

Call for public inputs – Template for inputs	Recommendations for possible changes to the modalities and procedures of the CDM
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Issue No.	Issue to be addressed (including need for change)	Proposed change (including proposed text, if applicable)
1	<p>Para 4 (b)</p> <p>The review of the regional and subregional distribution of DOEs by COP/MOP shall take into account the fact that numerous DOEs operate on a global scale including the employment of staff in local offices. The benefits of a global exchange of experiences are undervalued when promoting accreditation of entities in developing countries. Business reality has demonstrated that the regional distribution is a result of market aspects and not of regulations.</p>	Might be deleted
2	<p>Para 5 (f) and (g)</p> <p>Instead of providing the Accreditation Standard as an annex to the “modalities and procedures” the EB should be required to make the most recent version of the accreditation standard and accreditation procedure available on its website and to ensure a review of the documents in a periodic manner.</p>	<p>In this context, the Executive Board shall:</p> <p>(..) Be responsible for the accreditation of operational entities and make recommendations to the COP/MOP for the designation of operational entities. The Executive Board shall make the accreditation standard and accreditation procedure publicly available and shall ensure its review every [2] years.</p>
3	<p>Para 6</p> <p>The requirement that information to determine the baseline and to demonstrate additionality shall not be considered confidential should be revisited. An alternative is that all information is made available to the EB and its support structure, but not the public.</p>	
4	<p>Para 8 (f)</p> <p>In addition, there should be an explicit requirement that CDM-EB members have to declare their involvement in any CDM projects, individually or as a member of a private or public organisation, and anything else that could represent a conflict of interest. It is recommended that CDM-EB members should not be staff members of any DNA, thus avoiding conflicts with activities like attracting CDM projects or approving CDM projects.</p>	

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5	<p>Para 16</p> <p>It might be an opportunity to constitute the option for an interaction with discussion on regulatory (non-project) issues at the beginning of EB meeting to representatives of the DOE (Forum), project participants and DNA (Forum). This would make the recent process more official.</p>	
6	<p>Para 17</p> <p>There should be an explicit requirement that the EB publishes a rationale for its decision at the time when the decision is published (usually with the EB report). Moreover, the M&amp;P should also include the “right” introduced by the project cycle procedure for PPs and DOEs to request direct communications.</p>	
7	<p>Para 20 (a) and (d)</p> <p>As for issue N° 2</p>	
8	<p>Para 22 to 24</p> <p>With regard to significant deficiencies and excess issuance the DOE Forum and the Designated Operational Entities and Independent Entities Associations made several inputs including various options that help to avoid negative market impacts by inappropriate approaches. We will further elaborate on these options when preparing an input to SBI and emphasize the need to consider options for balancing excess issuance independently from its originator. Any sanctions on the DOE should be only in the form of the sanctions already foreseen in the accreditation process.</p>	
9	<p>Para 27 (f)</p> <p>This requirement should be deleted as the information on the UNFCCC website is sufficient. Instead, the UNFCCC website should allow searching for validation / verifications by DOE.</p>	
10	<p>Para 37</p> <p>In reality, the contractual relationship is not always directly with a PP. It may either be with another legal entity of the PP or sometimes another company which has been empowered by the PPs to contract the DOE. This should be reflected in the M&amp;P.</p>	
11	<p>Para 38</p> <p>The timelines for the review and approval of new methodologies are not realistic and any reference to timelines should be removed. Furthermore the wording requires a validation order before submission of a new methodology which is also not consistent with the actual approach.</p>	
12	<p>Para 41</p> <p>It is recommended either to refer to the recent procedures or revise this section by summarizing the recent procedures.</p>	

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13	<p>Para 43</p> <p>A different definition of additionality is needed. We will never know what would have happened in the absence of the CDM. Hence, project additionality should be defined that a project is additional if it meets an additionality test approved by the EB. The EB will have the mandate to develop and as necessary revise these additionality tests to ensure that projects which are likely to have occurred also in the absence of the CDM are not meeting these additionality tests.</p>	
14	<p>Para 45 (c)</p> <p>The requirement that a baseline must be established on a project specific baseline contradicts the fact that standardized baselines are allowed.</p>	
15	<p>Para 45 (e)</p> <p>This paragraph should also include or refer to the E-/E+ guidance by the EB.</p>	<p>E-/E+ guidance should not only be referred in the “Establish a Baseline” para 45, but also in the additionality test mentioned in para 43 (Issue 13). It should be clear that the decision of the board regarding E-/E+ policies could also be needed in the additionality test. Now it seems that the guidance of the board regarding E-/E+ policies only affects the determination of the Baseline scenario but not the additionality demonstration.</p>
16	<p>Para 48 (c)</p> <p>This paragraph needs to be aligned with the EB guidance on performance benchmarks. There is no methodology where the top 20% is applied and also the EB guidance on performance benchmarks does not accept the top 20% principle, but instead requires determining the top % for each sector.</p>	
17	<p>Para 60</p> <p>In reality, the contractual relationship is not always directly with a PP. It may either be with another legal entity of the PP or sometimes another company which has been empowered by the PPs to contract the DOE. This should be reflected in the M&amp;P.</p>	
18	<p>Para 61-63</p> <p>The possibility for post registration changes should be described.</p>	
19	<p>Para 62 (e)</p> <p>This should be deleted as the DOE cannot recommend changes to the monitoring methodology. Instead the concept of post registration changes should be described as stated above.</p>	To be deleted
20	<p>Appendix A</p> <p>Instead of providing the Accreditation Standard as an annex to the “modalities and procedures” the EB should only be required to make the most recent version of the accreditation standard and accreditation procedure available on its website and to ensure a review of the documents in a periodic manner.</p>	To be deleted

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21	<p>Appendix B</p> <p>This section needs to be adapted to the recent procedures especially in the context of new methodologies.</p>	
22	<p>dec5/CMP.1 (Afforestation and Reforestation in CDM)</p> <p>This section needs to be adapted to the recent procedures. Aspects which are already presented above (e.g. contracts with project participants) shall be taken into account in a consistent manner.</p>	Might be incorporated into overall M & P
23	<p>In general</p> <p>The aspects of Programmes of Activities should be treated under the new set of M&amp;P in a consistent manner. This also includes the aspect of erroneous inclusion. Furthermore this would deliver an opportunity to establish PoA under new rules that enables a more successful implementation of activities as recently experienced.</p>	
24	<p>In general</p> <p>The aspects of standardized baselines should be treated under the new set of M&amp;P in a consistent manner.</p>	
25	<p>In general</p> <p>Many procedures have been issued and furthermore revised by EB since the adoption of the Marrakech Accords. It might be advisable to keep procedures as a separate issue by making reference in the new document which might then be considered as the “modalities” which are under the overall responsibility of CMP.</p>	
26	<p>In general</p> <p>As new market mechanisms and various approaches (see FVA) are emerging it would be advisable to address the issue of double-counting when revising the M&amp;P. Furthermore the review delivers a good opportunity to highlight the possibilities to use the infrastructure in other schemes than CDM.</p>	