

# Application of the Oeko-Institut/WWF-US/ EDF methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website <u>Site terms and Privacy Policy</u> apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: <u>www.carboncreditquality.org</u>

Sub-criterion:	1.3.1: Robustness of the general program principles and provisions for determining emission reductions and removals
Carbon crediting program:	CDM
Assessment based on carbon crediting program documents valid as of:	30 June 2021
Date of final assessment:	20 May 2022
Score:	Afforestation/reforestation projects: 2.71 Other project types: 2.29

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## **Assessment**

#### Indicator 1.3.1.1

### Relevant scoring methodology provisions

"The program has quantification methodologies in place and available for use, as well as a process for developing new or updating existing quantification methodologies."

### Information sources considered

- 1 CDM-EB70-A36-PROC, Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. September 1, 2017. Available <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf
- 2 CDM Methodologies, Program Website: https://cdm.unfccc.int/methodologies/index.html. Last accessed February 2<sup>nd</sup>, 2022.

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 4, page 4: "This procedure defines the processes for the development of new methodologies and methodological tools, for the revision of approved methodologies and methodological tools, and for the provision of clarifications of approved methodologies and methodological tools."
- Provision 2 Source 2, CDM Methodologies webpage: The program website includes all methodologies in place and available for use within the CDM program.

#### Assessment outcome

Yes (2 Points).

### Justification of assessment

The CDM program has methodologies in place and available for use (Provision 2) and a process that identifies how to develop, revise, and clarify approved methodologies (Provision 1). The indicator is therefore fulfilled.

### Indicator 1.3.1.2

### Relevant scoring methodology provisions

"Approved methodologies (or general program provisions) address the following essential components:

- · Applicability or eligibility criteria
- Determination of the project boundary

- Determination of additionality
- Establishing the baseline scenario
- Quantification of emission reductions
- Monitoring practices"

#### Information sources considered

- Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1, 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf
- New baseline and monitoring methodology initial assessment form, Version 01.0. CDM-PNIA-FORM. 13 June 2013. Available: <a href="https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-">https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-</a> meth form24.pdf/meth form24.pdf?t=Rm18cjdkejV5fDCnCj GnOG5sP7SjzIL7ttl

- Provision 1 Source 1, paragraph 11, page 6: "The project participants of a planned CDM project activity, the coordinating/managing entity of a planned CDM PoA, a DOE, a designated national authority (DNA) or any other stakeholder (hereinafter in section 5.1 referred to as the proponent) may propose a new methodology to the Board by submitting, through a specific interface on the UNFCCC CDM website, the following documents to the secretariat:
  - (a) The duly completed "New baseline and monitoring methodology proposal" form (CDM-PNM FORM);
  - (b) The proposed new methodology using the relevant form (CDM-NM-FORM, CDMSSC-NM-FORM, CDM-AR-NM-FORM or CDM-CCS-NM-FORM);
  - (c) The draft project design document (PDD) of the planned CDM project activity or the draft programme design document (PoA-DD) of the planned PoA that intends to apply the proposed new methodology, using the relevant PDD or PoA-DD form and with at least the following sections of the form and relevant appendices completed, applying the proposed new methodology:
    - (i) For planned CDM project activities:
      - a. Description of project activity;
      - b. Application of selected approved baseline and monitoring methodology;
      - c. Duration and crediting period;
    - (ii) For planned CDM PoAs:
      - a. General description of PoA;

- b. Demonstration of additionality and development of eligibility criteria;
- c. Duration of PoA;
- d. General description of a generic CPA; e. Application of a baseline and monitoring methodology."
- Provision 2 Source 2, no. 3, page 1: "Is the compliance with the applicability conditions of the proposed new methodology possible to demonstrate and validate?

Are there any environmental integrity1 concerns identified in the applicability conditions of the methodology, for which safeguards are not taken?"

Provision 3 Source 2, no. 4, page 1-2: "Does the proposed new methodology cover all the GHG emission sources and types that are related to the project activities/ programmes of activities covered by the methodology?

Is the project boundary clearly defined in the proposed new methodology?

Are the components of the project activities/ programmes of activities covered by the proposed new methodology and the way they achieve emission reduction/ GHG removal by sinks clearly described?"

- Provision 4 Source 2, no. 5, page 2: "Are the following elements of the proposed new methodology consistent with each other:
  - (d) Baseline approach;
  - (e) Applicability conditions;
  - (f) Project boundary;
  - (g) Baseline emission estimation approach/procedure for estimation of the baseline net GHG removals by sinks;
  - (h) Project emission estimation approach/ procedure for estimation of the actual net GHG removals by sinks;
  - (i) Leakage; and
  - (j) Monitoring methodology."

#### Assessment outcome

Yes (1 Point).

#### Justification of assessment

The new baseline and monitoring methodology proposal form which must be submitted to gain approval of a new methodology (Provision 1) includes explicit mention of required elements that are to be incorporated into any methodology within the CDM program (Provisions 2 to Provision 4). The indicator is therefore fulfilled.

#### Indicator 1.3.1.3

### Relevant scoring methodology provisions

"The program requires that, as part of the approval process, new quantification methodologies undergo expert review by an independent technical panel or working group."

#### Information sources considered

Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1, 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 21, page 8: "In preparing the draft recommendation, the secretariat may draw upon external expertise, depending on the technical complexity of the proposed new methodology, by selecting a maximum of two independent experts to review the submission. For this purpose, the secretariat shall establish and maintain a roster of experts. If the secretariat does not find suitable and available experts on the roster, it may use the services of experts not included on the roster."
- Provision 2 Source 1, paragraph 22, page 8: "The secretariat shall select two members of the relevant methodological panel or working group and forward the draft recommendation to them for their review. The selected members shall provide input on the draft recommendation within five days of receipt of it."
- Provision 3 Source 1, paragraph 23, page 8: "The secretariat shall finalize the recommendation, taking into account the input from the selected members of the relevant methodological panel or working group, and submit it to the panel or working group for consideration at its meeting in accordance with paragraph 10 above, at the latest seven days before the meeting."
- Provision 4 Source 1, paragraph 24, page 8: "The relevant methodological panel or working group shall consider the recommendation and prepare a draft recommendation to the Board. The panel or working group shall make every effort to conclude its consideration and finalize the recommendation to the Board within three consecutive meetings. The recommendation to the Board shall be to either:
  - (a) Approve the proposed new methodology ("A case"); or
  - (b) Reject the proposed new methodology ("C case")."

#### Assessment outcome

Yes (2 Points).

