

CDM-EB70-AA-A10

Revision of regulatory documents due to introduction or changes to provisions related to PoA

Version 01.0

DRAFT



United Nations
Framework Convention on
Climate Change

COVER NOTE

1. Procedural background

1. At the seventh meeting of the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (hereinafter referred to as the CMP), Parties agreed to decision 8/CMP.7, which included a request to the clean development mechanism (CDM) Executive Board (hereinafter referred to as the Board) to continue its work to improve the procedures on programmes of activities (PoA).
2. The Board has recently approved new standards and guidelines to clarify rules pertaining to the PoA¹. Many stakeholders have provided inputs through communication channels such as “Direct communication with the Board” or “Call for public input” on PoA issues². Furthermore, the 6th CDM Roundtable and the DOE Forum (Bonn, 11 and 12 October 2012) provided inputs; stakeholders have welcomed the recent approval of new guidance by the Board related to additionality of small-scale and microscale projects including positive list of technologies and have requested simplifications in other areas.
3. At its sixty-ninth meeting the Board considered a concept note and the work programme on improving standards, guidelines and procedures related to PoAs and requested the secretariat to take into account the following guidance and propose clarifications or revisions to the PoA-related regulatory documents as appropriate for the consideration of the Board at its seventieth meeting:
 - (a) Start date of a PoA: The Board considered the options to extend the requirements for prior consideration of the CDM to PoAs; for example, through a notification of announcement of a PoA to the secretariat and the designated national authority (DNA). The Board requested the secretariat to explore options to further strengthen these draft requirements for the consideration of the Board;
 - (b) Component project activity design documents (CPA-DDs): The Board agreed that one actual case CPA-DD for every technology/measure included in the PoA design document (PoA-DD) is required at the time of registration of the PoA-DD; similar requirements would apply when combinations of methodologies are applied in component project activities (CPAs);
 - (c) Post-registration changes to PoA-DD: The Board noted that changes to the eligibility criteria or inclusion of additional eligibility criteria through a post-registration change to a PoA-DD are permissible only if warranted by circumstances indicated in the PoA standard (for example methodology revised after being put on hold or PoA boundary changed to expand the geographic coverage). Any changes to sampling plan explicitly allowed by the sampling standard (e.g. shift to single sampling plan) is also allowed;

¹ Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities (referred to as PoA Standard in this document), Standard for sampling and surveys (sixty-fifth and sixty-ninth meetings of the Board); Sampling guidelines (sixty-seventh and sixty-ninth meetings of the Board)

² <<http://cdm.unfccc.int/stakeholder/submissions/index.html>>.

- (d) Post-registration changes to CPA-DD: A post-registration change to CPA-DD is allowed as long as the implemented CPA that has deviated from the initial CPA-DD is still in compliance with the eligibility criteria of the registered PoA-DD;
 - (e) Request for issuance: Requirements specified in paragraph 294 of the "CDM validation and verification standard" pertaining to request for issuance of a PoA shall remain unchanged; that is, the request shall cover all CPAs included in the PoA, implying that coordinating/managing entities (CMEs) shall present monitoring reports of all CPAs included in the PoA during a monitoring period to the verifying designated operational entity (DOE);
 - (f) Validation and verification by the same DOE: The Board noted that it had already requested the secretariat at its sixty-eighth meeting to prepare a proposal in this regard for the consideration of the Board at its seventieth meeting;
 - (g) Advancing to verification of CPAs skipping the validation step: The Board agreed to request the secretariat not to prioritize the issue for further work at this point in time.
4. The Board at the sixty-ninth meeting also took note that the secretariat is working on several issues related to PoAs and will make proposals as appropriate for the Board's consideration at a future meeting, including:
- (a) Forms and templates to use when both large-scale and small-scale methodologies are applied;
 - (b) Clarifying issues related to crediting periods of CPAs and PoAs;
 - (c) Further clarifying issues related to letters of approvals (LoAs) for a multi country PoA;
 - (d) Clarifying issues related to single sampling plan;
 - (e) Clarifying application of bundling under a PoA;
 - (f) Clarifying issues related to the use of single versus multiple monitoring reports for CPAs;
 - (g) Further clarifying CME management system requirements and DOE liability for erroneous inclusion of CPAs.

2. Purpose

5. The purpose of this document is to improve and consolidate existing regulations related to PoA. Taking into account guidance from the Board, inputs from stakeholders and experience gained by the secretariat, revisions to requirements specified in Project standard (PS), Project cycle procedure (PCP), Validation and verification standard (VVS), PoA standard, CDM glossary of terms and Guidelines for completing the PoA-DD have been proposed.

3. Key issues and proposed solutions

3.1. Issue 1: Start date of a PoA and CPA

3.1.1. Description of the issue

6. **Start date of a PoA and CPA:** CDM glossary of terms (version 6) defines 'start date' as follows: "In the context of a CDM project activity or PoA, the earliest date at which either the implementation or construction or real action of a CDM project activity or PoA begins". There may be a need for further clarifying this issue as PoA is merely a framework to set the scene for the real action that takes place in the context of CPAs included in the PoA. Further the current requirements indicate that CMEs need to confirm that the start date of any CPA is not, or will not be, prior to the commencement of the validation of the proposed CDM PoA. However, engaging a DOE and publishing for global stakeholder consultation (GSC) on the UNFCCC website takes considerable time from the point of conceptualization of a PoA. Therefore the above requirement may be too restrictive.
7. **Crediting period of a PoA and CPA:** Current requirements indicate that the length or the lifetime of the PoA shall not exceed 28 years (60 years for afforestation and reforestation (A/R)) and a CPA can choose either renewable or fixed crediting period. In this regard there is a need to clarify if the definition of "renewable or fixed crediting period" is analogous to the definition indicated in paragraph 49 of Decision 3/CMP.1³ in which case it should be clarified that the total length of 28 years referred to in paragraph 161 of PS is in the context of a PoA and not a CPA. The guidance agreed by the Board at its thirty-second meeting seems to support such an interpretation (see paragraph 10, annex 38 of thirty-second meeting of the Board stating "the crediting period of a CPA will be either a maximum of seven years (twenty years for A/R project activities) which may be renewed at most two times or a maximum of ten years (thirty years for A/R project activities) with no option of renewal. However, the duration of crediting period of any CPA shall be limited to the end date of the PoA regardless of when the CPA was added").
8. Further there is a need to clarify what signifies the start of the crediting period of a PoA. Thus the questions that need to be addressed include: (a) when to renew a CPA if renewable crediting period is selected; whether each CPA can be renewed independent of each other or all included CPAs in a PoA have to be renewed at the same specified point in time on the life span of the PoA; (b) when does the crediting period of a CPA start; and (c) can CPAs within the same PoA have different crediting periods (renewable or fixed).

