

CDM-EB80-AA-A06

Revision of PoA-related regulatory documents

Version 01.0

COVER NOTE

1. Procedural background

1. The Executive Board of the clean development mechanism (hereinafter referred to as the Board), at its seventy-eighth meeting (EB 78), considered a concept note on further work on methodologies, tools and standards and agreed on the methodological products for further work in 2014 (see annex 8 of the EB 78 meeting report). Table 1 in annex 8 covers the issues related to programme of activities (PoA) standards for simplification.
2. At EB 78, the Board considered a concept note on improved PoA regulations for multi-country PoAs and agreed that the requirements in the regulatory documents should be revised to indicate that the coordinating/managing entity (CME) shall provide a specific-case component project activity design document (CPA-DD) for each host Party during the registration of the PoA or during expansion of the boundary of the PoA to add additional host Parties. Subsequently, the Board approved revisions to paragraph 18 of the project cycle procedure (PCP) per annex 5 to the EB 79 report to include guidance as follows: "If the PoA is hosted in more than one host Party, one specific-case CPA-DD for each host Party shall be provided at the time of publication of the PoA-DD for global stakeholder consultation. In this case, if the PoA-DD defines more than one generic CPA-DD, the specific-case CPA-DD for a host Party may correspond to any generic CPA-DD ...".
3. The Board at EB 78 also requested the secretariat to assess whether further guidance would be required in section 8.1.3 of the PCP, "Requesting review of request for issuance" with regard to multi-country PoAs.

2. Purpose

4. The purpose of this document is to propose revisions to regulatory requirements for PoAs taking into account guidance from the Board, inputs from panels, working groups and stakeholders besides the experience gained by the secretariat.
5. Key issues and proposed solutions are described below, i.e. including the proposed revised text for inclusion in the "Clean development mechanism project standard", the "Clean development mechanism project cycle procedure", the "Clean development mechanism validation and verification standard", the "Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities", and the "Standard for sampling and surveys for CDM project activities and programme of activities".

3. Key issues and proposed solutions

6. The issues listed below are covered:
 - (a) Issue 1: Post-registration changes to PoA;
 - (b) Issue 2: Definition of types of generic CPA-DDs;
 - (c) Issue 3: Multiple specific CPA-DDs per generic CPA-DD at registration of PoA;

- (d) Issue 4: Requesting review of request for issuance for multi-country PoAs;
- (e) Issue 5: Requirements to estimate multiple parameters in a single survey;
- (f) Issue 6: Sample size calculator;
- (g) Issue 7: Other editorial revisions.

3.1. Issue 1: “Post-registration changes to PoA”

3.1.1. Key issue/mandate

- 7. Currently the eligible types of post-registration changes to registered PoAs are limited as compared to regular projects, more so with regard to the addition/change of technologies/measures and methodologies applied to the PoA. The provisions for post-registration changes including a revision of eligibility criteria of a registered PoA are indicated in paragraphs 23 to 27 of the "Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities" (PoA standard) and paragraphs 134 to 137 of the PCP.
- 8. Stakeholders have requested further clarity and simplification on when CMEs can propose post-registration changes including revision of eligibility criteria in the registered PoA-DD. This issue was raised in the 19th DOE teleconference and Regional Collaboration Centre (RCC) workshops as well in several submissions from stakeholders.

3.1.2. Analysis

- 9. Since PoAs involve a lengthy period of implementation and often cover emerging technologies or dispersed technologies installed in widespread geographic locations, post-registration changes to PoA design and/or eligibility criteria may be unavoidable to some extent. Also, many improvements to standards, guidelines and procedures approved by the Board over time, particularly to facilitate regional distribution of projects and enhance efficiency of the process, may have limited impact if the applicability to the changes is limited to new projects and PoAs. On the other hand, considering that PoAs involve a significant shift of responsibility to the DOEs, frequent changes to the project design and/or eligibility criteria of the PoA through post-registration changes may introduce complexities in the project cycle with potential impacts on the efficiency and reliability of validation and verification results.
- 10. In this regard, the Board at EB 74 took an important step in permitting some changes as reflected in paragraphs 134 to 137 of the PCP.
- 11. With regard to changes to the programme design in the registered PoA, only the following changes are currently allowed (see paragraph 135 of the PCP):
 - (a) Changes to programme boundary to expand geographical coverage or to include additional host Parties;
 - (b) Updates to the eligibility criteria under the circumstances indicated in the PoA standard (e.g. to implement changes decided by the Board if an issue related to environment integrity is identified);

- (c) If a PoA includes more than one generic CPA-DD, addition of specific case CPA-DDs corresponding to generic CPA-DDs for which a specific case CPA-DD has not been submitted at the time of request for registration of the PoA;
 - (d) Removal of methodologies from the registered PoA.
- 12. With regard to changes to the project design in the registered generic CPA or specific CPA, the modification or addition of technologies/measures is allowed only when the following conditions are met (see paragraph 136 of the PCP):
 - (a) The applicability conditions of the approved baseline and monitoring methodologies and tools that are applied cover the modified or added technologies/measures (i.e. the modified or added technologies/measure are applicable under the approved baseline and monitoring methodologies);
 - (b) The modified or added technologies/measures were already included in the originally registered PoA-DD and the eligibility criteria for these technologies/measures had been specified in the originally registered PoA-DD.
- 13. However, stakeholders feel that the scope for CMEs to propose post-registration changes needs to be further extended. Thus, further clarity and expansion of permitted changes to the registered PoA-DD when they are justified would be useful for the practical and effective implementation of the PoAs.
- 14. There are several types of circumstances where CMEs may wish to make post-registration changes and/or request a revision of eligibility criteria as described below:
- 15. The first type of change is the addition/change of technologies/measures which may involve addition/change of applied methodologies in the registered PoAs.
 - (a) Changes that allow a shift to more efficient or equivalent technologies for similar applications such that flexibility is provided without compromising the environmental integrity of emission reduction estimates. Such changes may or may not involve the addition/change of methodologies:
 - (i) **Example 1:** Moving to LED lighting from CFL lighting. In this case, different methodologies (e.g. AMS-III.AR, AMS-II.C) may be added to the registered PoA in order to include LED lighting;
 - (ii) **Example 2:** The same example as above. However, in this case, the same methodology (e.g. AMS-II.C, AMS-III.AR) continues to be applied;
 - a. The change may be only related to a component of the technology. For example, a post-registration has been requested to introduce LED lamps with the Solar Home System (SHS) instead of CFL lamps with the same SHS. In this case, the changes are only related to the electric/electronic devices that are consuming the electricity generated by the SHS;
 - (iii) **Example 3:** Shifting from AMS-II.G to AMS-I.E to distribute renewable energy cookstoves, instead of improved cookstoves using non-renewable biomass;