#### Justification of assessment

The above documentation specifies that an expert review and input process exists to evaluate methodologies and that this process may be used to assist in drafting the recommendations, at the discretion of the Secretariat reviewing the proposed methodology (Provisions 1 to 3). Subsequently, a methodological panel or working group of experts will consider a proposed new methodology and make a recommendation to the CDM Executive Board (Provision 4). Therefore, the indicator is fulfilled.

### Indicator 1.3.1.4

### Relevant scoring methodology provisions

"The program requires that the approval of new quantification methodologies must include a public stakeholder consultation."

#### Information sources considered

Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf

### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 18, page 7: "If the submission is concluded as qualified for consideration, the secretariat shall issue a unique reference number to the proposed new methodology and make the submission publicly available on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 15 days. After this period, the secretariat shall make the comments received publicly available on the UNFCCC CDM website."

Provision 2 Source 1, paragraph 43, page 11: "The secretariat shall make the draft recommendation to the Board publicly available on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 15 days. After this period, the secretariat shall make all comments received publicly available on the UNFCCC CDM website."

### **Assessment outcome**

Yes (2 Points).

### Justification of assessment

The above provisions specify that public stakeholder input is a part of the methodology approval process (Provision 1 and Provision 2). The indicator is therefore fulfilled.

#### Indicator 1.3.1.5

### Relevant scoring methodology provisions

"The program requires that all quantification methodologies be reviewed and updated at least every five years to verify that they continue ensuring environmental integrity. The program may provide for exceptions from this rule (e.g. in case of rarely used quantification methodologies or if the review is pending due to forthcoming decisions by other bodies such as governments or guidance setting institutions)."

#### Information sources considered

Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1, 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 73, page 16: "The Board may, taking into account the appendix to this procedure, decide to revise an approved methodology (including an approved consolidated methodology) or methodological tool at any time." [...]
- Provision 2 Source 1, paragraph 74, page 17: "A methodological panel or working group, or the secretariat, may, taking into account the appendix to this procedure, propose that the Board revise an approved methodology (including an approved consolidated methodology) or methodological tool at any time.[...]"

#### Assessment outcome

No (0 Points).

### Justification of assessment

The carbon crediting program's provisions provide for updating methodologies anytime (Provisions 1 and 2). However, there is no requirement to update them periodically within defined timeframes. The indicator is therefore not fulfilled.

### Indicator 1.3.1.6

### Relevant scoring methodology provisions

"The program has procedures in place to suspend the use of quantification methodologies in cases where new information, such as new scientific studies, indicate that emission reductions or removals are being over-estimated or that additionality may not be ensured."

### Information sources considered

1 Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1,

2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf

- Provision 1 Source 1, paragraph 73, page 16-17: "The Board may, taking into account the appendix to this procedure, decide to revise an approved methodology (including an approved consolidated methodology) or methodological tool at any time. In this case, the Board shall also decide to:
  - (a) Put on hold the approved methodology or methodological tool, with immediate effect. In this case, DOEs shall not submit, through a dedicated interface on the UNFCCC CDM website, any PDD or PoA-DD for global stakeholder consultation, any request for registration or any request for renewal of crediting period of a project activity or PoA applying the methodology or methodological tool from the day following the date of publication of the Board's meeting report containing the decision;
  - (b) Put on hold the approved methodology or methodological tool, with a grace period of 28 days. In this case, DOEs shall not submit, through a dedicated interface on the UNFCCC CDM website, any PDD or PoA-DD for global stakeholder consultation, any request for registration or any request for renewal of crediting period of a project activity or PoA, applying the methodology or methodological tool any more than 28 days following the date of publication of the Board's meeting report containing the decision; or
  - (c) Maintain the current version of the approved methodology or methodological tool until the expiry of its validity, in accordance with paragraphs 88–90 below."
- Provision 2 Source 1, paragraph 74, page 17: "A methodological panel or working group, or the secretariat, may, taking into account the appendix to this procedure, propose that the Board revise an approved methodology (including an approved consolidated methodology) or methodological tool at any time. If the panel or working group or the secretariat considers that the current version of the methodology or methodological tool should be put on hold, it shall recommend so to the Board. In these cases, the Board shall consider the proposal and/or the recommendation, and decide whether to revise and/or to put on hold the current version of the methodology or methodological tool in accordance with paragraph 73 above."
- Provision 3 Source 1, Appendix, paragraph 2, page 24: "A revision is the modification of an approved methodology or methodological tool in order to improve it or broaden its scope and applicability.
- Provision 4 Source 1, Appendix, paragraph 3, page 24: "A revision of an approved methodology or methodological tool may be carried out if one or more of the following conditions apply:
  - (a) New or generally accepted scientific evidence indicates that emission reductions or removal enhancements will be overestimated or underestimated based on the approved methodology or methodological tool or that the reductions or enhancements may not be real, measurable and verifiable;

- (b) The applicability conditions require broadening to include more potential project activity types or conditions for use;
- (c) There are identified inconsistencies, errors and/or ambiguities in the language and/or formulae used within or between methodologies or methodological tools;
- (d) Further simplification (e.g. default values) is required to improve the userfriendliness of the approved methodology or methodological tool;
- (e) Key issues clarified through a request for clarification of the approved methodology or methodological tool in accordance with section 8 of this procedure are required to be incorporated in the approved methodology or methodological tool;
- (f) There are changes to a methodological tool to which an approved methodology refers to and the changes affect the provisions of the methodology. "

#### Assessment outcome

Yes (1 Point).

#### Justification of assessment

The CDM Executive Board may decide at any time to revise methodologies. When taking such a decision, the Board may also decide to put an existing methodology on hold (Provisions 1 and 3). The provisions further specify that a hold can be effective immediately or with a grace period. Putting a methodology on hold is considered equivalent to a suspension of the methodology for the purposes of evaluating this indicator. Revision requests can be made because of new or generally accepted scientific evidence (Provision 4). The indicator is therefore fulfilled.

### Indicator 1.3.1.7

### Relevant scoring methodology provisions

"The program clearly defines that a carbon credit unit represents one metric ton of  $CO_2$  equivalent of GHG emission reductions or removals and identifies the underlying GWP values used to calculate the  $CO_2$  equivalence (e.g., the source of the GWP value and the time horizon used)."

#### Information sources considered

1 Glossary CDM Terms, version 10.0. CDM-EB07-A04-GLOS. 12 September 2019. Available: https://cdm.unfccc.int/Reference/Guidclarif/glos CDM.pdf

### Relevant carbon crediting program provisions

Provision 1 Source 1, term "CER (certified emission reduction)", page 9: "A unit issued for GHG emission reductions from CDM project activities or PoAs (non-A/R) in accordance with the CDM rules and requirements, which is equal to one metric tonne of carbon dioxide equivalent, calculated using global warming potentials defined by decision 2/CP.3 or

as subsequently revised in accordance with Article 5 of the Kyoto Protocol. See also the definitions for "ICER" and "tCER"."

