

Public scrutiny of CDM projects – tools for civil society



Antonia Vorner, CDM Watch

www.cdm-watch.org

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„Civil Society Workshop on Carbon Markets in South East Asia“

About CDM-Watch

Why engage?

The phases of a CDM project and public participation rights

CDM Actors – who is who?

Get Involved!

Stop the generation of carbon credits when emissions are not actually reduced



Stop projects with negative impacts from generating CDM credits



Strengthen the voice of those affected by or concerned about CDM projects



International Level (UNFCCC)

- Expose deficiencies of the CDM
- Influence the political process (UNFCCC, CDM EB, etc...)

European Union

- Influence European governments and companies not to buy credits from harmful projects
- Influence the legislative process

CDM Watch Network

- Support, train and collaborate with local movements, NGOs and affected communities to stop harmful CDM project activities



**Additionality
Sustainable
Development?
Effectiveness?
Perverse incentives
Justice & Equity?
Ecological Limits to
Offsetting**

...







Concerns, problems and complaints:



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What concretely can be done against harmful CDM projects?



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What aspects to adress at what level?

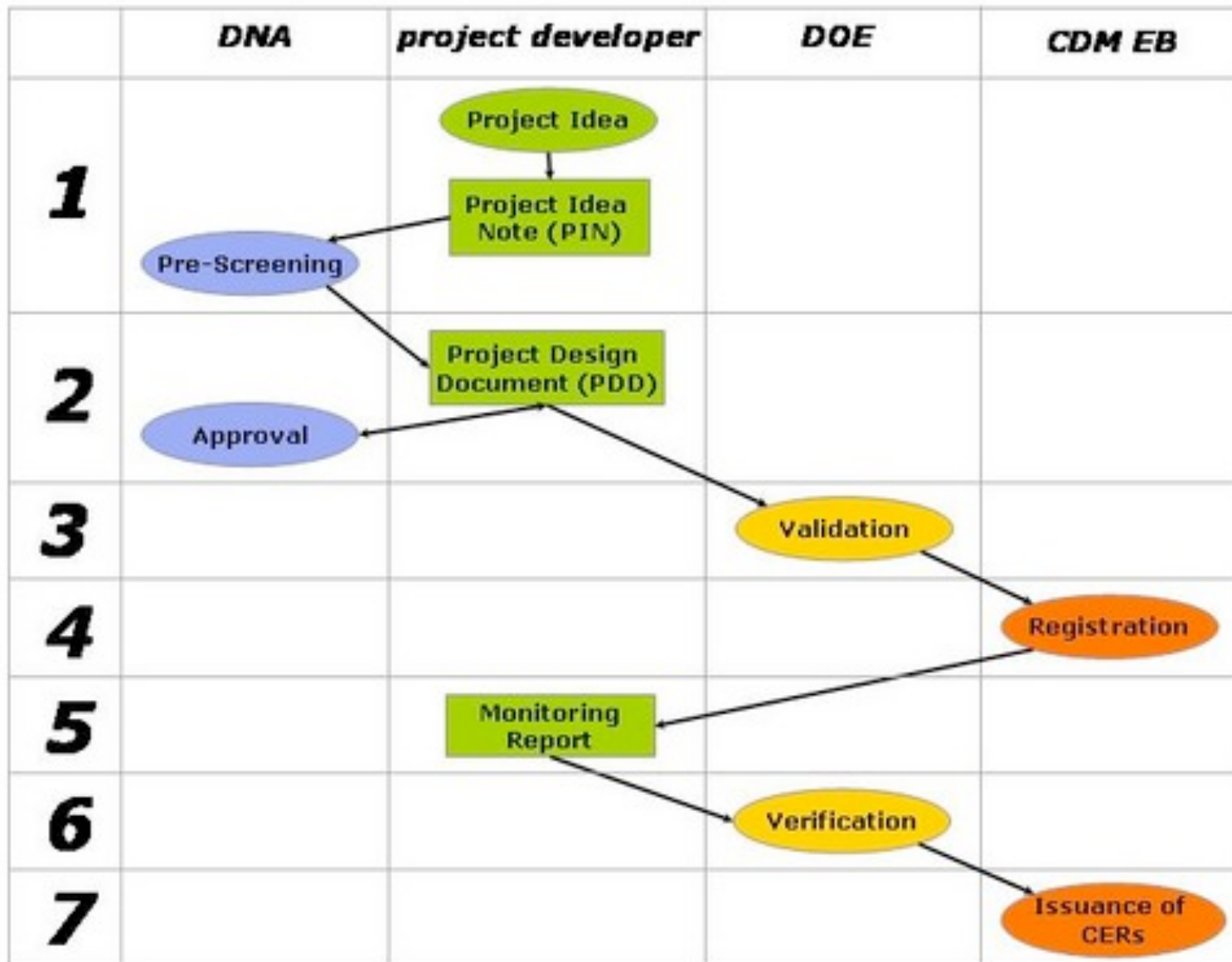


Concerns, problems and complaints:

What concretely can be done against harmful CDM projects?

What aspects to address at what level?

Current rules and need for public pressure.



- **CMP**
- **SBSTA/SBI**
- **CDM Executive Board (EB)**

UNFCCC



- **Designated National CDM Authority (DNA)**
 - Host country
 - Annex-I
- **UNFCC Delegations**

Government



- **Project developer**
(ex. South Pole)
- **PDD Consultant**
(ex. Perspectives)
- **CDM Project Auditor –DOE**
(TUEV, SBS, DNV)
- **Company that buys credits** (RWE etc..)

Private Sector



Financing bank (WB, DB, IBRD, etc)



- Rules and Procedures
- Final decision on CDM projects
- Future of the CDM

UNFCCC



- EIA + rules on ev. public hearings
- SD criteria
- Initial approval of CDM Project
- Annex-I: credit buyers

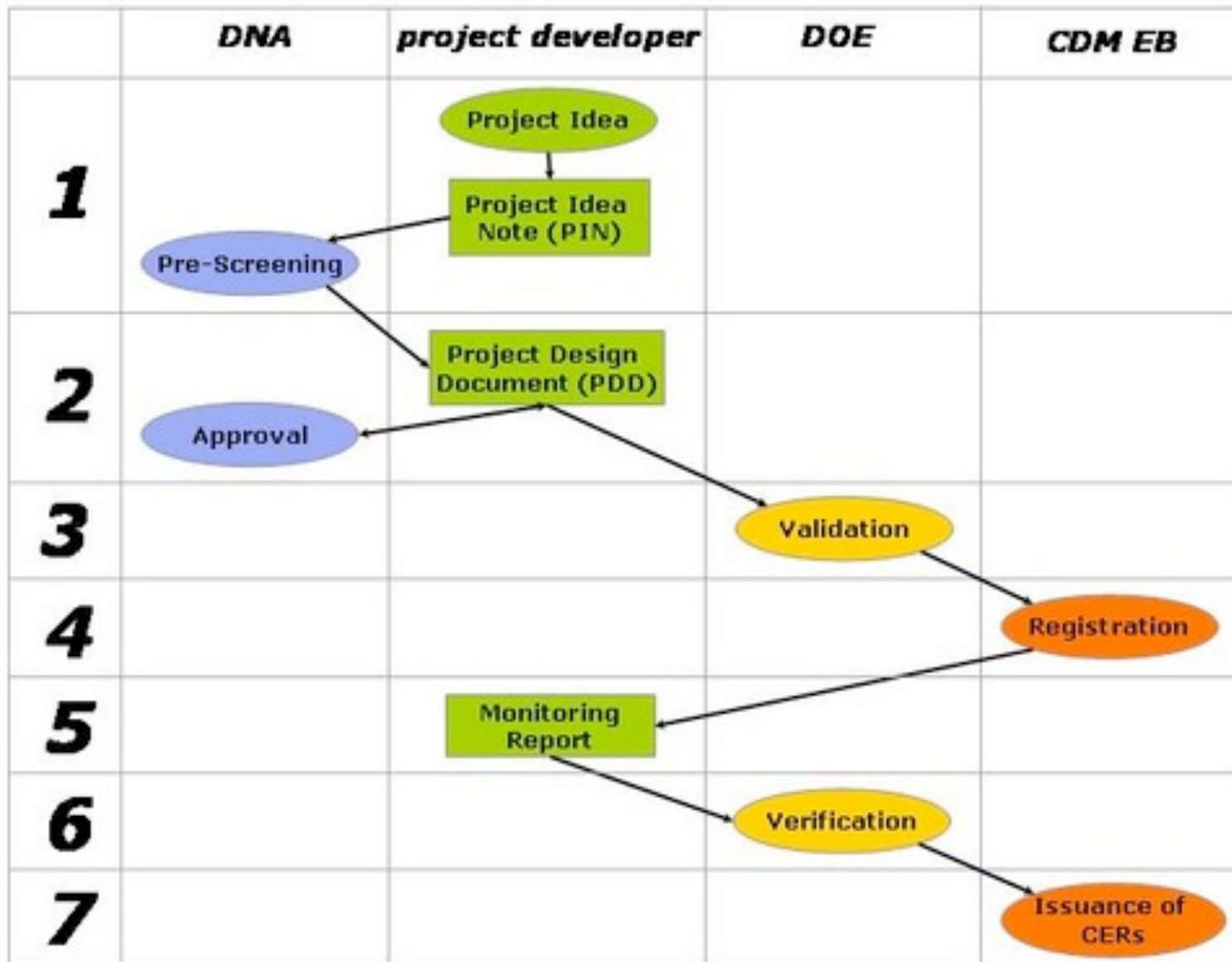
Government



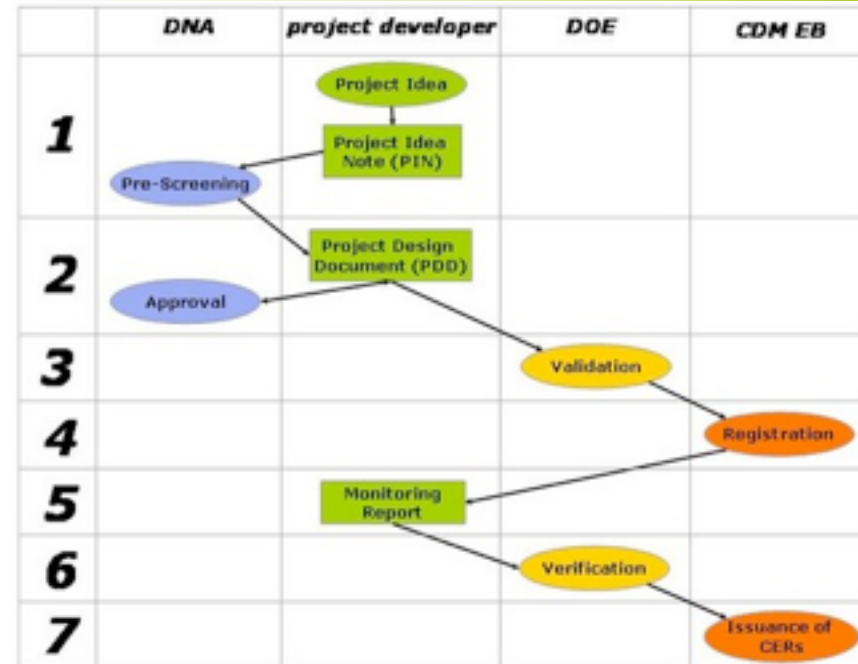
- Development of projects
- Validation, Verification and Certification of projects
- Public Consultation Process
- Credit buyer

