

TABLE FOR COMMENTS

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#	Para No./ Annex / Figure / Table	Line Number	Type of comment 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)

Template for comments

Date: 03/11/2017

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	7		ge	<p>Paragraph 7 might be considered to be taken out. It implies that the registration process would be substantially more difficult if other technologies /measures or different capacities had been included in the DD document at the time of registration. This is understood not to be correct as the CDM Secretariat and the CDM EB should follow the same process of and requirement for all DDs requested for registration and should only check for compliance with CDM Rules and regulations.</p> <p>The implication of paragraph 7 could be perceived as incorrect, unless there are stated rules and regulations that specify what kind of additional and more rigorous processes would be required during the registration process, if more technologies or different capacities were included in the original DD at the time of registration. If paragraph 7 should be included, it is recommended that the paragraph should specify that the proposed PRC related to technology or capacity should be approved, if there is no clear rules and regulations that would specify that a more rigorous process would have been required during registration process if the proposed changes in the technology or capacity had been included at the tie of registration. In most cases it is understood that adding technologies or changing capacity that is in compliance with the methodology and CDM Rules and regulations should not add to the transaction cost associated with the Registration process of the CDM, but rather the CME would have substantial additional transaction cost if such additional technologies or capacities is added as PRC. As the cost of adding technologies or capacities is highest when done as part of a PRC, the CME has no incentive to plan for adding technologies or capacities as a PRC rather than doing so as part of the initial registration, as implied with the proposed note.</p> <p>Implying that the CDM secretariat or the CDM EB apply different standards and processes for approving DD documents for registrations, based on different technologies, when the technologies is applicable for the methodology and all CDM rules and regulations, would cause adverse reputational perception of the Clean Development Mechanism.</p>		

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	11		ge	Reference to the what is allowed to be submitted should be removed, and should be replaced with explaining what kind of changes that should be allowed. It is understood that as a rule based program such as the Clean Development Mechanism should make rules related to what kind of PRC that might be allowed, and not related to what kind of request that might be submitted to the CDM EB and its representatives.	With respect to the changes in the design capacity of a CDM project activity, PoA or included CPAs after registration, the following changes are allowed as PRCs in the project design, in accordance with the provisions of the process for PRCs in the CDM project cycle procedure.	
	12		ge	Reference to "are allowed to be submitted " should be removed. It is understood that the Clean Development Mechanism is a rule based Mechanism where the rules of what should be allowed and not should be clearly defined by rules. The rules should not specify what might be applied for, but what kind of PRC that should be approved. There should be not restrictions to apply for PRC which is not clearly clarified in the rules and regulations, but any such requested PRC, which is outside of what is clarified by the CDM Rules and Regulations, might then be considered non-rule based considerations by the CDM EB. If the rules refer to "are allowed to be submitted", then it must be understood that any PRC not specified in the proposed note, would not be allowed to be submitted. It would be a very big change in the Clean Development Mechanism, if the CDM Rules and regulations is starting to restrict information in which stakeholders might raise with the CDM Executive Board or its representatives.	It is also proposed that the changes in the technologies/measures compared to the description in the registered design document (PDD, POA-DD, generic CPA-DD or specific CPA-DD) are allowed following the same provisions of the process for PRCs in the PCPs referred to in paragraph 11 above, except for the following:	

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13		(C) (to be added)	ge	<p>Unreasonably restricting the best technology to be used, would contribute to sub-optimal technology to be deployed. This would increase total transaction cost relative to project value and could adversely impact the integrity and the public opinion of the Clean Development Mechanism.</p> <p>To avoid such negative impact on the perceived integrity of Clean Development Mechanism from unreasonably restricting PRC, a new sub paragraph (C) is proposed under paragraph 12 of the concept note. Please see proposed change in column to the right.</p> <p>CDM EB could alternatively consider to change the word “And” to “Or” in between sub-paragraph (v) and (vi).</p>	<p>C. The limitation of two years does not apply if</p> <p>(i) the requested PRC do not impose increase in total Emission compared to that stated in the DD document.</p> <p>(ii) The requested PRC do not require any changed to the Eligibility Criteria of the DD document.</p> <p>(iii) Rejection of the Proposed PRC would cause substantial negative social or environmental impact and hence could contribute to negative perception of the Clean Development Mechanism.</p> <p>(iv) The proposed changes, would not, to the qualified reader, be perceived as having any impact on the issuance of the LoA or the stakeholder consultations.</p> <p>(v) The Changes in the technology or capacity complies with the Methodology, and all CDM Rules and regulation and is in line with the goal of the project /program, and there is no CDM Rules and regulations that would have required a more rigorous registration process if proposed changes had been included in the initial registration of the PDD at time of initial registration.</p> <p>And,</p> <p>(vi) There are no changes in the calculation of the ER.</p>	