

Please note that the template for input to the standards has been merged into one document as the interface did not allow for submitting 3 separate documents. Thanks.

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Date: 19/10/2012 _ the following refers to the VVS

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#	Para No./ Annex / Figure / Table	Line Number	Type of input ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
	10b		ge	The current text is at odds with the text in the Project Standard (PS) and should be brought into line. We suggested that the PS version should read as shown on the right	should” is used for a recommended, but not mandatory, means for meeting a requirement.	
	34		ge	The VVS should recognize the requirement in paragraph 20 of PCP to check the authenticity of the stakeholders who submit comments on the PDD, and should take account of whether comments are project-specific or not.	The DOE shall acknowledge receipt of and take in to account all bone fide comments on the PDD of the proposed project activity submitted by authenticated stakeholders in accordance with the Project cycle procedure.	
	35		ge	The global stakeholder consultation is only open for a limited period. Therefore, the DOE shall take into account the comments received in this period. And this needs to be in line with para 20 of the PCP/para 36 VVS, and whether these comments are project specific.	Delete this para.	

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	36		ge	<p>With the recent influx of bogus comments from sources not even related to the project activity in question but intended to consume DOE time and clog up the process, DOEs should be given the latitude to ignore such comments and focus on those that are relevant.</p> <p>From our experience, this is not clear enough to all validators. PPs are regularly demanded to respond to spam comments rather than the DOE requesting authentication (which would prove the comment is spam, and thus should be deleted) or clarification (which would prove the comment is non-project specific, and should thus be ignored).</p> <p>We believe a blacklist of spammers would be useful to all DOEs and the secretariat to reduce time wasted for all.</p>	<p>If comments are not sufficiently substantiated or if they indicate that the proposed project activity does not comply with the CDM requirements, then the DOE shall have the option to request further clarification from the entity providing the comment. However, the DOE is not required to enter into dialogue with Parties, stakeholders, NGOs, or unauthentic individuals/organizations that comment on the CDM requirements. If no additional information or substantiation is provided in response to a request for clarification, the DOE shall proceed to assess the comments as originally provided.</p>	
	37		ge	See above comment on para 36.	The DOE shall report the details of the actions taken, if any, to take due account of the comments received during the validation process	
	54		ge	Any one of the options should be sufficient to verify credentials so “or” is needed.	(a) Directly checking evidence for corporate, personal identity and other relevant documentation, or	
	60 (a)		ge	With frequent updates of forms and other documents, it is unreasonable to demand that PPs continuously update the MOC during validation. The form should be the latest version at the time of submission to the DOE. In fact, given the time it takes to sign forms, there should be at least 8 weeks grace.	“(a) The latest version of the form for the “Modalities of communication statement” (F-CDM-MOC) <u>at the time of submission to the DOE, and applying 8 weeks grace period,</u> has been used”	

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	62	Footnote 5	ge	We have compared the each set of PDD templates: PDD and SSC-PDD, AR-PDD and SSC-AR-PDD, and POA-DD & CPA-DD and SSC-POA-DD & SSC-CPA-DD. There are only three difference between each set of large and small scale versions (and in some cases some minor editorial differences): (1) the small scale templates includes a section to describe “debundling”, which is not applicable for large scale; (2) the large scale templates include a full table of greenhouse gases, which is not given in the small scale versions, but the gases still need to be given even if not in the specified table; and (3) the large scale templates include a section to describe conclusions and references to the environmental impact assessment if required, which is not required for small scale. These three differences do not justify having different templates and guidelines for their completion The simplifications for small scale activities, which are still required to reduce transaction costs, are primarily reflected in the small-scale methodologies and related procedures, not in the PDD template or PDD completion guidelines. Therefore, we would like to propose to simplify the procedures and merge the respective templates and guidelines.	Simplify the procedures and merge the respective templates and guidelines.	

