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Date: 12 October 2012

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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	Entire document		ge	The proposed revision to the guidelines for completing the proposed new baseline and monitoring methodology form appears inconsistent with the approach taken on standardized baselines in the decision 3/CMP.6 and in relevant procedures and guidelines adopted by the Board to date. According to the procedures for “Submission and consideration of standardized baselines” an approved methodology can be used to develop a standardized baseline. In such case, a proposed new methodology to derive a standardized baseline should contain methodological approaches to determine in a standardized way the additionality and/or baseline emissions. However, the proposed document proposes that in such cases the respective parts of the methodology should not be completed. This appears in consistent with the approved procedures.	The entire amendment to the document should be redrafted, ensuring consistency with the procedures for “Submission and consideration of standardized baselines”	

Call for public inputs – Template for inputs	Document: “Draft revised guidelines for completing the proposed new baseline and monitoring methodology form” (version 02.0)”
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2			<i>ge</i>	<p>As highlighted in our comments on the other proposed documents (project standard, validation and verification standard), there are important implicit assumptions in this document which would make the use of standardized baselines difficult or impractical. Particularly:</p> <ul style="list-style-type: none"> - There is no distinction between the baseline emission factor and the baseline scenario. In some cases, a standardized baseline may only represent a baseline emission factor but the baseline scenario may be determined in project-specific manner (e.g. in the case of using the grid emission factor as standardized baseline in approved methodologies) - All baseline emission sources are assumed to be determined through standardized baselines. In many cases (as outlined in the comments on the project standard for standardized baselines) this would be impractical, and could reduce the accuracy of the overall emission reductions. - It is assumed that methodologies do no longer provide any guidance on how to calculate baseline emissions. Yet in many cases, it will still be necessary that the methodology provides methodology-specific guidance how the standardized baseline (e.g. an emission factor for t CO₂ / to of clinker) is to be used. 	<p>Re-consider the proposed approach and provide the possibility for methodology submitters to provide additional guidance in the proposed new methodology on how a standardized baseline is to be used to calculate emission reductions. Allow project developers to determine specific baseline emission sources through a standardized baseline, while other emission sources may be determined through a respective methodology procedure.</p>	

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3	Entire document, example paragraph 2, page 23		<i>ge</i> / <i>te</i>	<p>Throughout the document the text refers to methodologies that are submitted “for the purpose of being integrated with a specific standardized baseline”. The text is not fully clear and could be misinterpreted. According to the procedures for “Submission and consideration of standardized baselines” (e.g. paragraph 4) methodologies are not “integrated” with standardized baselines but can have two purposes:</p> <p>1) Methodologies are used in conjunction with an approved standardized baselines derived from the “Guidelines for the establishment of sector specific standardized baselines” (also referred to as Approach 1)</p> <p>2) Methodologies are used to develop a standardized baselines (also referred to as Approach 2)</p> <p>These two cases require substantially different requirements in the proposed procedures. It seems that some parts of the document only consider Approach 1 but not Approach 2.</p> <p>For example, in the case of Approach 2 it would be necessary that the methodology contains a procedure how a standardized baseline scenario can be derived for a country or a group of countries (see page 23). However, the text (see page 23) recommends that this section in the PNM form does not need to be completed. This makes sense for Approach 1 where an approved standardized is derived from the methodological approaches contained in the “Guidelines for the establishment of sector specific standardized baselines” but it does not work for Approach 2 where methodological guidance to derive the standardized baseline would need to be provided in the proposed new methodology.</p>	<p>Replace the current text in paragraph 2 with the following text:</p> <p>“If project participants wish to propose a new baseline and monitoring methodology for the purpose of developing a standardized baseline or for the purpose of applying the methodology together with approved standardized baselines, they shall complete and submit the CDM-NM and a draft CDM-PDD with only sections A-C filled taking into consideration the specific provisions contained in this document.”</p> <p>Change the text in other parts of the document accordingly, clearly differentiating between methodologies under approach 1 and methodologies under approach 2. For example, the amendment on page 23 could read as follows:</p> <p>“In cases where the proposed new methodology is submitted for the purpose of being applied with a standardized baseline derived from the “Guidelines for the establishment of sector-specific standardized baselines” (approach 1), this section does not need to be completed.</p> <p>In cases where the proposed new methodology is submitted for the purpose of deriving a standardized baseline from the methodology (approach 2), this section should include methodological approach to derive the baseline scenario in a standardized manner.”</p> <p>Similar changes are recommended to several other parts of the document to clearly differentiate these two cases.</p>	
4	15 and Table A		<i>te</i> / <i>ed</i>	<p>Technical: Substantive technical comments on the content of the paragraph are included in CDM Watch comments on the relevant standard.</p> <p>Editorial: This language duplicates language from the standard. It is recommended to include a cross-reference to the standard instead of duplicating the language. This simplifies future revisions/amendments and avoids inconsistencies.</p>	Delete paragraph 15 and Table A and include a cross-reference to the relevant standard	

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Page 21			ed / te	<p>The language should be further clarified (see comment above on “integrated”). In addition, the provision does not seem fully consistent with the procedures for “Submission and consideration of standardized baselines”. In the case where a proposed new methodology is developed for the purpose of deriving a standardized baseline, the procedures require that the standardized baseline is derived from an APPROVED methodology. In this case, it would not be possible to state the reference number of the proposed or approved standardized baseline: a proposal for a standardized baseline that is not based on an approved methodology would not pass the initial assessment (see paragraph # of the procedure).</p> <p>Moreover, it is not clear why a submission of a methodology requires a reference to a specific standardized baseline proposal. A project developer could also first develop a new methodology and then, once the methodology is approved, use the “Guidelines for the establishment of sector specific standardized baselines” to derive a standardized baseline which fits the methodology. For assessing the proposed methodology it does not seem necessary to have a proposed or approved standardized baseline.</p>	Delete the proposed amendment	