



## **Annex 1**

### **Draft revised tool for the demonstration and assessment of additionality**

Attached “Draft revised tool for the demonstration and assessment of additionality”.



## Tool for the demonstration and assessment of additionality (Version ~~0203~~)

### I. SCOPE AND APPLICABILITY

1. This document provides for a step-wise approach to demonstrate and assess additionality. These steps include:

- Identification of alternatives to the project activity;
- Investment analysis to determine that the proposed project activity is not the most economically or financially attractive;
- Barriers analysis; **and**
- Common practice analysis. ~~;~~ **and**

**• Impact of registration of the proposed project activity as a CDM project activity.**

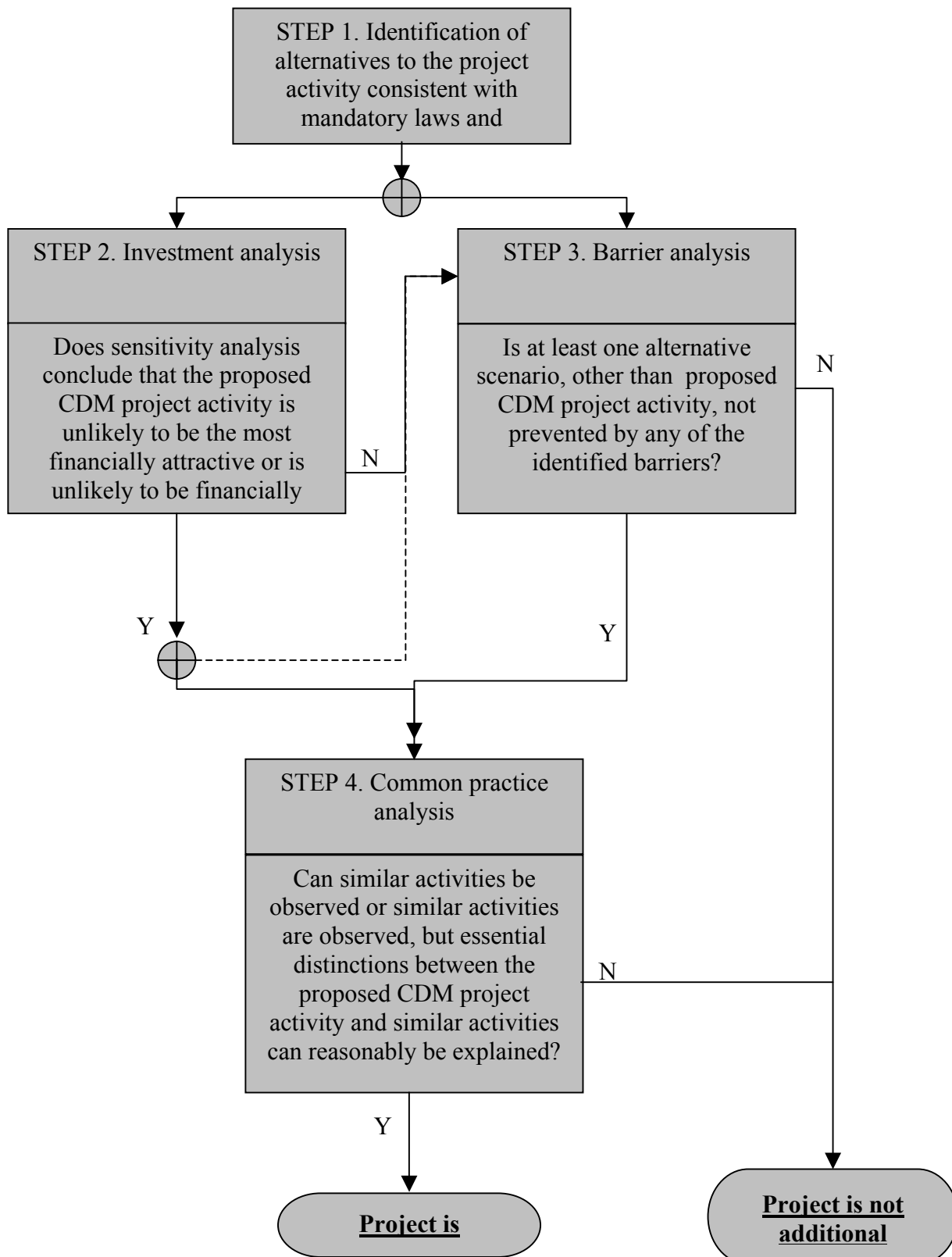
Based on information about activities similar to the proposed project activity, the common practice analysis is to complement and reinforce the investment and barriers analysis. The steps are summarized in the flow-chart **at the end on page 2** of this document.

