


Dear CDM EB Chair Mr. Martin Hession:

Responding to “**Call for comments from stakeholders on the issues included in the annotated agenda of EB 65, including its annexes**”, I prepared the following inputs.

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


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Comments on Annex 5 “Draft Standard for Sampling and Surveys for ...”

We do need to consider “materiality” aspects for optimal sampling/survey.

This implies that the project participants are not necessary to undertake rigid sampling/survey to evaluate a minor (insignificant) part in calculation of emission reductions in theory for mathematical treatment.

Although the guidelines for materiality has not released by the Board, we shall rely the DOE to judge this aspect case-by-case basis at the time of validation and/or verification. Theoretical aspects can be found in IPCC 2006 Guidelines, Vol. 1, Ch. 3: Uncertainties.

I propose to insert the following paragraph after para. 8:

8-bis In case the targeted parameter for evaluation by the sampling/survey is significant in evaluating total emission reductions, the following procedures shall apply. If it is insignificant, materiality principle can be applied considering the relative magnitude of other parts in emission reductions. The DOE judges the appropriateness at the time of validation or verification.

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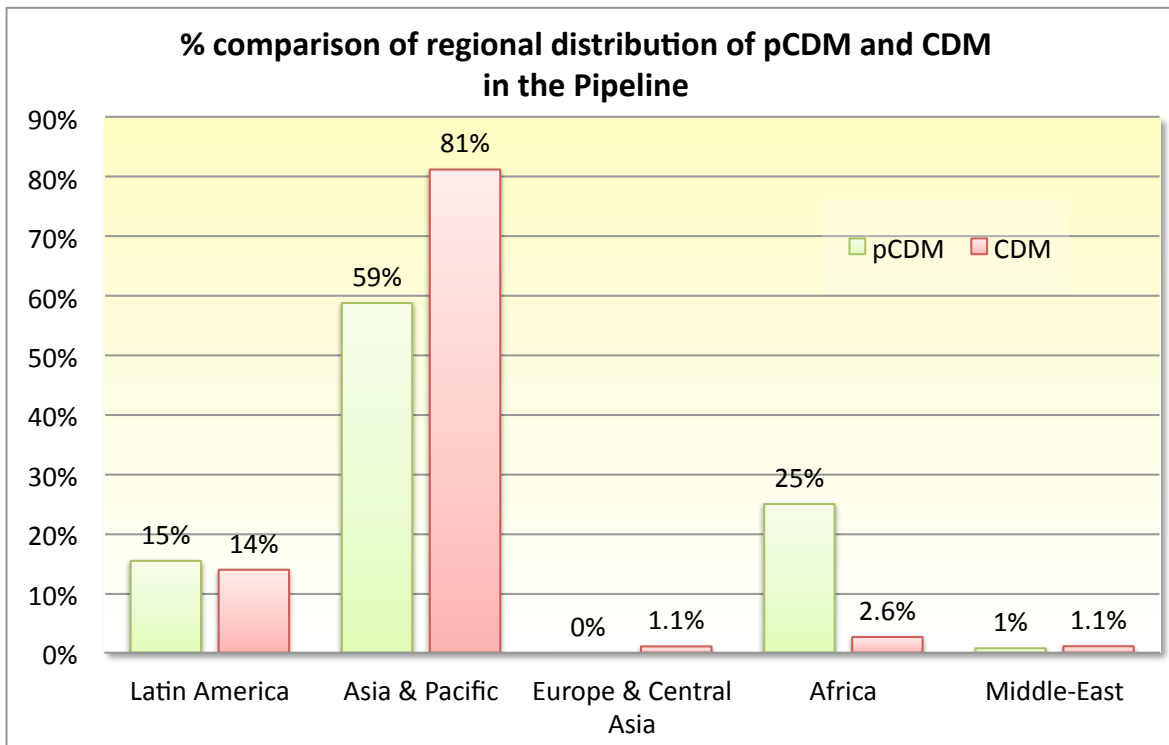
“Sampling requirements for PoAs” (para. 19) requires the same level of stringency of the large scale one (95/10) to the PoA.

As is well known, PoA is opening a door for poor countries and regions to enjoy the benefits of CDM as shown in the following graph for Africa (CDM pipeline, 10/2011).

If this rigid requirement is set without considering the reality of the area where the activities of PoA will be implemented, the original objective of the PoA will be drastically suppressed.

Therefore, I propose that the 90/10 confidence/precision is appropriate for PoA with

SSC methodologies.



Comments on the definition of the abbreviated terminology “CPA”

We see some confusion on the abbreviated definition of “CPA”.

All Annexes (draft standards) of EB65 specify it as “Component Project Activity”, although it used to be said as “CDM Project Activity” in the EB 63 standards and “CDM Programme Activity” at the beginning of PoA.

Could you fix this fluctuating definition of terminology? I think “component project activity” well reflects the real situation.

Comments on Annex 13 “Draft work programme on Standardized Baselines”

We appreciate step-wise progress plan as specified in this work programme.

On the other hand, we wish the Board to foster the on-going process of specific default factor setting such as that of non-renewable biomass.

Comments on Annex 16 “Draft procedure for submission and consideration of Microscale renewable energy technology...”

We appreciate this process very much. However it is not clear whether the “automatic additionality” is assured for the activities not belonging to the host countries except for that of the submitting DNA.

In many cases, the situation can be shared by other countries, especially in LDCs. It is very difficult for them to follow all details of CDM EB’s decisions and submit their proposal to the Board additionally.

Therefore, except for specific situation to the host country of submitting DNA is found, the automatic additionality assurance should be applied to any developing countries, at least to any LDCs.