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	98		ge	Bring into line with the principles in the PS	The DOE shall verify the justification given in the PDD for the choice of data and parameters used in the equations. If data and parameters will not be monitored throughout the crediting period of the proposed CDM project activity but have already been determined and will remain fixed throughout the crediting period, the DOE shall assess that all data sources and assumptions are appropriate and calculations are correct, applicable to the proposed CDM project activity and will result in an accurate, and failing that, conservative estimate of emission reductions. If data and parameters will be monitored or estimated on implementation and hence become available only after validation of the project activity, the DOE shall confirm that the estimates provided in the PDD for these data and parameters are reasonable	
	107		ge	The requirements for prior consideration are very clear. However, it may be even clearer if the description also states that all the requirements of para 108 and 109 are <i>not</i> required. DOEs almost always demand evidence of compliance with these inapplicable requirements too.	“107. For a project activity with a start date on or after 2 August 2008, for which a PDD has not been published for global stakeholder consultation or a new methodology has not been proposed to the Board before the project activity start date, the DOE shall confirm by referring to the list of prior consideration notifications from the UNFCCC website and communication between the project proponent, the secretariat and the host Party DNA regarding the commencement of a new project activity. ¹¹ If such notification has not been provided by the project participants within 180 days of the project activity start date, the DOE shall determine that the CDM was not seriously considered in the decision to implement the project activity. The requirements of para 108 and 109 do not apply for such project activities. ”	

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	108 (a) 108 (b)		te	make it explicit that emails are an acceptable form of documentation.	108 (a) “... and/or notes and emails related to the consideration...” 108 (b) “...term sheets, ERPAs and other documentation, including emails, related to ...”	
	126 (a)		ge	If the DOE can reject barriers on the basis of its own sectoral or local expertise then it should also be able to approve them.	“... The DOE shall determine whether the existence of barriers is substantiated by independent sources of data such as relevant national legislation, surveys of local conditions and national or international statistics, or its sectoral or local expertise.	
	129 130		ge	The validation requirement described relates to para 44-46 of the Additionality Tool but not to para 47. However, almost all projects have to apply para 47!		
	132 (b)		ed	Bring into line with the PS	The monitoring arrangements described in the description of the monitoring plan are feasible within the project design;	
	133b		ed	Bring into line with the PS	Describe the steps undertaken to assess whether the monitoring arrangements in the description of the monitoring plan are feasible within the project design;	
	160		ge	The upper limits for microscale do not include the language (or the appropriate equivalent).	“160. In the case of Type I project activities up to 5 MW (or the appropriate equivalent) that employ renewable energy as their primary technology, Type II energy efficiency project activities that aim to achieve energy savings at a scale of no more than 20 GWh per year (or the appropriate equivalent), and Type III project activities that aim to achieve emissions reductions at a scale of no more than 20 ktCO ₂ e per year, the DOE shall assess the relevant criteria to establish the automatic additionality for these projects.” ²⁵	
	193		ge	To clarify that local stakeholder consultation can be undertaken before submission of documents. Add following the requirement or as a footnote.	The DOE shall confirm that the start date of any CPA is not prior to the commencement of the validation of the PoA, which is the date the CDM-POA-DD is first published for global stakeholder consultation. For the purposes of this requirement, local stakeholder consultation is not an indication of the start of the process.	

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	212(a)		ge	The registered PDD contains the description of the MP, so no need to specify it, otherwise it must refer to the description of the MP	The registered PDD including any approved revisions or changes to the registered PDD	
	216		ge	This paragraph relates to paragraphs [214] and [215] in the Project Standard which requires that DOEs make adjustments to, and certify ERs on the basis of unverifiable data (such as the assumption that a project source is operating at 100% capacity). We have proposed deleting paragraphs [214] and [215] in the PS and replacing them with an alternative approach. Please see our comments on the PS as well. The expectation that every CER can be verified is not realistic. 217 b) vii) acknowledges the existence of procedures to correct any errors or omissions in the reported monitoring parameters. We recommend that this clause is deleted.	Delete 216: The DOE shall only certify emission reductions that are based upon verifiable evidence	
	217			to make it explicitly clear that the full (vs. description) Monitoring Plan is contained in section D of the relevant Monitoring Report.	217(a)(ii) A review of the monitoring plan provided in the Monitoring Report and monitoring methodology, including applicable tools, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures; 217(b)(iii) Interviews with relevant personnel to confirm that the operational and data collection procedures are implemented in accordance with the monitoring plan in [section D] of the monitoring report; 217(b)(v) A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the PDD, the monitoring plan provided in the Monitoring Report, and the selected methodology and corresponding tool(s), where applicable;	