2. The document provides a general framework for demonstrating and assessing additionality and is to be applicable to a wide range of project types. Particular project types may require adjustments to this framework.

**3.** The use of this tool to assess and determine additionality does not replace the need for the baseline methodology to provide for a stepwise approach justifying the selection and determination of the most plausible baseline scenario alternatives. Project participants proposing new baseline methodologies shall ensure consistency between the determination of additionality of a project activity and the determination of a baseline scenario. **Project participants can use the “tool for identification of baseline scenario and demonstration of additionality”, which provides a procedure for baseline scenario identification as well as additionality demonstration.**

4. Project participants proposing new baseline methodologies may incorporate this ~~consolidated~~ tool in their proposal. Project participants may also propose other tools for the demonstration of additionality to the Executive Board for its consideration.

**5. In validating the application of this tool, Designated Operation Entities (DOEs) should carefully assess and verify the reliability and creditability of all data, rationales, assumptions, justifications and documentation provided by project participants to support the demonstration of additionality. The elements checked during this assessment and the conclusions should be documented transparently in the validation report.**



**Step 0. Preliminary screening based on the starting date of the project activity**

The Marrakesh Accords and decision 18/CP.9 provide guidance on the eligibility of a proposed CDM project activity which started before registration.<sup>4</sup>

1. If project participants wish to have the crediting period starting prior to the registration of their project activity, they shall:

(a) Provide evidence that the starting date of the CDM project activity falls between 1 January 2000 and the date of the registration of a first CDM project activity, bearing in mind that only CDM project activities submitted for registration before 31 December 2005 may claim for a crediting period starting before the date of registration; and

(b) Provide evidence that the incentive from the CDM<sup>2</sup> was seriously considered in the decision to proceed with the project activity. This evidence shall be based on preferably official, legal and/or other corporate) documentation that was available at, or prior to, the start of the project activity.

**Step 1. Identification of alternatives to the project activity consistent with current laws and regulations**

(Note: In accordance with guidance by the Executive Board, consistency is to be ensured between “baseline scenario” and “baseline emissions”<sup>3</sup>)

Define realistic and credible alternatives<sup>4</sup> to the project activity(s) that can be (part of) the baseline scenario through the following sub-steps:

**Sub-step 1a. Define alternatives to the project activity:**

1. Identify realistic and credible alternative(s) available to the project participants or similar project developers<sup>5</sup> that provide outputs or services comparable with the proposed CDM project activity<sup>6</sup>. These alternatives are to include:

<sup>1</sup> For more information see decisions 17/CP.7 and 18/CP.9 (documents FCCC/CP/2001/13/Add.2, FCCC/CP/2003/6/Add.2) and the Glossary of CDM terms contained in the guidelines for completing the project

<sup>2</sup> This could include evidence of the objective to mitigate climate change.

<sup>3</sup> Please refer to paragraph 2 of Annex 3 of the report of the Executive Board at its ninth meeting, see <<http://cdm.unfccc.int/EB/Meetings>>.

<sup>4</sup> Reference to “alternatives” throughout this document denotes “alternative scenarios”.

