Call for public inputs – Template for inputs	Document: Draft CDM project standard (PS)
--	---

Name of submitter: Eva Filzmoser

Affiliated organization of submitter (if any): Carbon Market Watch

Email address of submitter: eva.filzmoser@carbonmarketwatch.org

Date of submission: 15 April 2014

#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph	Proposed change (including proposed text, if any)
1	7.1. Description of project activity or programme of activities (31 c)	ge	The current design of the PDD is very technical which makes it challenging for layman and local stakeholders to understand the project activity. The general description of the project should therefore include a non-technical summary of the project activity and a non-technical description of the project's EIA analysis including the project's projected scope, lifetime, adverse impacts and management plans, along with all other relevant information about the project;	Describe the purpose and general description of the project activity or PoA, including a non-techncial summary of the project activity and a non-technical description of the project's projected scope, lifetime, adverse impacts and management plans
2	7.1. Description of project activity or programme of activities (31 b)	ge	Several studies and research finds that the contribution of projects to sustainable development changes over time. The project description shall also include a description on how the project adapts to these changing parameters. This will also help to operationalise the SD Tool and will avoid discrepancies with initially claimed SD contributions to actual implemented achievements. Moreover, several countries, such as India are requiring a sustainable development action plan. Where such national rules exist, projects should include information about these action plans in the project description.	Describe how the project activity or PoA contributes to sustainable development of the host Party <u>and the planned measures to implement the</u> <u>SD contributions;</u>
3	7.2.8.3. Other elements of monitoring plan (56 new para)	ge	Numerous project activities and PoAs already monitor the sustainable development contribution of project activities and PoAs. The monitoring plan should therefore also include information on how the project activities and PoAs monitor the sustainable development contribution.	Parameters to monitor sustainable development indicators where national requirements exist.
4	7.4. Environment al impacts (63)	te	Currently, information about environmental impacts is very short and not very descriptive. Moreover, related documents and information is hardly ever published at the respective location on the CDM website. However, the environmental impacts of projects provide an essential element and should be made public, including related documents, e.g. the EIA analysis documents.	The project participants or the coordinating/managing entity shall carry out an analysis of the environmental impacts of the proposed CDM project activity or PoA, including transboundary impacts. The project participants or the coordinating/managing entity shall provide a summary of the analysis and references to all related documentation <u>and make these</u> <u>publicly available at the CDM website</u> .

Call for public inputs – Template for inputs Document: Draft CDM pr		ument: Draft CDM projec	oject standard (PS)		
#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph		Proposed change (including proposed text, if any)
5	7.4. Environment al impacts (64)	ge	Some countries, such as India, do not require an environme assessment (EIA) for renewable energy projects except hyd However, the environmental impacts of large scale projects associated with the technology used. An analysis of enviror proposed CDM project activity or PoA shall therefore be a r project activities of PoAs.	dro power projects. are not necessarily mental impacts of the equirement for all CDM Pro- pro- ent imp Pa act imp of pro- pro- coo coo coo coo	the project participants or the pordinating/managing entity, or the host Party onsiders e environmental impacts of the proposed CDM oject activity or PoA significant, the oject participants or the coordinating/managing tity shall carry out an environmental pact assessment in accordance with the host arty's procedures. For large scale CDM project ctivities or PoAs an environmental upact assessment shall be conducted regardless possible exceptions by the host Party's <u>ocedures.</u> The project participants or the pordinating/managing entity shall provide all onclusions and references to all related pourted.
6	7.5. Local stakeholder consultation (65)	ge	Current CDM stakeholder consultation requirements are ins poorly defined, regulated and documented. There are dozen projects were registered despite insufficient stakeholder par opposition and clear evidence that the projects cause harm and/or ecosystem. Clarity for project participants to conduct consultations will provide transparency and improve accourt	ns of instances where rticipation, strong local to the local populations t local stakeholder htability.	tional rules on local stakeholder consultation.

Call	Call for public inputs – Template for inputs Document: Draft CDM pr		eject standard (PS)		
#	Para No./ Annex / Figure / Table	Type of input ge = general te = technical ed = editorial	Comment on the paragraph		Proposed change (including proposed text, if any)
7	7.5. Local stakeholder consultation (66)	te	appropriate and effective means such as: radio, newspapers a in the local language distributed and put up at local meeting p area (e.g. at community centers, churches, libraries, schools a	points in the project and post offices)	The project participants or the coordinating/managing entity shall invite comments from local stakeholders in an open and transparent manner <u>using appropriate and effective means</u> , in a way that takes into account national and cultural circumstances and facilitates comments to be received from local stakeholders. At least the following local stakeholders shall be invited: <u>local people impacted by the project or their official representatives, local policy makers and representatives of local authorities, an official representative of the DNA of the host country of the project and local NGOs working on topics relevant to the project. To allow for a reasonable time for comments to be submitted, the stakeholder consultation shall be announced at least 30 days prior to the consultation meeting. The invitation to the local stakeholder consultation shall include a non-technical description of the project's EIA analysis including the project's projected scope, lifetime, adverse impacts and management plans, along with all other relevant information about the project, taking into account confidentiality provisions of the applicable CDM M&Ps. <u>All</u> relevant information shall also be made public on the website of the respective DNA.</u>

Note: Please add rows as necessary.