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	217(b)(vi i)			How are DOEs expected to decide whether or not any such procedures are acceptable?	An identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters	
	225 (a)			“all physical features” – this is back to 2 cm increase in the size of the flange. Para [29d] in the PS describes the requirements for the technology and we should be consistent	Determine whether the project activity has been implemented and operated as per the registered PDD or any approved revised PDD, and that all physical features of the project, relevant to the technology, scale and type, demonstration of additionality, application of the selected methodology and the calculation of GHG emission reductions or net GHG removals, are in place;	
	225 (c)			there is no such thing as an approved monitoring plan. Delete “or any revised monitoring plan”	Determine whether actual monitoring systems and procedures comply with the monitoring systems and procedures described in the monitoring plan or any revised approved monitoring plan , and the approved methodology including applicable tool(s);	
	226 (a)			f the description of the Monitoring Plan in the PDD complies with the monitoring methodology and the Monitoring Plan in section D of the Monitoring Report complies with the monitoring methodology, then it follows that the Monitoring Plan will comply with the registered PDD or any revision thereof.		
	227			same as 226 (a)		
	229		ed		The DOE shall verify that the monitoring plan in the Monitoring Report of the project activity is in accordance with the applied methodology including applicable tool(s).	
	230			This paragraph falls under the heading “Compliance of the MP with the MM including applicable tool(s)” and should be limited to discussions on the MP, not other areas of the registered PDD.	The DOE shall confirm that the implementation of the Monitoring Plan in the Monitoring Report is in accordance with the provisions of the monitoring methodology, and that any deviations or changes are in accordance with the provisions of section 12.8.4 of the project standard.	

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	231			This wording has led DOEs to request revisions of the monitoring plan that had no significant impact on accuracy or completeness of the monitoring plan.	For monitoring aspects that are not specified in the methodology, particularly in the case of small-scale methodologies (e.g. additional monitoring parameters, monitoring frequency and calibration frequency), the DOE should bring to the attention of the Board issues which may significantly enhance the level of accuracy and completeness of the monitoring plan	
	232			not needed.	delete “or an approved revised PDD”	
	233-236			there is no such thing as a registered monitoring plan. This complete section should be deleted. The DOE only needs to verify that the monitoring plan submitted in the monitoring report complies with the methodology and this has already been done under 9.4.2 above.	Section 9.4.3 , paras 233 to 236	
	243				The DOE shall report whether the calibration is conducted at the frequency as specified by the methodology or the monitoring plan in the monitoring report.	

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	245			<p>This text would bring this section into line with the proposed text in the Project Standard. failing this approach, we request that a definition of “most conservative assumption theoretically possible” be included in the guidance or training as some DOEs, in order to take no risk and be overly conservative, may interpret the most conservative assumption as ‘0’ or 100%. For example, consider the following scenario. During a short period within the monitoring period the continuous flow meter readings for gas towards the engine are missing (malfunctioning, ...). However operational records clearly indicate that the engine has been running and producing electricity during the period of the equipment malfunction. The missing data on the volume of gas, can in this case be (back) calculated on the basis of engine running hours and load. A correlation between running hours and gas consumed could be based upon historical data set (or data set after restoring event) to support the validity of replacement data. PPs feel that taking this action would be the “most conservative assumption theoretically possible” since proof is provided that engine had been running. However, DOEs may feel the most conservative approach would be to simply resort to assigning zero (0) gas for the period.</p>	<p>(a) A complete set of data for the specified monitoring period is available. If only partial data are available because activity levels or non-activity parameters have not been monitored in accordance with the registered monitoring plan, the DOE shall check that missing data have been interpolated in a conservative manner, and corroborate the estimates with alternative sources of information. If the aggregated value of all of the missing data in the monitoring report divided by the aggregated value of the project emissions, baseline emissions and leakage emissions in the monitoring report in question, exceeds the thresholds defined in the Project Standard, the DOE shall either raise a CAR for the project participants to make a more conservative assumption in finalizing the verification report, or raise a request for deviation prior to submitting the request for issuance, if appropriate;</p>	
	283			<p>Section F, para 283 and onwards, replace references to registered monitoring plan with monitoring plan in the monitoring report.</p>		

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	297			It would be useful to make it explicit that the additionality is not reassessed.	“297. When contracted by project participants to validate an existing project activity for a second or further renewal of crediting period, the DOE shall determine whether the project participants have updated sections of the PDD relating to the baseline, estimated emission reductions and the monitoring plan using the most recent version of baseline and monitoring methodology applicable for the project activity. The additionality of the project activity is not to be reassessed. The required updates are as follows:”	

