

July 5, 2014

CDM Executive Board
c/o UNFCCC Secretariat
D-53153 Bonn
Germany

Re: Call for input on "Issues included in the annotated agenda of the eightieth meeting of the CDM Executive Board and its annexes" (30 June to 6 July 2014, 24:00 GMT)

Honorable Members of the CDM Executive Board,

We welcome the opportunity to comment on the annotated agenda of the 80th CDM Executive Board meeting. Our comments relate to Annex 6 regarding Revision of PoA-related regulatory documents. This submission builds on our earlier submission on the annotated agenda to the 78th meeting of the EB. Drawing from our experience, we would like to comment on the following issues:

- 1. Issue 1: Post-registration changes to PoA.** The limits on post registration changes for PoA, at present, constitute barriers to both innovation and the promotion of advanced and upgraded technologies that could bring greater environmental benefits and increase environmental integrity. For instance, LED lamps are not only more efficient and longer-lasting than CFLs, but they also contribute to the effective management of mercury in the environment. As a result we support the recommendation by the secretariat to expand post registration changes to include the addition of related technologies/measures and methodologies that facilitate the goals described in paragraph 15. Furthermore we support the recommendation made to also permit the changing of PoA eligibility criteria as defined in Para 19 to account for any improvements in methodologies and/or, additionality demonstration, if the CME wishes to apply the relevant revised version of a methodology or tool.

We would also like suggest that regulations allow developers flexibility to access better alternative technologies/measures occurring as a result of changing policy/economic conditions during a crediting period. A simple example for this could be to permit a household to change from use of SHS to the grid or mini-grid connection. Clear guidance on the information needed for re-assessment of baseline and probably additionality would be useful for many rural electrification programs.

- 2. Issue 2: Definition of types of generic CPA-DDs.** The Secretariat has proposed two solutions to support the reduction of transaction costs associated with multiple generic CPA-DDs to identify each type of CPA for each type of technology/measure, each methodology or combinations of methodologies/measures planned under the PoAs. To reduce unnecessary duplication in the forms cross referencing is allowed but even more costs could be reduced if both the proposals outlined in para 34 of Annex 6 are applied and we therefore support the adaptation of ***both*** measures identified in para 34.

3. **Issue 5: Survey requirements to estimate multiple parameters in a single survey.** We support the recommendation made in para 61 to allow smaller random samples within a larger sample provided the confidence/precision levels are achieved for each individual parameter. This clarification could substantially reduce the costs for monitoring without negatively impacting environmental integrity. In addition we would also like to note that transaction costs are greatly reduced by the application of defaults. We encourage the EB and its panels to continue to support the development of simple calibration defaults for commonly used monitoring equipment (e.g. thermometers for water and scales for fuel wood) in order to avoid situations where projects are required to use high end monitoring equipment since simple technologies have no calibration requirements.

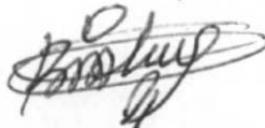
4. **Other issues not addressed in Annex 6 but included in our submission on PoA reforms in the annotated agenda to EB78:**

We would kindly like to remind the EB of our previous recommendations regarding PoA reforms since these issues have not been addressed in the Annex, however we consider them to be critical measures to ensure the PoA is able to effectively and efficiently achieve real scaled up greenhouse gas mitigation:

- a. **Simplified CPA inclusion for PoAs addressing micro scale activities.** Recognizing that simplification of the PoA procedures lowers transaction costs, promotes efficiency and predictability, it is recommended that an **optional simplified CPA inclusion procedure for PoAs addressing micro scale** activities is established. Under simplified procedures the Coordinating/Managing Entity (CME) would directly include the micro scale CPAs into a PoA that has been registered and validated by the DOE. The CME will only include micro scale CPAs into the validated and registered PoA provided they complied with an EB pre-approved simplified eligibility template.
- b. **Address CPA threshold limits** – Applying the micro-scale thresholds at the underlying unit level (instead of the CPA level) can substantially reduce transaction cost in providing more flexibility in grouping individual activities to CPAs. Currently **micro**-scale thresholds are applied at the level of each CPA rather than at the unit level or project activities level. This results in the current practice of artificially grouping project activities (e.g. solar lighting projects) into bundles of activities that meet the threshold.

We look forward to continued co-operation on these issues with both the EB and its secretariat. Should further information be required, please do not hesitate to contact us.

Sincerely,



Leon Biaou

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