3.1.2. Stakeholders' inputs on the issue:

9. CMEs should be allowed to commence activities related to CPA implementation upon announcement of a PoA through a notification to the secretariat and the DNA.

³ "Project participants shall select a crediting period for a proposed project activity from one of the following alternative approaches:(a) A maximum of seven years which may be renewed at most two times, provided that, for each renewal, a designated operational entity determines and informs the Executive Board that the original project baseline is still valid or has been updated taking account of new data where applicable; or (b) A maximum of 10 years with no option of renewal"

10. Potential A/R PoAs are particularly constrained because of the existing requirements. Defining the project boundary has always been a major challenge for A/R projects and, very often, the boundary is determined after the plantation has taken place; therefore proponents either opt out of A/R PoAs in favour of single project activities or abandon their intention to seek CDM registration completely (which is often the case for small projects in poor rural areas).
11. DOEs have cited CDM web site error messages if a date in the future is not entered while uploading PoA documentation (e.g. "ERROR: Since this is a small-scale project, the PoA lifetime start date must be at least 4 weeks after the submission date").

3.1.3. Analysis and proposed solutions:

12. **Start date of a PoA and CPA:** The secretariat has observed that the PoAs with dispersed activities (e.g. cook-stoves, lighting, waste treatment, solar and hydro projects), having more than 75per cent share in the PoA pipeline (>390 PoAs), typically require lengthy period of development before CDM-PoA-DDs are completed and published for GSC. Therefore, the secretariat considers that it is reasonable to allow CMEs to commence activities related to CPA implementation upon announcement of a PoA. Notification of a PoA to the secretariat or a DNA is currently not required as per paragraph 29 of the PS. The Board may wish to consider allowing CME to notify to the DNA of the host Party of the PoA and the secretariat, the commencement of the PoA using "CDM PoA notification form" (F-CDM-PoA). Secretariat recommends that the start date of a PoA shall be:
 - (a) The date of notification of the intention to seek the CDM status by the CME to the secretariat and the DNA; or
 - (b) The date of publication of the PoA-DD for GSC; or
 - (c) The date of submission by the CME of a proposed new methodology deemed to be complete in accordance with the applicable procedures.
13. The CME shall ensure that the start date of a CPA shall be on or after the start date of a PoA. It is further recommended that the CDM glossary is revised to state "Start date - In the context of a CDM project activity or CPA, the earliest date at which either the implementation or construction or real action of a CDM project activity or CPA begins."
14. Considering that some elements from prior consideration rules applicable to regular CDM projects (e.g. eligibility of projects that started before 2008) have been excluded in the above recommendations and further streamlining of the definition of the crediting period has been recommended as below, the secretariat recommends that the Board may wish to consider approving the above recommendations. Any additional steps for strengthening these requirements may be considered at a future date based on the experience gained.
15. **Crediting period of a PoA and CPA:** It may be useful to have a definition of the start date of the crediting period of a PoA distinct from the start date of the PoA defined above. A PoA is a framework for action for a duration of 28 years (60 years for A/R PoAs) indicating that the maximum duration of the crediting period of a PoA is 28 years. Secretariat recommends that Board may wish to consider specifying that start date of the crediting period of a PoA as the date of registration of the PoA. To keep the complexities of PoA project cycle at a manageable level, the Board may also wish to specify options

for fixed and renewable crediting periods at the PoA level requiring that all included CPAs are also renewed along with the PoA at the time of renewal i.e. if renewable crediting period is chosen for the PoA, each renewable crediting period of the PoA shall be at most seven years and may be renewed at most three times such that total duration of 28 years (60 years for A/R) is not exceeded. Further it is recommended that the first renewal of a PoA along with all CPAs included shall be undertaken seven years after the start date of the crediting period of a PoA. Similarly if a fixed crediting period is chosen for the PoA, maximum length of the crediting period shall be 10 years. The secretariat, also recommends that the start date of crediting period of a CPA shall be on or any date after the inclusion of a CPA (for the first CPA presented along with the PoA-DD, it shall be on or after the date of registration of the PoA).

16. Further there will be two options to amend paragraph 161 of the PS to define the crediting period of CPAs. One option is to base it on a 21 years of crediting for the CPAs irrespective of number of renewals that the CPAs have to undergo depending on the PoA project cycle; however under this option CPAs added in year 2 to year 6 of the crediting period of the PoA may potentially have “three renewals of crediting period” thereby not being in compliance with the CMP requirements of “at most two times” renewal for the CPAs. Therefore CMP guidance may be needed for implementing this option. An alternative option would be to stick to “at most two times” renewal for the CPAs, however this option could potentially lead to a situation where for example CPAs included in year 8 or year 9 would have longer crediting periods than CPAs added in year 6 of the crediting period of the PoA potentially creating more incentives for the CMEs to include more CPAs at the beginning of the first and second crediting period of the PoA.

3.2. Issue 2: Specific component project activity design documents (CPA-DDs)

3.2.1. Description of the issue:

17. DOEs understand the current requirement in paragraph 14 of PCP that only one specific CPA-DD for an actual CPA is required at the time of request for registration. However, recently approved versions of some large-scale methodologies (e.g. ACM0002) require CMEs to present one specific CPA-DD for each type of CPA included in the PoA, to be validated by a DOE and submitted for the registration.