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	Table of contents			The paragraph numbers in the table of contents is not consistent with the content of the document.		
	7		ge	The proposed limit to the prior consideration was revised from 6 months to 180 days. Although that represents a very small difference, for any project the prior consideration of which has already been done (but registration has not been requested), we suggest that the rules at the time of the prior notification to the EB (6 months) should apply and not the shorter period (180 days).	Suggest add footnote: “for any project the prior consideration of which has already been completed before 25 November 2011, the rules at the time of the prior notification to the EB (6 months) should apply and not the shorter period (180 days).”	
	9		ge	<p>The requirement to update the UNFCCC has no added value in terms of environmental integrity of the mechanism but adds to transaction costs and risk for many proposed project activities, in particular small projects in countries with few projects.</p> <p>There is no formal procedure, merely an email to PPs and some text in the FAQ. This is not acceptable.</p> <p>There is no consequence to failing to update, nor a procedure to correct such failure. This means DOEs simply refuse to take on projects that can not prove to have provided the update.</p> <p>The term (2 years) is unclear.</p> <p>In principle this procedure seems to apply to all projects that have already submitted their prior notification, and thus means a retroactive change of the rules.</p>	<p>Delete paragraph.</p> <p>If the EB believes that these requirements are absolutely necessary and is unwilling to remove them, the following is required:</p> <p>A formal procedure. An exact deadline (730 days, or <i>within 2</i> years). A consequence of failure to update, and procedure to correct it. Limited applicability only to projects that have submitted their first prior notification since the adoption of the PCP, and not to projects predating the PCP.</p>	

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	20 21		ge	There needs to be clearer description that spam is deleted and spammers banned, as this is not generally acted no by DOEs.		
	25		ed	With frequent updates of forms and other documents, it is unreasonable to demand that PPs continuously update the MOC during validation. The form should be the latest version at the time of submission to the DOE. In fact, given the time it takes to sign forms, there should be at least 8 weeks grace.	“... MoC statement using the latest version of the form for the “Modalities of communication statement” (F-CDM-MOC) <u>at the time of submission to the DOE, and applying 8 weeks grace period</u> ”	
	32		ge	If the contact details in Annex 1 of the PDD are overruled by the contact details in the MOC, then they should be removed from the PDD to avoid duplication of information.	Delete ‘Annex 1 of the PDD.’	
	40 61 140 188		ge	Decision 3/CMP.6 in its paragraph 60 urges the CDM Executive Board to limit the awaiting time before commencement of completeness checks to a maximum of 15 days. This limit however is not mentioned in the PCP. The PD Forum suggest that this limit be included in the PCP.		
	105 233		ge	The PD Forum suggest that the following text be inserted as new paragraphs after both paragraph 104 and paragraph 232:	“The DOE or the project participants may request the secretariat, by email through a dedicated email address ([xxxx@unfccc.int]), to make a telephone call to them to provide clarifications on the reasons for the rejection if they are not sufficiently clear to them. Only one such request, regardless of the requesting party, shall be allowed per review of the request for [registration] [issuance]. In this case, the DOE or the project participants shall provide contact detail of the person to be called with preferred time slots. The secretariat shall fix a call appointment within three (3) days from the receipt of the request. The secretariat shall record the call.”	

