



18/03/2011

CDM Executive Board
UNFCCC Secretariat
PO Box 260124
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Subject: Call for Public Inputs on Programme of Activities (PoA)

Dear Members of the CDM Executive Board

EVI welcomes the opportunity of providing inputs on the subject matter. We sincerely hope that Board finds these comments useful.

The barriers in the current rules:

Issue 1: Start date of CPA:

As per EB 55, Annex 38, the start date of any CPA is not, or will not be, prior to the commencement of validation of the programme of activities, i.e. the date on which the CDM-POA-DD is first published for global stakeholder consultation.

Engaging DOE and webhosting DDs on UNFCCC takes considerable time from the time of PoA conceptualization and timing the first CPA to match the above requirement becomes tedious due to the below problems:

1. Any activity related to the implementation of a CPA is to be kept on hold till the PoA validation begins
2. In that case, it is difficult to make the specific CPA-Design Document as complete information about the (future) CPA may not be available precisely at the time of validation of the PoA

Recommendation:

It is recommended that PoA project start date becomes the date of the “prior consideration” intimation sent by the Managing Entity to UNFCCC and/or DNA.

Issue 2: Erroneous inclusion of the CPA

If a CPA is found to be erroneously included in the PoA and is sent for further review in the Board, then the further inclusion of new CPAs and issuance of CERs to that PoA shall be put on hold. As the inclusion is CPA specific and not dependent upon any other CPA, it is inappropriate to put the inclusion of other CPAs on hold.



Recommendation:

Only the identified erroneous CPA should be put under hold and the inclusion of new CPAs and issuances of CERs of eligible CPAs must be continued during that period. This is justified as the assessment of all the CPAs is done independent from each other and the base document(s) to be referred is the POA DD, which is fixed and common for all.

The rules that are not existing or are missing and should be there:

Issue 1: Applicability of 'Additionality tool for <5MW projects'

The *Guidelines for demonstrating additionality of renewable energy projects =< 5 MW and energy efficiency projects with energy savings <= 20 GWH per year* is not applicable to PoAs. However, it must be noted that most of the low capacity/low investment/community based projects come under the realm of PoAs. Thus, not allowing PoAs to use the above said tool, does not fully utilize its potential.

Recommendation:

The guideline should be applicable to the PoA, which will not only encourage such development initiatives in the local and remote areas, but also justify the need for such a simplified guideline.

Issue 2: LoA for CPA

As per the Para 9 of EB 55, Annex 39, the coordinating/managing entity shall obtain letters of approval from each host Party and Annex I Party which wishes to be involved in the PoA. However, it is not clear why the LoAs from all the host countries proposed are required at the time of registration of the PoA.

Recommendation:

In cases where the PoA plans to expand in more than one country, the managing entity need not be required to submit LoAs from all the host countries at the time of PoA registration, because the process of PoA implementation in any particular country might start at a later date. Rather, the LoA from a particular host country, should be required only before the inclusions of CPAs from that host country.

Issue 3: Data monitoring in the PoA

It is possible that the monitoring procedures for the future CPAs, get improved/changed due to technological advancements. If the monitoring plan in the PoA DD is to be revised due to the new procedure in the future CPAs, how should the existing CPAs be considered?



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Recommendation:

The new CPAs should be allowed to use a revised monitoring plan. However, the earlier CPAs should be allowed to follow the same monitoring plan. That is to say, different monitoring plans should be allowed for CPAs of different vintages.

With warm regards

CDM Methodology Team

Emergent Ventures India

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