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**Note:** The comments provided are not based on a complete evaluation of the standard but only refer to specific sections where areas for improvement have been identified in the past by CDM Watch.

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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)
1	29		ge	The paragraph states that the requirements on “prior consideration” do not apply to PoAs. It makes sense that these requirements do not apply to each individual CPA, as long as the CPAs are initiated and conducted by the same PPs. However, it is not clear why the requirements should not apply to the programme as whole or in cases where other operators join the programme (e.g. a new hydro power plant in a CPA covering many hydro power plants). If the programme as a whole was designed without consideration or knowing about the CDM, the PoA would clearly not be additional but implemented anyways.	Replace paragraph 29 by the following language: “In the case of programmes of activities (PoAs), the requirements in paragraphs 26 to 28 above apply to the development of the programme. They shall also apply to each individual CPA if the operator of the CPA was not a project participant when the PoA was approved. If the operator of the CPA was a project participant at the approval of the CPA, the requirements in paragraph 26 to 28 do not apply to the CPA.”	

<b>Call for public inputs – Template for inputs</b>	<b>Document: “CDM project standard” (ver. 01.0)</b>
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2	31 - 33		te	<p>In many PDDs, the description of the project activity and the technology applied is relatively vague. Key parameters, such as the size of the plants installed, the manufacturer, the type of equipment applied are not always described. In addition, in a number of cases it is important which other existing or new equipment was installed at the site prior to the implementation of the project activity (e.g. to understand to what extent the project is a greenfield or brownfield activity). Some of this information is key for the assessment of the additionality of the project activity or whether a baseline and monitoring methodology is actually applicable to the project activity. The use of the word “scenario” in paragraph 32 is confusing, as this refers to a historical situation rather than a future “scenario”. It is therefore recommended to amend the current language with respective requirements.</p>	<p>Amend paragraph 31 by new or modified sub-bullets to ensure a more precise description of the project activity, such as:</p> <ul style="list-style-type: none"> <li>- Provide a detailed description of the technical equipment involved in the project activity, including the manufacturer, the models used, the capacity of the equipment, the planned operating hours. Where appropriate, provide relevant flow diagrams or manufacturer specifications.</li> </ul> <p>Amend paragraph 32 as follows:</p> <ul style="list-style-type: none"> <li>- Provide a description of the situation prior to the implementation of the project activity at the sites involved in the project activity, such as a description of any equipment installed and operated at the project site, including the manufacturer, the models used, the capacity and operating hours, the practices (e.g. type of land-use) applied prior to the implementation of the project activity, etc</li> </ul> <p>Add a new paragraph:</p> <ul style="list-style-type: none"> <li>- Provide a description which other equipment will be operated at the project site but not be part of the project activity.</li> </ul> <p>Add a new paragraph:</p> <p>Ensure that the descriptions referred to in paragraphs ## to ## include all elements that could be relevant for the assessment of additionality, the identification of the baseline scenario, the definition of the project boundary and the monitoring and calculation of emission reductions.</p>	

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3	187 – 188		te	The PS implicitly assumes that applicability conditions are only documented in the PDD and checked at validation. This is appropriate for many applicability conditions. However, some applicability conditions in baseline and monitoring methodologies are phrased in a way that they refer to the actual implementation of the project activity (E.g. “during the operation of the project activity (...”). Some applicability condition cannot be assessed at all during validation, as they depend on circumstances when the project is up and running. If this is the case, they need to be monitored. However, the PS and the VVS do not contain any sections which explicitly require to check whether these applicability conditions actually apply. We therefore recommend that a new section to address this issue is included.	Introduce a new sub-section, requiring the project participants to show that applicability conditions, which refer to the implementation and operation of the project activity, have been met during the monitoring period.	
4	188		te	Paragraph 188 is key for ensuring that the project activity has been implemented and operated as described in the PDD. Changes in the implementation or operation of CDM projects could impact not only the applicability of the methodology (as suggested in subparagraph (c) but also the additionality, the baseline scenario or the emission reduction calculation. In this regard, paragraph (c) should be clarified and modified.	Amend subparagraph (c) (i) as follows:  Any events or situations that occurred during the monitoring period or, in the case of the first monitoring report, in the time period between validation and the start of the crediting period, that may impact the applicability conditions of the methodologies or tools applied, the demonstration and assessment of additionality, the identification of the baseline scenario, the definition of the project boundary or the monitoring and calculation of emission reductions.	
5	225		ge / te / legal	This paragraph does not seem legally in line with the modalities and procedures for the CDM. The modalities and procedures for the CDM define that a baseline is a “scenario” (paragraph 44). Paragraph 49 subsequently requires that the baseline is assessed by the DOE at the renewal of the crediting period. Together, the two paragraphs clearly imply that the scenario representing the baseline shall be re-assessed. In addition, it does technically not make sense to re-assess emissions if the underlying scenario is not re-assessed. The emissions are closely linked to the underlying scenario.	It is urgently recommended to seek legal advice on the correctness of this paragraph and, where necessary, correct the current provisions. This would impact several paragraphs, including the tool for renewal of the crediting period.	