- (iv) **Example 4:** Introducing institutional cookstoves for a registered household cookstoves PoA, while keeping the methodology applied the same (AMS-II.G in this case) ;
 - (v) **Example 5:** Introducing charcoal-burning stoves for a registered PoA which distributes household wood-burning stoves;
- (b) Changes that introduce compatible measures/technologies:
 - (i) **Example 6:** Changing the utilization of recovered methane (e.g. from flaring to heat, from heat to electricity). This may involve the addition/change of Type I methodologies to registered PoAs applying Type III waste/wastewater methodologies;
- (c) Moving to a more suitable methodology that has recently become available
 - (i) **Example 7:** Switching AMS-I.C (generic methodology for thermal generation) to AMS-I.I (more tailored to biogas project activities which became available recently) in a registered biogas PoA.
- 16. The Board has clarified (see Table 1 in annex 8 of EB 78 report) that the scope of changes with regard to eligible post registration changes should not cover adding technologies/measures and methodologies that are not related to the technologies and methodologies indicated in the registered PoA. For example, a PoA registered for solar home systems may not add a technology or methodology for the management of manure.
- 17. The second type of amendments being proposed under this area is the revision of eligibility criteria in the registered PoA-DD.
- 18. Paragraph 16 of the PoA standard provides a minimum list of the eligibility criteria to be covered in the PoA-DD:
 - (a) The geographical boundary of the CPA including any time-induced boundary consistent with the geographical boundary set in the PoA;
 - (b) Conditions that avoid double counting of emission reductions like unique identifications of product and end-user locations (e.g. programme logo);
 - (c) The specifications of technology/measure including the level and type of service, performance specifications including compliance with testing/certifications;
 - (d) Conditions to check the start date of the CPA through documentary evidence;
 - (e) Conditions that ensure compliance with applicability and other requirements of single or multiple methodologies applied by CPAs;
 - (f) The conditions that ensure that the CPA meets the requirements pertaining to the demonstration of additionality;
 - (g) The PoA-specific requirements stipulated by the CME including any conditions related to undertaking local stakeholder consultations and environmental impact analysis;

- (h) Conditions to provide an affirmation that funding from Annex I Parties, if any, does not result in a diversion of official development assistance;
 - (i) Where applicable, target group (e.g. domestic/commercial/industrial, rural/urban, grid-connected/off-grid) and distribution mechanisms (e.g. direct installation);
 - (j) Where applicable, the conditions related to sampling requirements for the PoA in accordance with the “Standard for sampling and surveys for CDM project activities and programme of activities”;
 - (k) Where applicable, the conditions that ensure that every CPA (in aggregate if it comprises of independent sub units) meets the small-scale or microscale threshold and remains within those thresholds throughout the crediting period of the CPA;
 - (l) Where applicable, the requirements for the debundling check, in case the CPAs belongs to small-scale or microscale project categories.
19. Some PoA developers have pointed out that they have been facing implementation problems with pre-defined eligibility criteria and have therefore requested that they should be allowed to improve the eligibility criteria of a registered PoA as illustrated below:
- (a) Updating the eligibility criteria in the registered PoA-DD:
 - (i) **Example 8:** Switching conventional methods of demonstrating additionality (e.g. barriers in Attachment A of Appendix B, additionality tool) to positive lists under the small-scale additionality guidelines or micro-scale additionality guidelines that have recently become available or that have been updated;
 - (ii) **Example 9:** Changing the means to demonstrate compliance with requirements on avoidance of double counting (e.g. using the manufacturers’ serial number stamped on the equipment instead of marking the equipment with project logo while being compliance with the applied methodology);
 - (iii) **Example 10:** Updating of the eligibility criteria to adopt the monitoring approach in a more recent methodology without the need to change the methodology applied.
20. Improvement of the eligibility criteria could provide flexibility and simplification for inclusion of CPAs in the future. However, it should be assessed which type of changes in eligibility criteria should be permitted because such changes do not affect the environmental integrity.

3.1.3. Feedback from stakeholders during the 7th CDM Round Table

21. The 7th Round Table suggested that further work is required to assess:
- (a) Compatible measures/technologies that may be eligible for inclusion in a registered CPA (e.g. methane generation with/without heat and power);

- (b) Safeguard measures that ensure the rules pertaining to environmental impact assessment, letter of approval and global stakeholder consultation are followed;
- (c) The procedure to move to a more suitable methodology that has recently become available (e.g. PoA for biogas is registered with generic methodology AMS-I.C of thermal energy generation whereas AMS-I.I tailored to biogas projects became available recently).

3.1.4. Proposed solutions

22. The secretariat recommends that the Board may wish to consider the following:

- (a) To allow CMEs to seek for prior-approval by the Board of proposed post-registration changes (i.e. to adopt provisions in latest versions of standards, guidelines and methodologies applied and/or to add compatible technology/measures), by submitting a request for clarification to the secretariat in accordance with the latest applicable procedure for 'Development, revision and clarification of baseline and monitoring methodologies and methodological tools'. Where possible, these requests shall be considered on priority basis and the response shall be provided on a fast track basis. In addition the Board may also wish to mandate the SSC WG to develop top down a list of allowable changes for recommendation to the Board taking into account past public inputs received in this regard.
- (b) Upon prior-approval by the Board, to allow CMEs to propose an update or revision of the eligibility criteria in the registered PoA-DD through the submission of a request for post-registration changes.
- (c) To add a requirement that, if the proposed post registration changes are approved, the CME shall revise all the specific-case CPA-DDs such that they are aligned with the revised version of the PoA-DD (that also includes generic CPA-DDs) to avoid a situation that different versions of applicable PoA-DDs co-exist.

