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**Note:** The comments provided are not based on a complete evaluation of the standard but only refer to specific sections where areas for improvement have been identified in the past by CDM Watch.

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#	Para No./ Annex / Figure / Table	Line Number	Type of input 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)
1	120		ge / te	Manipulation of the investment analysis in order to make projects appear additional is an issue which is frequently reported to CDM Watch. One possible means to address such manipulation is to compare the input values and parameters in the PDD with information that was provided to the entities providing the debt funding. The advantage of this approach is that this information constitutes external communication which could be cross-checked with the entity providing the debt funding.	Introduce a new sub-paragraph:  In the case where debt is used to finance the project: cross-check the input parameters and values used in the investment analysis with those presented to entity(ies) providing the debt funding.	
2	225ff		ge / te	The VVS implicitly assumes that applicability conditions are only documented in the PDD and checked at validation. This is appropriate for a many applicability conditions. However, some applicability conditions in baseline and monitoring methodologies are phrased in a way that they refer to the actual implementation of the project activity (E.g. “during the operation of the project activity (...”). Some applicability condition cannot be assessed at all during validation, as they depend on circumstances when the project is up and running. In this regard, they need to be monitored and verified by the DOE. However, the VVS does not contain any sections which explicitly require to check whether these applicability conditions actually apply. It is therefore recommended to include a new section to address this issue.	Introduce a new sub-section, requiring the DOE to assess whether applicability conditions, which refer to the implementation and operation of the project activity, have been met during the monitoring period.	