#### Assessment outcome

Yes (1 Point).

### Justification of assessment

Provision 1 specifies that the indicator is fulfilled.

### Indicator 1.3.1.8

### Relevant scoring methodology provisions

"The program requires in its general program provisions (rather than only in its specific quantification methodologies) that emission reductions or removals be determined in a conservative manner (rather than using the most accurate estimate) to ensure that emission reductions or removals are not overestimated (this prioritization of conservativeness over accuracy acknowledges that uncertainty exists with even the most accurate estimates)

### OR

The program requires in its general program provisions (rather than only in its specific quantification methodologies) that emission reductions or removals be determined in a conservative manner (rather than using the most accurate estimate) to ensure that emission reductions or removals are not overestimated, unless emission reductions or removals can be determined with a very high accuracy, in which case no conservativeness needs to be included in the quantification."

#### Information sources considered

- 1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf</a>
- 2 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.
  30 March 2006. Available: https://cdm.unfccc.int/Reference/COPMOP/08a01 abbr.pdf

- Provision 1 Source 1, paragraph 18, page 8: "Reduce bias and uncertainties as far as it is practical/cost-effective, or otherwise use conservative assumptions, values and procedures to ensure that GHG emission reductions or net anthropogenic GHG removals are not overestimated."
- Provision 2 Source 1, paragraph 76, page 20: "The project participants shall ensure that the application of default data in the estimation of GHG emission reductions or net

anthropogenic GHG removals for the proposed CDM project activity results in conservative estimates."

Provision 3 Source 2, paragraph 45., page 16: "A baseline shall be established:

- (a) By project participants in accordance with provisions for the use of approved and new methodologies, contained in decision 17/CP.7, the present annex and relevant decisions of the COP/MOP;
- (b) In a transparent and conservative manner regarding the choice of approaches, assumptions, methodologies, parameters, data sources, key factors and additionality, and taking into account uncertainty;
- (c) On a project-specific basis;
- (d) In the case of small-scale CDM project activities which meet the criteria specified in decision 17/CP.7 and relevant decisions by the COP/MOP, in accordance with simplified procedures developed for such activities;
- (e) Taking into account relevant national and/or sectoral policies and circumstances, such as sectoral reform initiatives, local fuel availability, power sector expansion plans, and the economic situation in the project sector."

Provision 4 Source 2, Appendix C, page 25: "The appropriate level of standardization of methodologies to allow a reasonable estimation of what would have occurred in the absence of a project activity wherever possible and appropriate. Standardization should be conservative in order to prevent any overestimation of reductions in anthropogenic emissions."

#### Assessment outcome

The first condition applies (2 Points).

### Justification of assessment

The program establishes conservativeness as a key principle for calculations of emission reductions caused by project activities (Provision 1 to 4). Therefore, the first of the two conditions is fulfilled.

### Indicator 1.3.1.9

### Relevant scoring methodology provisions

"The program requires in its general program provisions that, before approving a methodology, the level of uncertainty of emission reductions and removals is identified, or that a provision is included in the methodology requiring that each project applying the methodology must determine the level of uncertainty in quantifying the emission reductions or removals."

#### Information sources considered

1 Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1,

- 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf
- Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.
  30 March 2006. Available: <a href="https://cdm.unfccc.int/Reference/COPMOP/08a01">https://cdm.unfccc.int/Reference/COPMOP/08a01</a> abbr.pdf
- 3 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg</a> stan04v02.pdf
- 4 New baseline and monitoring methodology initial assessment form, Version 01.0. CDM-PNIA-FORM. 13 June 2013. Available: <a href="https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-meth-form24.pdf/meth-form24.pdf?t=Z3N8cjdlMjQzfDBE3-ZUlw3l5D5xmKcU7sy-">https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-meth-form24.pdf/meth-form24.pdf?t=Z3N8cjdlMjQzfDBE3-ZUlw3l5D5xmKcU7sy-</a>
- 5 ACM0001 Version 19.0: Large-scale Consolidated Methodology Flaring or use of landfill gas. Available: https://cdm.unfccc.int/methodologies/DB/JPYB4DYQUXQPZLBDVPHA87479EMY9M
- 6 AR-ACM0003 Version 02.0: A/R Large-scale Consolidated Methodology Afforestation and reforestation of lands except wetlands. Available: https://cdm.unfccc.int/methodologies/DB/C9QS5G3CS8FW04MYYXDFOQDPXWM4OE
- 7 AMS-III.G Version 10.0: Small-scale Methodology Landfill methane recovery https://cdm.unfccc.int/methodologies/DB/0KHNES8D09H134V3TZDQ47C3LQL3H2
- 8 AMS-II.G Version 12.0: Small-scale Methodology Energy efficiency measures in thermal applications of non-renewable biomass https://cdm.unfccc.int/methodologies/DB/10PELMPDW951SVSW1B2NRCQEBAX96C

- Provision 1 Source 2, paragraph 45., page 16: "A baseline shall be established:
  - (a) By project participants in accordance with provisions for the use of approved and new methodologies, contained in decision 17/CP.7, the present annex and relevant decisions of the COP/MOP;
  - (b) In a transparent and conservative manner regarding the choice of approaches, assumptions, methodologies, parameters, data sources, key factors and additionality, and taking into account uncertainty;
  - (c) On a project-specific basis."
- Provision 2 Source 3, paragraph 79, page 20: "Measured data with high levels of uncertainty shall be compared with data from other sources to check the consistency."
- Provision 3 Source 3, paragraph 81, page 21: "The monitoring plan shall include all data, parameters and related information required by the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, including: [...]

- (b) Uncertainty levels, methods and the associated accuracy level of measuring instruments to be used for various parameters and variables;"
- Provision 4 Source 4, no. 9, page 3: "Are uncertainties and accuracy of instrumentation taken into account, where relevant?"

#### Assessment outcome

No (0 Points).

#### Justification of assessment

The program documents address uncertainty in a number of provisions (Provisions 1 to 4). While there are provisions that in some cases require the quantification of uncertainty, these provisions only relate to the monitoring plan and could miss uncertainties associated with other aspects of the methodology to quantify emission reductions. A systematic quantification of uncertainties is not required. The indicator is therefore not fulfilled.

#### **Indicator 1.3.1.10**

### Relevant scoring methodology provisions

"The program requires in its general program provisions (rather than only in its specific quantification methodologies) that the degree of conservativeness in quantifying emission reductions or removals be based on the magnitude of uncertainty in the estimation of emission reductions and removals (i.e., applying a larger degree of conservativeness in case of higher uncertainties)."

