

**Comment 1:**

There is required a preamble for why this tool is required in the first place when we have an existing tools for baseline and Additionality, what barrier it is believed to remove this time and any case specific example of previous project submissions that were not screened or unnecessarily hindered because of absence of such tool. Would this new tool automatically displace the existing tools for that part of baseline identification wherever a certain chosen existing methodology is used hereafter?

**Comment 2:**

As this would be the first tool that ever existed in addressing chronic CDM baseline issue in projects with multiple components under them, it is highly commendable though much delayed. **This tool seems also potentially the first baseline tool that may help participants to benchmark the allegedly existing high level of inconsistency and subjectivity of the decisions of bodies of the executive board in their evaluation of methodological submissions or projects. However the proposed tool still needs adjustment to enhance clarity and comprehensiveness to address more matters.**

On the transparency and accountability side, what would the fate of already registered projects without using this tool or loss of opportunities from non registration due to absence of such tool be? In other words would this tool apply retroactively? Or how would the concern of environmental integrity is addressed when already generating CERs without applying the approach of this tool? And who would be responsible for compensating either incurred loss of environmental integrity or loss of emissions reduction opportunity?

We believe a procedure should in parallel be instituted to determine accountability in the case of ill decision by members and bodies of EB related to such matters, similar t what was **done** for DOEs in the 58<sup>th</sup> meeting of the board. Such accountability procedure will save project participants from harms of inconsistent EB decision pattern, save huge public money spent for payment of board or meth members on repetitive “methodology approval or tool development”, in most cases for undoing their past mistakes or past decisions made for another project. Such procedure is surely necessary when it is known that board or meth members are openly allowed to engage one way or another in CDM projects themselves only by writing few lines of “statement of conflict of interest” and when it is not possible to check whether or not their CDM project involvement was a result from leverages they potentially are able to take as decision makers (virtually or actually) under different bodies of the board. “Scratch my back and I will scratch yours” seems also straightforward in a small constituency like board or panel or combined. Such position and CDM involvement potentially and might already be resulting in decision inconsistencies and highly subjective engagements so far. Without such accountability procedure, this same tool and others would definitely come again to table for modification, may be just from a personal interest of either of a member or to lock or unlock specific statement(s) of interest when needed in a tool or methodology.