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“Guidelines for demonstrating additionality of renewable energy projects =<5 MW and energy efficiency projects with energy savings <= 20 GWh per year“

Input to the Public Call from 18 February to 8 March 2011

We welcome the opportunity to express our views concerning the application of the “Guidelines for demonstrating additionality of renewable energy projects =<5 MW and energy efficiency projects with energy savings <= 20 GWh per year” (“Guidelines”) and would like to give an input specifically to the following issues:

1. Expansion to Type III projects:

Comparing existing methodologies of Type I for renewable energy project activities and Type II and III, you find a much larger number and diversity of measures within the methodologies of Type III. Therefore, we are of the opinion that Type III projects should not generally be included in the Guidelines, but that an assessment should be conducted, whether micro-scale project activities are technologically feasible and whether there is a high probability, that they would also be additional. This assessment could be carried out either for each methodology or at least clusters of methodologies pertaining to one sector. The criteria for demonstrating additionality should then be formulated on the basis of this assessment.

2. Application to programme of activities (PoAs) and bundled projects:

Although the PoA-pipeline now comprises 80 programmes (according to the UNEP-Risoe-Pipeline of 1 March 2011), we do not expect that all of these will be registered or issue Certified Emission Reductions. Apart from similar experience with non-programmatic project activities so far, we consider the setting up and implementation of a PoA still to be a challenging task with many obstacles, although the EB has removed some of them by changing their guidance concerning PoA. Therefore, we deem it a necessary and logical step to allow the Guidelines to be used for the proof of the additionality of CPAs that meet the criteria stipulated therein. The same should also be true for

bundled projects. The criteria prescribed in the guidelines set a frame that ensures environmental integrity and enables the implementation of activities that would otherwise not have been carried out due to disproportionately high transaction costs.

Aside from our opinion concerning this matter we would like to draw your attention to the fact that an existing PoA uses the Guidelines for CPAs meeting the criteria prescribed in Section II Paragraph 2(c). This PoA, "Promotion of Biomass Based Heat Generation Systems in India", was registered on 12 January 2011 under the reference PoA 4041. This precedent in addition to the reasons and conditions mentioned above leads us to the recommendation to treat further PoAs requesting registration accordingly.

Yours sincerely

On behalf of the German DNA



Dr. Wolfgang Seidel