3.2.2. Stakeholders' inputs on the issue:

18. DOE inputs: “Thanks to EB68 decision to extend the VVM deadline to January 31st 2013 many PoAs were able to catch up with the deadline to apply the VVM forms; this included a number of PoAs applying combinations of technologies or methodologies that were published for GSC and have undergone validation. Most PoAs are aiming to be registered before the end 2012 deadline on account of EU ETS requirements. If EB70 were to approve the new requirements to supply actual case CPA-DDs per technology/methodology, at a minimum a reasonable grace period for the on-going PoAs to continue without having to provide additional documentation at this stage would be essential. Moreover there are technical reasons such as the current CDM interface for launching the global stakeholder consultation only allows one specific CPA-DD to be uploaded. Current PoA interface for requesting registration also allows only one specific CPA design document to be uploaded. Moreover the Board has taken note that the trends in carbon markets are already having a significant adverse impact on the CDM, and that this should be considered in the context of the Board's strategic work.”

19. DNA Vanuatu: “As an LDC/SIDs country Vanuatu faces barriers for CDM including lack of capacity, low volumes etc. While simplifications in SSC guidelines that EB has undertaken is very welcome, requirements for real case CPA-DD per technology under a PoA can be self-defeating; will be impossible to provide real cases for all technologies upfront for the 28 years span and if done will curb innovation and capacity to absorb new technologies. Such ad-hoc new requirements if introduced will increase costs and complexities immensely.”
20. ADB in consultation with DNAs of Pacific countries: “The new requirement for CPA-DD per technology will significantly negatively impact PoA development particularly in LDCs/SIDs. Over 15 PoAs have been developed to apply multiple technologies and methodologies with particular focus on electrification of un electrified areas; all of them will be severely impacted. Requiring only one real case CPA-DD is unlikely to lead to information gaps as all measures / technologies will be described in part II of the PoA-DD form (VVS track) or the generic CPA-DD, which specifies the generic information relevant to all CPAs that may be included in the PoA (VVM track).”
21. The 6th CDM Round table and DOE Forum held in Bonn 11 and 12 October 2012 recommended that it should be required to provide at least one actual case CPA-DD at the time of registration following which additional actual case CPA-DDs are provided for each technology or methodology (or combinations thereof) over a period of time but before inclusion of CPAs for that type. The CDM Round table also noted that providing such actual case CPA-DDs may not be considered as “post-registration change” (PRC) in the strict sense of PRC as most information is already available in the generic CPA-DDs in the registered PoA documentation and only confirmation with the specified requirement via the actual case is being achieved.

3.2.3. Analysis and proposed solutions

22. The literal interpretation of the current requirements in the PCP entails provision of only one specific (or actual) CPA-DD at the time of registration of the PoA.
23. Large-scale methodologies that have been revised recently to specify PoA provisions include ACM0001 (landfill gas), ACM0002 (renewable energy), ACM0010 (manure), ACM0014 (waste water), AM0009 (gas flaring in oil wells), AM0025 (waste treatment)⁴. These revisions envisage specific CPA-DDs for each type of CPA included in the PoA; differences in the means of demonstration of additionality, emission reduction calculations and monitoring methods are considered for defining a ‘type of CPA-DD’. Thus, a number of different parameters trigger the requirements for a specific or actual case CPA-DD e.g. baseline conditions (e.g. partial release of LFG, total release of LFG in the baseline), project output (e.g. different applications of thermal energy, captive use of electricity, electricity export to the grid), technologies employed (e.g. wind, run off the river hydro, dam reservoir hydro), legal and regulatory framework etc.
24. PoA rules require that generic CPA-DDs⁵ 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

⁴ These methodologies have a grace period until 08 November 2012 (for AM0025), 11 January 2013 (ACM0001 and ACM0002), 20 March 2013 (for ACM0014 and AM0009) and 13 May 2013 (for ACM0010)

⁵ Multiple generic CPA-DDs are provided as one document i.e. part II of the PoA-DD form are repeated for each type of CPA-DD.

in the form of hypothetical CPA-DDs. Actual case CPA-DDs will serve as confirmation of compliance with the proposed requirements in the PoA-DD besides providing information relating to 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 (PoA rules allow conducting stakeholder consultation and environmental impact at the PoA level).

25. While additional specific case CPA-DD may be desirable when multiple technologies are intended for implementation under the PoA, the boundaries for the requirements should be clearly defined to ensure predictability of application of PoA rules. The Board may wish to consider that PoAs will be continued to be registered with at least one specific CPA-DD submitted at the time of registration of the PoA-DD as is currently being done. However the Board may wish to require that CMEs submit specific CPA-DDs for other technology/measures or methodologies or combinations thereof⁶⁷ planned under the PoA at a later stage following the procedures for post registration changes. Further the Board may wish to stipulate that all specific CPA-DDs pertaining to a registered PoA-DD should be provided within a specified period of [one year] [two years] from the date of registration of the PoA. Although there may be some merit in stakeholder assertions that the issue is not a typical PRC issue, it is hard to conceive a new procedure for this issue that is very different and any simpler than the PRC process. It is also essential to specify a time period within which to provide specific case CPA-DDs so that the implementation model of the PoA remains clear and relatively stable which can possibly facilitate the task of inclusion of CPAs and any assessment of such inclusions against the predefined eligibility criteria. On the other hand, requiring provision of specific CPA-DDs for all of the technology and methodology combinations included in the PoA-DD at the time registration itself even for the PoAs that are currently undergoing validation may be difficult to comply with as indicated by the stakeholders; it may also be perceived as retroactive application of rules as the current requirements indicated in the PCP require the provision of only one specific CPA-DD.

3.3. Issue 3: Post-registration changes to PoA-DD and to CPA-DD

3.3.1. Description of the issue

26. According to the PCP, the post-registration changes to registered PoAs are allowed only for programme boundary change to expand the geographical coverage or to include additional host Parties; it may be inevitable that CME is obliged to make other changes. There is a need therefore to clarify permitted changes to the registered PoA-DD (e.g. to include additional specific CPA-DDs, compliance with additional regulatory requirements on account of PoA standard requirements).