Private Sector



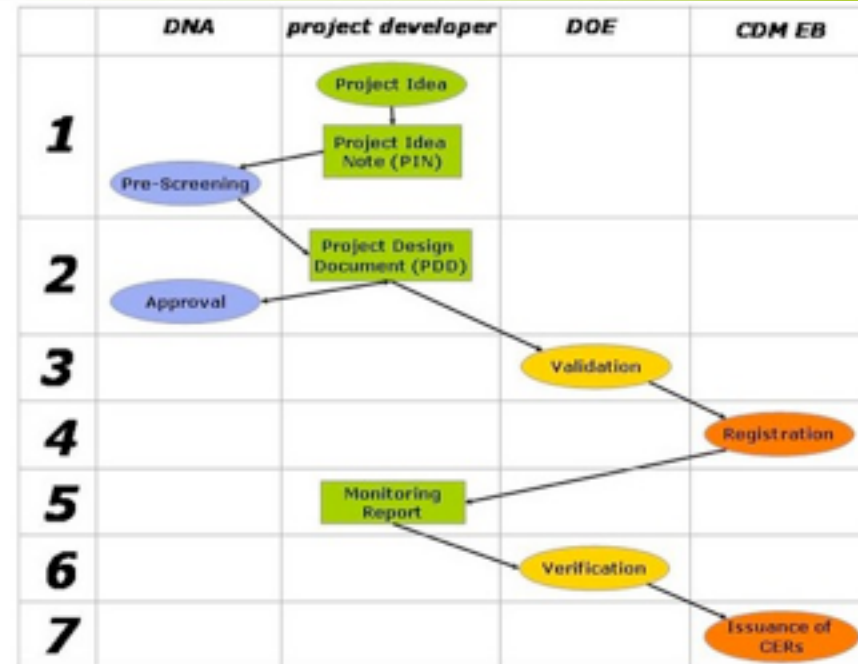


Project Idea – PIN / PDD





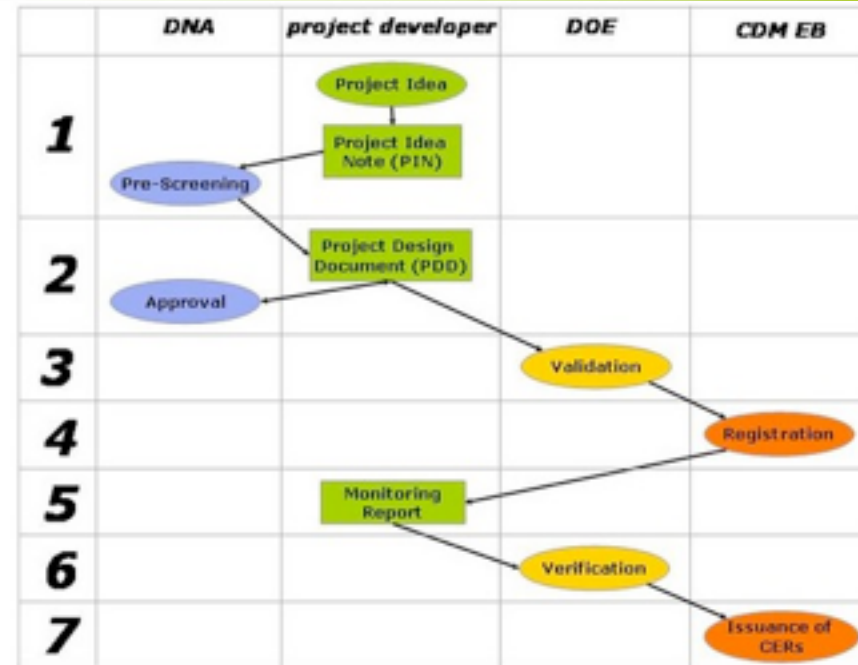
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**Project Idea Note
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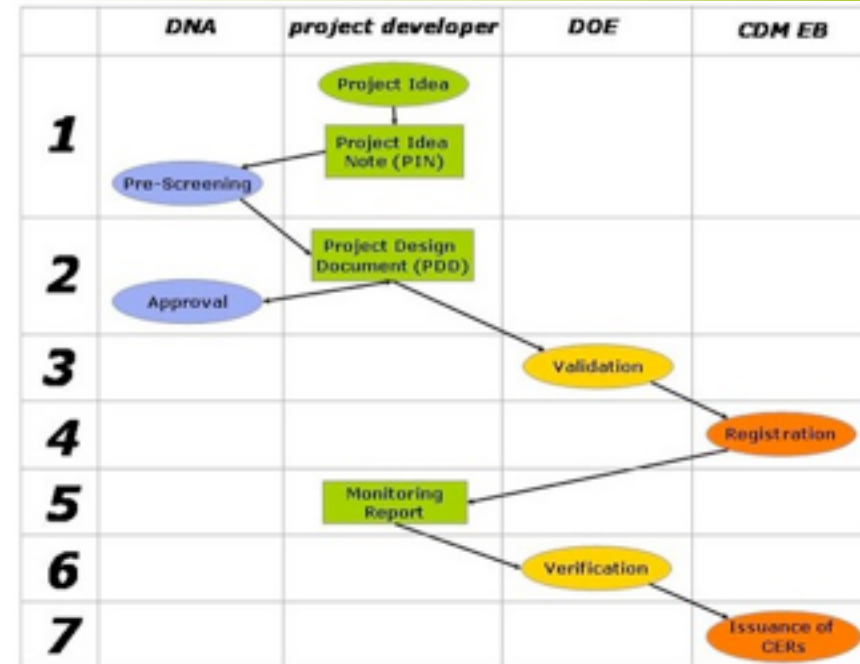




**Project Idea Note
(PIN)**

1. Project developer approaches Host Country Government

Project Idea – PIN / PDD



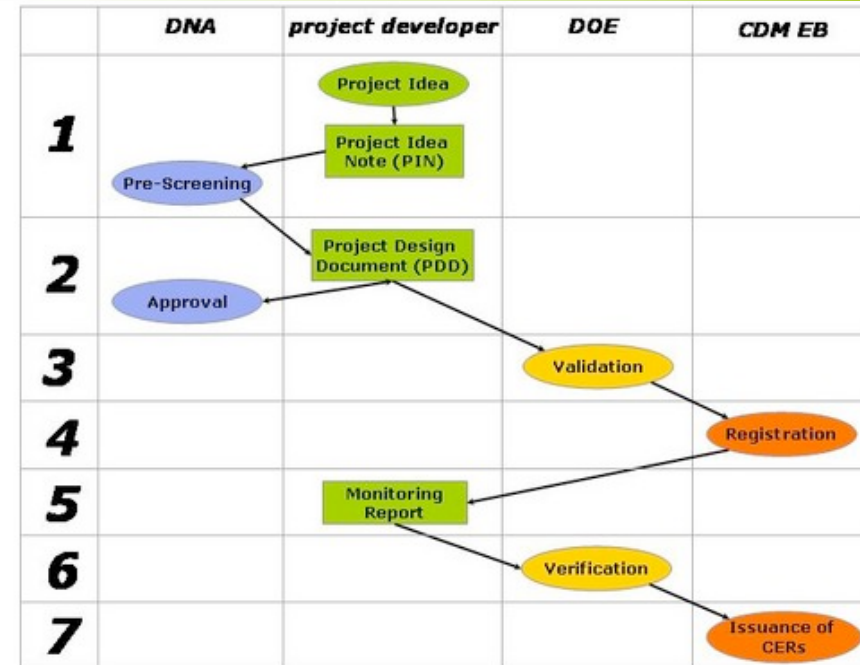


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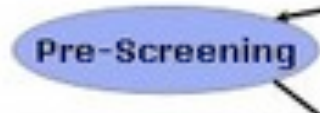
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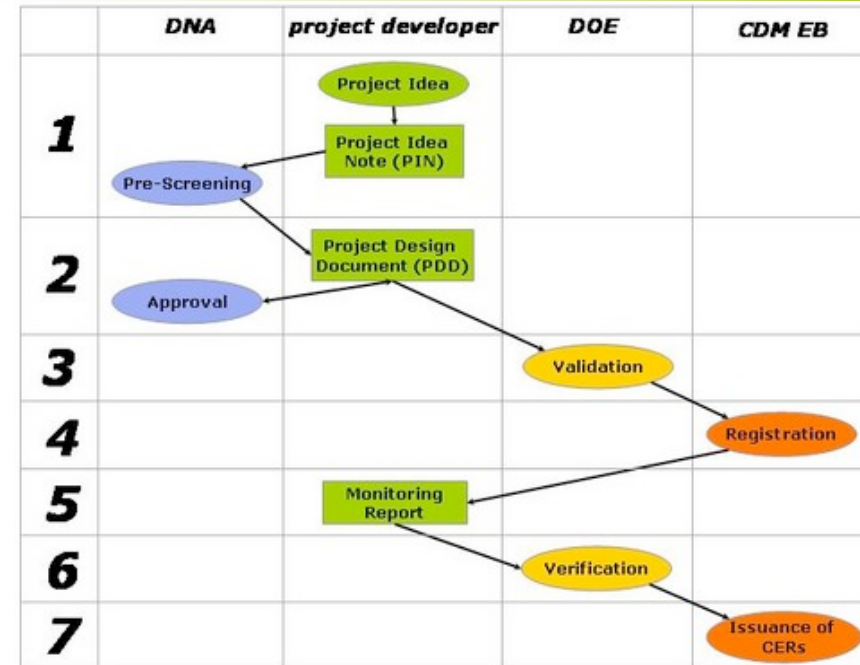




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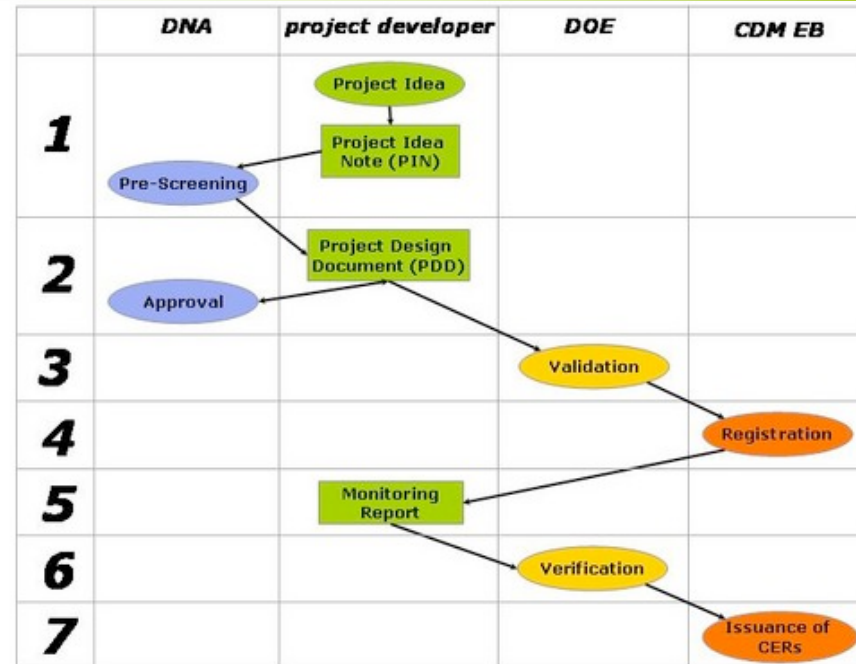


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SD?