3.2. Issue 2: "Definition of types of generic CPA-DDs"

3.2.1. Key Issue/mandate

23. Stakeholders have requested further clarity on definition of different types of generic CPA-DDs for PoAs which directly affects the preparation of PoA documents (e.g. generic CPA-DD, specific CPA-DD). This issue was also raised by the DOE/AIE Coordination Forum meeting in 28 October 2013 as well as in the 20th DOE teleconference in 22 October 2013 with reference to paragraph 189 of the project standard (PS).

3.2.2. Analysis

24. The PoA rules require that generic CPA-DDs¹ are provided at the time of registration to indicate each type of CPA-DD that will be implemented. Therefore most of the information pertaining to additionality, emission reduction calculations and monitoring are available in the form of hypothetical CPA-DDs. Specific CPA-DDs will serve as

¹ Multiple generic CPA-DDs are provided as one document, i.e. part II of the PoA-DD form is repeated for each type of CPA-DD.

confirmation of compliance with the proposed requirements in the generic CPA-DD besides providing information relating to the actual location of the project and project participants, boundary, detailed technical specification of the project technology, information on stakeholder consultation and environmental impact analysis when these are done at the CPA level. Although the PoA rules allow conducting stakeholder consultation and environmental impact analysis at the PoA level, about 60 per cent of the PoAs indicate that stakeholder consultation will be done at the CPA level.

25. The PoA rules indicate that PoAs can be registered with at least one specific CPA-DD submitted at the time of registration of the PoA-DD for each type of generic CPA-DD, but that CMEs shall submit specific CPA-DDs for other technology/measures or methodologies or combinations thereof planned under the PoA at a later stage following the procedures for post-registration changes. Thus, generic and corresponding specific CPA-DDs represent one CPA model for implementation, registration of which will allow inclusion of similar CPAs by the designated operational entity (DOE). Possibilities to add more generic and corresponding specific CPA-DDs over time also provide flexibility to the CME.
26. During the 7th CDM Round Table stakeholders pointed out that when more than one technology/measure is applied in a PoA and the applied technology/measures differ marginally it is likely that many sections of the CPA-DDs repeat. It was therefore recommended to allow cross-referencing sections of the new CPA-DD (for a different technology/measure) to avoid repetition of all sections of the original generic CPA-DD developed with the PoA-DD. The Board at EB73 agreed to allow cross-referencing to avoid repeating every section of the CPA-DD with regard to the separate generic CPA-DDs for each CPA type.
27. With regard to guidance on the requirements for generic CPA-DDs, paragraph 189 of the PS states:

“As part of the proposed CDM PoA, the coordinating/managing entity shall prepare generic CPA-DDs with generic information applicable to all CPAs that will be included in the PoA. For PoAs applying more than one technology/measure or more than one methodology, the coordinating/managing entity shall prepare a generic CPA for each technology/measure, each methodology and each combination thereof.”¹⁶

28. Furthermore, the footnote to paragraph 189 states:

*“For instance a PoA for efficient residential lighting applying more than one methodology will need more than one generic CPA-DD (e.g. a generic CPA-DD for efficient residential lighting under AMS-II.C and a generic CPA-DD for efficient residential lighting under AMS-II.J). Similarly a PoA for energy efficiency activities applying a single methodology but including different technologies will need more than one generic CPA-DD (e.g. a generic CPA-DD for efficient street lighting under AMS-II.C and a generic CPA-DD for efficient water pumping under AMS-II.C). Furthermore, a PoA for treatment of domestic manure would need more than one generic CPA-DD for applying more than one combination of methodologies (e.g. a generic CPA-DD for applying the combination AMS-III.R.+AMS-I.E.+AMS-I.I. and a generic CPA-DD for applying the combination AMS-III.R.+AMS-I.I.). **However, separate generic CPA-DDs are not required to cover cases that do not differ in terms of emission reduction calculations***

(e.g. separate generic CPA-DDs are not required for installing prefabricated project stoves of efficiency N under methodology AMS-II.G by manufacturer M1 versus installing prefabricated project stoves of efficiency N under methodology AMS-II.G by manufacturer M2)."

29. Stakeholders consider that, although the above simplifications are helpful, further work is required. They consider that the above requirements i.e. CPA-DDs based on emission reduction calculations, work as a guiding principle but further clarity and simplification to reduce transaction costs would be desirable.
30. The issue is illustrated with the example of cookstove projects in the paragraphs below. Household stoves burning charcoal are implemented under many projects and PoAs together with household stoves burning wood fuel. In that regard CMEs and DOEs have queried whether charcoal and wood burning stoves are considered as similar or different technologies and whether institutional stoves are considered as a different technology than household stoves; there is thus room for further clarity in this regard. Also many cookstove PoA-DDs in the CDM pipeline have described that they will either install portable or in-situ stoves. Given that the calculations of emission reductions for both cases (i.e. in-situ and portable) are identical, they have provided only one generic CPA-DD in this case. Similarly in case a PoA-DD is open to all options for testing of efficiency of stoves for emission reduction calculations (Option 1: Kitchen Performance Test, Option 2: Water Boiling Test, and Option 3: Controlled Cooking Test), stakeholders have argued that it should be sufficient if they can provide for options in the emission reduction calculations section, instead of having three different generic CPA-DDs.
31. On the other hand in the case of some large-scale methodologies such as ACM0001 (landfill gas), ACM0002 (renewable energy), ACM0010 (manure), ACM0014 (waste water), AM0009 (gas flaring in oil wells) and AM0025 (waste treatment), specific guidance on when separate generic CPA-DDs need to be prepared is included. In these large-scale methodologies, differences in the means of demonstration of additionality, emission reduction calculations and monitoring methods are considered for defining a 'type of CPA-DD'.
32. However, when renewable technologies (e.g. solar PV or small hydro plant) are deployed as a small-scale project activity using Type I methodologies such as AMS-I.D and I.L, additionality may be demonstrated based on the positive list under "Guidelines on the demonstration of additionality of small-scale project activities" (small-scale additionality guidelines) or "Guidelines on the demonstration of additionality of microscale project activities" (microscale additionality guidelines). In addition, emission reductions can be quantified using standardized methods based on conservative default emission factors when the monitoring of a minimum number of parameters indicated in the methodologies is undertaken. In such instances the added value of having multiple generic CPA-DDs per technology may be limited. Therefore, for a PoA which can benefit from automatic additionality and standardization in baseline setting and monitoring, the risk of information gap due to the reduced number of generic CPA-DDs would be relatively low even if multiple technologies/measures are employed in the PoA.
33. The positive list of technologies referred above that are automatically additional generally cover solar PV and other small sized renewable energy technologies besides distributed units where the users of the technology/measure are households or communities (i.e. units are no larger than 5% of the small-scale CDM thresholds). In general monitoring for these technologies comprises either direct measurements (e.g. as

