

TABLE FOR COMMENTS

Name of submitter: Mr Takalani Rambau, Chair of the African DNA Forum

Affiliated organization of the submitter (if any): African DNAs

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#	Area*	Related CDM regulatory document (if any)	Para no. (if any)	Issue (Description of an issue concerning a specific CDM rule or operation that you consider results in unnecessarily high burdens or transaction costs on stakeholders, together with a description of the observed burdens or costs and their implications)	Proposed change (Description of an idea for simplification/streamlining of a particular CDM rule or operation and expected implications on the efficiency and integrity of the CDM)
1	General	-	-	PoAs are in many ways different from single CDM project. To recognize differences and enable simplifications, PoAs should have their own standard and project cycle	Consolidate sections relevant to PoAs in the CDM Project Standard, the CDM Validation and Verification Standard and the CDM Project Cycle Procedure into a single standard for PoAs.
2	Issuance	-	-	PoAs often bundle activities from commercially independent organizations (CPA implementers). PoAs should further reform to ensure that one CPA implementer is not held up or suffering from the mal-performance of another or by the fact that commercial considerations differ between the CPA implementer and the CME.	<ul style="list-style-type: none"> - Allow for the option to issue CERs directly to CPA implementers instead of the CME - Allow for unlimited issuances for CPAs within a monitoring period (EB 80 has allowed for up to 10 issuances) - for multi-country PoAs, a request for review of a request for issuance raised by a host Party shall only affect CPAs in the Party's own territory

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3	Other project cycle steps	-	-	Steps of the PoA cycle should be reduced where feasible to reduce costs to CMEs	<p>Allow as an option a simplified validation and registration process for activities that satisfy micro-scale thresholds and are considered automatically additional. This option to include:</p> <ul style="list-style-type: none"> - Validation of PoAs without the submission of a specific CDM programme activity (CPA); - Inclusion on the basis of a pre-approved standardized inclusion template of CDM Component Project Activity (CPAs) directly by the Coordinating and Managing Entity (CME) without prior validation through a DOE.

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4	Other project cycle steps	-	-	Steps of the single project cycle should be reduced where feasible to reduce costs to project participants	<p>Allow as an option the simplified registration of CDM project activities that qualify as automatically additional so that;</p> <ul style="list-style-type: none"> - Registration is approved on the basis of a standardized pre-approved registration template using objective criteria without prior validation through a DOE; and - Ex-post confirmation of the compliance to the registered template of the implemented project activity is undertaken by the DOE during first verification.

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5	Validation and Verification	-	-	The requirement to engage different DOEs for validation and verification increases costs to project developers (search and contracting costs) and foregoes the possibility for cost savings in the financial offers of DOEs. With a shrinking number of DOEs active in the market, CDM project implementers face increasing difficulties in finding suitable DOEs that are accredited for their relevant scopes. At the same time the added value of employing a second DOE has to be questioned. The CDM Accreditation Standard contains rigorous requirements for the work of the DOEs including on human resources, impartiality safeguards and quality management to ensure good performance	Allow for the same DOE to carry out validation and verification of the same project or PoA for all project sizes.

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6	General	-	-	Capacity gap: Potential stakeholders in under-represented countries such as Sub-Saharan African countries, especially LDCs, are chronically under-equipped to fully master and apply the stringent administrative and regulatory framework established by the CDM. Project proponents often lack the internal expertise, awareness and resources to comply with all steps and requirements of the CDM project cycle in parallel to their challenging business environment, while DNAs also face frequent under-staffing and unavailability of resources to promote the CDM, evaluate project proposals and properly monitor Sustainable Development indicators.	The existing CDM loan scheme mechanism should be reinforced as follows: <ul style="list-style-type: none"> - The threshold of 10 registered project activities as of beginning of submission year should be turned into 10 issued project activities - Bi-annual call for projects frequency should be increased to quarterly calls

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7	Other specific process	Procedure for DNA Submission of Microscale Renewable Energy Technologies for Automatic Additionality	-	Lack of participation/inputs: only 12 DNAs have proposed specific renewable technologies/measures for consideration by the Board for automatic additionality among which none in Sub-Saharan African countries.	<ul style="list-style-type: none"> - The current “Procedure for DNA Submission of Microscale Renewable Energy Technologies for Automatic Additionality” should be modified to allow not only DNAs but also any other entity to propose specific renewable technologies/measures for consideration by the Board for automatic additionality. - Additional budget provisions should be reserved to non LDCs Sub-Saharan African countries to identify Special Underdeveloped Zones.

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8	Other specific process	-	-	Field visits costs: implicitly required on-site inspections of monitoring surveyors and visits of DOE auditors at validation and/or verification stage result in significant travel costs than can be deterrent especially for multiple, scattered devices activities (e.g. improved cook stoves) and unstable countries/areas.	<ul style="list-style-type: none"> - On-site visits exemptions at validation stage and at recurrent verification stage should be clarified and simplified depending on status of project, safety issues and means of distance validation/verification of critical parameters. - Field surveys at monitoring stage should be left optional (or only partially required) in case of drastically distant appliances/users and/or unsafe areas, where phone/SMS monitoring procedures could conveniently make up for physical inspections' complexity and cost.
9	Other specific process	-	-	The current situation of CDM acts as a hinder for project developer in order to register projects or even issue CERs due to the modest prices of CERs, while the CDM is the most credible MRV system and the concrete mechanism up to now. Thus, there is an urgent need to find unconventional solution for this problem.	Allow the use of CERs by non-annex I parties that are parties to Kyoto protocol, that are achieved nationally and owned by the non-annex I party for fulfilling any mitigation actions whether domestically or under any future regime.

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*Area: Please choose from the following categories:

General; Registration; Issuance; Post-registration changes; Renewal of crediting period; Other project cycle step; Methodology development; Methodology revision; Methodology clarification; Accreditation; Other specific process.

Please divide your inputs on issue by issue using different rows. Please create as many rows as needed.