

Thomas Grammig
Die Rappenwiesen 3
D-61350 Bad Homburg
Germany

UNFCCC secretariat
SDM
Haus Carstanjen
Martin Luther King Str. 8
D-53175 Bonn

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Comment on Issues included in the annotated agenda EB84

I would like to draw your attention to the Concept note: Direction for simplification and streamlining of the CDM para 8.d, page 9 (CDM-EB84-AA-A01).

This concept note states that a value-added and cost-benefit analysis has led to a general direction for simplification and streamlining. Regarding the process of methodology making, the concept notes lists 8.d (i) clarity enhancement (CDM methodology booklet) and (ii) reducing the time required for methodology and subsequent project approval, possibly with a "hybrid approach". These two suggestions are the general direction for simplifying methodology making.

As a general direction for simplifying methodology making, these two suggestions appear as insufficient. A value-added and cost-benefit analysis of the cause why four-fifth of the approved methodologies are never used should yield a more forceful general direction for simplification and streamlining. It is plausible that this cause is also the reason for the small number of methodologies (gaps in coverage of types and technologies) and the reason for the small number of organizations that created methodologies. In my own experience, most major industrial players and technology innovators looked at the CDM methodology making context and concluded that it is not worth their best talents' time and funds to undertake such an unpredictable endeavor. Academia is also entirely absent.

The cause why four-fifth of the approved methodologies are not used could largely consist of the process followed by the Methodology Panel and the SSC Working Group. Submitted methodology proposals become too cumbersome / costly / uncertain in the exchanges between methodology proponents and MP / SSCWG. EB49 studied the usability of methodologies but did not separate reasons for the popularity of methodologies from the reasons why most are not used at all.

I would like to suggest two observations:

- 1 – the secretariat has shown, for example in the Concept note: Non-binding best practice examples within methodologies (CDM-EB83-AA-A04), how to use criteria to identify problems/deficiencies in methodologies. This analytical skill in the secretariat and further work with this evidence can be used to define the cause why four-fifth of the methodologies are not used.
- 2 – The cause why four-fifth of the methodologies are not used is certainly far more influential and revealing for simplification and streamlining than the two suggestions 8.d(i) and 8.d(ii).