

Name of submitter: Anja Kollmuss

Affiliated organization of the submitter (if any): CDM Watch

Contact email of submitter: anja.kollums@cdm-watch.org

Date: 12 October 2012

0	1	2	3	4	5	6
#	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	All paragraphs		ge	<p>It is recommended that the draft standard is integrated in the “Project Standard”. This ensures that inconsistencies between the new standard and the project standard are avoided. It makes the requirements also more easily accessible.</p> <p>The comments below illustrate in more detail that the proposed approach of replacing single words in the project standard would result in some cases in inconsistencies in the CDM framework or in meaningless text. This strongly supports the argument that a full amendment to the project standard is a better approach rather than a separate standard which replaces single words in the project standard.</p>	It is strongly recommended to integrate the document in an amendment of the “project standard” rather than developing a new standard	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
2	All paragraphs and specifically paragraphs 17 and 18		te	<p>The document implicitly assumes that baseline emissions are determined through one single standardized baseline. However, this is not always practical. In many cases, baseline emissions do not only include one emission source but several emission sources. For example, in the case of a landfill project the baseline could include (a) avoided methane from the landfill (b) the displacement of electricity in the grid and (c) the displacement of heat in a specific facility. In such a case, it does not make sense to determine the baseline emissions from avoided methane as a standardized baseline, as these are determined through direct metering of the captured methane. For this reason, the “Guidelines for the establishment of sector specific standardized baselines” also highlight that in such cases this emission source should be determined based on direct metering of the methane captured.</p> <p>Similarly, a normal baseline may be used for the replacement of heat if a standardized baseline is not available. Such situations are not reflected in the proposed text. Instead, it is suggested to be mandatory that in such cases all baseline scenarios and all baseline emissions are determined in a standardized way. This will either not be possible or strongly reduce the accuracy of the emission reduction calculation in situations where accurate data to determine actual baseline emissions is available. For this reason, requirements for the determination of the baseline scenario or the baseline emissions in paragraph 41-45 may still be required for some emission sources.</p>	Delete the paragraph and allow in an amended project standard situations where only some baseline emission sources are determined through standardized baselines.	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
3	All paragraphs and specifically paragraphs 17 and 18		te	Even if a standardized baseline is used for the determination of baseline emissions, some information with regard to the baseline determination may still be required. Standardized baselines are often emission factors or default values which alone do not yet provide provisions to calculate absolute baseline emissions. The standardized baseline emission factor or default value usually needs to be multiplied with an activity level. For example, where the grid emission factor is used as a standardized baseline, this section may need to include provisions to determine the baseline electricity consumption. In the case of a cement plant the standardized baseline emission factor may need to be multiplied with the cement production under the project activity to determine baseline emissions.	Delete the paragraph and reflect in an amended project standard that standardized baselines do not provide absolute emission levels but consist of emission factors or default values. This requires methodology-specific equations to calculate the absolute emissions level.	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
4	11 and Appendix 1		te	<p>Paragraph 11 implicitly assumes that, when deriving a standardized baseline from a methodology or tool, the methodology or tool provides for a standardized method to both establish the baseline (scenario) and the baseline emissions. However, this is in practice not always the case. A number of tools and methodologies will only provide a standardized baseline emission factor but not the baseline scenario. For example, the application of the “Tool to calculate the emission factor for an electricity system” only provides a grid emission factor but not the baseline scenario. Similarly, the methodology ACM0002 provides different approaches to determine the baseline scenario, depending on whether the project is a greenfield or a brownfield project. Given that the Board decided that the verification of grid emission factors, as requested by the CMP, should be part of the procedures for the submission of standardized baselines, the standard should cover the situation where only a standardized emission factor is determined. Moreover, the wording is unclear. It could easily be interpreted that “baseline establishment” and “baseline emission estimation” are the same thing, as the difference is not very clear. In addition, in most cases, a standardized approach to establish baseline emissions will only determine a standardized baseline emission factor which is then multiplied with an activity level, whereas the text suggests that the absolute emissions level is determined through the approach. To avoid confusion, we recommend to continue to use the terms that are well establish under the CDM, such as “baseline emission factor” or “baseline scenario”.</p>	<p>Amend paragraph 11 and Appendix 1 by replacing the wording “Baseline establishment and baseline emission estimation” by “Determination of the baseline scenario and/or baseline emission factor”</p>	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
