

In addition to expressing **views regarding the implementation of paragraph 4 of decision 3/CMP.6**, the Board specially seeks for inputs, in the above context, on the following:

(a) What are the possible **alternative concepts** for a PoA?;

(b) What are the **barriers** in the current rules?;

Current rules define the scenario for PoAs development. Looking to this scenario, we can see that the spread of this type of programs hasn't been as fast as was initially expected. In our opinion, there are some "regulatory" barriers preventing PoAs development, but also other important barriers that are not related to the existing rules.

The barriers in the current rules are associated to the lack of definition in some aspects. One example would be **the lack of definition on how DNAs should approve their voluntary participation in a PoA**. This issue offers two solutions: issuing a LoA for the entire PoA, or issuing a LoA for each CPA. This gap may be preventing some countries (especially non Annex I countries) to approve PoAs, blocking their development. For project proponents also, DNAs disparity on how to approve PoAs means an additional obstacle to take into account when thinking about the development of a PoA. There are 7 examples of registered PoAs and the solutions adopted in each case are different which also does not offer clarity in this sense.

Another element under the current rules which may be blocking PoAs spread is **DOEs liability issues**. This topic is always raised when talking about PoAs barriers and may be any change in the rules would lead to a higher number of DOEs willing to validate PoAs and shorter times for finishing PoAs cycle. In this regard, we consider that the measure of including new CPAs directly by the DOE is appropriate as it reduces transaction times, costs, and burden of PoAs cycle.

Last but not least, there is one rule that has a **retroactive character** and introduces a barrier (additional costs, effort, longer program cycle, uncertainty...) to PoAs. That is "*if a methodology is put on hold or withdrawn (i.e. in case of a consolidation of a methodology), the PoA shall be revised accordingly. The changes shall be subsequently documented in a new version of the PoA, validated by a DOE and approved by the EB.*"

(c) What are the **rules that are not existing or are missing** and should be there?;

Those related to DNA procedures and maybe a new approach to tackle DOEs liability issues.

Contact details regarding the attendance to the workshop on PoAs: and@marm.es