

TABLE FOR COMMENTS

Name of submitter: _____ Havard Norstebo _____

Affiliated organization of the submitter (if any): _Green Development AS__

Contact email of submitter: ___hn@greendevlopment.no_____

0	1	2	3	4	5	6
#	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: 16.10.2020

Document: comments on calculations of non-renewable biomass

0	1	2	3	4	5	6
#	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)
	ALL	all	GE	<p>Providing default values for non-renewable biomass for each developing country would greatly reduce transaction cost.</p> <p>Such default values would greatly reduce the cost of project implementer. It is difficult to calculate the value of non-renewable biomass and find all the reference documents when this is only done once (for a particular country in which a project implementer considers implementing a project). The cost is greatly reduced when this is done by someone that can do the same calculations for all countries.</p> <p>If the project implementer has to make the calculations of the value of non-renewable biomass and make a mistake in the calculations, it greatly increases the cost of Validation, verification, registration and issuance process. Such cost would include, but not be limited to, the additional time used for correction of documents and calculations.</p> <p>CDM EB has decided that DOE during validation has to check and verify the correctness of all the baseline values, even though the baseline values has been validated by other DOE as part of registration process. Such validation of the calculation of the value of non-renewable biomass for each monitoring report to be verified, increase the cost of verification.</p> <p>If project implementer has to calculate the value of the non-renewable biomass, it will be a time-consuming job for the CDM secretariat to check if these calculations are all correct. This will hence increase the workload of the CDM Secretariat, relative to if the CDM secretariat makes the calculations of the non-renewable biomass for each country. Hence having default values for each country will reduce the transaction cost of the CDM secretariat, and hence enable reduce time for issuance process, which will increase the value of project funding through the Clean Development Mechanism.</p>	<p>The CDM EB should provide country default values for the fraction of non-renewable biomass for each country (for each development country) as an appendix to the document.</p> <p>Country default values should always be used for project activities that include a whole country. Calculations should only be allowed to be used if a project does NOT include a whole country.</p>	

Template for comments

Date: 16.10.2020

Document: comments on calculations of non-renewable biomass

0	1	2	3	4	5	6
#	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)
				Continuing. If the project implementer makes the calculation and the value is validated by DOE and approved by the CDM Secretariat and the CDM EB as part of registration of a CDM Project, and later found to be mistaken, it might lead to no CERs being able to be issued. It is understood that there are rules that limit the ability to make changes in the baseline scenario of a registered CDM Project during the crediting period. This is hence a substantial risk to the project implementer, and such substantial risk reduce the net value of project funding through Carbon credits through the UN systems. Before requesting registration of a CDM Project, project implementer must consider the risk associated with making a mistake in the baseline scenario calculations, which could lead to no Carbon Credits being issued. This risk might in many cases be considered so substantial that it is not worth while making the investment in a CDM application process.		