

Call for public input	A6.4-MEP002-A01: Draft Standard: Demonstration of additionality in mechanism methodologies (v. 01.0)
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Legend for Columns

- 1 = Section Number in the document
- 2= Paragraph number
- 3 = Comment – the actual feedback or observation, including justification for what needs changing
- 4 = Proposed change – suggest the text if possible

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1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
2.1	6	"May" should be changed to "shall", regarding the scope of use of the standard for demonstrating additionality.	"This standard sets out the requirements for mechanism methodologies with regard to demonstrating additionality. It may shall be used by activity participants [...]"
3.1	10e	Minor clarification is needed to ensure that the transparent demonstration of additionality will lead to public disclosure of relevant information.	"Transparency: Sufficient and appropriate information shall be disclosed, including in the publicly available project design document , to allow intended users to make decisions with reasonable confidence."
4.1	16	Each approach should be required, and so the text should be tightened up to ensure there is no ambiguity.	"Mechanism methodologies shall include each of the following approaches to demonstrate additionality:"
4.1	16b	Additional descriptions and assessments to demonstrate there is no lock-in risk are important.	"(b) Analysis of lock-in risk: Mechanism methodology shall include provisions to demonstrate that the implementation of eligible mitigation activities does not lead to a lock in of levels of emissions or carbon-intensive technologies or practices, including through an assessment of the scale, lifetime, and emissions intensity of the activity. "
4.1	16c	Para 16c should be unbracketed	"(c) Common practice analysis: Mechanism methodologies shall include provisions to demonstrate that the relevant technology or practice is not common practice (e.g., it has a low market penetration). ; "
4.1	16d	The financial viability analysis described in para 17a should be moved under para 16 (supposing our earlier comment on the chapeau of para 16 is taken into account that would require each approach under para 16 to be undertaken).	"(d) Financial viability analysis: Mechanism methodologies shall include provisions to demonstrate that mitigation activities are not financially viable in the absence of carbon credit revenues, that the financial performance of the mitigation activities increases decisively through carbon credit revenues {and that carbon credit revenues can make the mitigation activities financially viable}; "

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4.2	20a	It appears preferable to delete paragraph 20a, unless the language is considerably strengthened. For example, the second sentence should be reworded since the current provisions for satisfying additionality are too broad and risk effectively amounting to a positive list. The last sentence on potential revisions is also too weak. The edits we propose in the cell to the right aim to strengthen this paragraph but are unlikely to resolve the issues that may arise from this paragraph which may effectively create positive lists.	Option 1: delete para 20a Option 2: “(a) Mechanism methodology: The proponent of a mechanism methodology may demonstrate that one or several each of the approaches referred to in section 4.1 are satisfied for all, or a subset of, the mitigation activities that are eligible under the methodology. The methodology may specify applicability criteria or conditions under which the approach is deemed to be satisfied (e.g. if the mitigation activity is implemented in a particular region, if the capacity of the installed plant does not exceed a certain threshold or if the market penetration is below a certain threshold in the relevant geographical region) . The mechanism methodology may then state that the approach is deemed to be satisfied for the relevant mitigation activities, as long as the applicability criteria or conditions specified in the methodology are satisfied and comply with Decision 3/CMA.3, Annex I, paragraphs 33, 34, and 38 . The proponent shall provide documented evidence and justifications in the methodology. The mechanism methodology may need to shall be regularly revised, at least every 5 years , to update the underlying analysis.”
4.2	20c	It appears preferable to delete para 20c. It is not exactly clear how one would accurately determine that the development of a standardized baseline can either demonstrate additionality or eliminate the need to conduct additionality tests (as other paras in the text indicate).	“(c) Standardized baseline: The proponents of a mechanism methodology shall specify in the methodology which approaches, parameters or conditions may or shall be demonstrated through the development of a standardized baseline.”
4.2	23	Same comment as above. Moreover, it is strange in such a document to use the term “preferable”. “Should” or “shall” are more appropriate for these types of documents.	“23. Mechanism methodologies should preferably include approaches that are applied at the level of mechanism methodologies or standardized baselines , where appropriate in the context of the technology or practice.”
5.1	24	Propose to delete “[enforced]”	“24. Mechanism methodologies shall include provisions to demonstrate that the emission reductions or removals caused by the mitigation activity would not occur as a result of any [enforced] legal requirements.”
5.1	25(c)	Para 25(c) and Box 2 should be unbracketed.	Unbracket para 25(c) and Box 2
5.1	27	Para 27, option 1, is preferable and should be retained.	Retain para 27 option 1 as is.
5.1	28	In the event para 27, option 1 is not retained, then the wording in para 28 option 2 should be modified as proposed in the cell to the right	“For [high-income countries] [countries other than LDCs and SIDS] , all legal requirements shall be deemed to be enforced. For LDCs other countries , legal requirements shall only be deemed to be unenforced if: (a) Non-enforcement is widespread (i.e. more than 50%) and documented through credible, authoritative and up-to-date evidence; and [...].”
5.1	29(a)	Option 1 is preferable in paragraph 29a. Option 2 does not represent an appropriate frequency.	“Where the analysis is applied to a specific mitigation activity, as referred to in paragraph 20(b) above, the analysis shall be conducted [Option 1: at each verification of emission reductions or removals] [Option 2: at the latest at each renewal of the crediting period]; ”
5.1	29(b)	As indicated in our comments about para 20(c) and 23, the reference to standardized baselines for determining additionality does not appear appropriate and so this paragraph seems better to delete.	
5.2	30	The first set of brackets should be deleted. The second set of brackets should be unbracketed and retained. Additional text should also be added as proposed.	“Do not lead to the adoption or the prolongation of the lifetime of technologies or practices that are incompatible with achieving [global net zero emissions by midcentury, taking into account different national circumstances by countries] the long term goals of the Paris Agreement); Mechanism methodologies shall also ensure a conservative approach is taken that avoids locking in levels of emissions, technologies or carbon-intensive practices incompatible with Decision 3/CMA.3, Annex I, paragraph 33;”

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5.2	30c	Propose to slightly clarify para 30c to ensure that it does not lead to an interpretation permitting e.g. new fossil fuel-based plants.	“(c) For technologies or practices with a long lifetime, rely on a technology or practice that is among those with the the lowest greenhouse gas intensity in the relevant region taking into account the lifetime of the technology or practice, as long as these comply with paragraph 30(a) and 30(b) above as well as 30(d) below; ”