

**Ref: Call for public inputs on the structure of cornerstone regulatory document of the CDM**

Dear Madam/Sir,

This input in reference to the “Call for public inputs on the structure of cornerstone regulatory document of the CDM” has been submitted on behalf of the members of the PoA Working Group (PoA WG).

The PoA WG welcomes the opportunity to submit public inputs with regards to developing consolidated and streamlined set of provisions for programmes of activities (PoAs), taking into account the [concept note](#) by the UNFCCC secretariat.

The PoA WG would like to express its support for **Option 2** outlined in the call for public inputs:

- *Two documents: (i) one consolidating all elements of the PS, VVS and PCP for project activities (ii) one consolidating all elements of the PS, VVS, PCP for PoAs and the PoA standard*

This recommendation is based on the following rationale:

- PoAs are distinct from project activities with regard to specific elements in the project cycle
- PoAs are distinct from project activities with regard to the role of key actors in the CDM project cycle, including, inter alia, DNAs, DOEs, CMEs and PPs.

Separating regulatory provisions may thus mitigate the risk of confusion both for CMEs and PPs wishing to develop CDM activities, as well as for DOEs who wish to validate or verify a project activity of PoA. Any such consolidation of documents should be guided by the ambition to enhance the clarity and usability of regulatory documents. Sections that apply to both project activities and PoAs can be initially duplicated in both documents without impacts on usability. Future revisions should be synchronized as appropriate.

As a consequence, this separation of documents would implicitly result in a need to adapt the terminology as it generates a new programme or PoA cycle that replaces the project cycle for PoAs.

Regarding the timelines set out in the concept note, the PoA WG further recommends taking into account any possible future revisions of the CDM's Modalities and Procedures, in particular those with relevance for PoAs.

Yours respectfully,

The PoA Working Group