

The Executive Board, at its **fifty-ninth meeting**, agreed to open a call for public inputs on the **"Call for public inputs on the "Guidelines for demonstrating additionality of renewable energy projects =<5 MW and energy efficiency projects with energy savings <=20 GWh per year" (EB 54, annex 15)** to facilitate the work on the revision and broadening of these guidelines.

Specific issues to be covered include, but are not limited to:

1. Expansion to Type III projects;
2. Application to programme of activities (PoAs) and bundled projects;
3. Appropriateness of the unit thresholds (e.g.750 kW);
4. Definition of communities and primary technologies;
5. Application of the criteria implied in paragraph 2 (d) of the referred guidelines **(EB 54, annex 15)** for the host country DNAs and the Board to determine specific renewable energy technologies to be additional in the host country.

The Executive Board requested the Small Scale Working Group (SSC WG). that, at its thirtieth meeting, it shall make a recommendation for the revision and broadening of the above mentioned guidelines taking into account the public inputs for the consideration of the Board at its sixtieth meeting.

Regarding the call for inputs on the guidelines for demonstrating additionality of renewable energy projects =< 5MW and energy efficiency projects with energy saving <= 20 GWh per year, I have the following moot points.

1. Expansion to Type III projects: This guideline can be easily expanded to include measures under the Type III projects, with an upper limit of 20,000 CERs per year. Number of methodologies categorised under the Type III projects is higher thus including these into this Guidelines would encourage such measures and reduce the unaccounted emissions which could have been prevented little effort and reasonable investment.
2. For the assessment of the para 2(d) of the guidelines, the criteria used should be based mostly on the sustainable development indices instead of a purely financial criteria. The technologies that lead to a higher level of sustainable development should be treated as additional. As Sustainable development is only an abstract term and cannot be compared between two regions/technologies. It becomes pragmatic to define a certain methodology for converting the abstract term into a mathematical equation whose result would give us explicit values which can be easily compared between regions/technologies. The sustainable development measures will make projects in different regions/countries comparable. So, some technologies will have a greater impact in some countries while little or no impact in others. This will help in promoting CDM to many more countries and promoting diversity in technologies and countries.

For Example: The penetration of solar lanterns/LED lighting system in the rural areas of a country. Here as the cost for these inputs is high, the poor rural people cannot afford it. Also, due to high costs involved and the ever rising risk of PDD registration and CER issuance, there is reluctance among the manufacturers/suppliers to provide these at a discounted price. It is very clear that the project is non additional considering the cost of the baseline energy source – the grid but the impact of the technology is tremendous in the form of sustainable development. So if we can quantify the level of sustainable development provided by each technology and a comparison is done on purely sustainable development measures then such technologies will get an obvious boost as it will reduce the costs involved in the CDM process and reduce the risks associated with it too.

Only the technologies that meet a certain level of sustainable development should be allowed by the DNA and EB to be part of this guideline. There is a possibility of building upon the existing “do not harm” assessment and the Sustainability Matrix used under the Gold Standard projects. These can be modified and adjusted to suit the CDM process. This procedure will be used only by the local DNA and EB to select which technologies should be categorised under Auto additionality. Once the technologies have been selected, the PPs will not be required to demonstrate these parameters and would be eligible for the Auto additionality.

3. It should also be elaborated as to which past documents are to be referred when assessing the special underdeveloped zone identified by the government of the host country. Development is a relative term, thus an area when compared to the most developed region may be termed as underdeveloped while

when compared to least developed region can be termed as developed. These disparities become exceedingly important when the comparison is made among countries. This not only creates a confusion regarding which documents to be referred to check the development of the region but also creates a disparity/bias among regions.

For example: A region in country X is the most underdeveloped region of the country, this might be much more developed than most parts of country Y. So instead of giving benefit to only country Y (less developed country) it is shared among both the countries even if country X did not require it. This goes against the objective of diversification of countries.

4. In reference to Para 2(b) of the guidelines, Captive power consumption in regions of low grid availability (off-grid) should also be allowed to be part of this guideline. As any small/ medium size industry that exists in the region would be in the baseline import carbon intensive energy sources which would further increase the emissions due to the transportation. Including these into guideline will have a twofold benefit. Firstly, the energy sources are replaced from carbon intensive energy source to a cleaner energy source. Secondly, it will also encourage more industries in those regions thus improving employment and sustainable development.