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Questionnaire for soliciting public inputs on the ‘concept note on operationalizing carbon dioxide capture and storage as a CDM project activity’

Background: The Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (hereinafter referred to as the CMP) adopted at its seventh session decision 10/CMP.7; "Modalities and procedures for carbon dioxide capture and storage in geological formations as clean development mechanism project activities" (hereinafter referred to as the CCS modalities and procedures).

At its seventy-second meeting, the CDM Executive Board (the Board) approved the ‘workplan of the CDM Executive Board for 2013’. In the workplan Board approved to launch a public call for concept note of project 160 ‘Operationalizing carbon capture storage (CCS)’. The input received from this call for input will be considered in seventy fourth meeting of the Board.

QUESTIONNAIRE

Part I: Overall assessment of the concept note

Please provide general suggestions for improvement and editorial comments on the draft document. For example, is the document:

- (a) Well written;
- (b) Simple and accessible;
- (c) User-friendly;
- (d) Well-organized, with flow of logic that is clear;
- (e) Exemplified;
- (f) Complete

Part II: Input on specific and technical issues

The concept note has discussed the main issues in CCS modalities and procedures which may need clarity for implementation. The inputs are sought on the following:

- a. **Coverage of issues:** Are the issues covered in concept note adequate? Is there any other issue which require further clarification?
- b. **Options and recommendations:** Do you propose some other option and recommendation other than mentioned in the concept note?
- c. **Additional standards/procedures:** Do you require any additional procedures/guidelines/standards which may help fulfilling the requirements for CCS project activity as mentioned in CCS modalities and procedures? If yes, kindly explain.

Part III: Other comments/inputs

Please provide comments/inputs on any other general or specific issue that you identify with the draft or any other issue which may help in operationalizing the CCS CDM project activities, using the commenting table below:

0	1	2
Para No.	Issue to be addressed (including need for change)	Proposed change (including proposed text, if applicable)
12	<p>According to the CCS modalities and procedures, a DOE needs to validate the host Party participation requirements, financial provisions, liability arrangement etc. It appears that under these additional requirements for CCS project activities a DOE needs to check not only that the relevant laws and regulations exist, but also that the laws and regulations are sufficient. For example, if a host Party has established a law for CCS project activities does it sufficiently cover all the provisions mentioned in CCS modalities and procedures?</p>	<p>The objective of the DOE is to validate and verify project Activities under the CDM scheme. In any case, the scope of the validation/verification of the project activity does not cover the assessment of the suitability of the national Legislation..</p> <p>This situation is clearly contradictory with the current validation process, EG. The DOE does not assess the Environmental Impact legislation, whether is correct, too tight or too lax. During validation the DOE studies whether the national legislation requirements have been met by the project activity, but the accredited body cannot assume the role of judging national legislation, and whether these laws are in line with the UNFCCC requirements.</p>
20	<p>The following shall be evaluated when determining whether geological storage sites shall be used to store carbon dioxide as project activities under the CDM consistent with paragraph above:</p> <ul style="list-style-type: none"> • All available evidence, such as data, analysis and history matching, indicates that the injected carbon dioxide will be completely and permanently stored such that, under the proposed or actual conditions of use, no significant risk of seepage or risk to human health or the environment exists; • (ii) Whether the geological storage site is suitable for potable water supply. 	<p>DOEs need clear rules to validate and verify project activities.</p> <p>Expressions such as “no significant risk of seepage or risk to human health or the environment exists” introduce a very high grade of uncertainty, since there is no clear description on how the concept “significant” has to be understood and assessed.</p>
10 D	<p>If at verification a DOE identifies that a host Party no longer meets the host Party participation requirements (e.g. relevant CDM CCS laws have been repealed) this shall result in a negative verification opinion</p>	<p>Further clarification is required.</p>
8.i	<p>... characterization and development of geological storage sites, recognizing</p>	<p>Re-wording is suggested:</p> <p>... characterization and development of geological storage sites, <i>including the monitoring requirements during the post closure period, and recognizing ...</i></p>
21.b		<p>Addition is suggested:</p> <p><i>The potential impact in the reduction of potable water resources in the area, caused by CO2 storage, should be also assessed</i></p>
25	<p>This value can be revisited based on the experience ...</p>	<p>Re-wording is suggested</p> <p><i>This value would be specific for each site and should be based on the risk assessment made for such site.</i> It can be revisited based on the experience ...</p>

Call for public inputs – Template for inputs**Concept note on operationalizing carbon capture and storage as a CDM project activity**

0	1	2
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