in the case solar PV systems larger than 1 kW whose electricity output is metered) or will be based on sample surveys to estimate the proportion of functional equipment over time. Stakeholders have pointed out that for the distributed units projects the realistic and comprehensive survey details will emerge only after the distribution and commissioning of equipment and it is unlikely all the details about survey would be fully available at the time of validation.

3.2.3. Proposed solutions

34. The secretariat recommends that the Board may wish to consider the following measures:
- (a) One solution that may be considered is to provide methodology-specific guidance in frequently-used methodologies (for example, cookstove or biogas or lighting methodologies) defining cases for which different generic CPA-DDs would need to be submitted.
 - (b) The other possibility is, in the regulatory documents, to relax the requirements for PoAs whose technologies/measures belong to positive lists under the small-scale additionality guidelines or microscale additionality guidelines, i.e. generic CPA-DDs in this case may include more than one technology/measure and the specific CPA-DD may correspond to any one of the technology/measures.
35. One implication of the proposal in 34 (b) is that when more than one technology/measure is included in one generic CPA-DD and only one specific-case CPA-DD for one technology/measure is submitted, specific-case CPA-DD(s) for other technologies/measures may not be reviewed by the secretariat/Board, but only by DOEs before inclusion to the PoA. However, it should be noted that CMEs should still include all the information related to eligibility criteria, emission reduction calculation and monitoring requirement for each technology/measure in one generic CPA-DD and as discussed above the monitoring of these types of projects is dependent on sample surveys the details of which are evaluated better at the time of verification.

3.3. Issue 3: “Multiple specific CPA-DDs per generic CPA-DD at registration of PoA”

3.3.1. Key issue/mandate

36. For the registration of a PoA, the CDM project standard allows only the submission of one specific CPA-DD for each generic CPA-DD at the time of request for registration of a PoA, while allowing the inclusion of additional specific CPA-DDs after the PoA-DD is registered. A proposal has been made to allow the submission of more than one specific CPA-DD for one generic CPA-DD at the time of request for registration of a PoA. The Board, at EB 74, requested the secretariat to analyse the issue and present possible solutions and their implications, for consideration by the Board at a future meeting.

3.3.2. Analysis and proposed solutions

37. The issue, rather than being a methodological issue or related to the accuracy of emission reduction estimates, is an operational issue.
38. The proposed simplification will reduce transaction costs (e.g. costs of validation) and provide more certainty to CMEs (registration with the Board will reduce the risks related to erroneous inclusion by the DOEs).

39. On the other hand, if a large number of CPA-DDs are submitted at the same time, potentially the work of the secretariat may be affected. Moreover, the PoA rules were designed in such a way that the secretariat does not assess each and every specific CPA-DD, relying on DOEs for "inclusion" (eligibility check). Allowing this change, even if it is limited to the addition of CPAs at the time of registration of the PoAs, may be seen as a departure from the original design although additional checks by the secretariat in this case may bring better quality assurance. Similarly a minimum number of changes in the IT workflow to accept additional CPA-DDs would be required.
40. Therefore, the secretariat recommends that the Board may wish to consider the following:
- (a) To revise the rule on the submission of specific CPA-DD at the time of request for registration, to allow the submission of more than one specific CPA-DD.
 - (b) To include similar provisions for post-registration change to submit the specific CPA-DDs for the generic CPA-DD.
 - (c) To limit the number of specific CPA-DDs that can be submitted to certain number (e.g. five CPA-DDs²) and to extend the stipulated time for the secretariat's assessment to certain number of days.
 - (d) If the Board were to approve the changes, the effective date of implementation has to be tailored to the date by which the required IT changes can be done.

3.4. Issue 4: "Requesting review of request for issuance for multi-country PoAs"

3.4.1. Key issue/mandate

41. For multi-country PoAs, the Board requested the secretariat to assess whether further guidance would be required in section 8.1.3 of the PCP, "Requesting review of request for issuance" with regard to multi-country PoAs.

3.4.2. Analysis

42. Paragraph 206 in section 8.1.3 of the PCP states that "*a Party involved in the CDM project activity or PoA and/or any member of the Board may request a review of the request for issuance within 28 days of the date of publication of the request for issuance for the project activity or within 42 days of the date of publication of the request for issuance for the PoA, respectively.*" The CDM glossary defined 'party involved' as "*A Party that has ratified the Kyoto Protocol and that provides written approval in accordance with the CDM rules and requirements*".
43. Paragraph 209 of the PCP states: "*A request for review shall provide, inter alia, the reasons for the request for review based on the "Clean development mechanism project standard", "Clean development mechanism validation and verification standard" or any other applicable CDM requirements*".

² A cap of five CPA-DDs is proposed considering: i) secretariat's resources to assess the submissions within a given time frame; ii) in most cases, three to five small-scale CPAs could cover distributed types of activities (e.g. CFLs, biogas digesters) in one country.

44. Furthermore, according to paragraphs 223 and 224 of the PCP, if a proposed decision is to reject the request for issuance, it shall contain an explanation of the reasons and rationale for the proposed decision, including, but not limited to: (a) the facts and any interpretation of the facts that formed the basis of the proposed decision; (b) the CDM requirements applied to the facts; and (c) the interpretation of the CDM requirements as applied to the facts.
45. It appears that the above rule may provide sufficient guidance with regard to requests for review when PoA-level issues are identified by a Party, whereas there may be a need to have further clarity with regard to the applicability of the request for review procedures when CPA-level issues are encountered (e.g. If the issues related to specific CPA1 located in country A triggers a request for review, should it affect the specific CPA2 in country A or specific CPA3 in country B?).
46. The Board, as noted in paragraph 43 of the EB 79 report, has approved requests for issuance for CPAs of a PoA in two mutually exclusive batches for a monitoring period and has also clarified that there is no issuance dependency between two batches. Furthermore, the Board at EB 78 requested the secretariat to assess the feasibility of further simplification of requirements (e.g. whether and under what conditions issuance to more than two batches or to individual CPAs in the PoA may be feasible) and make a recommendation to the Board at a future meeting.

