

**Ref: Call for public inputs on options for using the CDM as a tool for other uses**

Dear Madam/Sir,

This submission responds to the “Call for input on options for using the CDM as a tool for other uses”, and has been prepared by the PoA Working Group (PoA WG). The PoA WG welcomes the opportunity to submit its inputs to the CDM Executive Board and would like to suggest the following additions:

**Throughout the document, highlight the specific potential of CDM Programme of Activities.** CDM PoAs are distinct from project activities with regard to specific elements and actors in the project cycle, including, inter alia, DNAs, DOEs, CMEs and PPs. PoAs can significantly lower transaction costs, and often target activities with high sustainable development co-benefits. Implementing mitigation action through programmatic approaches is also a key ambition of climate finance institutions such as the Green Climate Fund. The CDM’s PoA concept offers fully operational rules for such programmatic approaches. However, the potential to use various aspects of the PoA concept is not fully recognized, and could be highlighted more explicitly in the current draft of the concept note.

Therefore, PoA WG suggests the following textual additions in ***bold italics***.

- ***Add a new point (d)*** in Section 3, para 4: ***Existing infrastructure for rapidly scaling up mitigation actions through programmatic approaches***
- ***Add*** in Table 1, Annex 1, Item 1: Add in the last sentence beginning with “The CDM offers a pipeline of bankable projects, a robust measurement, reporting and verification (MRV) system, ***existing rules and governance infrastructure for programmatic approvals of CDM activities***, and [...]”
- Explicitly highlight the potential of building on CDM PoA lessons for programmatic approval in the Green Climate Fund, in response to the GCF’s own ambition to explore programmatic approvals, e.g. in document GCF/B.11/04

The PoA WG also encourages the EB and Secretariat to further identify analyse which elements of the CDM PoA structure would need to be revised to make it more flexible so that it becomes the most attractive option for alternative uses (e.g. results-based financing).

Moreover, the COP decision on the adoption of the Paris Agreement recommended that the new mechanism established in Article 6.4. builds on experience gained with existing mechanisms including the CDM. We therefore recommend considering the lessons from programmatic approaches in the CDM to inform the design of this mechanism.

Yours respectfully,

The PoA Working Group