<sup>5</sup> For example, a coal-fired power station or hydropower may not be an alternative for an independent power producer investing in wind energy or for a sugar factory owner investing in a co-generation, but may be an alternative for a public utility. Alternatives are, therefore, related to technology and circumstances as well as to the investor.

<sup>6</sup> For example:

- In the case of a project reducing emissions in the aluminium or cement production, the output provided by the alternative scenarios should be the production of the same quality of aluminium or the production of a cement type that can be used in the same applications as the cement type produced by the project activity.



- The proposed project activity ~~not~~ undertaken **without being registered** as a CDM project activity;
- ~~All~~ **Other** plausible and credible alternative **scenario(s)** to the **proposed CDM** project activity **scenario** that deliver outputs and on services (e.g. electricity, heat or cement) with comparable quality, properties and application areas, **taking into account, where relevant, examples of scenarios identified in the underlying methodology**;
- If applicable, continuation of the current situation (no project activity or other alternatives undertaken) **and, where relevant, the “proposed CDM project activity undertaken without being registered as a CDM project activity” undertaken at a later point in time (e.g. due to existing regulations, end-of-life of existing equipment, financing aspects).**

**If the proposed CDM project activity includes several different facilities, technologies, outputs or services, alternative scenarios for each of them should be identified separately. Realistic combinations of these should be considered as possible alternative scenarios to the proposed project activity.<sup>7</sup>**

**For the purpose of identifying relevant alternative scenarios, provide an overview of other technologies or practices that provide outputs or services (e.g. electricity, heat or cement) with comparable quality, properties and application areas as the proposed CDM project activity and that have been implemented previously or are currently underway in the relevant geographical area. The relevant geographical area should in principle be the host country of the proposed CDM project activity. A region within the country could be the relevant geographical area if the framework conditions vary significantly within the country. However, the relevant geographical area should include preferably ten facilities (or projects) that provide outputs or services with comparable quality, properties and application areas as the proposed CDM project activity. If less than ten facilities (or projects) that provide outputs or services with comparable quality, properties and application areas as the proposed CDM project activity are found in the region/host country, the geographical area may be expanded to an area that covers if possible, ten such facilities (or projects). In cases where the above described definition of geographical area is**

- **In the case of a project improving the energy efficiency of motors in a facility, the service provided is mechanical energy. Different scenarios to produce the same quantity of mechanical energy should be considered.**
- **In the case of a landfill gas capture project, the service provided by the project includes operation of a landfill. Alternatives scenarios to the project could include different ways to operate the landfill, such as no capture of methane, capture and flaring of the methane or capture and combustion of the methane for energy generation. For example, the outputs of a cogeneration project could include heat for on-site use, electricity for on-site use, and excess electricity for export to the grid. In the case of a proposed landfill gas capture project, the service provided by the projects includes operation of a capped landfill.**

<sup>7</sup> For example:

- In case of a cogeneration project activity, alternative scenarios for heat and electricity generation should be established separately.
- In case of a project that improves energy efficiency in several boilers with rather different characteristics (e.g. size, technology, age, etc), alternative scenarios should be established for each boiler or for types of boilers with broadly similar characteristics.



**not suitable, the project proponents should provide an alternative definition of geographical area. Other registered CDM project activities are not to be included in this analysis. Provide relevant documentation to support the results of the analysis.**

**Outcome of Step 1a: List of plausible alternative scenarios to the project activity**

*Sub-step 1b. ~~Enforcement of Consistency with mandatory applicable~~ laws and regulations:*

