

I.

## Comments on the draft CDM Validation and Verification Manual

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**Axel Michaelowa**

Tel. +41 433550073

Mobile: +41 762324004

michaelowa@perspectives.cc

**perspectives GmbH**

Büro Zürich

Im Tobelacker 23

8044 Gockhausen, Switzerland

info@perspectives.cc

## I General assessment

The VVM is an important step in enhancing the credibility and consistency of validation and verification. It will thereby reduce the need for the RIT, the UNFCCC Secretariat and the EB to request reviews and to review projects submitted for registration as well as requests for issuance. However, a few areas remain where the VVM could be clearer and more specific.

## II. Proposals for changes in the VVM draft

- Para 42: add sub-para (g): “Identify tampered or faked documentation”. In the past, DOEs have tended to accept all documentation provided by project developers, even if there were clear indications that documentation was fake or had been tampered with.
- Para 50, (b), (i): “as applicable” should be deleted, as the current wording might give the impression that stakeholders are not generally to be interviewed.
- Para 67, first line: substitute “may” by “shall”. As so far DOEs have tended to dismiss public comments, it is paramount that they have to interact with the stakeholder who submitted the comment.
- Para 133: add new sub-para between (a) and (b): “Check consistency of all parameters in the PDD with the feasibility studies or detailed project reports previously written by the project developer for this project. In case of differences between the PDD and the feasibility studies / detailed project reports assess which parameters are more realistic”. This proposal is due to the observation that

frequently project developers report much more positive financial parameters of the project in feasibility studies / detailed project reports submitted to local regulatory authorities or financial institutions than in the PDD.

- Para 137 (b), first sentence: Delete “or”. Given the past negative experience with validator assessments of barriers, it is crucial that validators have to do interviews for determination of barriers.
- Para 140 (a): Delete part of sentence “... for certain technologies ... global”. Add sentence “Normally, the entire host country should be the relevant region. If a region smaller than the entire host country is chosen, DOEs have to provide an explanation why the smaller region is more appropriate”. This suggestion is made because in the past, artificially small regions were chosen by project developers to exclude regions where the technology was already common practice.
- Para 140 (c): Add sentence “Widely observed means that the technology used by the CDM project is used by projects making up more than 5% of the region’s capacity addition of the last five years before the project start to produce the good/service provided by the CDM project”. This suggestion is made because DOEs have in the past used strongly differing interpretations of “widely observed”.
- Para 149, first sentence: delete “or”. Stakeholders have to be interviewed; a document review is clearly insufficient!