

## **Call for inputs on simplified modalities for demonstrating additionality of small scale renewable energy and energy efficiency project activities**

Submission by  
Atmosfair and WECF – Women in Europe for a Common Future,  
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atmosfair is a non-profit CDM implementing organization with the highest environmental and climate protection standards regarding emissions calculation, project selection and funds allocation, see [atmosfair.de](http://atmosfair.de)  
WECF is an international network of women, environmental and health organisations, implementing projects in 40 countries and advocating globally for a healthy environment for all, see [wecf.eu](http://wecf.eu)

Dear Members of the Executive Board,

We refer to the call for inputs inviting suggestions for establishment of simplified modalities for demonstrating additionality for project activities up to 5 megawatts that employ renewable energy as their primary technology and for energy efficiency project activities that aim to achieve energy savings at a scale of no more than 20 gigawatt hours per year.

Please find our suggestions below.

Best regards,

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## **1.) Demonstration of additionality for project activities up to 5 megawatts that employ renewable energy**

A CDM project activity up to 5 megawatts that employs renewable energy as their primary technology is additional, if at least one of the following conditions is satisfied at time CDM was first considered (submission of prior consideration form):

- a) Geographical Location: The project activity is located in a Least Developed Country

*Justification: Renewable energy projects below 5 MW have difficulties to attract finance due to their small size and high investment risks. Generally, investments in LDC's are very limited.*

- b) Market share: Without the project activity, the total installed capacity of the project category (wind, small hydro, solar thermal, PV, biomass, geothermal) up to 5 MW is below 1% in terms of installed capacity in the country or the grid to which the renewable energy technology is connected

*Justification: If the market share of the project category is below 1%, investments are not business as usual. The renewable energy technology is among the first of its kind to be deployed and project proponents are pioneering the technology in the country.*

- c) Beneficiaries: Direct Beneficiaries of the project activity are households or communities (examples: community based village electrification/ irrigation projects, domestic biogas projects, solar cookers)

*Justification: Households and poor communities in developing and emerging countries have hardly been able to access funding via the Clean Development Mechanism (CDM), despite the large potential to reduce emissions. Currently, less than 2% of all registered projects are household energy projects.*

- d) Country Positive Lists: The host country DNA considers the technology of the project activity to be additional in accordance with the Kyoto Protocol, and approved by the EB. Positive Lists are revised and re-approved every two years.

*Justification: Host Country DNAs know best which technologies are not business as usual in their countries and need additional finance through CDM. Approval from EB guarantees environmental integrity of the positive lists.*

## **2.) Demonstration of additionality for project activities activity that aims to achieve energy savings at a scale of no more than 20 gigawatt hours per year**

A CDM project activity that aims to achieve energy savings at a scale of no more than 20 gigawatt hours per year is additional, if at least one of the following conditions is satisfied at time CDM was first considered (submission of prior consideration form):

- e) Geographical Location: The project activity is located in a Least Developed Country

*Justification: Markets for energy-efficient technology are not yet developed in LDCs.*

- f) Penetration rate: Without the project activity, total penetration of the project technology is below 5% in the country or the target area

*Justification: If the penetration rate of the project technology is below 5%, the technology is not business as usual. The energy efficient technology is among the first of its kind to be deployed and project proponents are pioneering the technology in the country.*

- g) Beneficiaries: Direct Beneficiaries of the project activity are households or communities (examples: efficient cook stoves, community based village irrigation projects, home insulation, CFL's)

*Justification: Households and poor communities in developing and emerging countries have hardly been able to access funding via the Clean Development Mechanism (CDM), despite the large potential to reduce emissions. Currently, less than 2% of all registered projects are household energy projects.*

- h) Country Positive Lists: The host country DNA considers the technology of the project activity to be additional in accordance with the Kyoto Protocol, and approved by the EB. Positive Lists are revised and re-approved every two years.

*Justification: Host Country DNAs know best which technologies are not business as usual in their countries and need additional finance through CDM. Approval from EB guarantees environmental integrity of the positive lists.*