2. The alternative(s) shall be in compliance with all **mandatory** applicable legal and regulatory requirements, even if these laws and regulations have objectives other than GHG reductions, e.g. to mitigate local air pollution.<sup>8</sup> (This sub-step does not consider national and local policies that do not have legally-binding status.<sup>9</sup>).
3. If an alternative does not comply with all **mandatory** applicable legislation and regulations, then show that, based on an examination of current practice in the country or region in which the law or regulation applies, those applicable legal or regulatory requirements are systematically not enforced and that noncompliance with those requirements is widespread in the country. If this cannot be shown, then eliminate the alternative from further consideration;
4. If the proposed project activity is the only alternative amongst the ones considered by the project participants that is in compliance with **mandatory all**-regulations with which there is general compliance, then the **proposed CDM project activity is not additional.**<sup>10</sup>

**Outcome of Step 1b: List of alternative scenarios to the project activity that are in compliance with mandatory legislation and regulations taking into account the enforcement in the region or country and EB decisions on national and/or sectoral policies and regulations.**

*“Proceed to Step 2 (Investment analysis) or Step 3 (Barrier analysis). (Project participants may also select to complete both steps 2 and 3.)”*

## Step 2. Investment analysis

Determine whether the proposed project activity is ~~the~~ economically or financially less attractive than other alternatives, **identified in step 1**, without the revenue from the sale of certified emission reductions (CERs). To conduct the investment analysis, use the following sub-steps:

### *Sub-step 2a. Determine appropriate analysis method*

1. Determine whether to apply simple cost analysis, investment comparison analysis or benchmark analysis (sub-step 2b). If the CDM project activity generates no financial or

<sup>8</sup>For example, an alternative consisting of an open, uncapped landfill would be non-complying in a country where this scenario would imply violations of safety or environmental regulations pertaining to landfills.

<sup>9</sup>This aspect may be modified based on forthcoming guidance from the Executive Board on national and sectoral policies.

<sup>10</sup>This provision may be further elaborated depending on deliberation from the Board regarding requirements for the renewal of a crediting period.



economic benefits other than CDM related income, then apply the simple cost analysis (Option I). Otherwise, use the investment comparison analysis (Option II) or the benchmark analysis (Option III).

***Sub-step 2b. – Option I. Apply simple cost analysis***

2. Document the costs associated with the CDM project activity and demonstrate that the activity produces no economic benefits other than CDM related income.

***“If it is concluded that the proposed CDM project activity is not financially attractive then proceed to Step 4 (Common practice analysis)”.***

***Sub-step 2b. – Option II. Apply investment comparison analysis***

3. Identify the financial indicator, such as IRR<sup>11</sup>, NPV, cost benefit ratio, or unit cost of service (e.g., levelized cost of electricity production in \$/kWh or levelized cost of delivered heat in \$/GJ) most suitable for the project type and decision-making context.

***Sub-step 2b – Option III. Apply benchmark analysis***

4. Identify the financial indicator, such as IRR<sup>12</sup>, NPV, cost benefit ratio, or unit cost of service (e.g., levelized cost of electricity production in \$/kWh or levelized cost of delivered heat in \$/GJ) most suitable for the project type and decision context. Identify the relevant benchmark value, such as the required rate of return (RRR) on equity. The benchmark is to represent standard returns in the market, considering the specific risk of the project type, but not linked to the subjective profitability expectation or risk profile of a particular project developer. Benchmarks can be derived from:
  - (a) Government bond rates, increased by a suitable risk premium to reflect private investment and/or the project type, as substantiated by an independent (financial) expert;
  - (b) Estimates of the cost of financing and required return on capital (e.g. commercial lending rates and guarantees required for the country and the type of project activity concerned), based on bankers views and private equity investors/funds’ required return on comparable projects;
  - (c) A company internal benchmark (weighted average capital cost of the company) if there is only one potential project developer (e.g. when the project activity upgrades an existing process). The project developers shall demonstrate that this benchmark has been consistently used in the past, i.e. that project activities under similar conditions developed by the same company used the same benchmark.