Project Idea – PIN / PDD





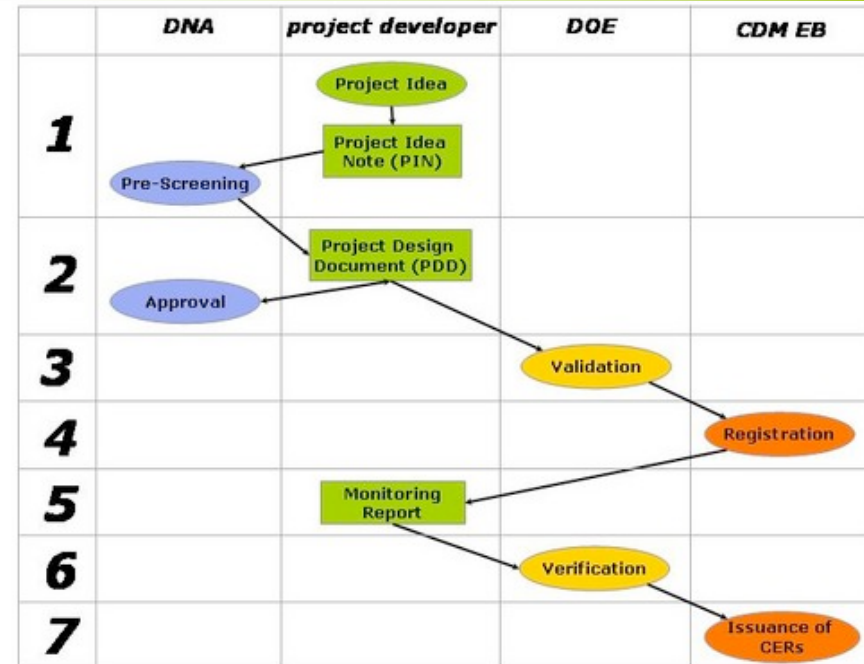
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EIA?

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Project Idea – PIN / PDD





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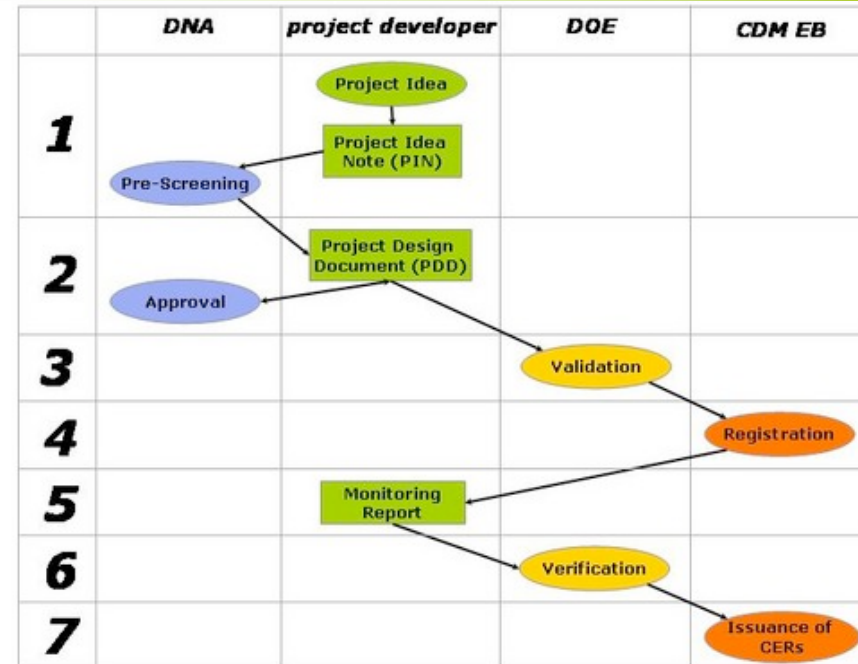


EIA?

Public Consultation?

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Project Idea – PIN / PDD





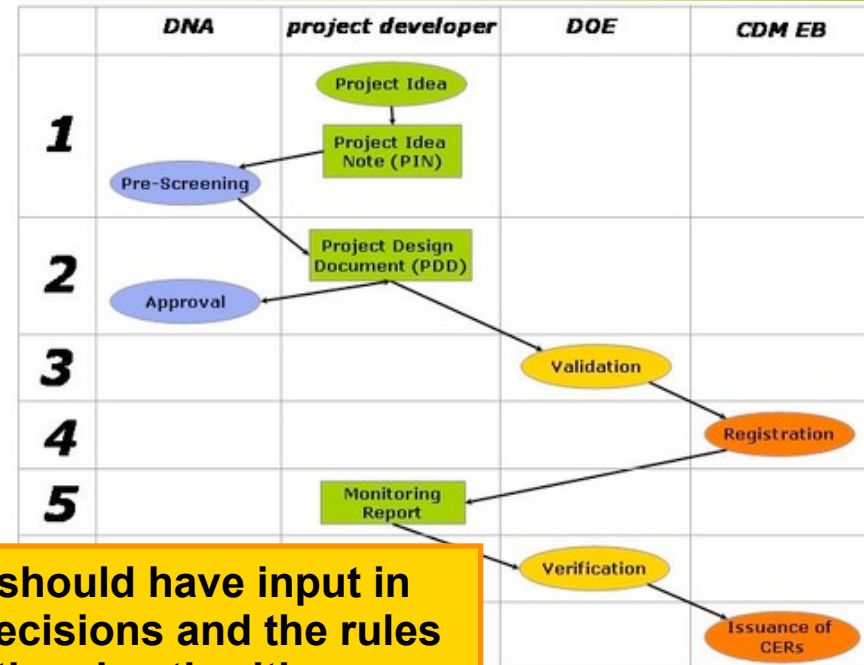
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Pre-Screening

EIA?

Public Consultation?

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CSO should have input in the decisions and the rules of national authorities.

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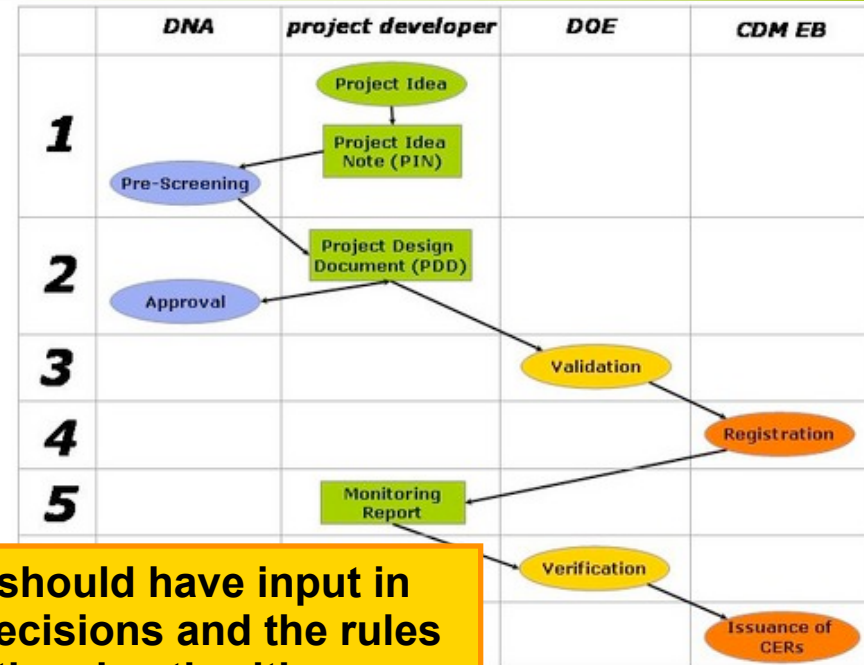
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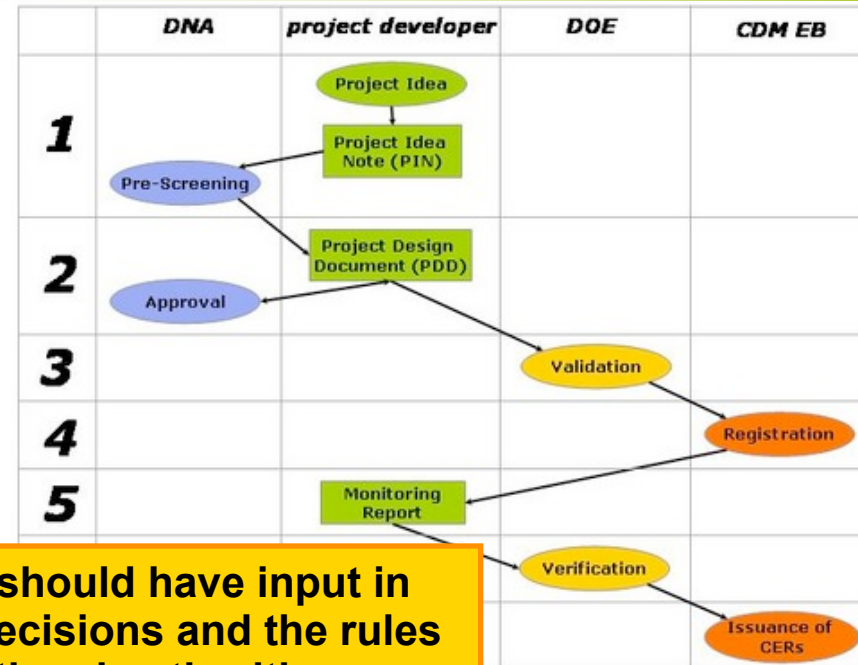
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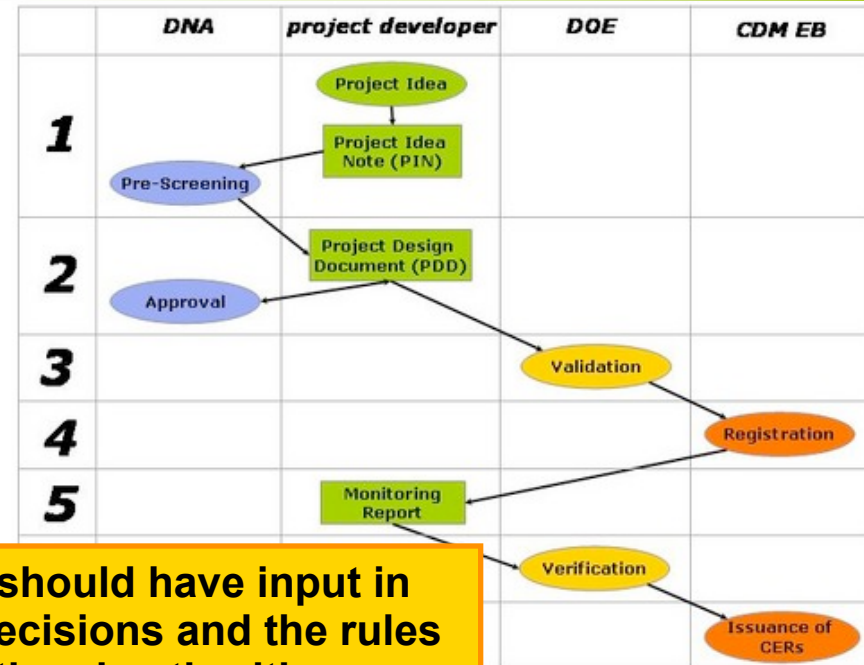
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2. Approval of CDM Project by Host Country CDM Authority - DNA