5	12		ge	<p>The proposed replacement of the words “methodology” with “standardized baseline” in the project standard would introduce major inconsistencies, unclarities and would in a number of cases make the requirements meaningless. This is illustrated with few examples which are by no means exhaustive and which cover only the first “replacements” of words:</p> <ul style="list-style-type: none"> - Section B of the PS would be called as “Identification of project type and selection of standardized baseline”. This would not make any sense, as the PPs still need to select a baseline or monitoring methodology, even if they use a standardized baseline. - For the same reason, paragraph 23 would not make any sense. PPs would need to select both an approved methodology and approved standardized baseline. - Paragraph 24a would neither make sense. Project participants would be guided to submit a request for revision of an approved standardized baseline. However, there is no existing procedure to submit a request for revision to an approved standardized baseline. - The same holds for paragraph 25. There is no procedure to seek clarification on an approved standardized baseline. The replacement of the word methodology does not make any sense here. 	Delete the paragraph and develop an amendment of the project standard instead.	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
6	15		te	<p>The proposed standard recommends that the selection of a standardized baseline fully replaces the selection of an approved baseline and monitoring methodology. This contradicts approved procedures and templates for standardized baselines under the CDM under which a standardized baseline is used IN CONJUNCTION with an approved methodology but not INSTEAD of an approved methodology.</p> <p>As rightly highlighted in the standard, the standardized baseline only replaces the baseline (scenario) determination, baseline emissions and/or additionality demonstration but not the monitoring of project emissions, the applicability conditions, or the determination of leakage. For this reason, a standardized baseline can not be used alone. Instead of replacing the paragraph in the project standard, a new requirement should be added that in addition to an approved methodology, the project developers should select and document the chosen standardized baselines.</p>	Delete the paragraph and develop an amendment of the project standard instead.	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
7	16		te	<p>The proposed standard suggests that “prior consideration” shall not apply to projects that use standardized baselines. This provision would seriously undermine the environmental integrity of the mechanism:</p> <ul style="list-style-type: none"> - Firstly, “prior consideration” is a key principle under the CDM to safeguard environmental integrity. If an investor took the decision to implement a project activity without considering the CDM, a project is clearly not driven by the CDM but is implemented for other reasons. Removing this requirement could substantially increase the number of non-additional projects in the CDM. For example, the proposed deletion could result in a situation where a project that has been implemented ten years ago not knowing at all about the CDM receives CDM credits once its emissions fall below the emission level established through the “Guidelines for the establishment of sector-specific standardized baselines”. This could potentially result in a very large amount of non-additional projects entering the CDM. - Secondly, the question of whether the CDM was considered in the decision to proceed with a project activity is independent of the question which methodological approach is used to demonstrate additionality or determine baseline emissions. Under the current rules, projects using methodologies with a positive list also need to demonstrate “prior consideration”. 	Delete the paragraph and maintain the requirement of prior consideration for all projects using standardized baselines.	

Call for public inputs – Template for inputs	Document: “Draft standard for CDM project activities using standardized baselines”
---	---

0	1	2	3	4	5	6
#	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)
8	19, 21 and 22		te	<p>The paragraphs implicitly assume that an approach of positive lists is used for the determination of additionality through a standardized baseline. This may not necessarily be the case. Many stakeholders have proposed different standardized approaches, such as emission benchmarks or flow diagrams which lead, in a standardized way, to the conclusion whether the project is additional or not. Such approaches could be proposed in methodologies which are then used to derive standardized baselines. The text should therefore not presume one specific approach to determine the additionality through a standardized baseline.</p> <p>Secondly, additionality can only be determined for a project as a whole. It does not make sense to determine the additionality of individual measures. This is recognised in the combined tool and additionality tool and well established practice under the CDM. The text appears to assume that additionality can be established for individual measures.</p>	<p>Change the requirement as follows: “For the demonstration of additionality, the relevant procedures and criteria established through the standardized baseline shall be applied.”</p>	