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Ihr Zeichen

Ihre Nachricht vom

Unser Zeichen
Bo/Sa

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Comment on draft for methodological tool for waste methane emissions Nr 6

Dear Secretariat,

BVEK has addressed the dire situation of waste management in the CDM on a number of occasions and raised the issue during a direct dialogue with the Executive Secretary Mrs. Figueres.

We were under the impression that the Secretariat and Methodology Panel received the mandate from the Board to improve the situation for waste management projects under the CDM, which currently suffer from a zero success rate despite the multitude of attempted project activities.

The introduction of modern and ecological waste management should be able to make a major contribution to clean development in many countries. The large GHG reductions potential that these type of activities provide and the additional revenue that should be generated from the sales of CERs would be sufficient to enable communities to manage their waste disposal and the related environmental impact even where public funds are not available to introduce clean and efficient waste disposal services.

Unfortunately the current draft does not provide any substantial improvement, but in contrast even introduces new hurdles to potential project activities

Waste management projects have high upfront investment cost as well as high operational costs. All this projects depend on regular income. The current multiphase approach that delays CER issuance by several years does factually prevent these type of projects that are in need of the CER income to be more readily accessible in most CDM host countries.

This problem is only magnified by the fact that not a single waste management project applying AM25 was ever able to receive CER, therefore CDM investor shy away from these type of projects and it is not possible to secure financing through upfront sales of CERs.

Therefore the current tool as well as the proposed update does not provide the necessary framework to make waste management projects feasible.

Vorstand: Alexander Sarac (Vorsitzender), Dietrich Borst (stellv. Vorsitzender), Stephan Schunkert (stellv. Vorsitzender)
Patrick Bahlert (Kassenwart), Michael Kroehnert

We wish to invite the Secretariat and Methodology Panel to explain why comments and requests regarding the postponement of CER issuance from stakeholders, experts (including lead reviewers) and specialized institutes seem to have been incorporated in the latest work and the well-known shortcoming of the current approach could not have been addressed.

Sincerely Yours

The Board

(Dietrich Borst-Leiter der Geschäftsstelle)