

Comments to the CDM Validation and Verification Manual

1.

In my personal opinion DNAs should abstain from giving letters of approval indicating that they are only valid for a specific version of PDD. DNAs should take full responsibility of their assessment of the sustainable development contribution of each project activity and issue such a letter only once they are clear about it. It does not make sense that LoA states that PDD version 3 contributes to sustainable development and PDD version 4, implicitly, will not. Contribution to sustainable development is an aspect that, in principle, does not change and DNAs may want to clarify this aspect in full issuing only one single letter.

2.

On the other hand, this Manual is a very useful tool for DOEs and allows them for a better assessment of projects that pretend registration and carbon credits issuance under the Clean Development Mechanism (CDM). Nevertheless, it seems like all responsibility for the improvement of quality of CDM projects is being put on DOEs shoulders.

It is important to notice that the quality of the projects does not depend only on DOEs but especially on Project Participants. They better the input is, the better the output will be. As long as DOEs continue receiving low quality projects, e.g. projects with a evident doubtful additionality and/or inconsistent data, the whole CDM system will not improve as expected. The responsibility of having high quality projects at the end of the pipeline should be shared among DOEs, DNAs and project proponents. At present DOEs spend a lot of time, effort and resources dealing with low quality projects. We need to find the way to encourage project proponents to submit better quality projects.

Please note that this is a personal opinion and do not represent those of any Company.