



INPUT BY POA WORKING GROUP ON STANDARDS, GUIDELINES & PROCEDURES FOR POAs

Who are the PoA working group?

- ◆ Established in October 2011 on the initiative of Perspectives Climate Change with financial support of the Federal German Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU), the CDM/JI Initiative
- ◆ Aim:
 - Forum for dialogue, exchange of experiences and coordination of support of PoAs by members
 - The topics for dialogues are current PoA developments, existing and remaining barriers for PoA implementation with aim to develop concrete solutions
- ◆ Members: KfW, UBA, CDC Climat Asset Management, Carbon Finance Unit, Designated Operational Entities and Independent Entities Association (DIA), PD Forum, and IGES.

Improvements for PoAs following EB69

EB 69 decision	Assessment
<p>Microscale thresholds applied at CPA level inefficient and costly. This has largely been addressed through expanding automatic additionality. (webcast EB69)</p>	<p>Agree that the issue has largely been addressed.</p>
<p>CPAs can start prior to PoA-DD validation if secretariat and DNA are notified within 6 months of start of PoA. To be discussed. (Para 93 (a) report)</p>	<p>This is practical, an consistent with stand alone CDM procedure. Note: it is very difficult to match the engagement of the DOE for PoA-DD & CPA start date.</p>
<p>Post registration design changes to PoA-DD and CPA-DD that are permitted versus those not permitted is helpful (e.g. eligibility criteria, technologies/measures, size/scale, applied methodology, methods for additionality) (para 93 (c) (d) report)</p>	<p>Welcome improved clarity and agree with decision that post registration changes are permitted for PoA if comply with PS and for CPA if it is still in compliance with the eligibility criteria for the PoA –DD.</p>
<p>Same DOE for inclusion and verification of SSC CPAs to be considered after further research by Secretariat (para 93 (f) report)</p>	<p>SSC PoAs should be allowed to use the same DOE that performed inclusion services for verification. Same as SSC CDM projects.CMP decision?</p>

Barriers to PoAs in the run up to Doha

EB Decision	Issue	Recommendation
<p>One actual case CPA-DD per technology/measure. (para 93 (b) report) Aim: Give DNAs control.</p>	<p>Higher risks deter investment Delays in starting PoAs Double check - inefficient</p>	<p>Do not see need for double check. Of options proposed by secretariat prefer option c) requiring one actual case CPA-DD per technology but over a period of time (see concept note). Exception when criteria linked to investment costs of technology or measure.</p>
<p>Para 294 of VVS :all CPAs in a monitoring period must be presented together to DOE (para 93 (e) report)</p>	<p>Supports investors but concerns about overlapping monitoring periods of CPAs.</p>	<p>Allow one or several verifications/yr/CPA or per group of CPAs by the same/or diff. DOEs? CPAs should have appropriate identification to avoid double counting.</p>
<p>Not to prioritize joint validation/verification for SSC PoAs. (para 93 report)</p>	<p>Concerns regarding errors or too much DNA and CME responsibility?.</p>	<p>Important to consider ways to standardize procedures which will reduce costs. Optional approach not compulsory.</p>
<p>CMP recommendation by EB that LoA could be withdrawn (EB webcast)</p>	<p>New investor risk. Problems in corrupt environments. Time delays.</p>	<p>Can concerns of EB to ensure „good“ CDM projects be assured by other means? E.g. National regs.</p>
<p>Erroneous inclusion and liability risk addressed. (EB webcast)</p>	<p>DOEs concerns with greenfield sites. Likely to incr. transaction costs.</p>	<p>Continue consulting with DOEs to find useful way forward that does not result in costs to PPs.</p>

Thank you

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