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	180		ge	<p>The requirement to update the UNFCCC has no added value in terms of environmental integrity of the mechanism but adds to transaction costs and risk for many proposed project activities, in particular small projects in countries with few projects.</p> <p>There is no formal procedure, merely an email to PPs and some text in the FAQ. This is not acceptable.</p> <p>There is no consequence to failing to update, nor a procedure to correct such failure. This means DOEs simply refuse to take on projects that can not prove to have provided the update.</p> <p>The term (2 years) is unclear.</p> <p>In principle this procedure applies to all projects that have already registered, and thus means a retroactive change of the rules.</p>	<p>Delete paragraph.</p> <p>If the EB believes that these requirements are absolutely necessary and is unwilling to remove them, the following is required:</p> <p>A formal procedure. An exact deadline (730 days, or <i>within 2</i> years). A consequence of failure to update, and procedure to correct it. Limited applicability only to projects that have submitted their request for registration since the adoption of the PCP, and not to projects whose requests for registration predate the PCP.</p>	
	189 192		ge	: Replace “(2) days” with “(2) working days” to allow for receipt on a Friday.	Replace “(2) days” with “(2) working days” to allow for receipt on a Friday.	
	227 230			<p>It is often the case that the publication of the final ruling after a rejection of a request for issuance can take more than two months after the project participant is informed of the rejection. That results in further delays in case project participants wish to resubmit the request for issuance. The PD Forum would thus like to suggest that the final ruling relating to the rejection of a request for issuance should be prepared by the secretariat together with the assessment report that led to the rejection, so that the CDM Executive Board can approve both the decision and the final ruling simultaneously. That could be implemented e.g. through the following revisions: paragraphs 229, 230 and 231 to be deleted and paragraphs 227 and 228 to be amended as on the right:</p>	<p>“227. If a Board’s final decision made in accordance with paragraph 218 or 222 above is to reject the request for issuance, the secretariat shall publish the final ruling and update the information on the UNFCCC CDM website accordingly on the first working day subsequent to the finalization of the decision. Furthermore, within 21 days of the finalization of the decision, the secretariat shall provide the Chair of the Board with an information note containing a proposed ruling incorporating the final decision.”</p> <p>“228. The proposed final ruling shall contain an explanation of the reasons and rationale for the final decision, including, but not limited to:”</p>	

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	13		ge	Terms and definitions are not exactly the same in VVS – we would like to suggest making in VVS reference to PS terms in VVS (like in PCP). To avoid misinterpretations by DOEs we further would like to suggest redefining	b) “should” is used for a recommended but not mandatory means for meeting a requirement. Other means which offer the same level of accuracy or intended result are allowed. c) “may” is used for what is allowed, but is not mandatory nor required	
	19		ge	We are missing the concept of confidentiality here. We would like to suggest here or later in the document to add that confidential information may be blacked out or is omitted as long as it is not related to additionality.	“confidential information may be blacked out or is omitted as long as it is not related to additionality.”	
	28a	Footnote 4	te	Please explicitly add “emails” as allowed evidences as this is sometimes the only available evidence and was accepted in EB62 annex13.	Evidence to support this could include, inter alia, minutes and/or notes related to the consideration of the decision by the Board of Directors, emails , or equivalent, of the project participants, to undertake the project as a CDM project activity	
	36		ge	Methodologies may refer to documents which will be superseded by the PS. It should be clarified here that compliance with such superseded documents is not required.	Project participants shall apply the selected methodology(ies) to the proposed CDM project activity or CPA including any tools, standards or guidelines required by the methodology(ies). Where methodologies refer to documents which have since been superseded by the PS, compliance with such superseded documents is not required.	

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	37		te	The version of the PS valid at the time of submission of the CDM project activity should also be specified.	Project participants shall apply the selected methodology(ies) to the proposed CDM project activity or CPA including any tools, standards or guidelines required by the methodology(ies). The version of the PS valid at the time of submission of the CDM project activity should also be specified.	
	44		ge	Replace “shall” with “may” as we do not think that E+/E- shall be discussed in each project.	When establishing the baseline scenario, project participants may take into account the following two types of national and/or sectoral policies	
	45		ge	Replace “shall” with “may” as above.	Project participants may address the two types of policies described in paragraph 44 above as follows:	
	49		te	The guidelines on first-of-its-kind and common practice are included in the Additionality Tool itself.	Delete	

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	56		ge	<p>As the detailed monitoring plan is mostly not available during the validation stage and to avoid lengthy and time consuming prior approval as far as possible we would like to replace “The monitoring plan shall also include the following” by “The description of the monitoring plan shall also include the following” to be consistent with the sentence before and make clear that the monitoring plan in the PDD is a framework for the real monitoring plan applied at the beginning of the monitoring.</p> <p>For the avoidance of doubt we would like to suggest changing the sub-paragraphs as following:</p> <p>(a) Description of the operational... (b) Description of the provisions.... (c) Description of the responsibilities... (d) Description of the quality assurance... (e) Description of the uncertainty levels (f) Description of the calibration frequency...”</p>	<p>“The description of the monitoring plan shall also include the following”</p> <p>(a) Description of the operational... (b) Description of the provisions.... (c) Description of the responsibilities... (d) Description of the quality assurance... (e) Description of the uncertainty levels (f) Description of the calibration frequency...”</p>	
	56e		ge	<p>Replace “Uncertainty levels, methods and the associated accuracy level of measuring instruments to be used for various parameters and variables; and” with “Minimum uncertainty levels, methods and the associated minimum accuracy level of measuring instruments to be used for various parameters and variables; and” as discussed during the workshop in Bonn before “B65</p>	<p>Minimum uncertainty levels, methods and the associated minimum accuracy level of measuring instruments to be used for various parameters and variables; and</p>	