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<sup>11</sup> For the investment comparison analysis, IRRs can be calculated either as project IRRs or as equity IRRs. Project IRRs calculate a return based on project cash outflows and cash inflows only, irrespective the source of financing. Equity IRRs calculate a return to equity investors and therefore also consider amount and costs of available debt financing. The decision to proceed with an investment is based on returns to the investors, so equity IRR will be more appropriate in many cases. However, there will also be cases where a project IRR may be appropriate.

<sup>12</sup> For the benchmark analysis, the IRR shall be calculated as project IRR. If there is only one potential project developer (e.g. when the project activity upgrades an existing process), the IRR shall be calculated as equity IRR.



***Sub-step 2c. Calculation and comparison of financial indicators (only applicable to options II and III):***

5. Calculate the suitable financial indicator for the proposed CDM project activity and, in the case of Option II above, for the other alternatives. Include all relevant costs (including, for example, the investment cost, the operations and maintenance costs), and revenues (excluding CER revenues, but including subsidies/fiscal incentives<sup>13</sup>, ODA, etc, where applicable), and, as appropriate, non-market cost and benefits in the case of public investors.
6. Present the investment analysis in a transparent manner and provide all the relevant assumptions, preferably in the CDM-PDD, or in separate annexes to the PDD, so that a reader can reproduce the analysis and obtain the same results. Refer to all clearly present critical techno-economic parameters and assumptions (such as capital costs, fuel prices, lifetimes, and discount rate or cost of capital). Justify and/or cite assumptions in a manner that can be validated by the DOE. In calculating the financial indicator, the project's risks can be included through the cash flow pattern, subject to project-specific expectations and assumptions (e.g. insurance premiums can be used in the calculation to reflect specific risk equivalents).
7. Assumptions and input data for the investment analysis shall not differ across the project activity and its alternatives, unless differences can be well substantiated.
8. Present in the CDM-PDD submitted for validation a clear comparison of the financial indicator for the proposed CDM activity and:
  - (a) The alternatives, if Option II (investment comparison analysis) is used. If one of the other alternatives has the best indicator (e.g. highest IRR), then the CDM project activity can not be considered as the most financially attractive;
  - (b) The financial benchmark, if Option III (benchmark analysis) is used. If the CDM project activity has a less favourable indicator (e.g. lower IRR) than the benchmark, then the CDM project activity cannot be considered as financially attractive.

***Sub-step 2d. Sensitivity analysis (only applicable to options II and III):***

9. Include a sensitivity analysis that shows whether the conclusion regarding the financial attractiveness is robust to reasonable variations in the critical assumptions. The investment analysis provides a valid argument in favour of additionality only if it consistently supports (for a realistic range of assumptions) the conclusion that the project activity is unlikely to be the most financially attractive (as per step 2c para 8a) or is unlikely to be financially attractive (as per step 2c para 8b).

***“If after the sensitivity analysis it is concluded that the proposed CDM project activity is unlikely to be the most financially attractive (as per step 2c para 8a) or is unlikely to be***

<sup>13</sup> This provision may be further elaborated depending on deliberations by the Board on national and sectoral policies.





*financially attractive (as per step 2c para 8b), then proceed to Step 3 (Barrier analysis) or Step 4 (Common practice analysis).*

*“Otherwise, unless barrier analysis below is undertaken and indicates that the proposed project activity faces barriers that do not prevent the baseline scenario(s) from occurring, the project activity is considered not additional.*

### Step 3. Barrier analysis

If this step is used, determine whether the proposed project activity faces barriers that:

- (c) Prevent the implementation of this type of proposed project activity; and
- (d) Do not prevent the implementation of at least one of the alternatives.