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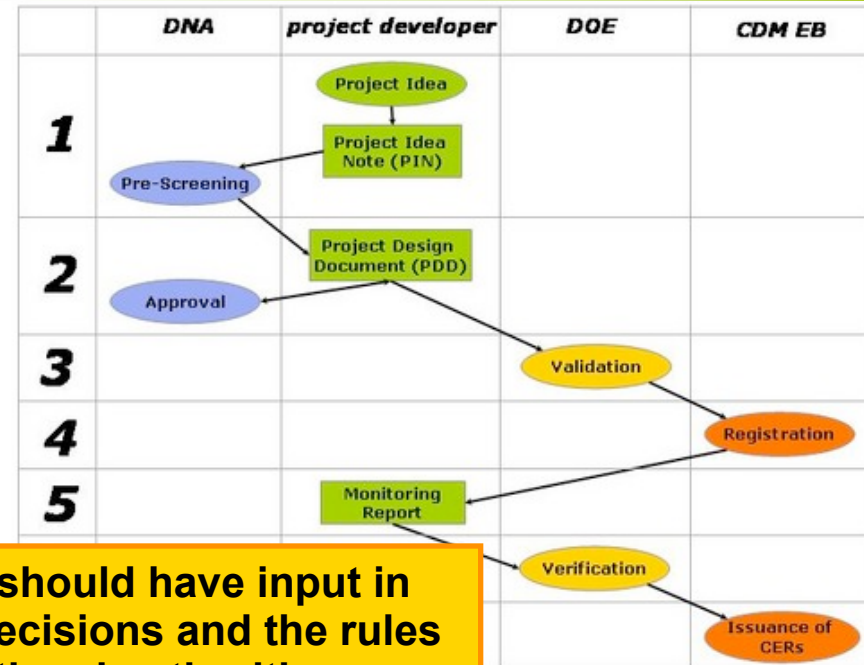
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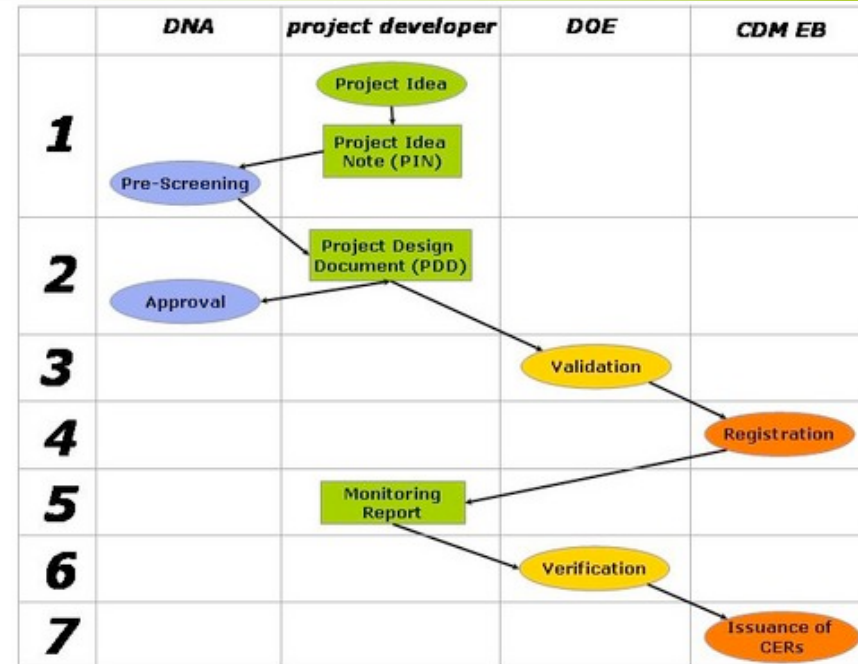


Approval

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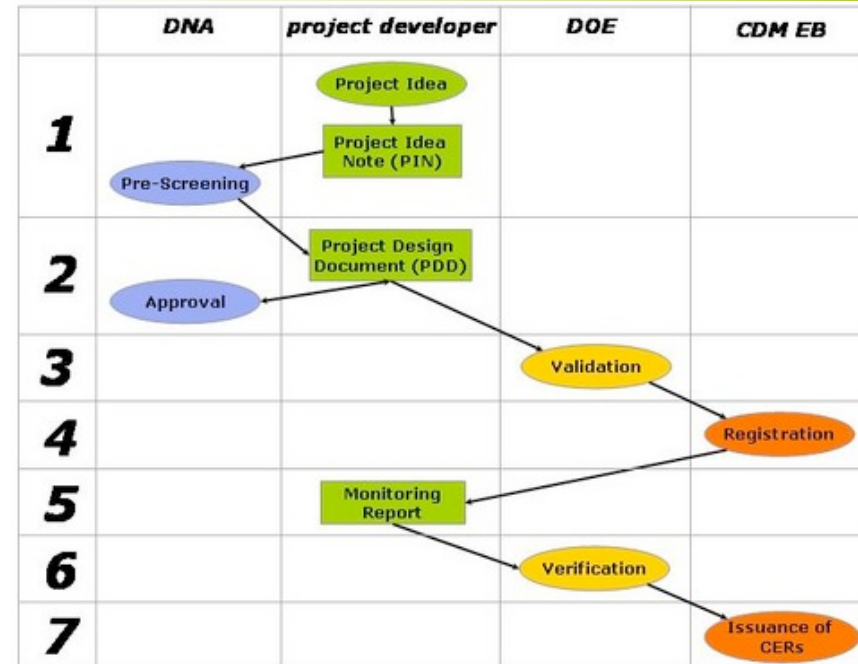
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Project Design Document (PDD)



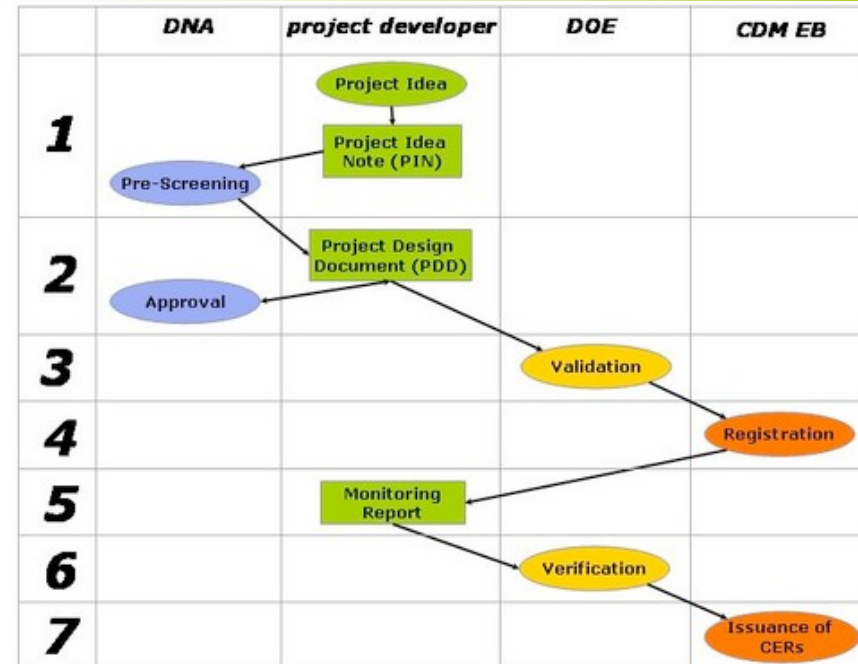
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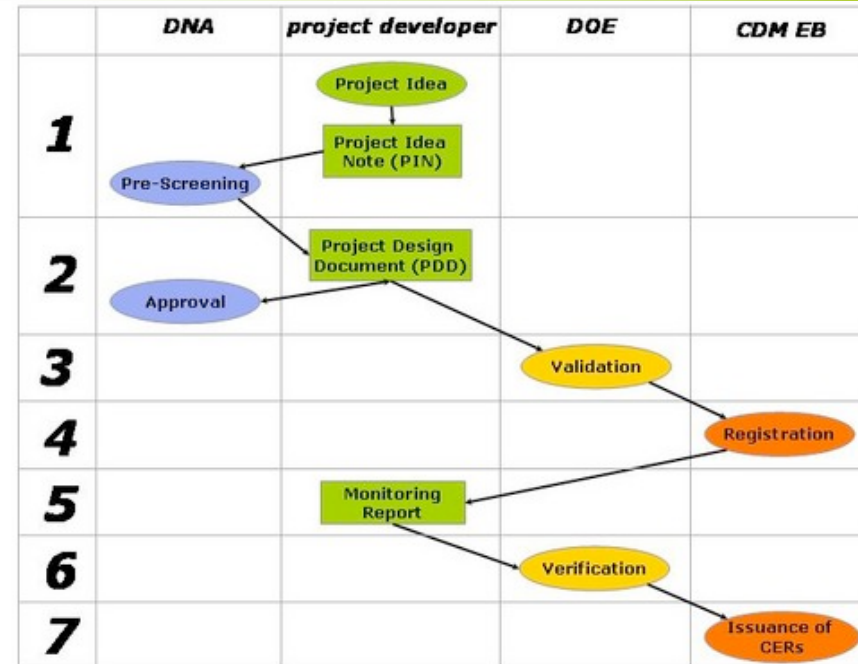


