

Dear Sir/Madam,

To respond the public inputs requests on First-of-its-Kind and common practice, I would propose a simplified approach in additionality analysis.

Based on past experience, there are lots of disputes on definition of first-of-its kind which is considered as a tremendous barrier for project implementation. On the other hand, common practice analysis is a compulsory step to demonstrate additionality for large scale projects whilst in most of case difference cannot be substantiated in comparison with non CDM projects.

Common practice analysis shall be taken as the first step in both [Tool for the demonstration and assessment of additionality](#) and [Combined tool to identify the baseline scenario and demonstrate additionality](#). If the technology application reaches more than 50% in host country, the project is considered not additional accordingly. First-of-its-Kind shall be removed as an individual barrier. New technology is taken as an alternative scenario in baseline identification, following current procedure included in the Tool by comparing results of the suitable financial indicator.

Sincerely,

Caiyang Wu