

## Plenary Session 8

# PROCESSES FOR POST-REGISTRATION MODIFICATIONS

**Integrated Workshop on Project Standard, Validation and Verification Standard,  
Project Cycle Procedure and Programme of Activities Standards**  
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## Contents of presentation

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- Coverage of the modifications processes
- Requirements for project participants (Project Standard)
- Validation and verification requirements for modifications
- Submission options – Issuance or Request
- Post-registration deviation from methodology
- Procedural steps for seeking Executive Board approval of modifications

# Coverage of the new post-registration modifications process

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## EXISTING PROCESSES REPLACED BY MODIFICATION PROCESS

- Procedures for requesting post-registration changes to the start date of the crediting period (EB52 Annex 59)
- Procedures for revising monitoring plans in accordance with paragraph 57 of the modalities and procedures for the CDM (EB49 Annex 28)
- Procedures for notifying and requesting approval of changes from the project activity as described in the registered PDD (EB48 Annex 66)
- Procedures for requests for deviation prior to submitting request for issuance (EB49 Annex 26)

## NEW PROCESSES INCLUDED INTO MODIFICATION PROCESS

- Requests for permanent deviation from methodology
- Corrections to information or parameters determined at validation
- In addition, new timing options for submission of the modifications have been proposed.

## Proposed or Actual Modifications to the PDD (I)

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### General requirements for project participants

- PPs must fully document any proposed or actual permanent modifications to the implementation, operation or monitoring of the project activity compared to the registered PDD in a revised PDD;
- PPs must demonstrate that the modified implementation, operation or monitoring of the project activity is in compliance with applicable CDM requirements;
- PPs must submit the revised PDD and all supporting documentation to a DOE either:
  - a) together with bundle of original MR submitted for verification, to the DOE contracted to perform a verification for a monitoring period of the relevant project activity ([Verification Track](#)) or
  - b) Request any DOE at any time prior to the commencement of verification of a monitoring period to validate the proposed or actual permanent modifications to the implementation, operation or monitoring in the revised PDD ([Approval from the EB Track](#))
- For the “Approval from the EB Track”, the DOE must be accredited for the validation function and sectoral scope(s) of the proposed project activity ;

## Proposed or Actual Modifications to the PDD (II)

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### Types of proposed or actual modifications covered

- Changes in the effective output capacity due to:
  - a) increased installed capacity or increased number of units, or
  - b) installation of units with lower capacity or units with less advanced technology
- Addition of component or extension of technology
- Removal or addition of one (or more) site of a project activity registered with multiple-sites
- Actual operational parameters which are within the control of project participant differing from the expected parameters;
- Revisions to the monitoring parameters and procedures in the monitoring plan contained in the registered PDD;
- Corrections to information or parameters determined at validation; and
- Alternative monitoring of the project activity that deviates from the requirements in the methodology (separate slide)

## Proposed or Actual Modifications to the PDD (III)

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### Requirements for demonstration of compliance with CDM

- PPs shall demonstrate that the proposed or actual modifications do not adversely impact any of the following:
  - a) The additionality of the project activity;
  - b) The scale of project activity.
- For additionality, PPs shall use the same approach as used in validation
- PPs shall assess and describe in the revised PDD whether the proposed or actual modifications adversely impact any of the following:
  - a) The applicability and application of the applied methodology under which the project activity has been registered;
  - b) Compliance of the monitoring plan with the applied methodology;
  - c) The level of accuracy and completeness in the monitoring of the project activity.
- In such cases, PPs shall demonstrate that the proposed or actual modifications can comply with the requirements of the applied methodology or if not possible, may apply a later version of the methodology or a new methodology and demonstrate compliance with the alternative methodology.

# Requirements for Validation and Verification of Modifications

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## Validation and Verification Requirements for DOEs

- The DOE shall determine whether proposed or actual changes in the implementation, operation or monitoring of the project activity comply with the requirements contained in the CDM Project Standard and do not adversely affect the conclusions of the validation report of the registered PDD with regards to:
  - a) The additionality of the project activity;
  - b) The scale of project activity.
  - c) The applicability and application of the applied methodology under which the project activity has been registered
  - d) Compliance of the monitoring plan with the applied methodology;
  - e) The level of accuracy and completeness in the monitoring of the project activity.
- If the DOE determines that the proposed or actual modifications to the project activity does not comply with the requirements established in the CDM Project Standard the DOE shall issue a negative validation opinion or should request guidance from the CDM Executive Board.

## Timing of submission of modifications for DOEs

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### Submission Options for DOE regarding complying modifications

- If the DOE determines that the proposed or actual modifications to the project activity comply with the requirements established in the CDM Project Standard, the DOE shall either:
  - a) Submit the revised PDD (in clean and track-change versions), a supporting validation opinion and any supporting documentation to the Board for determination prior to the conclusion of verification; or
  - b) Submit the revised PDD (in clean and track-change versions) together with any supporting documentation with the request for issuance, in which case the validation opinion on the proposed or actual modifications shall be contained in the verification report.
- For the proposed or actual modifications that include proposed alternative monitoring of the project activity in circumstances where a modified monitoring plan does not comply with the applied methodology.



## Post-registration deviation from methodology

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### Requirements for project participants

- Situations where PPs are unable to implement the monitoring plan and it will not be possible to monitor the project activity in compliance with the applied methodology and any applicable tools (permanent deviation)
- PPs shall describe of the nature and extent of the non-conforming monitoring in a revised PDD and the proposed alternative monitoring of the project activity.

### Requirements for DOEs

- Assess whether the proposed alternative monitoring is likely to lead to a reduction in the accuracy of the calculation of emission reductions.
- Require PPs to apply conservative assumptions or discount factors for cases where the deviation may lead to a reduction in the accuracy of the calculation of emission reductions to ensure that emission reductions will not be over-estimated as a result of the proposed alternative monitoring.

### Procedural requirements

- DOEs must follow the “Approval from the EB” track.

## Procedural steps for seeking prior EB decision

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### Submission requirements

- Request for approval of post-registration changes form.
- A validation or assessment opinion
- Revised PDD (in both clean and track-change versions)
- Any supplemental documentation

### Procedural Steps

- Submissions shall be schedules for commencement
- Completeness check stage of 7 days
- Secretariat assessment stage of 14 days
- If required, clarification request with 14 days to reply
- If required, seeking inputs from the relevant Panel/Working Group
- If required, finalisation of secretariat assessment stage of 14 days
- Submission to EB (either direct to EB members or consideration at EB meeting)
- 20 day objection period when directly submitted to EB members

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# Discussion

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