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Before validation the project developer must carry out a public consultation according to national law –
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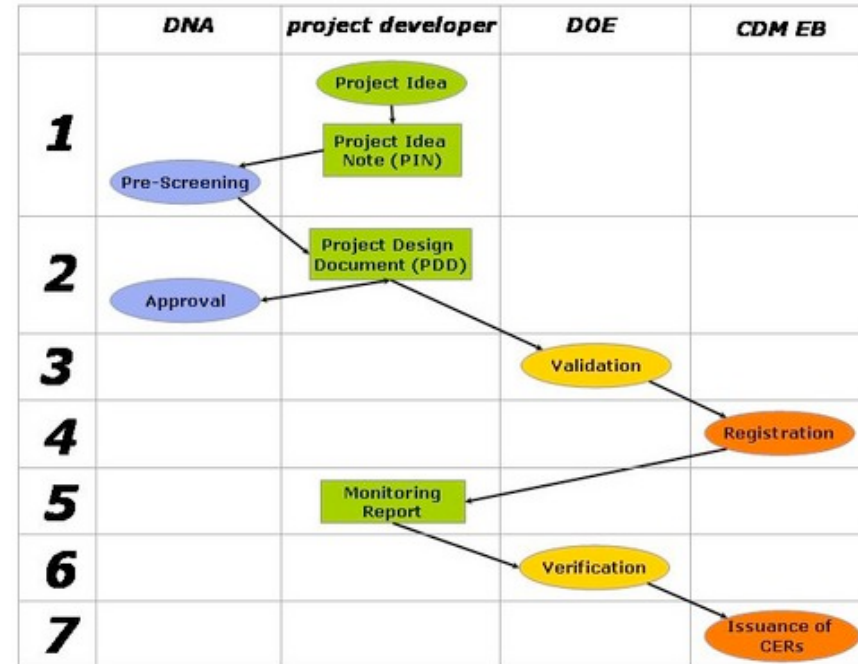
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by certified CDM auditing company, called a Designated operational Entity (DOE)



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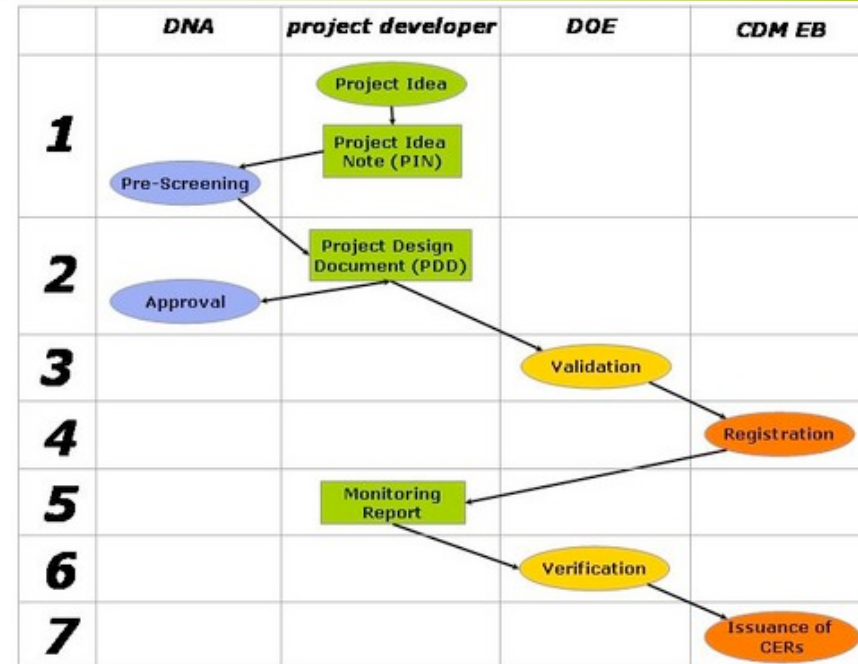
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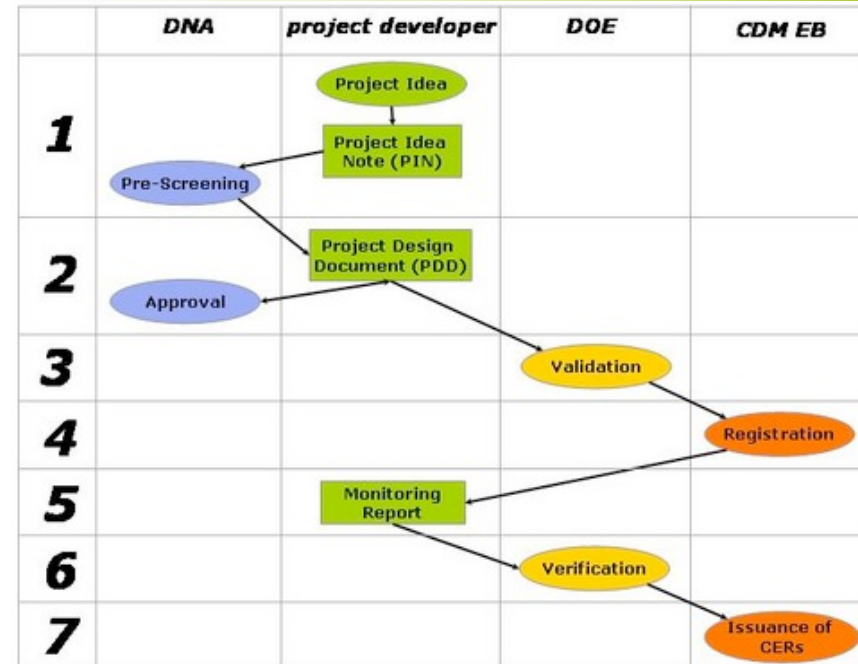
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30-Day Comment Period
as a part of the validation process

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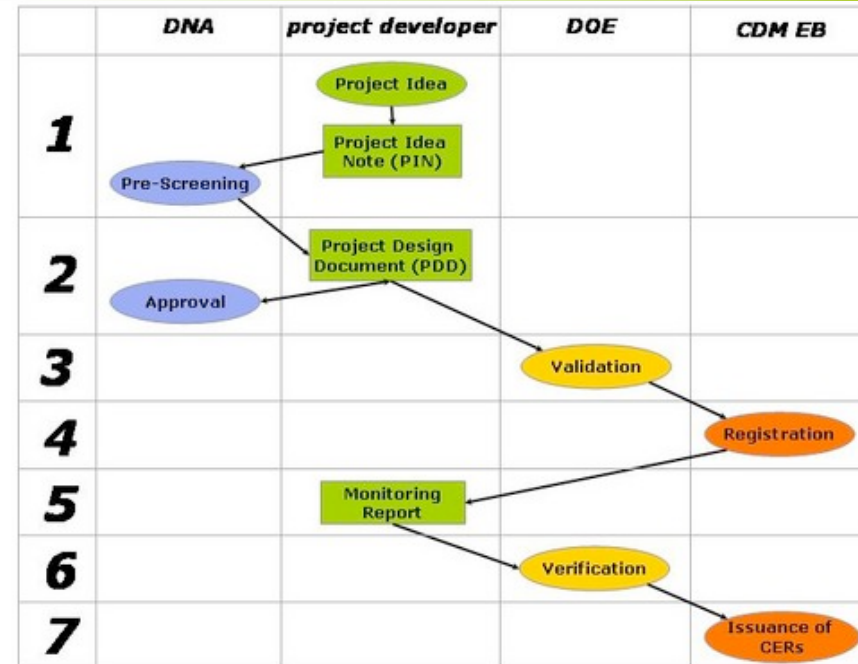
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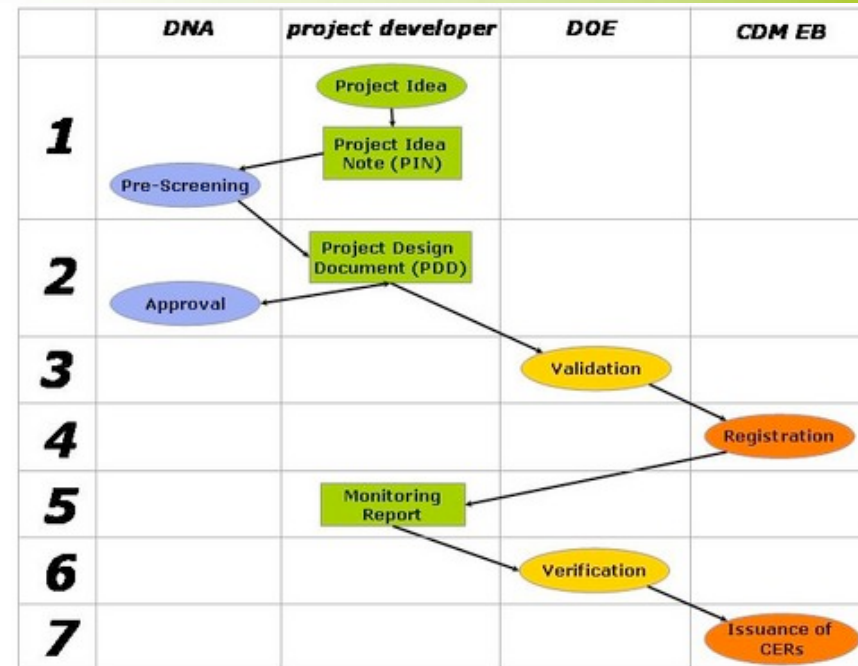
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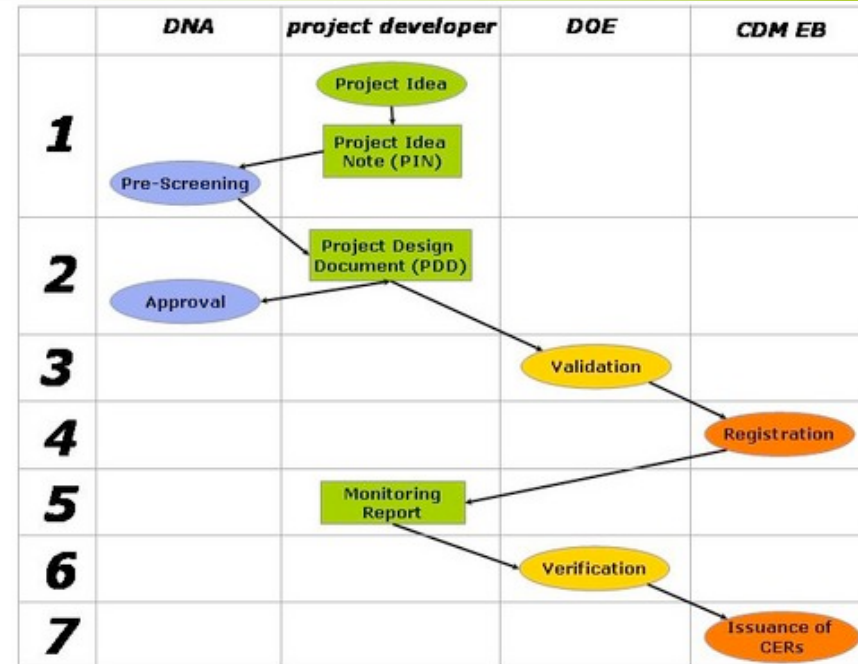
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Project can be withdrawn



