



Santiago, September 3<sup>rd</sup>, 2008

**Secretariat of the CDM Executive Board**

Ref.: Poch Ambiental comments on Programme of Activities

Dear Executive Board:

Regarding the Board invitation for public comments on Programme of Activities, we want to comment on “*Procedures for registration of a programme of activities as a single CDM project activity and issuance of certified emission reductions for a programme of activities*” and “*Guidance for determining the occurrence of de-bundling under a Programme of Activities (PoA)*”.

**I. Procedures for registration of a programme of activities as a single CDM project activity and issuance of certified emission reductions for a programme of activities**

**Paragraph 2**

*2. A coordinating/managing entity shall develop a Programme of Activities Design Document (CDM-POA-DD) setting a framework for the implementation of the PoA and unambiguously defining a CDM programme activity (CPA) under the PoA. The CDM-POA-DD shall include the following information:*

*(f) Description of a typical CPA that will be included in the PoA covering the technology or measures to be used, justification of the choice of an approved baseline and monitoring methodology, application of an approved baseline and monitoring methodology, and demonstration of additionality and accounting for leakage;*

This paragraph makes reference to the choice of an approved methodology for developing the POA-DD. If more than one methodology is used, the POA-DD may be limited for some project activities. Which is the recommendation from the EB regarding developing a POA-DD using two or more methodologies? Is recommendable developing different POA-DDs for each methodology?

**Paragraph 6**

*6. A DOE shall perform either validation/inclusion or verification/certification functions for a PoA, including SSC PoA and SSC-AR PoA. Upon request the Board may allow a DOE to perform all these functions within a single PoA.*

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Which are the conditions that shall be satisfied by the DOE in order to be allowed by the Board to perform validation/inclusion and verification/certification within a single PoA?

Paragraph 16

*16. A DOE, that has not performed validation, registration, inclusion or verification functions with regard to this PoA, shall conduct the review referred to in 15 (c)<sup>1</sup> and submit a review report to the Board.*

Which is the procedure if all the accredited DOEs from a specific sectoral scope have been involved in validation, registration, inclusion or verification functions with regard to this PoA? Which entity conducts the review for determine if any other CPA disqualifies?

Paragraphs 2, 21 and 22

*2. A coordinating/managing entity shall develop a Programme of Activities Design Document (CDM-POA-DD) setting a framework for the implementation of the PoA and unambiguously defining a CDM programme activity (CPA) under the PoA. The CDM-POA-DD shall include the following information:*

*(k) Description of the proposed statistically sound sampling method/procedure to be used by DOEs for verification of the amount of reductions of anthropogenic emissions by sources or removals by sinks of greenhouse gases achieved by CPAs under the PoA. In case the coordinating/managing entity opts for a verification method that does not use sampling but verifies each CPA (whether in groups or not, with different or identical verification periods) a transparent system is to be defined and described that ensures that no double accounting occurs and that the status of verification can be determined anytime for each CPA;*

*21. The DOE shall:*

*(a) Identify those CPAs that it shall consider for verification in accordance with the method/procedure to be used for verification of the amount of reductions of anthropogenic emissions by sources or removals by sinks of greenhouse gases achieved by CPAs under the PoA and determined in the CDM-POA-DD.*

*22. The DOE conducting the verification shall include in its verification report a description of how it applied the methods/procedures for the purpose of verification stipulated in the registered CDM-PoA-DD. The DOE shall include in its verification report a description/justification of the site visits undertaken.*

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<sup>1</sup> 15 (c): The further inclusion of new CPAs and issuance of CERs to that PoA shall be put on hold and all CPAs already submitted shall be reviewed to determine if any other CPA disqualifies.

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We consider that it should be defined a criterion to perform the statistically sound sampling method/procedure. For example, define a sample size statistically representative, with an acceptable error at 95% confidence level.

## II. Guidance for determining the occurrence of de-bundling under a Programme of Activities (PoA)

### Paragraph 1

1. For the purposes of registration of a Programme of Activities (PoA)<sup>2</sup> a proposed small-scale CPA of a PoA shall be deemed to be a de-bundled component of a large scale activity if there is already an activity<sup>3</sup>, which:

*a. Has the same activity implementer as the proposed small scale CPA or has a coordinating or managing entity, which also manages a large scale PoA of the same sectoral scope;*

This paragraph is no clear and may carry to misinterpretations. Following are some comments and questions in order to help to clarify the paragraph above:

- We ask for clarification regarding the concept of “debundling” in the context of the PoA, because the criteria for identification of debundling in the PoA is different from that established for the debundling in the traditional CDM projects context, which are presented as follows: “A proposed small-scale project activity shall be deemed to be a debundled component of a large-scale project activity if there is a registered small-scale CDM project activity or a request for registration by another small-scale project activity:
  - By the same project participants;
  - In the same project category and technology/measure; and
  - Registered within the previous 2 years; and
  - Whose project boundary is within 1 km of the project boundary of the proposed small-scale activity at the closest point.”
- This paragraph only applies for the CPA(s) that is(are) included in the PoA at the moment of requesting registration of the PoA? What regulation applies in this regard?

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<sup>2</sup> Only those POAs need to be considered in determining de-bundling that are: (i) in the same geographical area; and (ii) use the same methodology; as the POA to which proposed CPA is being added.

<sup>3</sup> Which may be a (i) registered small-scale CPA of a PoA, (ii) an application to register another small-scale CPA of a PoA or (iii) another registered CDM project activity

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- If a project implementer has a CDM Project, according to the paragraph, it is understood that this implementer could not develop a Project to be included as a CPA for an existing PoA, no matter the sectoral scope of both projects. Which is the sense under this measure? Is it a misinterpretation error?
- This paragraph indicates that the same coordinating or managing entity could not register a small scale POA-DD if there is registered a large scale POA-DD by the same coordinating or managing entity in the same sectoral scope. What happens in case that the small scale POA-DD to be registered is from the same sectoral scope but it considers a different technology? The small scale POA-DD can be registered? For example, both POA-DD in the sectoral scope 1, one considering electricity generation with a hydro power plant and the other with wind power plant. Which is the rationale of this guideline?

Currently, the Programme of Activities is a quite recent process that has some aspects not clarified. Therefore, it is necessary to clarify them in order to continuously improve PoA development.

Best regards,

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