



March 18, 2011

To,
CDM Executive Board
United Nation Framework Convention on Climate Change.
Bonn, Germany

Subject: Comments on “Call for public inputs on Programme of Activities (PoA)”

Dear Sir,

We thank you for giving us the opportunity to provide comments on the barriers in the current rules of PoA under “Call for public inputs on Programme of Activities (PoA)”. Our comments are attached herewith for your kind perusal.

We hope that this would bring clarity on various concerns in order to take the PoAs forward.

Thanking you,
For Thermax Sustainable Energy Solutions Limited,

Rajesh Madiwale
Business Head
mCARBON
Thermax Sustainable Energy Solutions Limited,
Phone No. 020-66476201



We are proposing following points to comments on “Call for public inputs on Programme of Activities (PoA)”

Sr No.	Reference / Guidance / Standard	Proposed Barriers / Alternatives
1	<p>EB 55 annex 37, Para 5, If a Designated National Authority (DNA) of a Party involved in the PoA or a Board member identifies information that may disqualify a CPA from inclusion in the PoA or renewal of its crediting period the Secretary of the Board shall be notified, by means of a request for review form (F-CDM-CPAR) within one year after the inclusion of CPA into a registered PoA or renewal of the crediting period of the CPA, or within six (6) months after the first issuance of CERs for that CPA, whichever is the latter.</p> <p>Para 10, A DOE, that has not performed validation, registration, inclusion or verification functions with regard to this PoA shall conduct the review referred to in paragraph 9, by assessing a random sample of 10% of all CPAs currently included and submitting a report to Board within eight weeks.</p>	<ul style="list-style-type: none"> • CPA which have passed the 1 year from inclusion and 6 months after 1st issuance whichever is later should be cleared from the sample check and should not be reopened for sample revalidation. • Only those CPAs which are within 1 year and the 6 months from issuance time line should be considered to be taken as a sample for check and not review again according to Para 10 (10% random sample and further Para 16 (further 15 % of included CPAs). • Only the included CPAs under Request for Review shall be put on hold till EB Board gives the final decision and not the whole PoA. • Other CPAs which are not the part of projects which can be considered as sample i.e. beyond the 1 year and 6 months timeline should be allowed to be verified and CERs should issued for the same



<p>2</p>	<p>EB 55 Annex 38, PROCEDURES FOR REGISTRATION OF A PROGRAMME OF ACTIVITIES AS A SINGLE CDM PROJECT ACTIVITY AND ISSUANCE OF CERTIFIED EMISSION REDUCTIONS FOR A PROGRAMME OF ACTIVITIES</p> <p>Para 9, 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. Letters of approval shall be issued in accordance with the guidance provided by the Board (EB 16 report, Annex 6).</p>	<p>HCA approval should not be mandatory for CPAs under a registered PoA if the PoA has received the Host Country Approval and CPA fulfill the eligibility criteria of registered PoA.</p> <p>The sample project submitted at the time of Validation and registration of the PoA is already approved as it is sustainable.</p>
	<p>Para 35. A DOE, who has not performed validation/inclusion/renewal of crediting period activities for the PoA, shall:</p> <p>(a) Identify those CPAs that it shall consider for verification in accordance with the method/procedure to be used for verification of the amount of reductions of anthropogenic emissions by sources or removals by sinks of greenhouse gases achieved by CPAs under the PoA and determined in the CDM-POA-DD,</p> <p>(b) Take into account the possible existence of different versions of the PoA and the need to account for this in its sampling approach, to ensure that a statistically sound sample of CPAs from each version of the PoA are being verified.</p> <p>(c) Make all monitoring reports received from the coordinating/managing entity immediately publicly available on the UNFCCC CDM website.</p> <p>(d) Systematically verify and certify the correct implementation and operation of the</p>	<p>We have identified a barrier in Para 35, and Propose that the DOE who has performed validation / inclusion / renewable of crediting period activities, shall identify those CPAs and may undertake verification if prior approval is received in advance by CDM EB. However the advance approval process is not available.</p> <p>Hence, we propose to allow any of the DOEs who have performed the Validation and or inclusion of PoA to undertake verification of CPAs for the same CPAs or introduced the advance approval process.</p>



	record keeping system.	
	<p>Para 37, A DOE shall request issuance of CERs for a PoA by submitting the .CDM form to submit verification and certification reports and to request issuance for a PoA.(F-CDM-POA-REQCERS) via a dedicated interface on the UNFCCC CDM website. The request shall relate to all CPAs included in the PoA during the specified monitoring period. The monitoring periods shall be consecutive. A request for issuance shall relate to the certified emission reductions verified as per above.</p>	<p>We would like to propose alternative, and suggest that the Request for issuance should be allowed for each CPA separately with flexible monitoring period instead of the request for issuance for all CPAs included shall have a specified monitoring period and that the period shall be consecutive. This will allow to do the verification and submission at different places as there is shortage of manpower and resources at both the DOE and PP end. This will also help in case PoA has been approved for different countries. CPAs also could then have monitoring, verification and issuance as per the LDC and non LDC countries even if they all form a part of one PoA.</p>
3	<p>EB 54 annex 15, Guidelines for demonstration of additionality of renewable energy projects =<5 MW and energy efficiency projects with energy savings =<20 GWH per year.</p> <p>Para 2, (c) The project activity is for distributed energy generation with both conditions (i) and (ii) satisfied (see below);</p> <p>(i) Each of the independent subsystem/measure in the project activity is smaller than or equal to 750 kW electrical installed capacity;</p> <p>(ii) End users of the subsystem or measure are households/communities/SMEs.</p>	<p>We are proposing, alternative to the point (ii) to allow this condition applicable to the non SMEs with point (i) applicable.</p>
4	<p>The Boundary of the PoA in terms of geographical area shall allow to Expand after registration of PoA if the boundary has to expand in LDC countries & countries</p>	<p>The registered PoA should be allowed expansion in LDC countries by taking a sample case CPA and get the same approved by having an HCA approval</p>

THERMAX SUSTAINABLE ENERGY SOLUTIONS LIMITED THERMAX HOUSE, ANNEXE, 4 MUMBAI PUNE ROAD, SHIVAJINAGAR, PUNE 411005, INDIA. TEL.: +91-20-66476200, 25542155, Fax: +91- 20 – 66476266. Website: www.thermaxindia.com



covered under EB 55 Annex 12 where countries with <10 or none registered CDM Project registered. This may be allow with the proper approval from the host country for CPAs meeting the eligibility criteria of the registered PoA in that countries.	for that host country and a DOE inclusion
--	---