

Public input on PoAs:

Allowing the use of a set of methodologies under a PoA

Dr. Christoph Sutter, CEO, South Pole Carbon Asset Management / 3 September 2008

As CDM methodology experts and project developers we highly welcome the EB's work with regard to Programmes of Activities (PoA) that can be registered as a single CDM project activity.

Our analysis of the publicly available documents regarding the procedures for registration of a PoA indicates however that the EB limits the use of methodologies for PoAs to only one single CDM methodology. We would like to highlight that such a regulation is stricter than the regulation for individual CDM projects (e.g. many registered small-scale biomass power generation projects use two methodologies in the same PDD, one for power generation and another for methane avoidance from avoided anaerobic decomposition of biomass). This means that projects currently developed under the CDM are not eligible for PoAs in its current form.

We fail to understand the rationale for this limitation. The restriction to one single CDM methodology does neither enhance the environmental benefit nor the credibility of PoAs; in the contrary it excludes many desirable project classes with high benefits for the global climate from the CDM. We understand that the EB has to safeguard PoAs against project participants bundling too different project activities under one PoA, however more than one methodology should be allowed within a PoA – in a similar fashion as under current CDM rules - to cover different aspects of a project.

We therefore recommend that PoAs shall be free to either use one or a set of approved methodologies, provided that wherever a set of approved methodologies is used, the same set of methodologies shall be used for all activities under the PoA.

About South Pole Carbon Asset Management

South Pole is a carbon asset management company with outstanding technical expertise and a reputation for developing innovative and cost-effective emission reduction projects. The company has globally more than 120 CDM projects under contract. It was the first company worldwide that generated issued CERs with the Gold Standard quality label and concluded the first ever international CER transaction. South Pole staff advised successfully registered CDM projects with a forecasted total of more than 100 million t CO₂e.