⁶ For example specific CPA-DDs are required for each of the following cases: Efficient residential lighting under AMS-II.C, Efficient residential lighting under AMS-II.J, Efficient street lighting under AMS-II.C, Efficient water pumping under AMS-II.C, Biomass gasification under AMS- I.C, Biomass gasification under AMS-I.D, Treatment of domestic manure under AMS-III.R.+AMS-I.E.+AMS-I.I., Treatment of domestic manure under AMS-III.R.+AMS-I.I

⁷ For example specific CPA-DDs are not required for the following case: Prefabricated project stoves of efficiency N under methodology AMS-II.G by manufacturer M1, Prefabricated project stoves of efficiency N under methodology AMS-II.G by manufacturer M2

3.3.2. Stakeholders' requests/suggestions on the issue

27. Clarification on design changes that are permitted versus those not permitted is helpful (e.g. eligibility criteria, technologies/measures, size/scale, applied methodology, methods for additionality).

3.3.3. Analysis and proposed solutions

28. Since PoAs involve lengthy period of implementation often covering emerging technologies post-registration changes to PoA design may be unavoidable to some extent. Also many improvements to standards, guidelines and procedures approved by the Board, particularly to facilitate better regional distribution of projects and to streamline the process to enhance efficiency may not have intended impacts fully if no changes to the existing project design are allowed. On the other hand, considering that PoAs involve significant shift of responsibility to the DOEs, frequent changes to the project design through PRC may introduce complexities in the project cycle with potential implications on efficiency and reliability of validation, verification results.

3.4. Issue 4: Validation and verification by the same DOE**3.4.1. Description of the issue**

29. VVS indicates that a DOE who has performed validation of a PoA may also undertake the verification if this has been approved in advance by the Board (see footnote 43 of VVS). The condition under which such an approval is granted is unclear.

3.4.2. Stakeholders' inputs

30. Transaction costs for PoA verifications are high, particularly true in LDCs. Project proponents and DOEs suggest that PoAs applying small-scale methodologies should be allowed to use the same DOE that performed inclusion services for verification services to lower verification costs. Communication to the Board from a DNA in a different context states "DOEs are simultaneously validating a large number of projects and they prefer to give priority to CDM projects from large countries with fast growing economies".

3.4.3. Analysis and proposed solutions

31. The Board has allowed validation and verification by the same DOE in the case of SSC CDM projects as one means of reducing transaction costs relative to the size of the project (i. e. reduced cost per unit emission reduction achieved). As compared to regular SSC projects, PoAs applying SSC methodologies (hereafter referred to SSC PoAs) may generate more emission reductions during the lifetime of the PoA, however those PoAs may also have more transaction costs on account of greater coordination effort involved with the implementation of PoAs due to many dispersed activities included. Given the paucity of data it is difficult to make conclusions on transaction costs of SSC PoAs versus SSC projects per unit emission reduction achieved. If the Board has reservations on accepting the stakeholder suggestions, the Board may wish to consider specifying additional criteria to complement the requirement that PoAs apply SSC methodologies. Secretariat recommends that in any case PoAs applying large-scale methodologies or combinations of large-scale and small-scale methodologies should continue to be validated and verified by different DOEs as per the current requirement. The Board may however wish to consider simplifications for SSC PoAs for specific project types or

regions by allowing validation and verification by the same DOE. The following conditions may be considered:

- (a) Option 1. PoA applies small-scale methodologies;
 - (b) Option 2. PoA applies small-scale methodologies and the geographic location of the PoA is in least developed countries.
32. The above criteria already feature in CDM regulatory documents for example under the modalities for the CDM Loan Scheme and for demonstrating additionality of microscale project activities as indicators of barriers for project development potentially indicating high transaction costs.
33. Further subject to approval of the above recommendations by the Board, foot note 43 of the VVS stating “.....DOE may also undertake the verification if this has been approved in advance by the Board” may be considered for deletion.

3.5. Issue 5: Clarifying issues related to the use of single versus multiple monitoring reports for CPAs

3.5.1. Description of the issue

34. Guidance is needed for the CMEs with regard to the submission of monitoring reports of CPAs in the PoA i.e. it needs to be clarified if monitoring reports for each individual CPA are to be prepared separately or can combined into one single monitoring report.

3.5.2. Stakeholders' inputs

35. Stakeholders requested guidance.

3.5.3. Analysis and proposed solutions

36. Secretariat recommends to specify single monitoring report (i.e. one document) containing all monitoring results of all CPAs covered in the PoA but clearly separating the monitoring results of individual CPAs. Within the monitoring report, monitoring results of individual CPAs should be grouped by generic CPA type.

3.6. Issue 6: Forms and templates to use when both large-scale and SSC methodologies are applied in a PoA

3.6.1. Description of the issue

37. There is a need to provide guidance on the use of PoA-DD forms and CPA-DD forms when both large-scale and small-scale (SSC) methodologies are applied in a PoA (e.g. If ACM0002 and AMS-I.D are applied in a PoA it is not clear if a large-scale PoA-DD form and large-scale CPA-DD form should be used even for the CPAs applying AMS-I.D). Similarly when PoA includes SSC CPAs, microscale CPAs besides large-scale CPAs, eligibility of SSC and Microscale additionality guidelines is not clear.

3.6.2. Stakeholders' inputs

38. Stakeholders requested guidance.

3.6.3. Analysis and proposed solutions:

39. The Board may wish to consider merging large-scale and SSC PoA-DD forms into one form. Until such consolidated form is available, the Board may consider specifying the use of large-scale PoA-DD and CPA-DD forms for PoAs applying both large-scale and small-scale methodologies.
40. When the CPA solely comprises of microscale units, irrespective of the methodology applied the guidelines for demonstrating additionality of microscale project activities should be applied. When the CPA solely comprises of SCC units then the SSC additionality guidelines should be applied. In rest of the cases the standards and guidelines for the additionality of large-scale projects should be followed.

3.7. Issue 7: Further clarifying issues related to letters of approvals for a multi country PoAs

3.7.1. Description of the issue

41. For multi-country PoAs, it is difficult to obtain letters of approval (LoAs) from all involved countries at the time of PoA validation and registration. There is no guidance with regard to LoA process for multi-country PoAs.

