 8.5 as the provision suits better in that section.	PS paras 89 and 100
65	PS	141	Merge with para 33 due to the similarity of provisions.	PS paras 33 and 141
66	PS	136(a)	Clarify the definition and limits for the small-scale A/R CDM project activities.	PS para 136(a)
	VVS	184		VVS para 184(a)
67	PS	157	Remove requirements on monitoring plan in the section for specific requirements for PoA due to the duplication with those in the section for all project type (PS para 54 and VVS para 131).	PS para 157
	VVS	198		VVS para 198
68	PS	165–166	Merge the two paragraphs as they are relating to the same requirement.	PS paras 165–166
69	PS	NEW	Introduce provision for small-scale project activities in implementation and monitoring requirements for all project types.	PS section 12.10
70	VVS	New	Introduce verification requirements in the VVS that correspond to requirements on the update of the status of the implementation/ verification of the registered CDM project activities and PoAs in the PCP (PCP paras 182 and 183).	VVS section 9.6.0 and para 284(d)

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
71	VVS	Many	Standardize the terminologies “on-site assessment”, “on-site visit”, “site visit”, “physical site inspection” and “physical inspection” as “on-site inspection” in consistent with the terminology used in the CDM M&Ps.	VVS many paras
72	VVS	96-100	Make the document structure consistent between the PS and the VVS in the areas of emission reductions calculation (PS section 7.2.7 and VVS section 7.12.7).	VVS sections 7.12.7 and 7.12.8 <sub>bis</sub>
73	VVS	147 and 148	Merge paras 147 and 148 to simplify and clarify reporting requirements of the validation report.	VVS paras 147, 148(a), 148(a) <sub>bis</sub> , 148(b) and 148(b) <sub>bis</sub>
74	VVS	159	Replace “Attachment A to Appendix B of 4/CMP.1, annex II” with “Guidelines on the demonstration of additionality of small-scale project activities” as the former was superseded by the latter.	VVS para 159
75	VVS	199	Remove requirements on environmental analysis in the section for specific requirements for PoA due to the duplication with that in the section for all project type (VVS para 134).	VVS para 199
76	VVS	208	Further clarify when the same DOE may perform both validation and verification of the same CDM project activity or PoA.	VVS paras 208 and 297
77	VVS	208 and 297	Consider creating the link with the “Procedure: Process for dealing with letters from DNAs that withdraw approval/authorization” adopted by the Board in EB76.	VVS paras 208 <sub>bis</sub> , 297(a) and 297(c)
78	VVS	284	Cover all the relevant requirements to be reported in verification reports in para 284(d). At present, para 284(d) does not cover all of them.	VVS para 284(d)
79	VVS	New	Introduce verification requirements in the VVS that correspond to requirements in the PS (PS para 83) on capping the emission reductions.	VVS para 287 <sub>bis</sub>
80	VVS	290	Enable coordinating/managing entities and DOEs to complete the changes to modalities of communication earliest possible in case of the change of the coordinating/managing entity.	VVS paras 290 and 290 <sub>bis</sub>
	PCP	174		PCP paras 173 <sub>bis</sub> and 174
81	VVS	New	Introduce validation requirements in the VVS that correspond to requirements on the renewal of programme of activities in the PS.	VVS section 11.2.1
82	PCP	72 and 200	Clarify that the DNA can send an email to the secretariat when requesting a review of a request for registration or of a request for issuance.	PCP paras 72 and 200
83	PCP	77	Clarify what is understood under effective date of registration of the project activity or PoA.	PCP para 77
84	PCP	New	Introduce a step to publish the requests for post-registration changes.	PCP para 144 <sub>bis</sub>
85	PCP	New	Introduce the process for those cases in which the Board decides on several changes combined in the same request for post-registration change.	PCP para 154 <sub>bis</sub>

#	Doc.	Para No.	Issue and/or proposed change	Revised paragraph/section
86	PCP	New	Introduce provisions for the withdrawal of published PDDs (para 22 <sub>bis</sub> ), request for post-registration changes (para 157 <sub>bis</sub> ), published monitoring report (178 <sub>bis</sub> ).	PCP paras 22 <sub>bis</sub> , 157 <sub>bis</sub> and 178 <sub>bis</sub>

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