Use the following sub-steps:

**Sub-step 3a. Identify barriers that would prevent the implementation of ~~type of~~ the proposed CDM project activity:**

1. Establish that there are **realistic and credible** barriers that would prevent the implementation of the ~~type of~~ proposed project activity from being carried out if the project activity was not registered as a CDM activity. Such **realistic and credible** barriers may include, among others:
  - Investment barriers, other than the economic/financial barriers in Step 2 above, *inter alia*:
    - **For alternatives undertaken and operated by private entities: Similar activities have only been implemented with grants or other non-commercial finance terms. Similar activities are defined as activities that rely on a broadly similar technology or practices, are of a similar scale, take place in a comparable environment with respect to regulatory framework and are undertaken in the relevant geographical area, as defined in sub-step 1a above.**
    - ~~Debt funding is not available for this type of innovative project activities.~~
    - No **private capital is available from access to domestic or** international capital markets due to real or perceived risks associated with **domestic or foreign direct investment** in the country where the **proposed CDM** project activity is to be implemented, **as demonstrated by the credit rating of the country or other country investments reports of reputed origin.**
  - Technological barriers, *inter alia*:
    - **Skilled and/or properly trained labour to operate and maintain the technology is not available in the relevant geographical area, which leads to an unacceptably high risk of and no education/training institution in the host country provides the needed skill, leading to equipment disrepair and malfunctioning or other underperformance;**
    - **Lack of infrastructure for implementation and logistics for maintenance** of the technology **(e.g. natural gas can not be used because of the lack of a gas**



- **transmission and distribution network).**
- **Risk of technological failure: the process/technology failure risk in the local circumstances is significantly greater than for other technologies that provide services or outputs comparable to those of the proposed CDM project activity, as demonstrated by relevant scientific literature or technology manufacturer information.**
- **The particular technology used in the proposed project activity is not available in the relevant geographical area.**
- Barriers due to prevailing practice, *inter alia*:
  - The project activity is the “first of its kind”: ~~No project activity of this type is currently operational in the host country or region.~~
- **Other barriers, preferably specified in the underlying methodology as examples.**

**Outcome of Step 3a: List of barriers that may prevent one or more alternative scenarios to occur.**

The identified barriers are only sufficient grounds for demonstration of additionality if they would prevent potential project proponents from carrying out the proposed project activity if it was not expected to be registered as a CDM activity.

***If the CDM does not alleviate the identified barriers that prevent the proposed project activity from occurring, then the project activity is not additional.***

***Sub-step 3 b. Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity):***

2. If the identified barriers also affect other alternatives, explain how they are affected less strongly than they affect the proposed CDM project activity. In other words, explain how the identified barriers are not preventing the implementation of at least one of the alternatives. Any alternative that would be prevented by the barriers identified in Sub-step 3a is not a viable alternative, and shall be eliminated from consideration. At least one viable alternative shall be identified.
3. **In applying sub-steps 3a and 3b, ~~Provide~~ provide** transparent and documented evidence, and offer conservative interpretations of this documented evidence, as to how it demonstrates the existence and significance of the identified barriers **and whether alternatives are prevented by these barriers.** Anecdotal evidence can be included, but alone is not sufficient proof of barriers. The type of evidence to be provided ~~should~~ ~~may~~ include **at least one of the following:**
  - (a) Relevant legislation, regulatory information or industry norms;
  - (b) Relevant (sectoral) studies or surveys (e.g. market surveys, technology studies, etc) undertaken by universities, research institutions, industry associations, companies, bilateral/multilateral institutions, etc;
  - (c) Relevant statistical data from national or international statistics;
  - (d) Documentation of relevant market data (e.g. market prices, tariffs, rules);



- (e) Written documentation from the company or institution developing or implementing the CDM project activity or the CDM project developer, such as minutes from Board meetings, correspondence, feasibility studies, financial or budgetary information, etc;
- (f) Documents prepared by the project developer, contractors or project partners in the context of the proposed project activity or similar previous project implementations;
- (g) Written documentation of independent expert judgments from industry, educational institutions (e.g. universities, technical schools, training centres), industry associations and others.