3.7.2. Stakeholders' inputs

42. Some stakeholders have suggested that for multi-country PoAs, obtaining the LoAs at the CPA level should be permitted, to be made available to DOEs at the time of CPA inclusion. However, CME should obtain LoA from the DNA of the host party of the specific-CPA to be submitted with the PoA-DD during the request for registration. Other stakeholders (e.g. some of the participants the 6th CDM Round table) have indicated that host country DNAs may be unwilling to issue LoAs at the time of PoA validation unless specific case CPAs are identified in the host country and the specific case CPA-DD is presented to the DNA.

3.7.3. Analysis

43. It is the understanding of the secretariat that LoAs from all host Parties involved in the PoA are required at the time of request for registration of the PoA. A new host Party may be added through post-registration change process, at which time the LoA of the new host Party shall be obtained. Secretariat however has also requested further guidance from the Board on a few other issues related to rules pertaining to the multi country PoAs and projects (e.g. identification of CERs). It is expected that further guidance from the Board at future meetings will provide more clarity on the issue of LoAs as well as other issues pertaining to multi country PoAs.

4. Impacts

44. More clarity on the requirements for generic and specific case CPA-DDs that this document aims to achieve will likely facilitate the work of CMEs, DOEs and other stakeholders; the proposal takes into account practical implementation aspects in specifying timelines for compliance at the same time as aiming to ensure that there are no information gaps in the registered PoA documentation. Clear definition of the start date of a PoA and CPAs will likely facilitate the implementation of PoAs providing some

flexibility for the development and implementation of CPAs; on the other hand the definition of crediting periods at the PoA level that is also linked to the crediting periods of CPAs may dwarf to some extent the flexibility currently available to choose a crediting periods for the CPAs. Similarly more clarity on permitted post registration changes, forms to use for PoAs, application of microscale and SSC additionality guidelines is likely to facilitate the work of stakeholders to develop and implement PoAs. The proposal on validation and verification of PoAs by the same DOE is likely to have significant positive impact on transaction costs of SSC PoAs if the Board were to choose option 1, while the choice of option 2 is likely to have small but positive impact on regional distribution of PoAs.

5. Proposed work and timelines

45. At its seventieth meeting Board will consider the proposed amendments of regulatory documents for the issues listed in this document. The secretariat will continue to work on PoA issues that were listed in the report of the meeting of the Board but not addressed under this document and present proposals for the consideration of the Board at future meetings. As in the past stakeholders will be consulted on these issues.

6. Recommendations to the Board

46. The secretariat recommends adopting the amendments contained in this document and that these come into effect immediately.

DRAFT

TABLE OF CONTENTS	Page
1. SUMMARY OF AMENDMENTS	14
2. AMENDMENTS TO “CDM PROJECT STANDARD (VERSION 01.0)”	15
2.1. Changes to Section XI. Specific design requirements for programme of activities.....	15
3. AMENDMENTS TO “CDM VALIDATION AND VERIFICATION STANDARD (VERSION 02.0)”	19
3.1. Changes to Section VIII. Specific validation requirements	19
3.2. Changes to Section X. Specific verification requirements	19
4. AMENDMENTS TO “CDM PROJECT CYCLE PROCEDURE” (VERSION 02.0)”	21
4.1. Changes to Section IV. Pre-registration activities	21
4.2. Changes to Section VI. Post-registration activities	22
4.3. Change to Section VII. Pre-issuance activities	24
4.4. Change to Appendix 1. Registration fee schedule	24
5. AMENDMENTS TO “STANDARD FOR DEMONSTRATION OF ADDITIONALITY, DEVELOPMENT OF ELIGIBILITY CRITERIA AND APPLICATION OF MULTIPLE METHODOLOGIES FOR PROGRAMME OF ACTIVITIES (VERSION 01.0)”	26
5.1. Changes to Section III.A. Demonstration of additionality	26
5.2. Change to Section III.B. Development and update of eligibility criteria	26
5.3. Change to Section III.C. Application of multiple methodologies.....	26
6. AMENDMENTS TO “GUIDELINES FOR COMPLETING THE PROGRAMME DESIGN DOCUMENT FORM FOR CDM PROGRAMMES OF ACTIVITIES (VERSION 02.0)”	28
6.1. Changes to Section V. Specific guidelines.....	28
7. AMENDMENTS TO “CDM GLOSSARY OF TERMS (VERSION 06.0)”	30
7.1. Change to Section V. Definition of terms in alphabetical order:.....	30

1. Summary of amendments

1. Amendments to requirements related to PoAs specified in Project Standard, Project Cycle procedure, Validation and Verification Standard, PoA standard, CDM glossary of terms and Guidelines for completing the PoA-DD have been proposed:
 - (a) To clarify requirements on the provision of generic and real case CPA-DDs of a PoA;
 - (b) To clarify the definition of the start date of a PoA and a CPA;
 - (c) To define the crediting periods of a PoA and CPAs and the relationship between the two; the start date of the crediting period of a PoA and a CPA is also clarified;
 - (d) To clarify permitted post-registration changes to PoA-DD and to CPA-DD;
 - (e) To clarify issues related to the use of single versus multiple monitoring reports for CPAs, forms and templates to use when large-scale and SSC methodologies are applied in a PoA;
 - (f) To clarify issues related to the letters of approval for a multi-country PoAs

2. Amendments to “CDM Project Standard (version 01.0)”

2.1. Changes to Section XI. Specific design requirements for programme of activities

2. The following paragraphs shall read as:

143. As part of the proposed CDM PoA, the coordinating/managing entity shall describe ~~a~~-typical CPAs with generic information applicable to all CPAs that will be included in the PoA. For PoAs applying multiple technologies/measures and/or multiple methodologies, the coordinating/managing entity shall demonstrate the application of the PoA framework to generic CPAs for each technology/measure, each methodology and each combination thereof.