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	56f		ge	We would like to suggest adding “industry best practices” as last fall back option.	Specifications of the calibration frequency for the measuring equipments. In cases where neither the selected methodology, nor the Board.s guidance specify any requirements for calibration frequency for measuring equipments, project participants shall ensure that the equipments are calibrated either in accordance with the local/national standards, or as per the manufacturer.s specifications. If local/national standards or the manufacturer.s specifications are not available, international standards or industry best practice may be used	
	62		ge	If the project start date is still in the future, a qualification to the date would in fact be useful for transparency.	Project participants shall state the expected start date of the crediting period in the format dd/mm/yyyy, and shall not use any qualifications to the start date, such as -expected- .	

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#	Para No./ Annex / Figure / Table	Line Number	Type of input ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
	73	Footnote 11	ge	We have compared the each set of PDD templates: PDD and SSC-PDD, AR-PDD and SSC-AR-PDD, and POA-DD & CPA-DD and SSC-POA-DD & SSC-CPA-DD. There are only three difference between each set of large and small scale versions (and in some cases some minor editorial differences): (1) the small scale templates includes a section to describe “debundling”, which is not applicable for large scale; (2) the large scale templates include a full table of greenhouse gases, which is not given in the small scale versions, but the gases still need to be given even if not in the specified table; and (3) the large scale templates include a section to describe conclusions and references to the environmental impact assessment if required, which is not required for small scale. These three differences do not justify having different templates and guidelines for their completion The simplifications for small scale activities, which are still required to reduce transaction costs, are primarily reflected in the small-scale methodologies and related procedures, not in the PDD template or PDD completion guidelines. Therefore, we would like to propose to simplify the procedures and merge the respective templates and guidelines.	Simplify the procedures and merge the respective templates and guidelines.	
	75		ge	Replace “should” with “shall” as we do not think that this is only a recommendation.	When completing the PDD, project participants shall follow the applicable guidelines for completing CDM-PDD forms	
	76		ge	We have found that some DOEs demand that the detailed technical area as per the CDM Accreditation Standard Version 02 are given.	Clarify in the footnote that the detailed technical area as per the Accreditation Standard are not to be used in the PDD.	

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	77		ge	Replace “together with supporting documentation” with “together with available supporting documentation”.	Project participants shall submit the completed PDD of the proposed CDM project activity, together with supporting documentation , to the selected DOE for validation.	
	79		ed	Typo. Consistency with language elsewhere	Before the publication of the PDD of proposed CDM project activity or CPA.	
	80			The description of small-scale project activities should correspond to those in paragraph 6(c) of Decision 17/CP.7		
	81b		ed	Typo. Energy efficiency does not have a maximum output.	“(b) Type II: Energy efficiency improvement project activities that reduce energy consumption, on the supply and/or demand side, by a maximum of 60 GWh per year (or an appropriate equivalent) in any year of the crediting period; or”	
	81 82		te	The limit in para 81 (a) is only understandable with the detailed explanation given in para 82. The appropriate equivalent should reference para 82. The limit in para 81 (b) is also to be explained, as the equivalent can be 180 GWh(th).	81. “(a) ... or an appropriate equivalent indicated in para 82 ”. (b) ... or an appropriate equivalent indicated in para 82 ”. 82. “In connection with paragraph 81 above and the scope of the maximum output capacity of 15 MW, or energy savings of a maximum of 60 GWh per year , project participants shall consider the following:” “(e) For thermal energy efficiency project activities, the maximum energy savings of 60 GWh(e) per year is equivalent to a 180 GWh(th) per year savings.”	

