

## TABLE FOR COMMENTS

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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)
	General	<b>CDM-EB82-AA-A02</b>	3. 5.-6.	Many CDM projects and PoAs have experienced costs, barriers and resulting delays relating to issues that are non-material in nature. The risks, costs, uncertainties and timelines relating to these activities are therefore increased unnecessarily and their effective implementation is undermined due to issues that have no material impact on environmental integrity.	Application of the materiality principle in all aspects of the CDM, including validation and post-registration changes.
	Registration	<b>CDM-EB82-AA-A02</b>	3. 9.	The validation and registration process, including additionality assessment, is a costly and time-consuming step in the CDM cycle. Since activities that qualify as automatically additional do not require additionality assessment during validation, it is possible to reduce transaction costs and timelines by simplifying the validation and registration process for such activities without compromising environmental integrity of these activities, provided that such simplified procedures include sufficient safeguards to ensure appropriate stakeholder consultations and environmental integrity.	Allow simplified registration as an option for activities that are automatically additional and qualify either as micro-scale or are eligible to apply standardised baselines, including (1) allowing for validation of PoAs without specific CPA-DDs for CPAs where the individual unit size qualifies as micro-scale; and (2) inclusion of the basis of pre-approved standardised inclusion template CPAs involving certain types of activities with individual unit size that satisfies the micro-scale activities thresholds directly by the CME without prior validation by a DOE. This would only apply provided that the global and local stakeholder consultations are appropriately carried out.
	General	<b>CDM-EB82-AA-A02</b>	3. 9.	The existing rules have emerged bottom-up through project-based approaches and thus have not been designed to take into account the specific features of PoAs, including their dynamic and diverse nature and consequent need for flexibility (besides manageable transaction costs) in design and implementation. A fresh look at the existing rules from the perspective of PoAs can identify opportunities to develop streamlined, consolidated and consistent rules and procedures specifically customised for PoAs.	Prepare separate PoA standards and procedures (rather than PoA sections in the CDM standards and procedures); this option is preferred to reflect PoAs as opposed to projects.

