

DOE/AE Forum | *Werner Betzenbichler* | *November 2011*

EB-65

Relations with Designated Operational and Applicant Entities

Topics

- Comments to Annexes of the Annotated Agenda
- Draft Procedure on Significant Deficiencies

Criticism on Scheduling of the Call for Input

- Status 09 Nov 09.30 CET

- Annex 1 - Draft revised CDM two-year business plan (Will be made available in due course)
-  Annex 2 - Compliance with indicative timelines for different processes (2292 KB)
-  Annex 3 - Synthesis report of the annual activity reports submitted by designated operational entities 2010/2011 (247 KB)
-  Annex 4 - Comprehensive report on the status of resources and recruitment to 31 October 2011 (211 KB)
-  Annex 5 - Draft standard for sampling and surveys for CDM project activities and programme of activities (249 KB)
-  Annex 6 - Draft standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programme of activities (169 KB)
- Annex 7 - Draft clean development mechanism validation and verification standard (Will be made available in due course)
- Annex 8 - Draft CDM project standard (Will be made available in due course)
- Annex 9 - Proposed implementation plan for the CDM project standard, the CDM validation and verification standard and the CDM project cycle procedure (Will be made available in due course)
- Annex 10 - Draft guidelines for completing the CDM project design document form (Will be made available in due course)
- Annex 11 - Draft revised CDM glossary of terms (Will be made available in due course)
-  Annex 12 - Draft revision to the methodological tool to assess the validity of the original/current baseline and to update the baseline at the renewal of a crediting period (147 KB)
-  Annex 13 - Draft work programme on standardized baselines (162 KB)
- Annex 14 - Draft CDM project cycle procedure (Will be made available in due course)
-  Annex 15 - Draft procedure for addressing significant deficiencies in past validation, verification or certification reports (156 KB)
-  Annex 16 - Draft procedure for submission and consideration of microscale renewable energy technologies for automatic additionality (143 KB)
-  Annex 17 - Report on sustainable development co-benefits and negative impacts of CDM projects activities (178 KB)
-  Annex 18 - Elements for the development of guidelines for baseline determination (148 KB)
-  Annex 19 - Draft workplan for capacity-building and related skills development for designated national authorities and other stakeholders (151 KB)

Comments to the Annotated Agenda

- Two-Year Business Plan (Annex 1)
 - Not available
 - Budget to support DOE Forum
 - Budget for harmonisation along new procedures
- Indicative Timelines (Annexes 5/6)
 - Demonstrate need to change accreditation procedure;
 - Priority issue in 2012

Comments to the Annotated Agenda

- Synthesis Report (Annex 3)
 - Declining of validations and verifications
 - Only 45 % of DOEs report profit → a warning signal
- Sampling Standard (Annex 5)
 - Paradigm to be applied more frequently;
 - Last telephone conference leveraged the requested adjustments

Comments to the Annotated Agenda

- VVS (Annex 7)
 - Comments on individual paragraphs
 - Still scope for improvement as not all comments were reflected
 - No major difficulties expected
- Project Standard (Annex 8)
 - Unresolved aspect of re-assessment of parameter, which have been verified at validation
 - Comments on individual paragraphs

Comments to the Annotated Agenda

- Implementation Plan (Annex 9)
 - 01 May 2012 is perceived reasonable
 - Clarification is requested on the treatment of refusals in CC and IRC
- Guideline for completing PDD(Annex 10)
 - Align grace period

Comments to the Annotated Agenda

- Project Cycle Procedure (Annex 14)
 - Procedure on erroneous inclusion of CPA has not been touched
 - No reflection of PoA workshop discussions

Significant deficiencies

- Still no agreement on core elements
 - Commensurateness of action
 - Not insurable, not quantifiable
 - Serves twofold objectives → higher likelihood of application while cases of fraud and professional negligence will be rare (or hopefully non-existing)
 - Missing appeals process
- Approval of this draft creates risks of CDM market distortions without delivering value



Significant deficiencies

- Deprecative feedback from insurance companies
 - Not insurable at recent status
 - Same concerns as expressed by DOE Forum
 - Even if improved, insurance will remain quite costly
- Suggested next step:
 - roundtable DOEs, EB, Secretariat and Insurers

Thank you for your attention!

Werner Betzenbichler
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on behalf of TÜV NORD

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