


Dear CDM EB Chair Mr. Martin Hession:

According to the 'Modalities and Procedures for Direct Communication with Stakeholders' (EB 62, Annex 15), here I would like to submit my comments on the Annexes of the EB 63 annotation as follows.

Thank you very much for your kind consideration.
Best regards,


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Comments on essential points:

[Annex 4 - Draft standard for demonstration of additionality of a programme of activities](#)

7. **Category-I approaches:** These approaches are to be applied when a PoA is undertaken to implement GHG emission reduction activities that are mainly triggered by CDM.

Comment

This underlying part undermines the benefits and purpose to create the channel of PoA and the additionality guidelines for micro-scale projects, therefore the clause should be deleted.

The PoA and additionality guidelines for micro-scale projects are innovative procedural treatments to mobilize projects for poors, such as improved cookstove, solar home system, domestic biogas digester, etc.

However, it is almost impossible to demonstrate that the penetration programme is “mainly triggered by CDM” in an objective manner by the LDC participant.

Therefore, if this clause is present, “Category-II approaches” must be chosen, which require the project participant to go through the hard channel to demonstrate additionality as ordinary projects.

It is known that SSC methodology is applied to CPAs, therefore it is natural to apply the additionality guidelines for micro-scale projects to CPAs without any conditions.

And if all CPAs are additional (i.e., delivers additional emission reductions), the PoA delivers additional emission reduction, in theory.

Comments on minor points:

[Annex 5 - Draft standard for the development of eligibility criteria for the inclusion of a project activity as a CPA under the PoA](#)

Comment

Throughout this document, CME is used as plural form “CMEs”. It is preferable to use in a singular form in order to avoid confusion because CME is a unique entity for a PoA.

Comment

The terminology “CPA” has many definitions as shown as examples. A unique definition shall be given. It was said as “CDM Programme Activity”...

[Annex 5 - Draft standard for the development of eligibility criteria for the inclusion of a project activity as a CPA under the PoA](#)

para. 2: component project activities (hereinafter referred to as CPAs), etc.

[Annex 6 - Draft standard for application of multiple CDM methodologies for a programme of activities](#)

para. 5: component project activities (hereinafter referred to as CPAs), etc.

[Annex 7 - Draft standard for sampling and surveys for CDM project activities and programme of activities](#)

para. 2: CDM Project Activities (CPAs), etc.

[Annex 9 - Draft clean development mechanism project standard](#)

para. 135: component project activity (CPA), etc.

[Annex 10 - Draft clean development mechanism validation and verification standard](#)

para. 191: component project activities (CPAs), etc.

[Annex 11 - Draft clean development mechanism project cycle procedure](#)

para. 14: component project activities (CPAs), etc.

Annex 7 - Draft standard for sampling and surveys for CDM project activities and programme of activities

56. For homogeneous PoAs, to determine parameters for PoA-DD/CPA-DD preparation (i.e. before implementation of CPAs) or for monitoring reports, a common sampling plan can be undertaken if it is implemented during the specified period under the following conditions:

Comment

The underlying part may cause confusion. I believe the original intension is to undertake one sampling and apply the results to all CPAs. Therefore “common sampling plan” should be changed to “single sampling”.

Annex 10 - Draft clean development mechanism validation and verification standard

Comment

Appendix A - II: “Para. 10 applies...” in the middle square shall be read as “footnote 31 applies...”

Annex 11 - Draft clean development mechanism project cycle procedure

Comments on the [bracketed] items:

- Para 49–54 OR Para 55–57:
Para 55–57 is better because it provides more concrete and rapid procedures.
- Para 110 OR Para 111:
Para 111 is better to include specific cases.
- Para 132 is not relevant because it limits the post-registration changes of CDM PoA than the CDM project activities.
- Para 150(d) is relevant as it allows flexible treatment by the Board.
- Para 153 OR Para 154:
Para 154 is relevant because it includes the case of PoA.

- Para 246 is relevant, although it is preferable to explain the difference of renewal of crediting period of a PoA and of a CPA.