144. Also as part of the proposed CDM PoA, the coordinating/managing entity shall define ~~an~~-actual CPAs under the PoA. For PoAs applying multiple technologies/measures and/or multiple methodologies, the coordinating/managing entity shall complete one specific case CPA-DD⁶ for each technology/measure, each methodology and each combination thereof⁷. In cases where all specific case CPA-DDs cannot be provided at the time of registration, at least one specific case CPA-DD is provided at the time of registration and the remaining specific case CPA-DDs shall be provided using the procedures for post registration changes within [1] [2] years of registration of the PoA.

⁶ Also referred to as actual case or real case CPA-DD

⁷ When same technology/measure under the same methodology is consistently applied across all CPAs only one specific case CPA-DD shall be provided

3. The following paragraphs shall read as:

158. The following applies instead of paragraphs 57-58 above: The coordinating/managing entity shall determine the start date ~~and length~~ of the proposed CDM PoA and provide a description of how the start date has been determined. The start date of a PoA shall be any one of the below:

(a) The date of notification of the intention to seek the CDM status by the coordinating/managing entity to the secretariat and the DNA; or

(b) The date of publication of the PoA-DD for global stakeholder consultation: or

(c) The date of submission by the coordinating/managing entity of a proposed new methodology deemed to be complete in accordance with the applicable procedures.

159. The coordinating/managing entity shall determine the start date ~~and expected operational lifetime~~ of any proposed CDM CPA and provide a description of how the start date has been determined. The start date of a

CPA is defined as the earliest date at which either the implementation or construction or real action of a CPA begins.

160. The coordinating/managing entity shall confirm that the start date of any proposed CDM CPA is not, or will not be, on or after the start date of a PoA, prior to the commencement of the validation of the proposed CDM PoA, i.e. the date on which the PoA-DD is first published for global stakeholder consultation.

161. The following applies instead of paragraphs 59-62 above: The coordinating/managing entity shall select the type (fixed or renewable) and duration of crediting period of the proposed CDM PoA and CPA considering that:

(a) *bis* The duration of a PoA shall not exceed 28 years (60 years for A/R), counting from the start date of a PoA;

(a) *ter* The start date of the crediting period of a PoA is the date of registration of the PoA;

(a) *quater* The type of crediting period (fixed or renewable) selected for the PoA shall apply to all CPAs included in the PoA. If a coordinating/managing entity opts for renewable crediting period for a PoA, all CPAs in the PoA shall have the renewable crediting period and all CPAs included shall also be renewed together with the PoA renewal;

(a) Each renewable crediting period for a PoA shall be at most seven years and may be renewed at most three times, for a maximum total length duration of 28 years (60 years for A/R). The first renewal of a PoA along with all CPAs included shall be conducted seven years after the start date of the crediting period of a PoA;

(b) A fixed crediting period for a PoA shall be at most 10 years. If a coordinating/managing entity opts for a fixed crediting period for a PoA, then all CPAs included shall have crediting periods equal to the remaining crediting period of the PoA⁶;

⁶ For example, if a CPA is added in the 2nd year of the fixed crediting period of the PoA, it will be only eligible for 8 years of crediting.

4. The following paragraphs shall read as:

162. The coordinating/managing entity shall determine the start date of the crediting period of the proposed CDM CPA considering that:

(a) For the specific CPAs for which the CPA-DDs are submitted at the time of the request for registration, the start date of the crediting period of the CPA is the date of registration of the PoA or any date thereafter⁸. The start date of the crediting period for a CPA included after the

registration of the PoA shall be the date of inclusion of the CPA in the registered PoA or any date thereafter;

⁸ Exceptions indicated for A/R project activity under paragraph 128 (c) also apply to A/R CPAs

(b) The duration of the crediting period of a CPA shall not exceed the end-date duration of the registered PoA. With regard to the renewable crediting period of a CPA, [total length of crediting periods of any CPA shall be a maximum 21 years (maximum 60 years for A/R PoAs)] [it shall be a maximum of seven years which may be renewed at most two times]. For the fixed crediting period of a CPA, the CPAs included have the crediting periods as the remaining crediting period of the PoA.

169. The coordinating/managing entity shall obtain a letter of approval from the DNA of each Party involved in the proposed CDM PoA at the time of request for registration of the PoA, confirming that:

- (a) The Party is a Party to the Kyoto Protocol; and
- (b) Participation in the proposed CDM PoA is voluntary.

169 bis. A new host Party (ies) may be added through post-registration change process including the letter of approval of the new host Party (ies).

177. Along with the preparation of a PoA-DD for the proposed CDM PoA, the coordinating/managing entity shall complete, using the latest version of the CDM-CPA-DD form applicable to the CPA, and taking into account the grace period of the form if it has been revised, the following:

- (a) A generic CPA-DD, which specifies the generic information relevant to all CPAs that may be included in the PoA. Where multiple technologies/measures and/or multiple methodologies are being applied, a generic CPA-DD shall be completed for each technology/measure, each methodology and each combination thereof (generic CPA-DDs are compiled and presented as a single document, however descriptions of each sections of a CPA-DD for a scenario shall remain separate and no section or sub sections of the CPA-DDs from different scenarios are combined).
- (b) A specific completed CPA-DD for each of the generic CPA-DD, which is to be based on the application of the PoA to one actual CPAs. At the time of request for registration, if all of the specific CPA-DDs are not available, at least one actual case CPA-DD corresponding to any of the generic CPA-DDs shall be submitted, that is,
 - If PoA-DD includes more than one technology/measure or methodology or combination thereof, one actual CPA-DD shall be provided for each type of generic CPA-DD either at the time of request for registration or after the registration of the PoA using the post-registration change process in

accordance with the CDM Project Cycle Procedure within [1] [2] years of registration of the PoA. In such cases, the coordinating/managing entity shall submit actual case CPA-DDs to a DOE for validation.

- If PoA consistently implements same technology/measure under the same methodology across all CPAs then only one actual CPA-DD shall be provided at the time of registration of the PoA i.e. more than one specific CPA-DD shall not be submitted at the time of request for registration or via the procedures of post-registration changes.