#### Information sources considered

- 1 Procedure for the development, revision and clarification of baseline and monitoring methodologies and methodological tools, Version 02.1. CDM-EB70-A36-PROC. September 1, 2017. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth</a> proc09.pdf
- Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.
  30
  March
  2006.
  Available: <a href="https://cdm.unfccc.int/Reference/COPMOP/08a01">https://cdm.unfccc.int/Reference/COPMOP/08a01</a> abbr.pdf
- 3 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf</a>
- 4 New baseline and monitoring methodology initial assessment form, Version 01.0. CDM-PNIA-FORM. 13 June 2013. Available: <a href="https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-">https://cdm.unfccc.int/filestorage/6/m/extfile-20130613144203606-</a>
  meth form24.pdf/meth form24.pdf?t=R3V8cjZwZm44fDB2KimAqIPoQ0ZaaF0NKqkX

- 5 ACM0001 Version 19.0: Large-scale Consolidated Methodology Flaring or use of landfill gas. Available:
  - https://cdm.unfccc.int/methodologies/DB/JPYB4DYQUXQPZLBDVPHA87479EMY9M
- 6 AR-ACM0003 Version 02.0: A/R Large-scale Consolidated Methodology Afforestation and reforestation of lands except wetlands. Available: https://cdm.unfccc.int/methodologies/DB/C9QS5G3CS8FW04MYYXDFOQDPXWM4OE
- 7 AMS-III.G Version 10.0: Small-scale Methodology Landfill methane recovery https://cdm.unfccc.int/methodologies/DB/0KHNES8D09H134V3TZDQ47C3LQL3H2
- 8 AMS-II.G Version 12.0: Small-scale Methodology Energy efficiency measures in thermal applications of non-renewable biomass <a href="https://cdm.unfccc.int/methodologies/DB/10PELMPDW951SVSW1B2NRCQEBAX96C">https://cdm.unfccc.int/methodologies/DB/10PELMPDW951SVSW1B2NRCQEBAX96C</a>

### Relevant carbon crediting program provisions

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#### Assessment outcome

No (0 Points).

#### Justification of assessment

No relevant provisions were identified in the above documentation speaking to varying degrees of conservativeness that are applied based on the magnitude of uncertainty in the quantification methods or data. The indicator is therefore not fulfilled.

### **Indicator 1.3.1.11**

### Relevant scoring methodology provisions

The program explicitly requires in its general program provisions (rather than only in its specific quantification methodologies) that existing government policies and legal requirements which lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) must be included when determining the baseline emissions.

Note: This indicator does not apply to announcements that have not yet been operationalized within the country, such as mitigation targets communicated in Nationally Determined Contributions (NDCs) or Low Emission Development Strategies (LEDS), or other similarly broad national goal-setting policies. However, the implementing policies developed to accomplish objectives within NDCs or LEDS would need to be considered (if relevant to the project in question).

#### Information sources considered

1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf</a>

- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg</a> stan03v02.pdf.
- Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.

  30 March 2006. Available: https://cdm.unfccc.int/Reference/COPMOP/08a01 abbr.pdf

- Provision 1 Source 1, paragraph 63, page 17: "As a general principle, relevant national and/or sectoral policies, regulations and circumstances shall be taken into account in the establishment of the baseline scenario, without creating perverse incentives that may impact host Parties' contributions to the ultimate objective of the Convention."
- Provision 2 Source 1, paragraph 64, page 17: "When establishing the baseline scenario, the project participants shall take into account the following two types of national and/or sectoral policies or regulations:
  - (a) National and/or sectoral policies or regulations that give comparative advantages to more emissions-intensive technologies or fuels over less emissions-intensive technologies or fuels;
  - (b) National and/or sectoral policies or regulations that give comparative advantages to less emissions-intensive technologies over more emissions-intensive technologies (e.g. public subsidies to promote the diffusion of renewable energy or to finance energy efficiency programmes)."
- Provision 3 Source 1, paragraph 65, page 18: The project participants shall address the two types of policies or regulations described in paragraph 64 above as follows:
  - (a) Only national and/or sectoral policies or regulations described in 64(a) above that have been implemented before the adoption of the Kyoto Protocol by the Conference of the Parties (hereinafter referred to as the COP) (decision 1/CP.3, 11 December 1997) shall be taken into account when establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the Kyoto Protocol, the baseline scenario should refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place;
  - (b) National and/or sectoral policies or regulations described in paragraph 64(b) above that have been implemented since the adoption by the COP of the CDM M&Ps (decision 17/CP.7, 11 November 2001) need not be taken into account in establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the CDM M&Ps, the baseline scenario could refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place."
- Provision 4 Source 2, paragraph 104, page 24: "As a general principle, relevant national and/or sectoral policies, regulations and circumstances shall be taken into account in the

establishment of the baseline scenario, without creating perverse incentives that may impact host Parties' contributions to the ultimate objective of the Convention."

Provision 5

Source 2, paragraph 105, page 25: "When establishing the baseline scenario, the coordinating/managing entity shall take into account the following two types of national and/or sectoral policies or regulations:

- (a) National and/or sectoral policies or regulations that give comparative advantages to more emissions-intensive technologies or fuels over less emissions-intensive technologies or fuels;
- (b) National and/or sectoral policies or regulations that give comparative advantages to less emissions-intensive technologies over more emissions-intensive technologies (e.g. public subsidies to promote the diffusion of renewable energy or to finance energy efficiency programmes)."

Provision 6

Source 2, paragraph 106, page 25: "The coordinating/managing entity shall address the two types of policies or regulations described in paragraph 105 above as follows:

- (a) Only national and/or sectoral policies or regulations described in paragraph 105(a) above that have been implemented before the adoption of the Kyoto Protocol by the Conference of the Parties (hereinafter referred to as the COP) (decision1/CP.3, 11December1997) shall be taken into account when establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the Kyoto Protocol, the baseline scenario should refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place;
- (b) National and/or sectoral policies or regulations described in paragraph 105(b) above that have been implemented since the adoption by the COP of the CDM M&Ps (decision17/CP.7, 11November2001) need not be taken into account in establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the CDM M&Ps, the baseline scenario could refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place."

Provision 7 Source 3, paragraph 45., page 16: "A baseline shall be established: [...]

- (e) Taking into account relevant national and/or sectoral policies and circumstances, such as sectoral reform initiatives, local fuel availability, power sector expansion plans, and the economic situation in the project sector."
- Provision 8 Source 3, Appendix B, paragraph 2, page 23: "Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account and an explanation of how the baseline was established in a transparent and conservative manner."

### Assessment outcome

No (0 Points).