3.4.3. Proposed solutions

47. The secretariat recommends that the Board may wish to consider extending the scope of the assessment referred above (i.e. EB 78 request) to also include the issue of request for review. In that case the secretariat will make a recommendation to the Board at a future meeting after analysing all related issues.

3.5. Issue 5: “Survey requirements to estimate multiple parameters in single survey”

3.5.1. Key issue/mandate

48. Footnote 8 to paragraph 10 of the “Standard for sampling and surveys for CDM project activities and programme of activities” (sampling standard) states *“If there is more than one parameter to be estimated in a CDM project activity, then a sample size calculation should be done for each of them. Then either the largest number for the sample size is chosen for the sampling effort with one common survey or the sampling effort and survey is repeated for each of the parameters.”*
49. Stakeholders (see stakeholders inputs to the annotated agenda of EB 77³) have pointed out that *“the latest version of the sampling standard includes a provision which is causing disproportionate cost to the implementation of decentralized demand side energy efficiency projects (such as cook stoves)”* as illustrated below:
50. *“In decentralized demand side energy efficiency projects (such as cook stoves projects), sampling is applied for the monitoring of emission reductions. The latest version of the sampling standard includes a provision which is causing issues for the implementation of the project type named above. This is illustrated for the example of a cook stove project below:*

³ <http://cdm.unfccc.int/public_inputs/2014/eb77_01/index.html>.

51. *“For cook stove projects, it is required to monitor stove efficiency, together with stove usage and possible additional parameters such as continued use of baseline stoves. While stove usage and additional parameters (proportional parameters) can generally be assessed by simple on-site checks and questionnaires, efficiency monitoring (mean value parameter) requires sophisticated tests, implying several hours spent in each household by trained and certified experts using calibrated equipment.*
52. *“Typically monitoring of cook stove projects takes place in vast areas with rudimentary infrastructure; visiting of representative samples of households under such conditions represents a huge effort and often requires many entire days spent travelling. Moreover the monitoring and especially the efficiency tests imply a mayor interruption of the households' daily activities.*
53. *“It is therefore very helpful and even necessary to monitor both stove efficiency (generally WBT Test), stove usage (survey) and other possible parameters (survey) in a single effort. According to the sampling standard ver. 04.1 (EB 50 Annex 30) however, this would imply to test the stove efficiency in every single household interviewed on stove usage, though the sampling size for this parameter (a mean value parameter) is generally much lower than for proportional parameters such as stove usage.*
54. *“This is illustrated in the example given in the sampling guidelines version 3, page 59, where minimum sample sizes are 98 for stove usage (here called "retention rate"), 62 for continued use of baseline stoves and 34 for stove efficiency. According to this example and the sampling standard ver. 04.1, efficiency would have to be tested for 98 stoves if a common survey is chosen.*
55. *“Testing the efficiency of such large numbers of cookstoves is not feasible with reasonable effort. Moreover, such large oversampling for efficiency testing will not lead to any improvement of data and is statistically unnecessary since the 90/10 precision can also be achieved with much lower sample sizes for the efficiency. Moreover, the selection of separate samples for each single parameter would lead to huge, unjustified efforts that can hardly be born under LDC conditions. (98+62+34=194 households to be visited in the case of the example of the sampling guidelines mentioned above).*
56. *“Footnote 8 is therefore adding an unnecessary burden for the development and issuance of decentralized energy efficiency projects which are one of the main project and PoA types implemented in underrepresented regions, while not adding any quality to the process. We urge the EB to revise the sampling standard to allow sampling of all parameters within one sample as long as the random selection of sub samples can be ensured.”*

3.5.2. Analysis and proposed solutions

57. The sample size for stove efficiency is much smaller than the other parameters. For the others, a much bigger sample may be feasible, but not for stove efficiency.
58. Footnote 8 provides two options, i.e. either *“the largest number for the sample size is chosen for the sampling effort with one common survey”* or *“the sampling effort and survey is repeated for each of the parameters”*.
59. It seems that the approach proposed by stakeholders is already possible under the second option above. In the example given in the above paragraphs, a sample of 98 stoves is just recommended practice but not mandatory.

60. AMS-II.G “Energy efficiency measures in thermal applications of non-renewable biomass” (version 6.0) has recently introduced provisions in this regard, clarifying that *“efficiency of devices may be monitored in a common survey with other monitoring parameters; therefore, a random sub-sample within the common survey can be taken for which stove efficiency is tested, as long as the required precision for stove efficiency is achieved.”*
61. In the same way, footnote 8 of the sampling standard can be revised to clarify that when more than one parameter is estimated through sampling and surveys, a random sub-sample within the common survey is allowed as long as the reliability specification (e.g. 90/10 confidence/precision for small-scale project activities and 95/10 for large-scale project activities) is achieved for each individual parameter.

3.6. Issue 6: “Sample size calculator”

62. As requested by stakeholders, a sample size calculator has been developed. This will facilitate the calculation of a sample size for a mean parameter value and a proportion parameter value for simple random sampling and stratified random sampling.

3.7. Issue 7: “Other editorial revisions”

63. Some editorial revisions (e.g. to keep consistency among PS/VVS/PCP) are also proposed in this document.

4. Impacts

64. More guidance, simplification and examples are likely to facilitate the implementation of PoAs, particularly in least developed countries. Further clarification and simplification in this area will directly affect the preparation of PoA documents, implementation of sampling and surveys for PoAs and hence transaction costs. Clarification on design changes (e.g. eligibility criteria, technologies/measures, applied methodologies) that are permitted versus those not permitted is also helpful.

