

DOE/AE Forum | *Werner Betzenbichler* | 23 Apr 2018

**EB-99**

**Relations with Designated Operational and Applicant Entities**

# Topics

- **Comments to Annexes of the Annotated Agenda**
- **AE/DOE Calibration Workshop**

## **Annex 4: Concept note - Changes in the CDM project activity, PoA or CPA to be allowed as post-registration changes**

Para 15 - changes to be submitted to the secretariat within two years

How should a DOE assess and finalize its verification opinion when it has identified that a technology/measure has been implemented/commissioned more than two years ago but since then no verification has been conducted.

Does the DOE have:

- a. to issue a negative verification opinion?
- b. to request a PRC to update the PDD to clearly state that this is not considered to account for emission reductions?
- c. if yes, is a prior approval required?
- d. to finalize the verification provided including a related assessment in the verification report which clearly demonstrates that this delay has not been considered for accounting emission reductions.

Similar issues for cases w.r.t. CPA inclusion timing

## **Annex 4: Concept note - Changes in the CDM project activity, PoA or CPA to be allowed as post-registration changes (cont.)**

Para 12 and 14 - accepted conditions / thresholds

Same questions if conditions / thresholds are not met . Does the DOE have:

- a. to issue a negative verification opinion?
- b. to request a PRC to update the PDD to clearly state that this is not considered to account for emission reductions?
- c. if yes, is a prior approval required?
- d. to finalize the verification provided including a related assessment in the verification report which clearly demonstrates that this delay has not been considered for accounting emission reductions.

## **Annex 5: Revision of CDM regulatory documents regarding post-registration changes to CDM project activities and PoAs**

Para 242 - CDM Project Standard for project activities

the proposed change “Other types of changes not referred to in subparagraphs (a)–(j) above” shall be either deleted or “other types” shall be specified;

Para 128bis - CDM PCP for project activities

and 141bis, 168bis - CDM PCP for PoA

reference to “the DOE shall submit within two years of the commissioning or implementation of the project activity, whichever is later”

Request to delete, as it is out of the control of a DOE whether a PP orders a verification within two years

## **AE/DOE Calibration Workshop, 28 May 2018**

- We welcome the fact that this instrument is revitalized
- From a practical view it might have been recommendable starting with a quick survey regarding the “ideal” venue (e.g. India might deliver higher participation rates)

**Thank you for your attention!**

Werner Betzenbichler  
Chair of the DOE/AIE Forum

[Werner.Betzenbichler@bece-experts.com](mailto:Werner.Betzenbichler@bece-experts.com)