- - - - -

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Regulatory Document Type: Standard Business Function: Registration, Issuance Keywords: programme of activities		

3. Amendments to “CDM Validation and Verification Standard (version 02.0)”

3.1. Changes to Section VIII. Specific validation requirements

5. The following paragraph shall read as:

193. The DOE shall confirm that the start date of any CPA is ~~not prior to the commencement of the validation of the PoA, which is the date the CDM-PoA-DD is first published for global stakeholder consultation~~ on or after the start date of a PoA.

3.2. Changes to Section X. Specific verification requirements

6. The following paragraph shall read as:

292. A DOE that has not performed validation/inclusion/renewal of crediting period activities for the PoA⁴³ shall:
- (a) Identify those CPAs that it shall consider for verification in accordance with the method/procedure to be used for verification of the amount of reductions of anthropogenic emissions by sources or removals by sinks of greenhouse gases achieved by CPAs under the PoA and determined in the CDM-PoA-DD;
 - (b) Take into account the possible existence of different versions of the PoA and the need to account for this in its sampling approach, to ensure that a statistically sound sample of CPAs from each version of the PoA are being verified;
 - (c) Make all monitoring reports received from the coordinating/managing entity immediately publicly available in accordance with the Project cycle procedure;
 - (e) Systematically verify and certify the correct implementation and operation of the record-keeping system.

⁴³ ~~Such a~~ A DOE may also undertake the verification if the following conditions have been met this has been approved in advance by the CDM Executive Board.
[Option 1. PoA applies only the small-scale methodologies;]
[Option 2. PoA applies small-scale methodologies and the geographic location of the PoA is in least developed countries]

- - - - -

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Regulatory		
Document Type: Standard		
Business Function: Registration, Issuance		
Keywords: programme of activities, validation and verification manual		

DRAFT

4. Amendments to “CDM Project Cycle Procedure” (version 02.0)”

4.1. Changes to Section IV. Pre-registration activities

7. The following paragraphs shall read:

11. Provisions in paragraphs 7-10 above shall not apply to PoAs. However, the coordinating/managing entity may notify to the designated national authority(ies) (DNAs) of the host Party(ies) of the programme of activity and the secretariat in writing of the commencement of the programme of activity by using the “CDM PoA notification form” (F-CDM-PoA).
14. 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 0–0 above:
 - (i) A PoA generic CPA-DD, which specifies the generic information relevant to all CPAs that may be included in the PoA; Where multiple technologies/measures and/or multiple methodologies or combinations thereof are being applied, a generic CPA-DD shall be completed for each technology/measure, each methodology and each combination thereof (generic CPA-DDs are presented as a single document, however each section of a CPA-DD for a specific scenario remains separate and no section or sub sections of CPA-DDs covering different scenarios are combined).

- (ii) A specific completed CPA-DD for each of the generic CPA-DD, which is to be based on the application of the PoA to one actual CPAs. At the time of request for registration, if all of the specific CPA-DDs are not available, at least one actual case CPA-DD corresponding to any of the generic CPA-DDs shall be submitted, that is,
- If PoA-DD includes more than one technology/measure or methodology or combination thereof, one actual CPA-DD shall be provided for each type of generic CPA-DD either at the time of request for registration or after the registration of the PoA using the post-registration change process in accordance with the CDM Project Cycle Procedure within [1] [2] years of registration of the PoA . In such cases, the coordinating/managing entity shall submit actual case CPA-DDs to a DOE for validation.
 - If PoA consistently implements same technology/measures under the same methodology across all CPAs then only one actual CPA-DD shall be provided at the time of registration of the PoA i.e. more than one specific CPA-DD shall not be submitted at the time of request for registration or via the procedures of post-registration changes.

4.2. Changes to Section VI. Post-registration activities

8. The following paragraphs shall read:

112. To include a CPA in a registered CDM PoA, the coordinating/managing entity shall forward the completed specific CPA-DD to any DOE, after having ensured that the CPA and the specific CPA-DD meet the eligibility criteria for inclusion in the PoA defined in the PoA-DD and its generic CPA-DD. The coordinating/managing entity may forward more than one specific CPA-DD at one time. Only upon approval of the first specific CPA-DD by the Board, CPAs of that type may be added to a registered CDM PoA.
116. If the methodology, subsequent to being placed on hold, is revised, the coordinating/managing entity shall revise the PoA-DD including updating the eligibility criteria for inclusion of CPAs in the PoA to be in line with the revised methodology, and the generic CPA-DD applying the updated eligibility criteria following the procedures described in paragraph 132, to be validated by a DOE and approved by the Board. The Board's approval defines a new version of the PoA-DD and the generic CPA-DD. Such revisions to the PoA-DD and the generic CPA-DD are not required in cases where the methodology is revised or withdrawn to be included in a consolidated methodology without being placed on hold, unless otherwise indicated in the report of the Board meeting at which the Board approved the revised or consolidated methodology.

130. A request for approval of changes may be submitted in respect of the following changes that have occurred or are expected to occur to a registered CDM project activity or PoA:
- (a) Temporary deviation from the monitoring plan as described in the registered PDD or the monitoring methodology;
 - (b) Permanent changes:
 - (i) Corrections;
 - (ii) Changes to the start date of the crediting period **including the crediting period of CPAs**;
 - (iii) Permanent changes to the monitoring plan as described in the registered PDD or the monitoring methodology;
 - (iv) Changes to the project or programme design in the registered CDM project activity or PoA.
131. For CDM PoAs, with regard to the changes referred in paragraph 130 (b) (iv) above, **only the following changes to the programme boundary to expand geographical coverage or to include additional host Parties shall be allowed:**
- (a) Changes to programme boundary to expand geographical coverage or to include additional host parties;**
 - (b) Changes 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 stipulated by the Board if an issue related to environment integrity is identified);**
 - (c) If PoA includes more than one technology/measure or methodology or combination thereof, addition of actual case CPA-DDs to cover the technologies or methodologies or combinations that were not included in the actual case CPA-DDs submitted at the time of registration;**
 - (d) Changes to apply the provisions of the most recent versions of the sampling standard;**
- 131bis** In ~~this~~ **the cases described in paragraph 131 above** , the coordinating/managing entity shall update the eligibility criteria for inclusion of CPAs in the PoA to reflect the change, and include them in new versions of PoA-DD and generic CPA-DD, to be validated by the DOE and approved by the Board in accordance with paragraph 132 below.