5. Recommendations to the Board

65. The secretariat recommends that the proposed amendments to the documents listed below be adopted and that these come into effect on xx:
- (a) Clean development mechanism project standard;
 - (b) Clean development mechanism project cycle procedure;
 - (c) Clean development mechanism validation and verification standard;
 - (d) Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities;
 - (e) Standard for sampling and surveys for CDM project activities and programme of activities.

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Appendix 1. Amendments to the “Clean development mechanism Project Standard (version 06.0)”

1. Changes to Section 12.1 Description of programme of activities

1. The following paragraph shall read as follows:

188. The coordinating/managing entity shall define the boundary for the proposed CDM PoA in terms of a geographical area (e.g. municipality, region within a country, country or several countries) within which all CPAs to be included in the PoA will be implemented. The coordinating/managing entity shall take into consideration ~~that~~ all applicable national and/or sectoral policies and regulations within the chosen boundary ~~are reflected~~ in the establishment of the baseline.

189. As part of the proposed CDM PoA, the coordinating/managing entity shall prepare generic CPA-DDs with generic information applicable to all CPAs that will be included in the PoA. For PoAs applying more than one technology/measure or more than one methodology, the coordinating/managing entity shall prepare a generic CPA for each technology/measure, each methodology and each combination thereof¹⁶

189 bis. As an exception, when the technologies/measures in the applied small-scale methodologies are included in the positive lists for additionality demonstration under the “Guidelines on demonstration of additionality of small-scale project activities” or “Guidelines on demonstration of additionality of microscale project activities” the generic CPA-DD may cover more than one technology/measure.

190. Also as part of the proposed CDM PoA, the coordinating/managing entity shall define a specific CPAs¹⁷ under the PoA as follows:

- (a) For PoAs applying the same technology/measure under the same methodology across all CPAs, ~~at least only one specific-case CPA-DD~~ but no more than [five] specific case CPA-DDs shall be provided;
- (b) For PoAs applying more than one technology/measure or more than one methodology, the coordinating/managing entity shall complete at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs for each generic CPA-DD. In cases where not all specific-case CPA-DDs to cover all generic CPA-DDs can be provided at the time of the publication of the PoA-DD for global stakeholder consultation, at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs corresponding to any of the generic CPA-DDs shall be provided at the time of the publication of the PoA-DD for global stakeholder consultation.

¹⁷ Also referred to as actual case or real case CPA DD.

- (c) If the generic CPA-DD contains more than one technology/measure in accordance with paragraph 189bis above, the specific CPA-DD(s) to be submitted may correspond to any one of the technology/measure or their combination. In this case, at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs shall be provided for each of the remaining generic CPA-DDs at the time of request for registration of the PoA or after the registration of the PoA. In the latter case, the specific-case CPA-DDs shall be provided for approval by the Board in accordance with the post-registration change process as defined in section 6.2 of the Project cycle procedure.

2. Changes to Section 12.8 Local stakeholder consultation

2. The following paragraph shall read as follows:

216. The local stakeholder consultation, as per section 7.5 above, may be carried out for the whole PoA or at the CPA level. The coordinating/managing entity shall specify the level of consultation applied.

217. For the actual CPA part of the proposed CDM PoA, the local stakeholder consultation shall be completed before submission of the PoA for validation. If the local stakeholder consultation is carried out at the CPA level, for CPAs to be included in the registered PoA, the local stakeholder consultation shall be completed before inclusion in the PoA.

3. Changes to Section 12.12. Inclusion of component project activities in programme of activities

3. The following paragraph shall read as follows:

234. To include a CPA in a registered CDM PoA, the coordinating/managing entity shall ensure that the proposed CPA meets all applicable requirements, including the eligibility criteria for inclusion of a CPA under the PoA mentioned in the latest version of the registered CDM PoA.

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Appendix 2. Amendments to the “Clean Development Mechanism Project Cycle Procedure” (version 06.0)”

1. Change to 4.3.1. Submission of project design document

1. The current paragraph 18 shall read as follows

18. When submitting the PDD or PoA-DD, the DOE shall, through a dedicated interface on the UNFCCC CDM website, also submit the following information to be made publicly available:
- (a) The name of the proposed CDM project activity or PoA;
 - (b) The host Party(ies) of the proposed CDM project activity or PoA;
 - (c) The names of the project participants listed in the PDD or PoA-DD with which the DOE has a contractual relationship for validation of the proposed CDM project activity or PoA, as well as the name of the coordinating/managing entity in the case of PoA;
 - (d) The estimated annual greenhouse gas (GHG) emission reductions or removal enhancements indicated in the PDD or, in the case of a PoA, the estimated total annual GHG emission reductions or removal enhancements of all component project activities (CPAs) expected to be included in the PoA;
 - (e) The approved baseline and monitoring methodology(ies) being applied to the proposed CDM project activity or PoA;
 - (f) Reference to any previous publication of the PDD or PoA-DD for public comments on the UNFCCC CDM website;
 - (g) The proposed start date and length of the first crediting period.
 - (h) In the case of a PoA, in addition to (a)–(g) above:
 - (i) The generic CPA-DDs, which specify the generic information relevant to all CPAs that may be included in the PoA. Where more than one technology/measure or more than one methodology is applied, a generic CPA-DD shall be completed for each technology/measure, each methodology and each combination thereof unless technologies/measures in the applied methodologies are included in the positive lists for additionality demonstration under the “Guidelines on demonstration of additionality of small-scale project activities” or “Guidelines on demonstration of additionality of microscale project activities”. In the latter case the generic CPA-DD may cover more than one technology/measure and the specific CPA-DD(s) to be submitted

as per subparagraph below may correspond to any one of the technologies/measures or their combinations;

- (ii) In case where all specific case CPA-DDs to cover all generic CPA-DDs cannot be provided at the time of publication of the PoA-DD for global stakeholder consultation, at least one specific case CPA-DD corresponding to any of the generic CPA-DDs shall be provided at the time of publication of the PoA-DD for global stakeholder consultation. In this case, for each of the remaining generic CPA-DDs, at least one specific case CPA-DD but no more than [five] specific case CPA-DDs shall be provided at the time of request for registration of the PoA or after the registration of the PoA. In the latter case, the specific case CPA-DDs shall be provided for approval by the Board in accordance with the post-registration change process as defined in section 6.2 below.

