

## 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)
1	General	-	-	<b>Language barrier:</b> French speaking Africa (31 countries) is the least represented region under the CDM to date, due to the complexity and cost associated with English written procedures, methodological documents and submission process, although French is an official language of the CoP. Project promoters and DNAs are confronted with constant difficulties in familiarizing themselves with existing and new procedural and methodological frameworks, as well as complying with English-written expectations for submissions and communications, hampering their participation in CDM.	<ul style="list-style-type: none"> <li>- PDDs, LoAs, Monitoring Report, Post Registration Changes and methodological clarifications or deviation requests, etc. should be allowed to be submitted in French language</li> <li>- DNAs should be entitled to claim official French translation of any existing or new piece of CDM regulatory document</li> <li>- The UNFCCC staff sent from Bonn to the Lomé Regional Collaboration Center should be fluent in French (French language should be mother tongue or staff should be certified with the French LPE of the United Nations)</li> </ul>
2	General	-	-	<b>Capacity gap:</b> Potential stakeholders in under-represented countries such as Subsaharan 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.	<ul style="list-style-type: none"> <li>- The existing CDM loan scheme mechanism should be reinforced as follows: <ul style="list-style-type: none"> <li>o The threshold of 10 registered project activities as of beginning of submission year should be turned into 10 issued project activities</li> <li>o Bi-annual call for projects frequency should be increased to quarterly calls</li> <li>o Additional budget provisions in the magnitude of US\$ 50 M. should be reserved for LDCs and non LDCs Sub-Saharan African countries</li> </ul> </li> </ul>

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3	Other specific process	Procedure for DNA Submission of Microscale Renewable Energy Technologies for Automatic Additionality	-	<b>Lack of participation/inputs:</b> only 12 DNAs have proposed specific renewable technologies/measures for consideration by the Board for automatic additionality among which none in Subsaharan African countries.	<ul style="list-style-type: none"> <li>- 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.</li> <li>- Additional budget provisions should be reserved to non LDCs Sub-Saharan African countries to identify Special Underdeveloped Zones.</li> </ul>
4	Other specific process	-	-	<b>Field visits costs:</b> 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 cookstoves) and unstable countries/areas.	<ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> </ul>
				[...]	

\*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.