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*Sent by e-mail to: hyem@ecoeye.com*

**Re.: Inclusion of several projects in a CPA**

Dear Ms. Park,

Thank you for your letter received on 16 February 2012, which has been made available to the Chair of the Board.

On behalf of the Chair of the Board, I would like to inform you that the CDM rules do not prohibit combining more than one measure into one component project activity (CPA) under a CDM programme of activities (PoA). Given the generic nature of your question, I regret that I am not in a position to provide specific guidance regarding development of your particular CPA/PoA.

Nevertheless, please be informed that in accordance with the *CDM Project Standard*, the coordinating/managing entity (CME) of the PoA is responsible for establishing the PoA framework, which involves defining an actual CPA under the PoA, and describing a typical CPA with generic information applicable to all CPAs that will be included in that PoA. This includes a description of the technology(ies) and/or measures to be used, to enable the identification of the project's scale and type, demonstration of additionality, application of the selected methodology(ies) and calculations of GHG emission reductions or net GHG removals. Therefore the conceptualization of the PoA at the programme level is first necessary before defining and describing the most suitable possible constellations of projects/measures at the CPA level.

In this context it is important to consider that different constellations would be bound by specific eligibility criteria in order to fulfill requirements regarding demonstration of additionality of the PoA. For example, different requirements apply for different types and scales of activities. Should the PoA involve any combinations of technologies/measures and or/methodologies the eligibility criteria relative to each of them shall be proposed to demonstrate additionality. The combinations of technologies/measures and/or methodologies for a PoA are eligible where it is demonstrated that there are no cross-effects between the technologies/ measures applied. Where such cross-effects do exist, the CME shall propose methods to account for such cross-effects using the *Procedures for requests to the executive board for deviation from an approved methodology* so as to ensure that the calculation of emission reductions is accurate.



Should the CME/project participants consider the PoA to be a small-scale programme and plan to make use of the requirements set out in the *Simplified modalities and procedures for small-scale CDM project activities*, none of the CPAs may individually exceed the applicable small-scale eligibility thresholds. Compliance of a CPA with the small-scale threshold shall be met by following the *General guidelines to SSC CDM methodologies*; therefore the CME/project participants must consider the adherence to such limits, which will impact decisions on combining projects into one or more CPAs. It would also be required to demonstrate that an individual CPA is not a debundled component of a large-scale activity, in accordance with the applicable provisions of the *Guidelines on assessment of debundling for SSC project activities*. Furthermore, the CME would need to choose between sampling or systematic verification; if sampling is chosen, it would be necessary to consider the composition of CPAs to group them according to technology/methodology to facilitate the verification process. This should take into account characteristics of the CPAs including approaches to baseline and additionality, scale, location, and monitoring requirements.

All of the above considerations are likely to be assessed by the CME along with cost and resource concerns to determine the most suitable composition of a CPA within a particular PoA. The process involved in meeting the various requirements, depending on the PoA-specific types of measures and scales of activities involved, should be discussed in detail with your CME and validating DOE in order to consider the potential options for your CPA development and inclusion in a specific PoA.

Yours sincerely,

Andrew Howard  
Secretary to the CDM Executive Board