

CDM: FORM FOR SUBMISSION OF A "LETTER TO THE BOARD" (Version 01.2)

This form should be used only by project participants and other stakeholders for submitting a "Letter to the Board" in accordance with the latest version of the Modalities and procedures for direct communication with stakeholders

Name of the stakeholder¹ submitting this form (individual/organization):	World Bank, Carbon Finance Unit
Address and contact details of the individual submitting this form:	Address: 1818 H Street N.W. Washington, D.C. 20433, USA
	Telephone number: (202) 473-6363
	E-mail address: koppermann@worldbank.org
Title/Subject (give a short title or specify the subject of your submission)	Verification Procedures for Small Scale Programme of Activities
Please mention whether the submitter of the form is:	Project participant
	Other stakeholder, please specify Multilateral Development Bank
Specify whether you want the letter to	☐ To be treated as confidential
be treated as confidential ² :	☑ To be publicly available (UNFCCC CDM web site)
Please choose any of the type(s) below3	to describe the purpose of this submission.
⊠ Type I:	
☐ Request for clarification ☐ Revision of existing rules	
	Please specify reference Procedures for Registration of a Programme of ity and Issuance of Certified emission reductions for a Programme of Activities
☐ Guidance. Pl	ease specify reference
☐ Forms. Pleas	se specify reference
Others. Pleas	se specify reference
Type II: Request for Introduction	ction of new rules
☐ Type III: Provision of inform	ation and suggestions on policy issues
Please describe in detail the issue on wh exact reference source and version (if ap	ich you request a response from the Board, including the oplicable).

¹ DNAs and DOEs shall use the respective DNA/DOE forms for communication with the Board.

² As per the applicable modalities and procedures, the Board may make its response publicly available.

³ Latest CDM regulatory documents and information are available at: http://cdm.unfccc.int/Reference/index.html.

Dear Members of the CDM Executive Board,

We would like to seek clarification on the text for selection of a DOE for verification of a CPA under a program of activities from the "Procedures for Registration of a Programme of Activities as a single CDM project activity and Issuance of Certified emission reductions for a Programme of Activities (V.04.1)" (EB 55, Annex 38), para.35, footnote 5, and in "Validation and Verification Standard, V.02.0" (EB 65, Annex 04), para. 292, footnote 43, which says:

"Such a DOE may also undertake the verification if this has been approved in advance by the CDM Executive Board". We kindly request the Board to clarify the conditions, if any, under which such an approval would be granted.

We would like to point out that transaction costs for PoA verifications are high. This is particularly true in LDCs.

Please provide any specific suggestions or further information which would address the issue raised in the previous section, including the exact reference source and version (if applicable).

We would therefore suggest to allow, as for other Small Scale CDM project activities, for CPAs under small scale program activities to use the same DOE that performed inclusion services for verification services, in an effort to lower verification costs.

We thank you for your consideration,

Yours Sincerely,

Klaus Oppermann

Team Leader Policy and Methodology Team
Carbon Finance Unit

If necessary, list attached files containing relevant information (if any)

• [replace this bracket with text, the field will expand automatically with size of text]

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat

21 August 2012

Reference number

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History of document

Version	Date	Nature of revision
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