***Sub-step 3 b. Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity):***

***3.4. If the identified barriers also affect other alternatives, explain how they are affected less strongly than they affect the proposed CDM project activity. In other words, explain how the identified barriers are not preventing the implementation of at least one of the alternatives. Any alternative that would be prevented by the barriers identified in Sub-step 3a is not a viable alternative, and shall be eliminated from consideration. At least one viable alternative shall be identified.***

***“If both Sub-steps 3a – 3b are satisfied, proceed to Step 4 (Common practice analysis)”***

***“If one of the Sub-steps 3a – 3b is not satisfied, the project activity is not additional”.***

#### **Step 4. Common practice analysis**

The above generic additionality tests shall be complemented with an analysis of the extent to which the proposed project type (e.g. technology or practice) has already diffused in the relevant sector and region. This test is a **credibility check** to complement the investment analysis (Step 2) or barrier analysis (Step 3). Identify and discuss the existing common practice through the following sub-steps:

***Sub-step 4a. Analyze other activities similar to the proposed project activity:***

1. Provide an analysis of any other activities implemented previously or currently underway that are similar to the proposed project activity. Projects are considered similar if they are in the same country/region and/or rely on a broadly similar technology, are of a similar scale, and take place in a comparable environment with respect to regulatory framework, investment climate, access to technology, access to financing, etc **and are undertaken in the relevant geographical area, as defined in sub-step 1a above, subject to further elaboration by the project proponents in the CDM-PDD.** Other CDM project activities are not to be included in this analysis. Provide **documented evidence and, where relevant, quantitative information. On the basis of that analysis, describe whether and to which extent similar activities have already diffused in the relevant geographical area.** **quantitative information where relevant.**

***Sub-step 4b. Discuss any similar options that are occurring:***

2. If similar activities are widely observed and commonly carried out, it calls into question the claim that the proposed project activity is financially unattractive (as contended in Step 2) or



faces barriers (as contended in Step 3). Therefore, if similar activities are identified above, then it is necessary to demonstrate why the existence of these activities does not contradict the claim that the proposed project activity is financially unattractive or subject to barriers. This can be done by comparing the proposed project activity to the other similar activities, and pointing out and explaining essential distinctions between them that explain why the similar activities enjoyed certain benefits that rendered it financially attractive (e.g., subsidies or other financial flows) **and which the proposed project activity can not use** or did not face the barriers to which the proposed project activity is subject.

3. Essential distinctions may include a serious change in circumstances under which the proposed CDM project activity will be implemented when compared to circumstances under which similar projects were carried out. For example, new barriers may have arisen, or promotional policies may have ended, leading to a situation in which the proposed CDM project activity would not be implemented without the incentive provided by the CDM. The change must be fundamental and verifiable.

***“If Sub-steps 4a and 4b are satisfied, i.e. (i) similar activities cannot be observed or (ii) similar activities are observed, but essential distinctions between the project activity and similar activities can reasonably be explained, then the proposed project activity is additional please go to step 5 (Impact of CDM registration)”.***

***“If Sub-steps 4a and 4b are not satisfied, i.e. similar activities can be observed and essential distinctions between the project activity and similar activities cannot reasonably be explained, the proposed CDM project activity is not additional.”***

#### **Step 5. Impact of CDM registration**

**Explain how the approval and registration of the project activity as a CDM activity, and the attendant benefits and incentives derived from the project activity, will alleviate the economic and financial hurdles (Step 2) or other identified barriers (Step 3) and thus enable the project activity to be undertaken. The benefits and incentives can be of various types, such as:**

- Anthropogenic greenhouse gas emission reductions;
- The financial benefit of the revenue obtained by selling CERs;
- Attracting new players who are not exposed to the same barriers, or can accept a lower IRR (for instance because they have access to cheaper capital);
- Attracting new players who bring the capacity to implement a new technology, and
- Reducing inflation /exchange rate risk affecting expected revenues and attractiveness for investors.

***“If Step 5 is satisfied, the proposed CDM project activity is not the baseline scenario.”***

***“If Step 5 is not satisfied, the proposed CDM project activity is not additional.”***