#### Justification of assessment

The CDM project standard for project activities and the CDM standard for programmes of activities states a general principle that baseline emission estimates shall reflect existing government policies and legal requirements in the establishment of the baseline scenario; however the subsequent paragraphs contain exceptions to that requirement as described in paragraph 65 of the CDM project standard for project activities and paragraph 106 of the CDM project standard for programmes of activities that erode the integrity of this requirement (Provision 1 to Provision 6). National and/or sectoral policies or regulations that incentivize emission reductions technologies and practices implemented before the adoption of the Kyoto Protocol are identified to be taken into account when establishing the baseline emissions, but policies and regulations occurring after the Kyoto Protocol's adoption are excluded. This exception is substantial because many emission reduction activities may be implemented due to policies adopted in the last 20 years and therefore may not be additional. The indicator is therefore not fulfilled.

### **Indicator 1.3.2.12**

### Relevant scoring methodology provisions

"The program explicitly requires in its general program provisions (rather than only in its specific quantification methodologies) that new government policies and legal requirements which lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) must be included when determining the baseline emissions, once they enter into force. This means that baseline emissions may need to be adjusted during the crediting period, and not only when a regular review of the baseline emissions is required (e.g., at the renewable of the crediting period).

Note: This indicator does not apply to announcements that have not yet been operationalized within the country, such as mitigation targets communicated in Nationally Determined Contributions (NDCs) or Low Emission Development Strategies (LEDS), or other similarly broad national goal-setting policies. However, the implementing policies developed to accomplish objectives within NDCs or LEDS would need to be considered (if relevant to the project in question)."

### Information sources considered

- 1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf</a>
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\_stan03v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\_stan03v02.pdf</a>
- Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.

  30 March 2006. Available: <a href="https://cdm.unfccc.int/Reference/COPMOP/08a01">https://cdm.unfccc.int/Reference/COPMOP/08a01</a> abbr.pdf

- Provision 1 Source 1, paragraph 63, page 17: "As a general principle, relevant national and/or sectoral policies, regulations and circumstances shall be taken into account in the establishment of the baseline scenario, without creating perverse incentives that may impact host Parties' contributions to the ultimate objective of the Convention."
- Provision 2 Source 1, paragraph 64, page 17: "When establishing the baseline scenario, the project participants shall take into account the following two types of national and/or sectoral policies or regulations:
  - (a) National and/or sectoral policies or regulations that give comparative advantages to more emissions-intensive technologies or fuels over less emissions-intensive technologies or fuels;
  - (b) National and/or sectoral policies or regulations that give comparative advantages to less emissions-intensive technologies over more emissions-intensive technologies (e.g. public subsidies to promote the diffusion of renewable energy or to finance energy efficiency programmes)."
- Provision 3 Source 1, paragraph 65, page 18: "The project participants shall address the two types of policies or regulations described in paragraph 64 above as follows:
  - (a) Only national and/or sectoral policies or regulations described in 64(a) above that have been implemented before the adoption of the Kyoto Protocol by the Conference of the Parties (hereinafter referred to as the COP) (decision 1/CP.3, 11 December 1997) shall be taken into account when establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the Kyoto Protocol, the baseline scenario should refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place;
  - (b) National and/or sectoral policies or regulations described in paragraph 64(b) above that have been implemented since the adoption by the COP of the CDM M&Ps (decision 17/CP.7, 11 November 2001) need not be taken into account in establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the CDM M&Ps, the baseline scenario could refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place."
- Provision 4 Source 2, paragraph 104, page 24: "As a general principle, relevant national and/or sectoral policies, regulations and circumstances shall be taken into account in the establishment of the baseline scenario, without creating perverse incentives that may impact host Parties' contributions to the ultimate objective of the Convention."
- Provision 5 Source 2, paragraph 105, page 25: "When establishing the baseline scenario, the coordinating/managing entity shall take into account the following two types of national and/or sectoral policies or regulations:
  - (a) National and/or sectoral policies or regulations that give comparative advantages to more emissions-intensive technologies or fuels over less emissions-intensive technologies or fuels;

(b) National and/or sectoral policies or regulations that give comparative advantages to less emissions-intensive technologies over more emissions-intensive technologies (e.g. public subsidies to promote the diffusion of renewable energy or to finance energy efficiency programmes)."

Provision 6 Source 2, paragraph 106, page 25: "The coordinating/managing entity shall address the two types of policies or regulations described in paragraph 105 above as follows:

- (a) Only national and/or sectoral policies or regulations described in paragraph 105(a) above that have been implemented before the adoption of the Kyoto Protocol by the Conference of the Parties (hereinafter referred to as the COP) (decision1/CP.3, 11December1997) shall be taken into account when establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the Kyoto Protocol, the baseline scenario should refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place;
- (b) National and/or sectoral policies or regulations described in paragraph 105(b) above that have been implemented since the adoption by the COP of the CDM M&Ps (decision17/CP.7, 11November2001) need not be taken into account in establishing the baseline scenario. If such national and/or sectoral policies or regulations were implemented since the adoption of the CDM M&Ps, the baseline scenario could refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place."

Provision 7 Source 3, paragraph 45., page 16: "A baseline shall be established: [...]

- (e) Taking into account relevant national and/or sectoral policies and circumstances, such as sectoral reform initiatives, local fuel availability, power sector expansion plans, and the economic situation in the project sector."
- Provision 8 Source 3, Appendix B, paragraph 2, page 23: "Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account and an explanation of how the baseline was established in a transparent and conservative manner."

### **Assessment outcome**

No (0 points).

#### Justification of assessment

Given the exceptions stated in Provisions 3 and 6 any newly implemented/enacted policies that might affect the baseline emissions do not need to be incorporated into the baseline emissions. The indicator is therefore not fulfilled.

#### Indicator 1.3.1.13

### Relevant scoring methodology provisions

"The program has established procedures to invalidate and/or replace carbon credits under circumstances in which the emission reductions or removals are demonstrated to have been overestimated."

#### Information sources considered

Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism.

30 March 2006. Available: https://cdm.unfccc.int/Reference/COPMOP/08a01 abbr.pdf

### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 22: "Registered project activities shall not be affected by the suspension or withdrawal of designation of a designated operational entity unless significant deficiencies are identified in the relevant validation, verification or certification report for which the entity was responsible. In this case, the Executive Board shall decide whether a different designated operational entity shall be appointed to review, and where appropriate correct, such deficiencies. If such a review reveals that excess CERs were issued, the designated operational entity whose accreditation has been withdrawn or suspended shall acquire and transfer, within 30 days of the end of review, an amount of reduced tonnes of carbon dioxide equivalent equal to the excess CERs issued, as determined by the Executive Board, to a cancellation account maintained in the CDM registry by the Executive Board."

#### Assessment outcome

No (0 Points).