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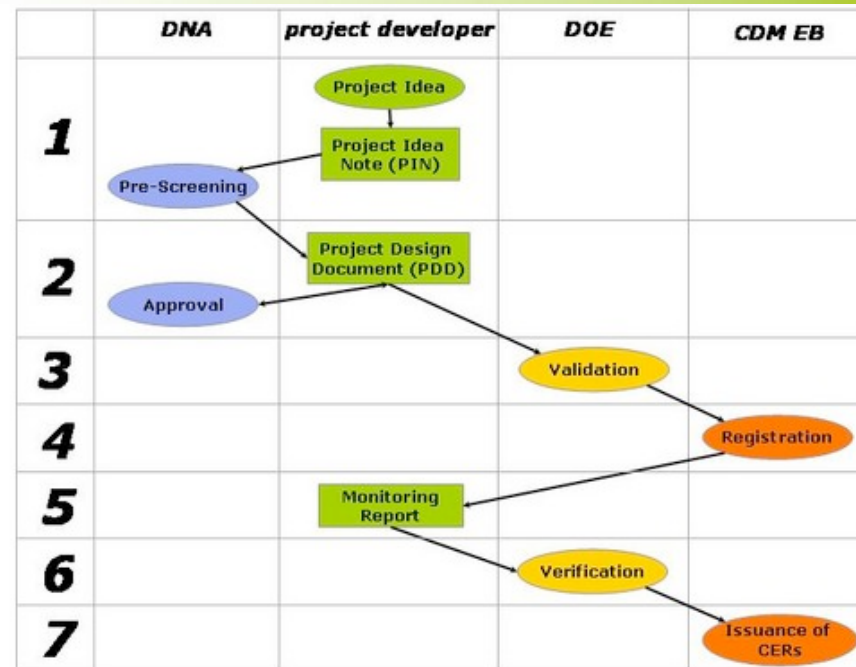
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Project can be withdrawn

Compliance with CDM rules?



Validation



30-Day Comment Period
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DNA letter of approval

Has your DNA approved this project?

Public consultation

Were you consulted by the project developer?
Does the summary in the PDD accurately reflect what you said and does it address the concerns you had?

EIA

Was the EIA carried out according to national laws and standards?

Additionality

Will this project go ahead anyway if it is not registered as CDM project

Has the project already begun? Construction works etc..?

Baseline: accurate and credible estimation of what will happen in the absence of the project being registered as a CDM project?

SD

Does the project contribute to sustainable development in your country?

Local Stakeholder consultation

Were you consulted by the project developer?

How were you informed about the meeting? Timing?

Who was invited? Who was present?

What topics were raised? Were you informed about the project, its impacts and the CDM?

Did your questions/concerns get answered?

What was promised?

VVM

Need for stronger rules!

<http://www.cdm-watch.org/wordpress/wp-content/uploads/2010/02/CDMWatchSubmissionValidationProcess4.pdf>

Start of 30 day commenting period

Through alert@cdm-watch.org &
UNFCCC RSS feeds

Research & draft comment – need to focus on the violation of CDM rules (additionality, local stakeholder consultation, etc..)

Submission in English, through online system

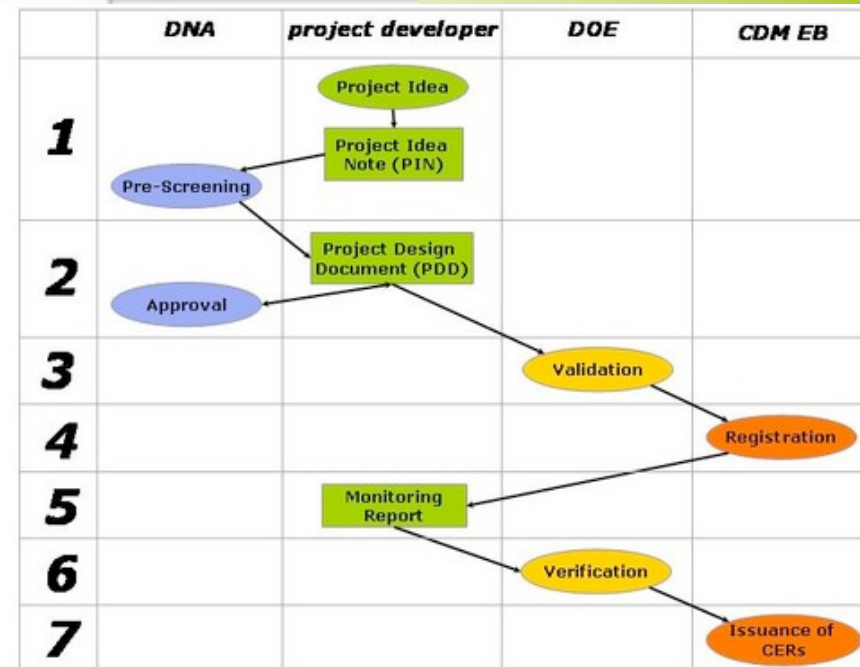
Deadline: 24h GMT on last day



Next steps:

Prepare for publication of validation report (~ 1 year) –
comments must be taken into account – project can only
be validated if DOE can prove that project complies with
rules despite your claims!