2. Change to 6.1.1. Submission of component project activity design documents

- 2. The current paragraph 116 shall read as follows:

116. To include a CPA in a registered CDM PoA, the coordinating/managing entity shall forward the completed specific case CPA-DD to any DOE, after having ensured that the CPA and the specific case CPA-DD meet the eligibility criteria for inclusion in the PoA defined in the latest version of registered PoA-DD and its generic CPA-DD. The coordinating/managing entity may forward more than one specific case CPA-DD at one time. Only upon the approval of the first specific case CPA-DD corresponding to a generic CPA-DD by the Board, CPAs corresponding to that generic CPA-DD may be included in the registered CDM PoA.

3. Change to 6.2.1. Submission of request for approval of changes

- 3. The current paragraph 135 (b) shall read as follows:

- 135. For CDM PoAs, with regard to the changes referred to in paragraph 134(b)(iv) above, only the following changes shall be allowed:

- (a) Changes to programme boundary . . .
- (b) Updates to the eligibility criteria under the circumstances indicated in the “Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities” (e.g. to implement changes decided by the Board if an issue related to environment integrity is identified, to adopt provisions in the latest versions of standards, guidelines and methodologies);

- 4. The current paragraph 136 (b) should read as follows:

- 136. For the generic and specific CPAs of the registered CDM PoA, with regard to the changes referred to in paragraph 134(b)(v) above, the following conditions have to be met to modify⁴ or add technologies/measures:

- (a) The applicability conditions of the approved baseline and monitoring methodologies and tools that are applied cover the modified or added technologies/measures (i.e. the modified or added technologies/measure are applicable under the approved baseline and monitoring methodologies);
- (b) The modified or added technologies/measures were either: (i) already included in the originally registered PoA-DD and the eligibility criteria for these technologies/measures had been specified in the originally registered PoA-DD⁵ or (ii) subsequently included in the revised PoA-DD following the submission by the CME and approval by the Board of a request for post-registration changes to update or revise the eligibility criteria in accordance with paragraph 135(b) above.

⁴ Modifications to technologies/measures may include changes to the effective output capacity.

⁵ An example is the case of a CPA that included portable LED lamps that are charged by mechanical energy whereas charging from other renewable energy sources such as solar PV electricity is also required during project implementation; PV electricity to charge the lamps would be eligible if the registered PoA-DD had included it.

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Appendix 3. Amendments to the “Clean Development Mechanism Validation and Verification Standard” (version 06.0)”

1. Change to Section 8.5.3. Description of a PoA/CPAs

1. The current paragraph 224 should read as:

224. The DOE shall assess the CDM-PoA-DD and the PoA-specific CDM-CPA-DD that is submitted by the coordinating/managing entity and shall confirm:

- (a) The framework developed for the implementation of the PoA, and defining a CPA under the PoA;
- (b) The policy/measure or stated goal that the proposed CDM PoA seeks to promote;
- (c) The proposed CDM PoA is a voluntary action by the coordinating/managing entity;
- (d) The CPA is neither registered as a CDM project activity nor included in another registered PoA.

2. Change to Section 8.5.4. Application of multiple methodologies

2. The current paragraph 225 should read as:

225. The DOE shall assess the application of multiple methodologies in accordance with the “Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities”.

The DOE shall confirm that a generic CPA-DD has been prepared for each technology/measure, each methodology and each combination thereof or technologies/measures of the PoA are included in the positive lists for additionality demonstration under the “Guidelines on demonstration of additionality of small-scale project activities” or “Guidelines on demonstration of additionality of microscale project activities.”

The DOE shall also confirm that for PoAs applying more than one technology/measure or more than one methodology at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs for each generic CPA-DD has been completed. In cases where not all specific-case CPA-DDs to cover all generic CPA-DDs can be provided at the time of the publication of the PoA-DD for global stakeholder consultation, at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs corresponding to any of the generic CPA-DDs shall be provided at the time of the publication of the PoA-DD for global stakeholder consultation. In this case, at least one specific-case CPA-DD but no more than [five] specific case CPA-DDs shall be provided for each of the remaining generic CPA-DDs at the time of request for registration of the PoA or after the registration of the PoA. In the latter case, the specific-case CPA-DD

shall be provided for approval by the Board in accordance with the post registration change process as defined in section 6.2 of the Project cycle procedure.

3. Change to Section 10.3.1. Post-registration change to boundary of programme of activities

3. Title of the section should read:

Section 10.3.1. Post-registration changes to programme of activities

4. The current paragraph 338 (b) should read as follows:

338. The DOE shall determine whether the registered generic CPA and specific CPA have been amended post-registration to change the project design due to modifications to or addition of technologies/measures. Where the project design has been changed, the DOE shall assess and confirm that:

- (a) The applicability conditions of the approved baseline . . .
- (b) The modified or added technologies/measures were either: (i) already included in the originally registered PoA-DD and the eligibility criteria for these technologies/measures had been specified in the originally registered PoA-DD; or (ii) subsequently included in the revised PoA-DD following the submission by the CME and approval by the Board of a request for Post-registration changes to update or revise the eligibility criteria in accordance with the "Clean development mechanism project cycle procedure".

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Appendix 4. Amendments to the “Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities” (version 03.0)”

1. Change to Section 3.2.2 Updating eligibility criteria

1. The following paragraphs are proposed to be inserted between the current paragraphs 24 and 25:

25. The CME may propose an update or revision of the eligibility criteria in the registered PoA-DD through the submission of a request for post-registration changes to adopt provisions in latest versions of standards, guidelines and methodologies applied, including:

- (a) Changing to the methods of demonstrating additionality (e.g. to use standardized approaches such as positive lists under small-scale additionality guidelines or the provisions of microscale additionality guidelines);
- (b) Changing the means to demonstrate compliance with avoidance of double counting or other requirements in accordance to the later versions of the applied methodologies;
- (c) Addition or change of technologies/measures with or without addition or change of applied methodologies in the registered PoA-DD, including:
 - (i) Changes that allow a shift to more efficient or equivalent technologies/measures without compromising the environmental integrity of emission reduction estimates;⁴
 - (ii) Changes that introduce complementary measures/technologies involving mass and/or energy transfer to/from the primary technology/measure (e.g. addition or change of Type I methodologies in a registered PoA primarily applying Type III methodologies);⁵

⁴ Examples of this are shifting to LED lighting from CFL lighting, introducing LED lamps with the Solar Home System (SHS) instead of CFL lamps with the same SHS, shifting from AMS-II.G to AMS-I.E to distribute renewable biomass burning cookstoves instead of efficient cookstoves using non-renewable biomass, introducing institutional cookstoves for a registered household cookstoves PoA, introducing charcoal-burning stoves for a registered PoA that distributes household wood burning stoves.