### Justification of assessment

The modalities and the procedures of the CDM include provisions to address the excess issuance of CERs. However, this provision has never been implemented in CDM rules. The indicator is therefore not fulfilled.

### **Indicator 1.3.1.14**

### Relevant scoring methodology provisions

"The maximum length of the sum of crediting periods is:

a. up to 40 years for afforestation/reforestation projects and up to 10 years for all other project types

OR

b. up to 60 years for afforestation/reforestation projects and up to 15 years for all other project types

OR

c. up to 80 years for afforestation/reforestation projects and up to 20 years for all other project types

OR

d. more than 80 years for afforestation/reforestation projects and more than 20 years for all other project types."

#### Information sources considered

- 1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg</a> stan04v02.pdf
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg</a> stan03v02.pdf.

### Relevant carbon crediting program provisions

Provision1

Source 1, paragraph 87, page 22: "The project participants shall select a type (renewable or fixed) and specify the duration of the crediting period for the proposed CDM project activity, taking into account that:

- (a) Each renewable crediting period shall be at most seven years and may be renewed at most two times, for a maximum total length of 21 years;
- (b) A fixed crediting period shall be at most 10 years."
- Provision 2 Source 1, paragraph 162, page 33: "Paragraph 86 above shall not apply to A/R CDM project activities."

Provision 3

Source 1, paragraph 163, page 33-34: "Notwithstanding paragraph 87 above, the project participants shall select a type (renewable or fixed) and specify the duration of the crediting period for the proposed A/R CDM project activity, taking into account that:

- (a) Each renewable crediting period shall be at most 20years and may be renewed at most two times, for a maximum total length of 60 years;
- (b) A fixed crediting period shall be at most 30 years;
- (c) The provisions of paragraphs 12 and 13 of decision17/CP.7 do not apply to A/R CDM project activities. An A/R project activity starting after 1January 2000 can also be validated and registered after 31 December 2005 as long as the first verification for the project activity occurs after the date of registration of this project activity. Given that the crediting period starts on the same date as the starting date

of the project activity, an A/R project activity starting in 2000 onwards can accrue tCERs/ICERs as of the starting date."

- Provision 4 Source 2, paragraph 43, page 13: "The coordinating/managing entity shall specify the duration of the proposed CDM PoA, which shall not exceed 28 years (60 years for the proposed CDM A/R PoA), counting from the start date of the PoA."
- Provision 5 Source 2, paragraph 122, page 28: "The coordinating/managing entity shall select a type (renewable or fixed) and specify the duration of the crediting period applicable to all corresponding CPAs, taking into account that:
  - (a) Each renewable crediting period shall be at most seven years and may be renewed at most two times, for a maximum total length of 21 years. The timing of renewal of the crediting period of the corresponding CPAs does not have to coincide with that of renewal of the PoA period;
  - (b) A fixed crediting period shall be at most 10 years;
  - (c) The crediting period of a CPA shall not exceed the end of the duration of the PoA, regardless of the crediting period type (renewable or fixed) of the CPA."
- Provision 6 Source 2, paragraph 147, page 35: "Notwithstanding paragraph 122 above, the coordinating/managing entity shall select a type (renewable or fixed) and specify the duration of the crediting period applicable to all corresponding A/R CPAs, taking into account that:
  - (a) Each renewable crediting period shall be at most 20 years and may be renewed at most two times, for a maximum total length of 60 years. The timing of renewal of the crediting period of the corresponding A/R CPAs does not have to coincide with that of renewal of PoA period;
  - (b) A fixed crediting period shall be at most 30 years;"

### **Assessment outcome**

Afforestation/reforestation projects: The second condition applies (2 Points).

All other project types: The fourth condition applies (0 Points).

### Justification of assessment

The above documentation specifies that the maximum length of the sum of crediting periods for project activities other than afforestation/reforestation is 21 years. For afforestation/reforestation projects, the maximum length of the sum of crediting periods is 60 years (Provisions 1 to 3). The same time limits apply for PoAs (Provisions 4 to 6). This corresponds to 2 points for afforestation/reforestation projects and 0 points for all other project types.

#### Indicator 1.3.1.15

### Relevant scoring methodology provisions

"The program provides guidance on the renewal of the crediting period, which must include a reassessment of the baseline scenario."

#### Information sources considered

- 1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg</a> stan04v02.pdf
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg</a> stan03v02.pdf.

- Provision 1 Source 1, paragraph 278, page 61: "The crediting period of a registered CDM project activity that has not been implemented in the first crediting period may be renewed if the project participants, through a DOE, obtain approval from the Board to proceed with a request for renewal of crediting period prior to the submission of such request in accordance with the "CDM project cycle procedure for project activities. For a CDM project activity that will not have income other than that from CERs to be issued for the project activity, this prior approval of the Board is not required, therefore the project participants may, through a DOE, directly proceed with a request for renewal of crediting period."
- Provision 2 Source 1, paragraph 279, page 61-62: "To support a request for renewal of crediting period of a registered CDM project activity, the project participants shall, using the valid version of the applicable PDD form, update the sections of the PDD of the project activity relating to the baseline, estimated GHG emission reductions or net anthropogenic GHG removals, the monitoring plan and the crediting period, applying methodologies in one of the following manners:
  - (a) The project participants shall use the valid version of the methodologies and methodological tools applied in the registered PDD, that is, the latest version at the time of the submission of the request for renewal of crediting period or the previous version if the submission of the request for renewal of the crediting period is still within the grace period of the previous version for use;
  - (b) If any of the methodologies applied in the registered PDD was withdrawn after the registration of the project activity and was replaced by consolidated methodologies, the project participants shall use the valid version of the consolidated methodologies; or
  - (c) If the project activity does not meet the applicability conditions of the methodologies or methodological tools under the options in subparagraphs (a)or (b) above due to their revisions or due to the update of the baseline, the project participants shall either:

- i. Select other applicable approved methodologies; or
- ii. Request, through the DOE that conducts validation for renewal of crediting period, a deviation from the valid version of the methodologies (including consolidated methodologies thereof) or the methodological tools applied in the registered PDD, or from any other selected methodologies, or any other methodological tools applied in accordance with the selected methodologies."
- Provision 3 Source 1, paragraph 281, page 62-63: "In updating the PDD of the registered CDM project activity in accordance with paragraph 279 above, the project participant shall consider the application of an approved standardized baseline to the project activity as follows:
  - (a) The project participants shall use the valid version of an approved standardized baseline if:
    - (i) The standardized baseline is applied in the registered PDD and the valid version of the standardized baseline is applicable to the project activity and to the methodologies applied in accordance with paragraph 279 above; or
    - (ii) The standardized baseline is not applied in the registered PDD but the valid version of the standardized baseline whose selection is mandatory is applicable to the project activity and to the methodologies applied in accordance with paragraph 279 above. However, the project participants may update the PDD without selecting such standardized baseline if the submission of the request for renewal of crediting period is made within 240 days after the standardized baseline became valid;
  - (b) If the valid version of the standardized baseline applied in the registered PDD is no longer applicable to the project activity and/or to the valid version of the methodologies applied in the registered PDD due to are vision of the standardized baseline after the registration of the project activity, the project participants shall:
    - (i) Select another applicable approved standardized baseline; or
    - (ii) Use only the valid version of the methodologies applied in the registered PDD, that are still applicable to the project activity and that can be used independently for estimating GHG emission reductions or net anthropogenic GHG removals without using the standardized baseline applied in the registered PDD;
  - (c) The project participants may use the valid version of an applicable approved standardized baseline if:
    - (i) The standardized baseline is not applied in the registered PDD; and
    - (ii) The standardized baseline standardizes baseline emissions only and does not require its mandatory selection, and is applicable to the project activity and to the methodologies applied in accordance with paragraph 279 above;
  - (d) The project participants shall not use an applicable approved standardized baseline if:

- (i) The standardized baseline is not applied in the registered PDD; and
- (ii) The standardized baseline standardizes additionality and/or baseline scenario and does not require its mandatory selection, and is applicable to the project activity and to the methodologies applied in accordance with paragraph 279 above."
- Provision 4 Source 1, paragraph 282, page 63: "The project participants shall demonstrate the validity of the original baseline or update it in accordance with paragraphs 283–286 below."
- Provision 5 Source 1, paragraph 283, page 63: "To demonstrate the validity of the original baseline or its update, the project participants are not required to reassess the baseline scenario. Instead, the project participants shall assess the GHG emission reductions or net anthropogenic GHG removals that would have resulted from that scenario."
- Provision 6 Source 1, paragraph 284, page 63: "The project participants shall assess and incorporate the impact of national and/or sectoral policies and circumstances, existing at the time of requesting renewal of crediting period, on the current baseline GHG emissions, without reassessing the baseline scenario."
- Provision 7 Source 1, paragraph 285, page 63: "The requirements contained in paragraph 284 above are not applicable to a registered CDM project activity applying the valid version of an applicable approved standardized baseline that standardizes baseline scenario in accordance with paragraph 281 above."
- Provision 8 Source 1, paragraph 286, page 63: "If data and parameters used for determining the original baseline, that were determined ex ante and not monitored during the crediting period, are no longer valid, the project participants shall update such data and parameters in accordance with the "Methodological tool: Assessment of the validity of the original/ current baseline and update of the baseline at the renewal of the crediting period"."
- Provision 9 Source 1, paragraph 287, page 63: "The result of the process described in paragraphs 278–286 above defines a new version of the PDD."
- Provision 10 Source 2, paragraph 283, page 61: "The coordinating/managing entity shall renew the PoA period of the registered CDM PoA every seven years (every 20 years for the registered A/R CDM PoA) counting from the date of its registration."
- Provision 11 Source 2, paragraph 284, page 61: "To support a request for renewal of the PoA period of a registered CDM PoA, the coordinating/managing entity shall, using the valid version of the applicable PoA-DD form, update the sections of the PoA-DD, including its generic CPA-DD part, relating to the eligibility criteria for inclusion of CPAs in the PoA, the baseline, estimated GHG emission reductions or net anthropogenic GHG removals, the monitoring plan and the PoA period, applying methodologies in one of the following manners:
  - (a) The coordinating/managing entity shall use the valid version of the methodologies and methodological tools applied in the registered PoA-DD, that is, the latest version at the time of the submission of the request for renewal of PoA period or

- the previous version if the submission of the request for renewal of the PoA period is still within the grace period of the previous version for use;
- (b) If the any of the methodologies applied in the registered PoA-DD was withdrawn after the registration of the PoA and was replaced by consolidated methodologies, the coordinating/managing entity shall use the valid version of the consolidated methodologies; or
- (c) If the PoA does not meet the applicability conditions of the methodologies or methodological tools under the options in subparagraphs (a)or (b) above due to their revisions or due to the update of the baseline, the coordinating/managing entity shall either:
  - (i) Select other applicable approved methodologies; or
  - (ii) Request, through the DOE that conducts validation for renewal of the PoA period, a deviation from the valid version of the methodologies (including consolidated methodologies thereof) or the methodological tools applied in the registered PoA-DD, or from any other selected methodologies, or any other methodological tools applied in accordance with the selected methodologies."
- Provision 12 Source 2, paragraph 285, page 61: "For renewal of the PoA period of a registered CDM PoA, the coordinating/managing entity is not required to reassess the additionality of the PoA nor update the section of the PoA-DD relating to additionality."
- Provision 13 Source 2, paragraph 286, page 62: "In updating the PoA-DD of the registered CDM PoA in accordance with paragraph 284 above, the coordinating/managing entity shall consider the application of an approved standardized baseline to the PoA as follows:
  - (a) The coordinating/managing entity shall use the valid version of an approved standardized baseline if:
    - (i) The standardized baseline is applied in the registered PoA-DD and the valid version of the standardized baseline is applicable to the PoA and to the methodologies applied in accordance with paragraph 284 above; or
    - (ii) The standardized baseline is not applied in the registered PoA-DD but the valid version of the standardized baseline whose selection is mandatory is applicable to the PoA and to the methodologies applied in accordance with paragraph 284 above. However, the coordinating/managing entity may update the PoA-DD without selecting such standardized baseline if the submission of the request for renewal is made within 240 days after the standardized baseline became valid;
  - (b) If the valid version of the standardized baseline applied in the registered PoA-DD is no longer applicable to the PoA and/or to the valid version of the methodologies applied in the registered PoA-DD due to a revision of the standardized baseline after the registration of the PoA, the coordinating/managing entity shall:
    - (i) Select another applicable approved standardized baseline; or
    - (ii) Use only the valid version of the methodologies applied in the registered PoA-DD, that are still applicable to the PoA and that can be used independently for