Contact DNA to be kept informed about new projects being developed

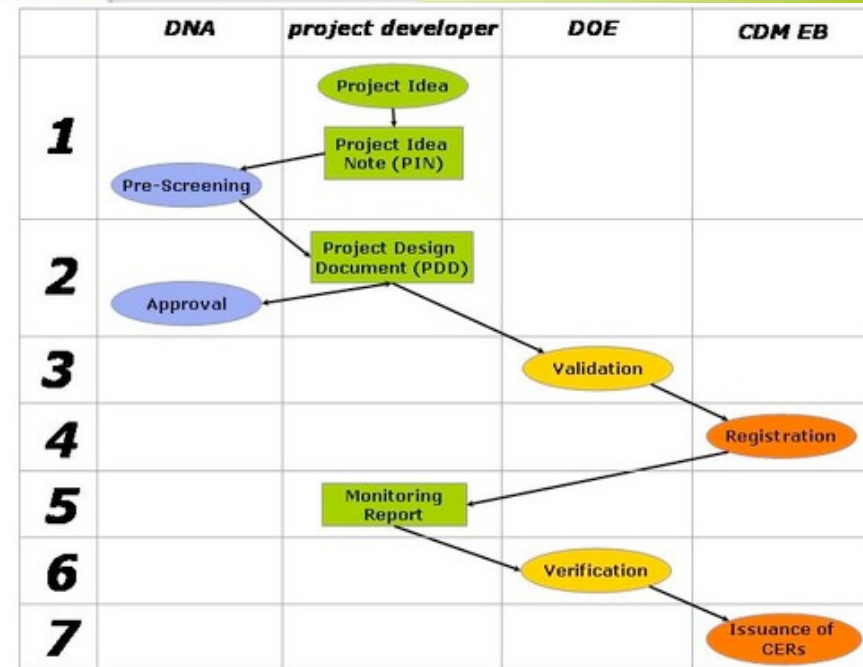


Request for registration

The PDD and validation report are submitted to the CDM Secretariat



Registration



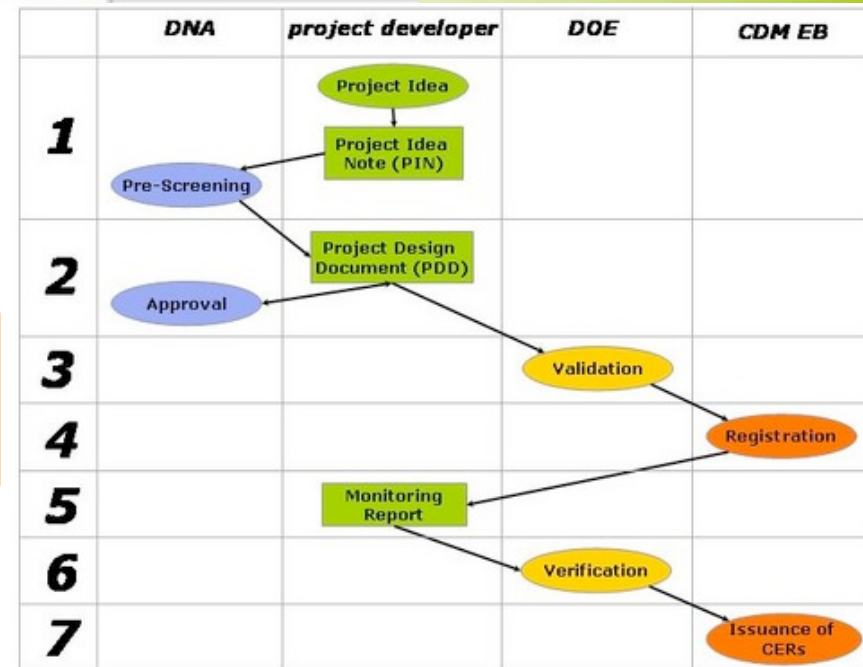
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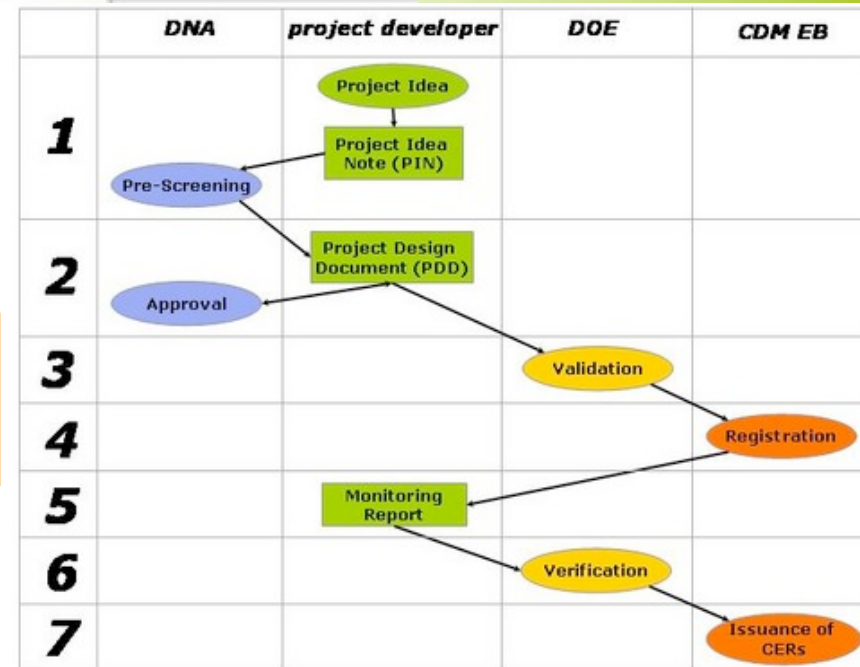
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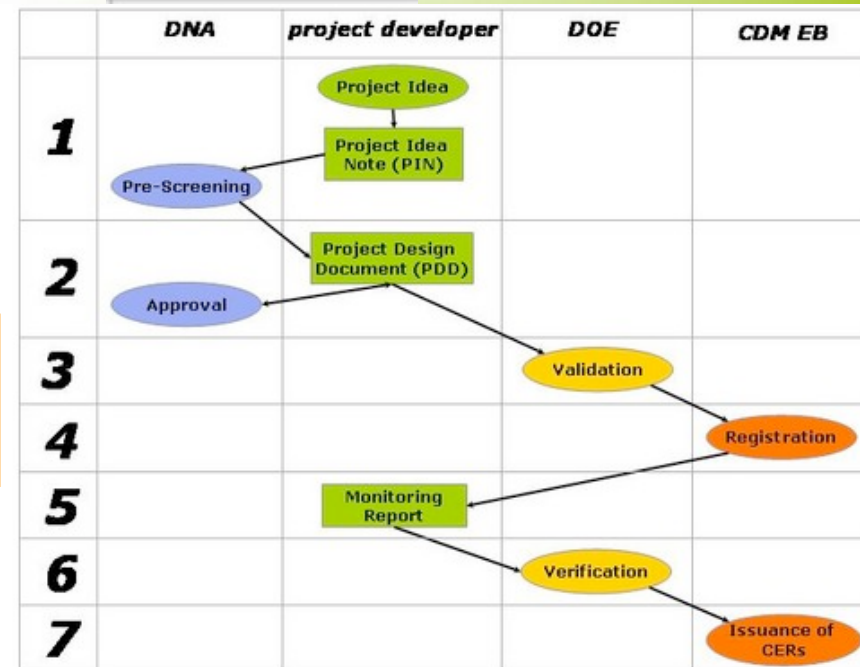
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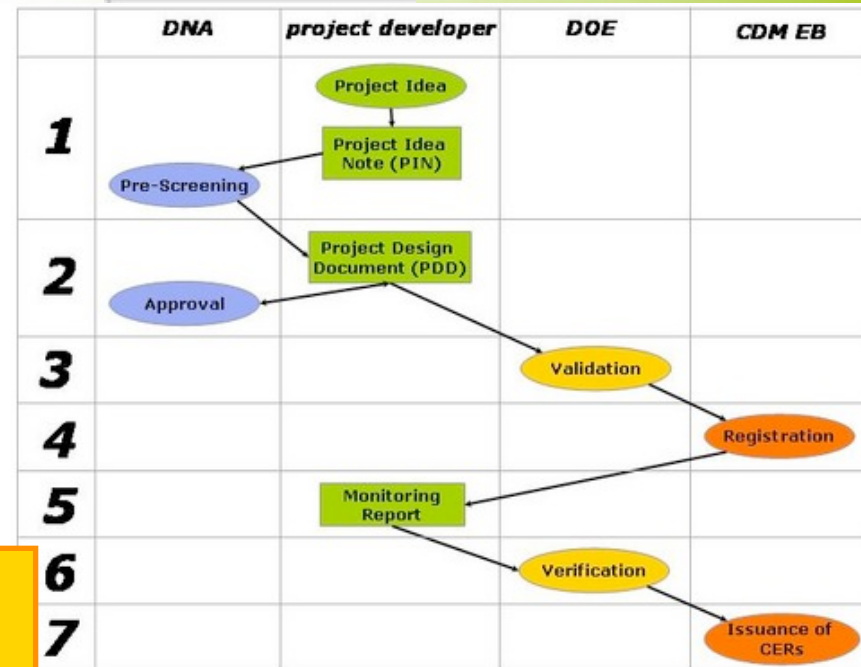
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Lobby **Government** or three members of the CDM EB to request a review



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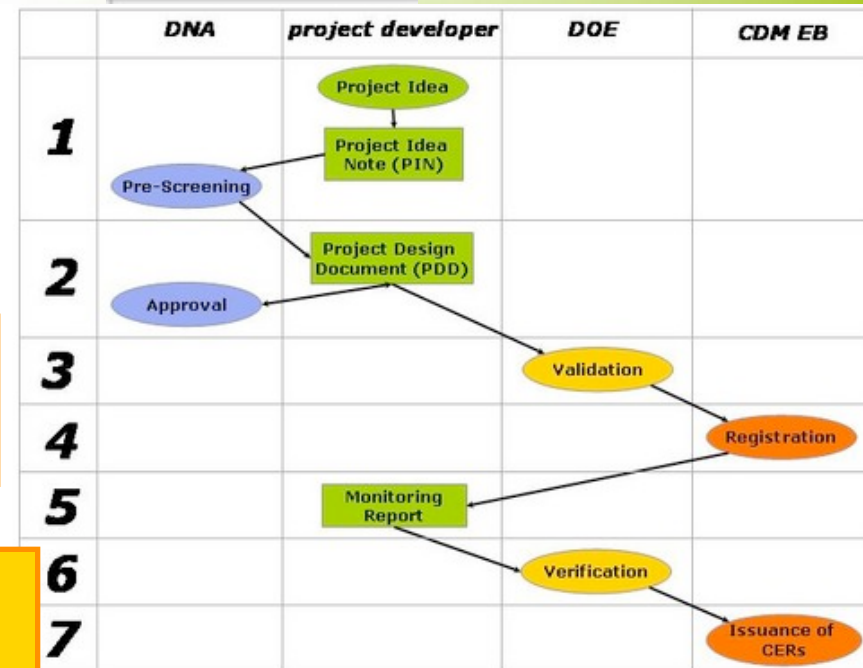
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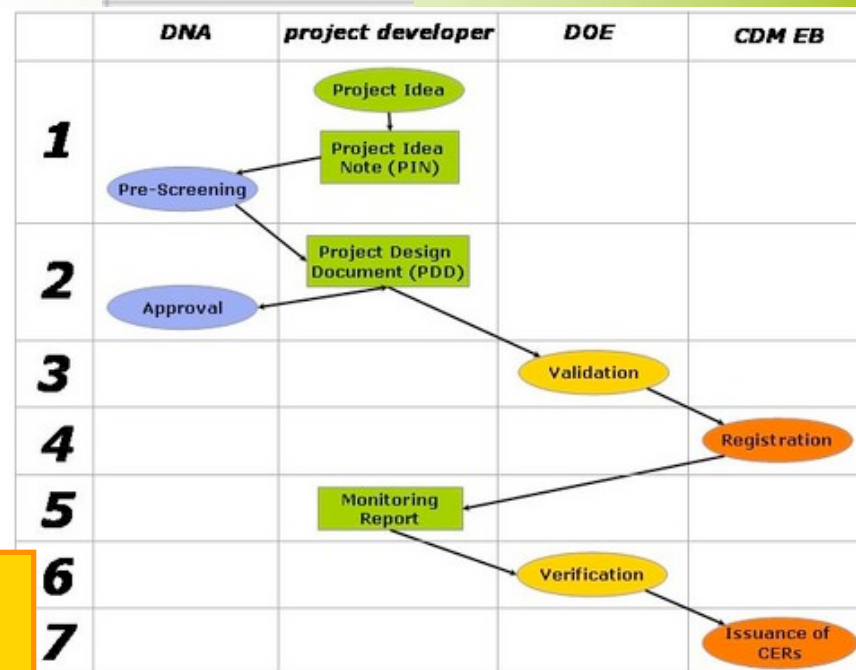
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CDM EB approval - Project is registered



