Sixteenth Meeting of the CDM
Designated National Authorities Forum

Position of DNA Armenia with regard to the proposals of the CDM reform

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Bonn, Germany
13-14 November, 2014
DNA Position

Improve composition of the EB of the CDM

- We consider that there is no need to change current distinction between members and alternate members, given the active role of alternate members.

- There is a possibility to follow up open part of sessions by observers.

- Encourage Parties to make the process for nomination of Board members more transparent.

- The nominations should be in fully accordance with the requirements for competence - diversity of expertise so that the Board can competently perform its functions.

- Limit total length of services at a maximum to 3 terms of 2 years, or a total of 6 years, for any person.
DNA Position

Reform additionality demonstration requirements

- We consider that with the current CER prices the additionality demonstration on the base of financial flows is difficult, however this is the most key factor for additionality.

- With the current transaction costs to start CDM project or monitor and verify the CERs is not feasible from purely financial perspective.

- It is obvious that certain project types are additional without word and there is a merit to define conditions to exclude/simplify additionality test for that projects.
DNA Position

Clarify the role of DNA

- Further elaborate the role of the DNAs, prior to project registration as well as during project implementation.

- Elaborate key principles for DNA withdrawing or suspending letters of approval.

- With current CER prices the DNA possibility to support and promote the CDM concept/project is a real challenge.

- Support DNA in understanding how to support CDM projects which are registered but are not following monitoring plan or are stacked in implementation: how they can be transferred/transformed to other market mechanisms, or revitalized as NAMA.
DNA Position

Improve the CDM’s contribution to sustainable development

- The minimum universal standards on sustainability and “no harm” requirements that each CDM project has to meet is a disputable issue.
- The DNAs can include in Letter of Approval conditionality to withdraw the Letter in case if CDM project doesn’t meet sustainable development criteria, this will strengthen the role of host country in guaranteeing sustainable development
- Support DNAs upon request on applying the SD tool.
DNA Position

Improve the CDM’s contribution to sustainable development

- There is no legal framework for mandatory requirement on monitoring, reporting and verification of sustainability benefits during the entire project cycle – DNA don’t have capacity, DOE is not responsible???

- Mandatory monitoring, reporting / verification / or assessment during the project cycle could invoke additional cost and burden to the project participant.
DNA Position

Strengthen Civil Society Participation in the CDM process

- Develop clear rules describing how to undertake the local stakeholder consultation process, i.e., location, scope, contents, frequency, and timeline of public consultation meetings.
- Strengthen and clarify the requirements for stakeholder involvement.
- No means for civil society to raise concerns once a project is registered even if adverse impacts occur during project implementation.
DNA Position

Set-up a Grievance Mechanism

- Develop and appeal procedure against DOE.
- Ensure that the appeals procedure is swiftly implemented and provides for broad legal standing.
THANK YOU

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