- estimating GHG emission reductions or net anthropogenic GHG removals without using the standardized baseline applied in the registered PoA-DD;
- (c) The coordinating/managing entity may use the valid version of an applicable approved standardized baseline if:
  - (i) The standardized baseline is not applied in the registered PoA-DD; and
  - (ii) The standardized baseline standardizes baseline emissions only and does not require its mandatory selection, and is applicable to the PoA and to the methodologies applied in accordance with paragraph284 above;
- (d) The coordinating/managing entity shall not use an applicable approved standardized baseline if:
  - (i) The standardized baseline is not applied in the registered PoA-DD; and
  - (ii) The standardized baseline standardizes additionality and/or baseline scenario and does not require its mandatory selection, and is applicable to the PoA and to the methodologies applied in accordance with paragraph 284 above."
- Provision 14 Source 2, paragraph 287, page 63: "The coordinating/managing entity shall describe how to demonstrate the validity of the original baseline or how to update it for each of the corresponding CPAs in accordance with the provisions in paragraphs 288–291 below."
- Provision 15 Source 2, paragraph 288, page 63: "To demonstrate the validity of the original baseline or its update, the coordinating/managing entity is not required to re-assess the baseline scenario. Instead, the coordinating/managing entity shall assess the modalities to calculate GHG emission reductions or net anthropogenic GHG removals that would have resulted from that scenario."
- Provision 16 Source 2, paragraph 289, page 63: "The coordinating/managing entity shall assess and incorporate the impact of national and/or sectoral policies and circumstances existing at the time of requesting renewal of the PoA period on the modalities to estimate baseline GHG emissions for the subsequent crediting period of each corresponding CPA, without reassessing the baseline scenario."
- Provision 17 Source 2, paragraph 290, page 63: "The requirements contained in paragraph 289 above are not applicable to a registered CDM PoA applying the valid version of an applicable approved standardized baseline that standardizes baseline scenario in accordance with paragraph 286 above."
- Provision 18 Source 2, paragraph 291, page 63: "If data and parameters used for determining the original baseline, that were determined ex ante and not monitored during the PoA period, are no longer valid, the coordinating/managing entity shall update such data and parameters in accordance with the "Methodological tool: Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period"."
- Provision 19 Source 2, paragraph 292, page 63: "The result of the process described in paragraphs 284–291 above defines a new version of the PoA-DD including its generic CPA-DD part."

- Provision 20 Source 2, paragraph 293, page 63: "Notwithstanding paragraph 283 above, if, in accordance with the "CDM project cycle procedure for programmes of activities", the PoA-DD has been revised because the applied methodologies and/or the standardized baselines have been revised or replaced after having been placed on hold or withdrawn, the next renewal of the PoA period shall occur seven years (20 years for the A/R PoA) after the approval of the revised version of the PoA-DD and every seven years (20 years for the A/R PoA) thereafter."
- Provision 21 Source 2, paragraph 294, page 63: "The coordinating/managing entity shall ensure that the MoC statement is up to date."
- Provision 22 Source 2, paragraph 295, page 63: "The coordinating/managing entity wishing to combine a request for approval of any types of changes to the registered CDM PoA with a request for renewal of the PoA period may submit combined requests in accordance with the "CDM project cycle procedure for programmes of activities"."
- Provision 23 Source 2, paragraph 296, page 63: "The coordinating/managing entity or the project participants shall select a DOE, accredited for the validation function and in the sectoral scopes linked to the applied methodologies and relevant to the registered CDM PoA, and submit the updated PoA-DD, together with supporting documentation, to the DOE for validation for renewal of the PoA period of the PoA. The coordinating/managing entity or the project participants shall have a contractual arrangement with the DOE for the validation."
- Provision 24 Source 2, paragraph 297, page 63: "The coordinating/managing entity shall submit to the selected DOE the updated PoA-DD, together with supporting documentation, for validation."
- Provision 25 Source 2, paragraph 298, page 63: "At any time before the adoption of the decision on the request for renewal of PoA period, the coordinating/managing entity may contact the DOE to withdraw the request."
- Provision 26 Source 2, paragraph 299, page 64: "To renew the crediting period of an included CPA, the coordinating/managing entity shall, using the valid version of the applicable CPA-DD form, update the sections of the CPA-DD in accordance with the latest version of the PoA-DD, relating to the demonstration of eligibility for being included in the PoA, the baseline, estimated GHG emission reductions or net anthropogenic GHG removals, the monitoring plan and the crediting period."
- Provision 27 Source 2, paragraph 300, page 64 "If data and parameters used for determining the original baseline, that were determined ex ante and not monitored during the crediting period, are no longer valid, the coordinating/managing entity shall update such data and parameters in accordance with the "Methodological tool: Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period"."
- Provision 28 Source 2, paragraph 301, page 64: "The coordinating/managing entity or the project participants shall select a DOE, accredited for the validation function and in the sectoral scopes linked to the applied methodologies and relevant to the registered CDM PoA, and submit the updated CPA-DD, together with supporting documentation, to the DOE for validation for renewal of the crediting period of the included CPA. The

coordinating/managing entity or the project participants shall have a contractual arrangement with the DOE for the validation."

Provision 29 Source 2, paragraph 302, page 64: "The coordinating/managing entity shall submit to the selected DOE the updated CPA-DD, together with supporting documentation, for validation."

#### Assessment outcome

No (0 Point).

### Justification of assessment

The baseline emissions are required to be updated for any project activities seeking to renew their crediting periods (Provisions 1 and 2). This requires that the baseline emissions are either determined to still remain valid or to be updated (Provisions 3 to Provision 9). The same requirements apply for PoAs (Provision 10 to Provision 29). The program provisions include a requirement to evaluate and adjust (if needed) the baseline emissions, but it is not required to re-evaluate the appropriateness of the selected baseline scenario (Provisions 5, 6, 15 and 16). Therefore, the indicator is not fulfilled.

#### Indicator 1.3.1.16

### Relevant scoring methodology provisions

"In the case of project types where the baseline scenario is the continuation of the current situation (i.e. not undertaking any investment), the program requires the re-assessment of additionality at the renewal of the crediting period." (See methodology for further explanation)

### Information sources considered

- 1 CDM project standard for project activities, Version 02.0. CDM-EB93-A04-STAN. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\_stan04v02.pdf</a>
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. 29 November 2018. Available: <a href="https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\_stan03v02.pdf">https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\_stan03v02.pdf</a>.

- Provision 1 Source 1, paragraph 28, page 62: "For renewal of crediting period of a registered CDM project activity, the project participants are not required to reassess the additionality of the project activity nor update the section of the PDD relating to additionality."
- Provision 2 Source 2, paragraph 285, page 61: "For renewal of the PoA period of a registered CDM PoA, the coordinating/managing entity is not required to reassess the additionality of the PoA nor update the section of the PoA-DD relating to additionality."

### **Assessment outcome**

No (0 points).

### Justification of assessment

The program provisions specify that additionality does not need to be re-evaluated at the renewal of crediting periods. Therefore, the indicator is not fulfilled.

### **Scoring results**

According to the above assessment, the carbon crediting program achieves a total point score of 13 for the project type afforestation/ reforestation and a total point score of 11 for all other project types. Applying the scoring approach of the methodology, this results in a score of 2.71 (A/R) and 2.29 (other project types) respectively for the sub-criterion.