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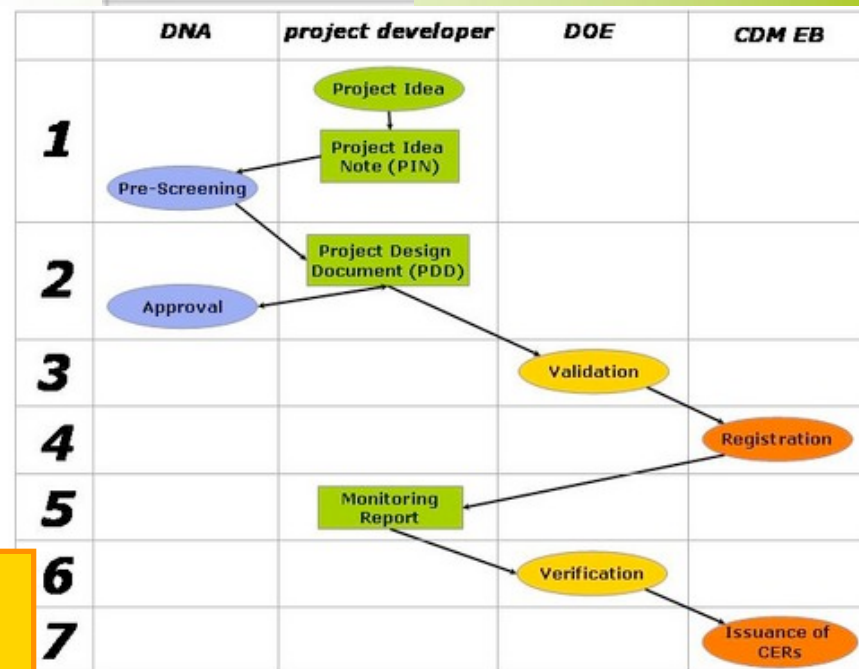
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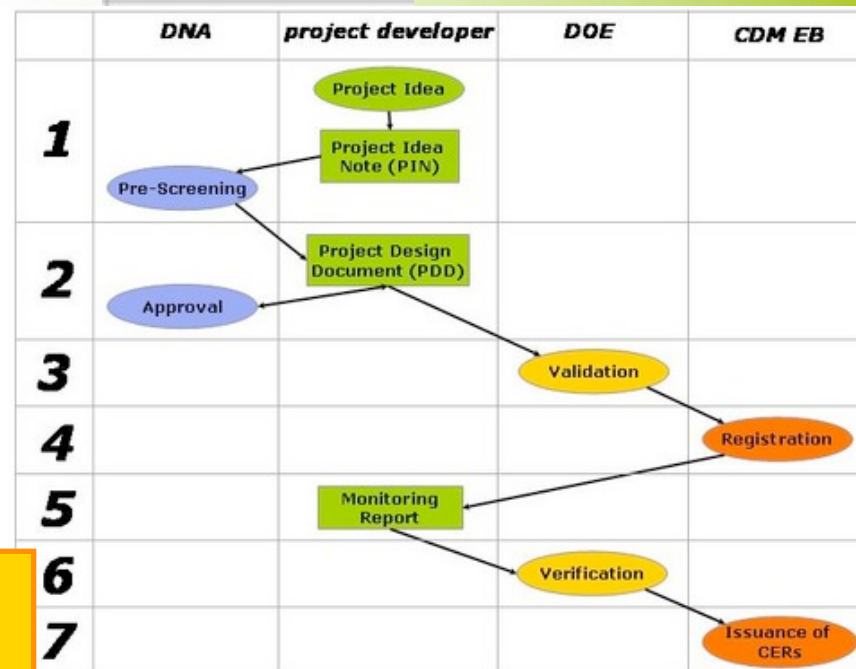
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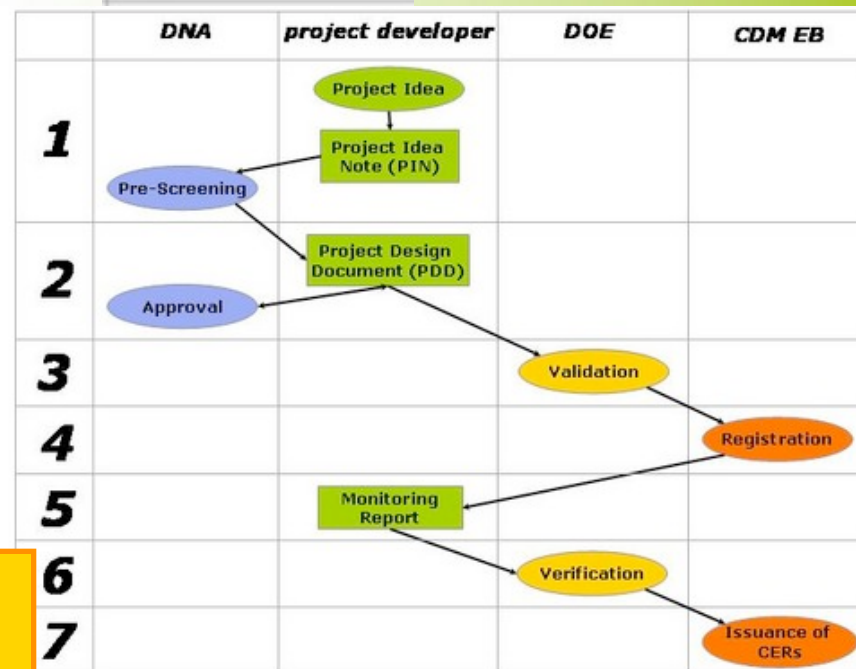
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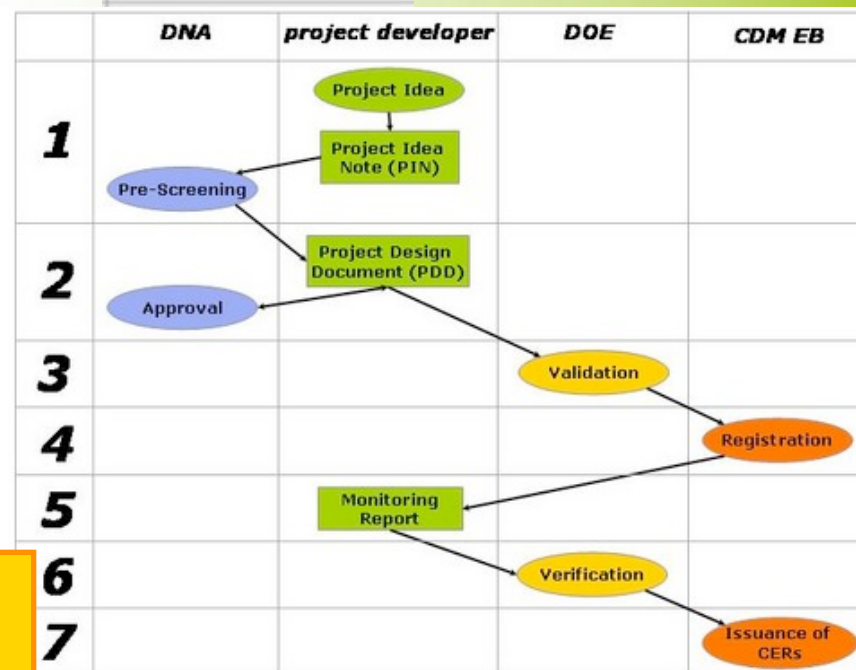
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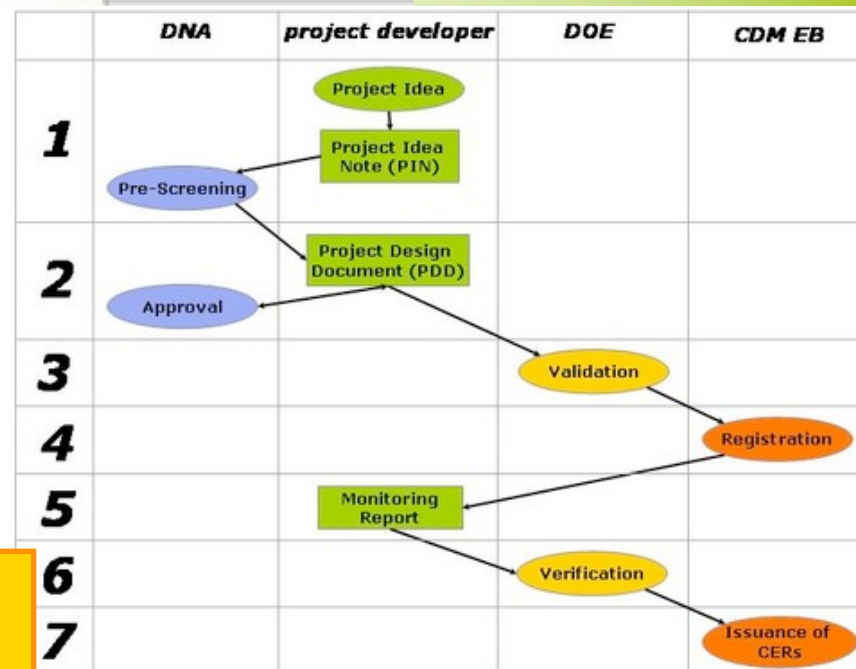
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Project may be rejected



Project development

- The project developer has to inform and consult about the project
- Request the government to inform CSO about planned projects

EIA

- Ev. possibility to have a say – advocate for stronger public consultation!

Aproval by DNA

- CSO needs to be consulted – have you got a say on the board of the DNA?
- Public pressure if project has negative impacts compared to bau

Validation

- Raise issues during 30 day public commenting period – public!
- Launch complaint procedure against misconduct by DOE

Requesting registration

- Lobby for request of a review – might lead to project rejection!

verification & monitoring

- Try to lobby for a review of the request for issuance to avoid emission of credits

After credits have been issued

- Public pressure against credits from harmful projects or project types (Black-list)

Public participation rules
weak and unclear

- + CSO often do not know its rights or does not use them

No notification

- Need for mailserve / info through DNA?

English only

- Possibility to submit complaints in host country language needed – to whom?

Public commenting period
30 days only

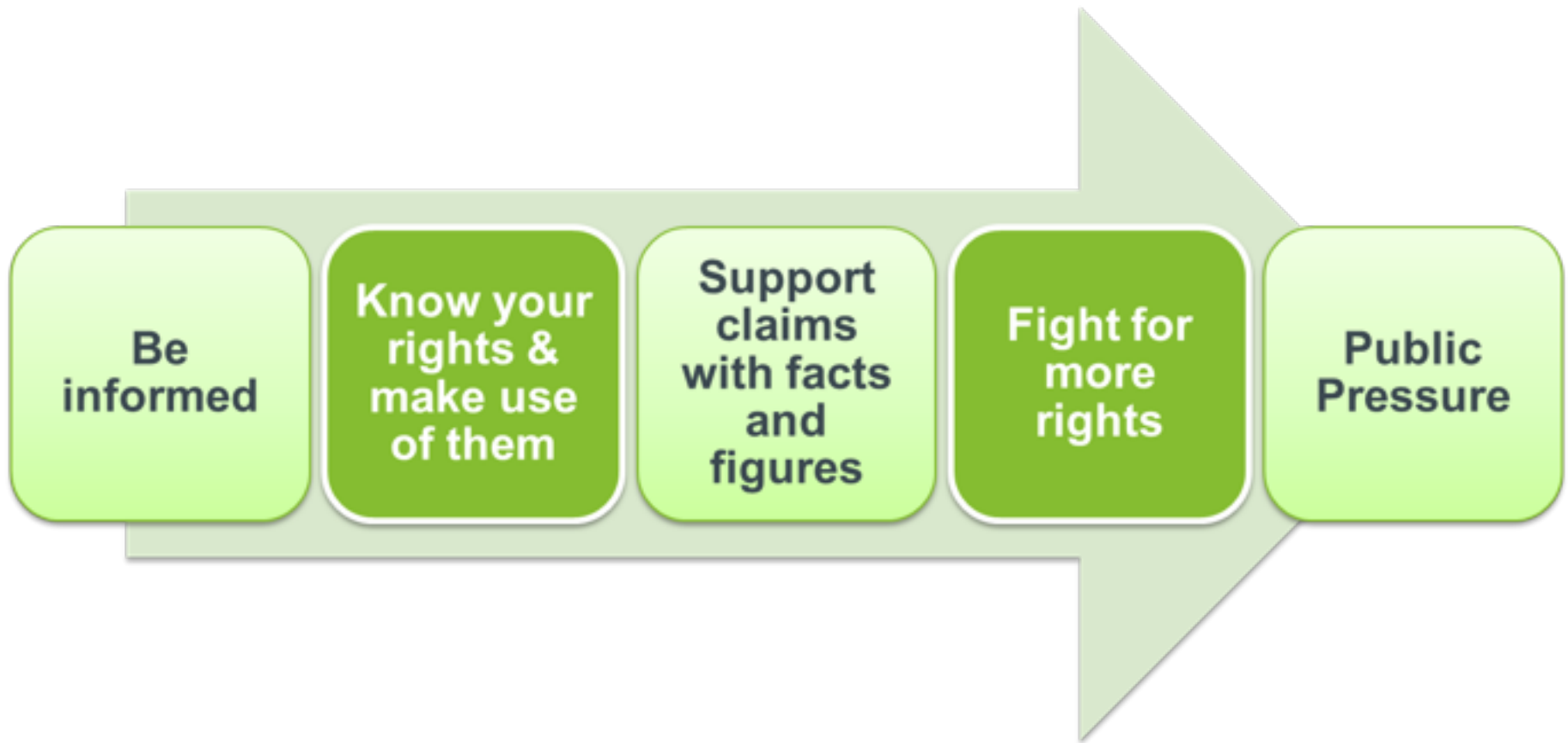
- Too short to inform potentially impacted people and analyse project

no appeal against registered
projects possible

- Need for way to adress negative impacts and complaints

Sustainable development is
defined by host government

- Intervene at early stage – DNA level!
- Later project can only be rejected if it violates CDM rules at UN level





A platform of > 300 NGOs



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- **Share information between CSO on all continents**



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- **Strengthen the voice of CS in the CDM**



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**and ultimately:
stop harmful CDM projects!**



Thanks!

**Antonia Verner
CDM Watch Network Coordinator**

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