4.3. Change to Section VII. Pre-issuance activities

9. The following paragraph shall read:

179. UNFCCC CDM web page where the monitoring report is made available shall contain the following information:

- (c) The name and reference number of the CDM project activity or PoA;
- (d) A link to the monitoring report;
- (e) The name of the DOE contracted by the project participants or the coordinating/managing entity for the verification;
- (f) The name of the DOE that performed the validation of the CDM project activity or PoA.
- (g) A single monitoring report (i.e. one document) containing all monitoring results of all CPAs included in the PoA but clearly separating the monitoring results of individual CPAs; within the monitoring report, monitoring results of individual CPAs may be grouped by the type of generic CPA.

4.4. Change to Appendix 1. Registration fee schedule

10. The following paragraph shall read:

6. The registration fee for a PoA shall be the share of proceeds applied to the expected average annual CERs of the “actual case” CPA submitted together with the request for registration of the PoA over its crediting period, as identified in the CPA-DD and as validated by the DOE. If there are more than one actual case CPAs submitted for different technology/measure or methodology or combination thereof, the registration fee shall be based on the sum of expected average annual CERs of actual case CPAs.

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Regulatory		
Document Type: Procedure		
Business Function: Registration, Issuance		
Keywords: programme of activities		

DRAFT

5. Amendments to “Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities (version 01.0)”

5.1. Changes to Section III.A. Demonstration of additionality

11. The following paragraph shall read:

9. PoAs that consist of one or more small-scale projects as CPAs shall include eligibility criteria derived from all the relevant requirements of the “Guidelines for demonstrating additionality of small-scale project activities” ~~attachment A of Appendix B of the “Simplified modalities and procedures for small-scale CDM project activities”.~~

12. The following provisions are new paragraphs to be added after paragraph 10:

10 bis. Large-scale CPAs, small-scale CPAs and microscale CPAs may be included under the same PoA. The guidelines for demonstration of additionality of microscale project activities may be applied to small-scale or large-scale CPAs if all of the units in the CPAs are below the microscale thresholds. The guidelines for demonstration of additionality of small-scale project activities may be used for small-scale CPAs only.

10 ter The large-scale PoA-DD form and large-scale CPA-DD form should be used for PoAs applying both the large-scale and small-scale methodologies.

5.2. Change to Section III.B. Development and update of eligibility criteria

13. The following paragraph shall read:

25. At the renewal of the crediting period of a PoA ~~(at the renewal of the first CPA)~~, the CME shall update the eligibility criteria as per the latest revised applicable methodologies. A new version of the PoA DD (e.g. version 1.4) and generic CDM-CPA-DD validated⁹ by a DOE shall be submitted to the Board for approval.

⁹ In this case, the stakeholder consultation is not required.

5.3. Change to Section III.C. Application of multiple methodologies

14. The following footnote shall be removed from paragraph 32:

32. For PoAs applying large-scale CDM methodologies, only combinations explicitly permitted in the methodologies can be applied without pre-approval.¹⁴ ~~In other cases, the CME shall submit a request seek for a clarification to the Methodologies Panel by following the latest applicable procedures version of the “Procedure for the submission and consideration of queries regarding the application of approved methodologies and methodological tools by designated operational~~

entities to the Meth Panel¹⁴ (see EB 42 report, annex 9) for the eligibility of the proposed combination.

¹⁴ For example, the combined use of AM0053 with ACM0001 is allowed in AM0053.

- - - - -

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Regulatory Document Type: Procedure Business Function: Methodology, Registration Keywords: additionality, programme of activities		

DRAFT

6. Amendments to “Guidelines for completing the programme design document form for CDM programmes of activities (version 02.0)”

6.1. Changes to Section V. Specific guidelines

15. The following provision shall read:

SECTION D. Duration of PoA

D.1. Start date of PoA

Describe how the start date was determined. If the coordinating/managing entity chooses the date of publication of the PoA-DD for global stakeholder consultation as the start date of a PoA, the coordinating/managing entity shall indicate that the start date of PoA is the date of publication of this PoA-DD at the stage of global stakeholder’s consultation, and the exact date of publication will be included before the request for registration of the PoA.

D.2. Length Type of crediting period (fixed or renewable) of the PoA

State the length type of crediting period (fixed or renewable) of the proposed PoA in years.

16. The following provision shall read:

PART II. Generic component project activity (CPA)

Use this section to demonstrate the application of the PoA framework to ~~implement~~ generic CPAs and to demonstrate that each type of CPA meets the requirements.

Where multiple technologies/measures and/or multiple methodologies are being applied, the demonstration of the application of the PoA framework to ~~implement~~ generic CPAs shall ~~must~~ be done for each technology/measure, each methodology and each combination thereof ~~of the combinations of technologies/measures and/or methodologies~~. Therefore, repeat all of Part II of these guidelines for each technology/measure, each methodology and each combination thereof ~~of the combination of technologies/measures and/or methodologies~~ such that one completed Part II represents one type of generic CPA-DD; generic CPA-DDs are compiled and presented as a single document, however descriptions of each sections of a CPA-DD for a scenario shall remain separate and no section or sub sections of the CPA-DDs from different scenarios are combined.

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Regulatory		
Document Type: Guideline		
Business Function: Registration		
Keywords: programme of activities, project design document		

DRAFT

7. Amendments to “CDM Glossary of Terms (version 06.0)”

7.1. Change to Section V. Definition of terms in alphabetical order:

17. The following term shall read:

Start date In the context of a CDM project activity or **PeA CPA**, the earliest date at which either the implementation or construction or real action of a CDM project activity or **PeA CPA** begins.”

- - - - -

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	5 November 2012	Initial publication as an annex to the annotated agenda of EB 70.
Decision Class: Operational Document Type: Glossary Business Function: Governance Keywords: glossaries		

DRAFT