

25th July 2012

Response to the call for public input launched by the CDM EB in its 68th Meeting on the
CDM sustainable development (SD) tool

Call for public input open 23 July 2011 until 10 August 2012 (24:00 GMT)

The Climate Concept Foundation is an environmental charity pursuing, amongst other aims, to promote the ecologic integrity of climate policy instruments such as the CDM.

In light of Art. 12 para 2 KP, efforts to improve the CDM's contributions to sustainable development in the host country are to be welcomed: the aim of the CDM is not only to assist Annex-1 parties in complying with their quantified emission limitation and reduction targets, but also to promote sustainable development in the project-hosting Non-Annex-1 country.

We generally believe that host country DNA's should be encouraged to enforce meaningful and adequate sustainable development criteria on CDM projects developed on their soil. Being familiar with the local context, a DNA can make a balanced judgment on whether a project renders an adequate contribution to sustainable development or not.

A centralized approach by the UNFCCC Secretariat should therefore primarily be aimed at enabling host country DNAs to assess CDM projects during the validation stage. At that time, DNAs can make their approval of the project – i.e. granting a letter of approval needed for the project's registration – dependent on the compliance with the nationally appropriate SD criteria for CDM projects.

In consequence, the evaluation of proposed CDM projects by project proponents by means of the SD tool shall be subject to formal acceptance by the DNA.

Some further questions / comments are

- In questions 5 to 16, one of the answering options is "not relevant"; it should be further explained what this answer means to say. It is unclear in what way this answer is different from



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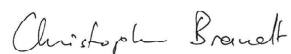
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answering “no”. Possibly, project proponents should explain further, why they believe that the respective parameter is not relevant in the context of the proposed project activity.

- Regarding question 25, we believe that a CDM project must meet certain SD standards in order to comply with Art. 12 para 2 KP. Therefore, the SD contribution must be part of the validation audit and must be also be verified in the subsequent regular verification audits. Any project proponent’s answer to this question therefore must be “yes”. However, it remains unclear what consequences arise if a CDM project is found not to comply with SD criteria after the DNA issued its Letter of Approval for the activity in question. The clarification of this question should be taken into view by the CDM EB.

Most sincerely,



(Christopher Brandt)



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