⁵ An example of this is changing the utilization of recovered methane (e.g. from flaring to heat generation, from heat generation to electricity generation). This may involve addition/change of Type I methodologies to registered PoAs applying Type III waste/wastewater methodologies.

(iii) Shifting to recently approved methodologies better tailored to the technology/measure of the PoA as compared to the broadly applicable methodology applied by the registered PoA,⁶

26. In the cases described in paragraph 25(c) above, the scope of changes shall not cover adding technologies/measures and methodologies that are not related to the technologies and methodologies included in the registered PoA.⁷

27. CME shall seek prior-approval by the Board for the proposed post-registration changes (i.e. to adopt provisions in the latest versions of standards, guidelines and methodologies applied and/or to add compatible technology/measures), by submitting a request for clarification to the secretariat in accordance with the latest applicable procedure for "Development, revision and clarification of baseline and monitoring methodologies and methodological tools". Where possible, these requests shall be considered on priority basis and the response shall be provided on a fast track basis. A list of allowable changes approved by the Board shall be made available on the CDM website for use by CME of any of the registered PoA.

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⁶ An example of this is switching from AMS-I.C (generic methodology for thermal generation) to AMS-I.I for biogas/biomass thermal generation.

⁷ An example of this is a PoA registered for biogas digesters providing biogas for cooking in households intending to implement mass rapid transport technologies, this will not be eligible.

Appendix 5. Amendments to the “Standard for Sampling and surveys for CDM project activities and programme of activities” (version 04.1)”

1. Change to Section 4. Sampling requirements

1. The following paragraph shall read as follows:

10. Where there is no specific guidance in the applicable methodology, project proponents shall use 90/10 confidence/precision as the criteria for reliability of sampling efforts for small-scale project activities and 95/10 for large scale project activities.⁶ This reliability specification shall be applied to determine the sampling requirements for each individual parameter value determined through a sampling effort.^{7,8}

- ⁸. If there is more than one parameter to be estimated in a CDM project activity, then a sample size calculation should be done for each of them. Then either the largest number for the sample size is chosen for the sampling effort with one common survey or the sampling effort and survey is repeated for each of the parameters. A random sub-sample within the common survey is allowed as long as (i) the reliability specification (e.g. 90/10 confidence/precision for small-scale project activities and 95/10 for large scale project activities) is achieved for each individual parameter and (ii) the random sub-sample is consistent with the design of the survey and the corresponding sample size calculation.

2. Change to Section 5. Sampling requirements

2. The following paragraph shall read as follows:

20. Parameter values shall be estimated by sampling in accordance with the requirements in the applied methodology separately and independently for each of the CPAs included in a PoA except when a single sampling plan covering a group of CPAs¹⁹ is undertaken applying 95/10 confidence/precision²⁰ for the sample size calculation. In the latter case ~~That is,~~ the populations of all CPAs in the group are combined together, the sample size is determined and a single survey is undertaken to collect data (e.g. if the parameter of interest is the daily usage hours of light bulbs, it may be feasible to undertake a single sampling and survey effort spread across geographic regions of several CPAs when either homogeneity of included CPAs relative to the light usage hours can be demonstrated or the differences among the included CPAs is taken into account in the sample size calculation). Several groups of CPAs may be formed and sample sizes may be calculated for the groups. Currently PoAs applying large scale CDM methodologies are not included for applying single sampling plan covering a group of CPAs pending further analysis.

21. [footnote 19 moved to paragraph 20].

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Appendix 6. Compilation of inputs received to the draft document on ‘Revision of PoA related regulatory documents’

1. The draft document on ‘Revision of PoA related regulatory documents’ was discussed during MP63 and SSC WG44 and members provided feedback on the draft document.
2. The table below provides an overview of the key feedback/inputs received, on the document and how it has been incorporated.

0	1	2	3
Issue	Meth Panel comment	SSC WG comment	Inclusion in the proposal
Definition of technology	MP supported two proposed solutions. A MP member suggested preparing a preliminary list of methodologies for which guidance would be developed. The rationale for not requiring separate generic CPA-DDs could be understood as covering technologies/measures with the same additionality demonstration (positive list) and same emission reduction calculation (electricity from renewable sources). A MP member suggested exploring if there are other similar cases where separate generic CPA-DDs are not required.	SSC WG supported the document in general.	yes
Definition of technology	When there are multiple options for ER calculations (e.g. three options in the cook stove methodology AMS-II.G, i.e. Option 1: Kitchen Performance Test, Option 2: Water Boiling Test, and Option 3: Controlled Cooking Test) , MP members mentioned that CMEs can provide for options in the ER calculations section of the PoA-DD, instead of having multiple different generic CPA-DDs (three generic CPA-DDs in this example).	SSC WG supported the document in general.	yes

0	1	2	3
Issue	Meth Panel comment	SSC WG comment	Inclusion in the proposal
Revision of eligibility criteria and PRC	MP supported the document in general. A MP member commented that the eligibility criteria need to be more general to avoid their changes at a later stage.	SSC WG supported the document in general.	The secretariat and MP/WG are developing standardized eligibility criteria for methodologies in key sectors.
Revision of eligibility criteria and PRC	A MP member suggested that a revision of eligibility criteria related to additionality should be possible not only when positive lists have recently become available but also when they are updated.	SSC WG supported the document in general.	yes
Sampling	MP supported the document in general.	SSC WG supported the document in general. A SSC WG member suggested providing more guidance in the sampling guidelines particularly with regard to surveys. He also suggested developing a template survey questionnaire for key parameters.	The secretariat is developing survey guidelines.

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