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	83		ge	<p>We are afraid that otherwise the projections of the GHG emissions may be inflated to avoid losses during verification, a wrong and unnecessary incentive that should be avoided.</p> <p>We would like to suggest changing to “...the GHG emissions that can be claimed during this particular year shall be capped at the level which is equivalent to the relevant small scale threshold”.</p>	“...the GHG emissions that can be claimed during this particular year shall be capped at the level which is equivalent to the relevant small scale threshold”.	
	186		ge	The PDD only contains a description of the monitoring plan, as explained in our input on the VVS.	Project participants shall monitor the registered CDM project activity and its GHG emission reductions or net GHG removals in accordance with the description of the monitoring plan as described in the registered PDD (hereinafter referred to as the registered monitoring plan).	
	192a		te	We suggest deleting the part in brackets as the frequency of monitoring should be in accordance with that described in the monitoring plan and PDD. The time interval is irrelevant.	(a) Provide the values of the monitored parameter for the purpose of calculating GHG emission reductions or net GHG removals. Where data are measured continuously, they shall be presented using an appropriate time interval (e.g. monthly for a monitoring period of six months or more; weekly if the monitoring period is less than six months; daily if the monitoring period is one month or less). For default values (such as an IPCC value), where it is ex post confirmed, the most recent value shall be applied;	
	199		ed	Replace “should” with “shall”.	When completing a monitoring report form, project participants shall follow the .Guidelines for completing the monitoring report form (CDM-MR).	

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	223		ge	The whole procedure for renewal of the crediting period is still quite unclear. More experience will help, but better descriptions and maybe examples could be useful.		
	224		ge	This paragraph states which part of the PDD need to be updated. However, it would also be useful to state that the additionality is <i>not</i> to be re-assessed.	“224. To support a request for renewal of the crediting period of a registered CDM project activity, project participants shall update the sections of the PDD of the project activity relating to the baseline, estimated GHG emission reductions and the monitoring plan using a baseline and monitoring methodology. The additionality of the project activity is not to be reassessed. The required updates are as follows:”	
	227		ge	There is also other data that could be updated in order to get a more accurate estimate. For example, the plant load factor of a power generation project has been estimated in advance, whereas on renewal of the crediting period the actual achieved plant load factor could be applied. Similarly, the methane generation and capture rates for a landfill project were estimated on ex-ante estimates of tipping rates and models, whereas on renewal of the crediting period the actual tipping rates, achieved capture rate etc. could be applied. It is perverse that on renewal the PDD still refers to parameters estimated ex-ante for which real data now exists.		

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	Appendix I		ge	<p>Appendix 1 lists generic “Changes that do not require prior approval by the board”. While this list is helpful, the PD Forum envisages a situation in which DOEs request prior approval by the Board for post-registration changes, regardless of this list, to avoid repercussions later if issuance track is followed but the Board deems that prior approval track would have been more appropriate.</p> <p>To avoid a large number of submissions under the prior approval track and the corresponding drain on resources of both the Board and Secretariat that this would represent, the PD Forum has compiled the following list of examples of common post-registration changes.</p>	Proposed list of changes are found in Annex I	

Annex I - List of proposed minor revisions that may use the issuance track

Change	Comments
Corrections	
Name of the transformer station	
Location of the transformer station	Without changing the voltage
Changes to the project design of a registered project activity	
Change of equipment type (e.g. different manufacturer, different unit capacity)	Total investment and installed capacity remain the same
Change in one parameter of investment analysis (e.g. total investment) but still within the bounds of sensitivity analysis	
Different type of biomass burned to that in registered PDD (for biomass fired plant)	
Permanent changes from the registered monitoring plan or applied methodology	

Change of location of meter (within control of PP)	
Change of accuracy of meter (within control of PP)	
Change in calibration frequency of meter (within control of PP)	
Change in number of meters (outside of control of PP)	
Temporary deviations from the registered monitoring plan or applied methodology	
Using backup meters/ back up calculation due to the main meter failure, as described in the registered PDD	
Change in frequency of monitoring certain parameters	
Monitoring alternative parameter to that required by the methodology but which leads to same result	e.g. ACM004 project monitoring steam consumption for start-up rather than auxiliary fuel
Temporary deviations that are clearly immaterial.	Below the materiality thresholds
Cross-checking meter readings with alternative documents instead of sales receipts	May happen at the beginning and end of monitoring periods when these dates do not match with the date that the grid company reads meters