

Public input on simplified modalities for demonstrating additionality for VSSC:

Allowing additionality demonstration through checklists and positive lists for Very Small Scale CDM activities

Dr. Christoph Sutter & Dr. Francois Beaurain, South Pole Carbon Asset Management / 12 April 2010

As CDM methodology experts and project developers we highly welcome the EB's interest with regard to simplification for the demonstration of the additionality for Very Small Scale CDM activities (VSSC).

There are many barriers that prevent the emergence of VSSC under the CDM. By simplifying the additionality demonstration, part of these barriers could be overcome which will significantly contribute to a more balanced regional distribution of CDM projects.

We recommend the EB to foster the implementation of VSSC projects through i) checklists and ii) positive lists.

- i) We recommend to base the rationale of the demonstration of VSSC barriers on a simplification of the Annex 13 of EB50 "Guidelines for objective demonstration and assessment of barriers" in standardised additionality test that could be presented under the form of checklist (one specific checklist for each kind of barrier). If the project participants can demonstrate that the checklist for one kind of barrier is fulfilled, the project is considered additional.
- ii) We also encourage the EB to develop a positive list of technologies that could benefit from an automatic additionality approval. In addition to a general positive list for VSSC project activities, we recommend to also define a streamlined, less stringent positive list for LDCs to facilitate very small scale CDM activities in LDCs. The positive lists shall be updated continuously to allow new technologies and reject technologies becoming more and more common.

Please refer to the submission by the Project Developer Forum for specific examples of checklists and positive lists.

About South Pole Carbon Asset Management

South Pole is a carbon asset management company with outstanding technical expertise and a reputation for developing innovative and cost-effective emission reduction projects. The company has globally more than 120 CDM projects under contract. It was the first company worldwide that generated issued CERs with the Gold Standard quality label and concluded the first ever international CER transaction. South Pole staff advised successfully registered CDM projects with a forecasted total of more than 100 million t CO₂e.