

**Name of submitter: Tridip Kumar Goswami**

**Affiliated organization of the submitter (if any): Ecoveda Climate LLP**

**Contact email of submitter: tridip@ecovedaclimate.com**

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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

<b>A6.4-MEP002-A01 (v.01.0)</b>			
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<b>Section no.</b>	<b>Para. no.</b>	<b>Comment</b>	<b>Proposed change (Include proposed text)</b>
5.1	27,28	The regulatory analysis approach assumes uniform enforcement of legal requirements at the country level, which is often not the case in developing regions.	It is suggested that the Project Proponent be granted the flexibility to define the geographical boundary for determining additionality, with appropriate justification. This would help to account for regional disparities in the enforcement of legal requirements and ensure a more accurate assessment of additionality using the regulatory analysis approach.
4.1	16(b)	The analysis of lock-in risks should consider not only the technology but also the socio-economic and infrastructural contexts that may affect the carbon-intensive practices. For example, regions with limited access to renewable energy infrastructure may face unintended lock-in risks due to lack of infrastructure rather than the available technology alternatives. Another example could be that technical skill is not developed in the region to cater to maintenance of technology or end users are not ready to take up a high-end technology.	It is suggested to include a multi-dimensional lock-in risk assessment that considers the infrastructural, socio-economic, and technological factors. It is suggested to develop guidelines for integrating the assessment framework at regional level to ensure a comprehensive evaluation of lock-in risks.
5.2	30	The criteria seem to imply that if the host country may not be willing to replace existing prevalent baseline technologies directly with high end technology, then the project cannot be proved additional using the Avoiding Lock-in analysis approach.	It is suggested to revise the criteria to clearly state that projects involving medium efficiency technologies may be allowed if they meet the requirements for low greenhouse gas intensity and efficient resource use. This could involve amending point (c)- that only technologies or practices within the lowest greenhouse gas intensity range should be considered, and explicitly excluding projects that do not meet this criterion.
4.1	17(a)	Financial viability analysis needs to account for the variability in regional financial markets, especially in terms of access to capital, interest rates, and financial incentives. Uniform financial benchmarks may not accurately reflect the economic realities of different regions.	It is suggested to propose region-specific financial benchmarks that reflect local economic conditions, access to finance, and prevailing interest rates. It is suggested to develop approach for adjusting financial viability criteria based on regional economic assessment, ensuring that there is no biasedness in estimation of additionality.
4.1	17(b)	Barrier analysis must be context-specific, recognizing that barriers in one region may not be applicable in another. Additionally, the interaction between different types of barriers (e.g., institutional, financial, informational) can be complex requiring an approach to accurately assess and address these barriers. In some instances, barriers can also be case-specific. For example, a client with a low credit score seeking a loan may face significantly higher interest rates compared to other investors, representing a unique financial and institutional barrier for that individual.	It is suggested to develop an integrated barrier analysis framework that includes a multi-criteria assessment of institutional, financial, and informational barriers. It is suggested to incorporate region-specific case studies and stakeholder input to ensure overall understanding of local barriers and the role of carbon credits in overcoming them.

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4.1	16(a), 17, 18	Section 4.1 provides an overview of the eligible approaches to demonstrate additionality. However, it is unclear which approaches are mandatory and which are optional for proving additionality.	It is recommended to include a decision-making framework or flowchart to assist project developers in selecting the appropriate approach to demonstrate additionality. This should be based on the available options (default and optional) at various levels, including mechanism methodology, mitigation activity, and standardized baseline.
5.4	45 (a) (b) (c)	The current text in Section 5.4 does not clarify how the adoption rate or penetration level will be determined. For example, if a Project Developer implements agroforestry practices, it is unclear whether the adoption rate threshold will be based on the area under agroforestry or the number of farmers practicing agroforestry.	It is recommended to specify the procedure for establishing the adoption rate threshold, including whether it will be based on primary or secondary data. Additionally, it is suggested to clarify if existing carbon projects will be considered in the common practice analysis for such cases.
4.2	20 (a)	The statement, "The proponent of a mechanism methodology may demonstrate that one or several 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," lacks clarity. It is not clear what is meant by "all, or a subset of, the mitigation activities."	It is suggested to clarify whether the term "all, or a subset of, the mitigation activities" refers to the option of choosing between demonstrating compliance for all eligible activities or only a specific portion of them. Additional guidance or examples would be helpful to ensure consistent interpretation and application.
5.3.4	43	The current text states that in most sectors (e.g. energy, industry, waste), alternative scenarios shall provide the same type and level of products or services as the mitigation activity. However, it mentions that this requirement does not apply to all mitigation activities in the AFOLU sector.  It is unclear which specific mitigation activities in the AFOLU sector are exempt from this requirement.	It is suggested to incorporate clarification on the mitigation activities in the AFOLU sector which are not required to provide the same type and level of products or services as the mitigation activity. It is suggested to consider including specific examples or criteria to help project developers understand which activities are exempt from this requirement.
5.1	28	The current wording suggests that non-enforcement is only considered for countries other than LDCs and SIDS if it is widespread (more than 50%) and documented. However, non-enforcement issues can also be prevalent in non-LDC countries. Therefore, it seems inconsistent to apply this criterion exclusively to certain countries.	It is recommended to apply the same criterion of non-enforcement (i.e., more than 50%) across all countries, including non-LDCs, to ensure consistent treatment. This could involve revising the text to state: "For all countries, legal requirements shall only be deemed to be unenforced if non-enforcement is widespread (i.e., more than 50%) and documented through credible, authoritative, and up-to-date evidence." Additionally, clarify the duration for which non-enforcement can persist after the entry into force of the relevant legal requirements.
5.3	32(a)	Frequency of reassessing the simple cost analysis to maintain the relevance and accuracy of the analysis over time is not mentioned. Cost savings as a key factor in the analysis to ensure that the most cost-effective and efficient measures are being implemented is also missing in the simple cost analysis.	It is recommended that the Simple Cost Analysis be reviewed at regular intervals to ensure continued compliance. This reassessment should consider the frequency of evaluation, such as every 5 years or at the renewal of the crediting period. Additionally, the aspect of cost savings should also be considered in the analysis.
5.3.4	43	The current text for the Investment Comparison Analysis lack specificity regarding the parameters to be considered for comparison. This can lead to inconsistencies in how analysis under different projects is evaluated.	It is recommended to specify the parameters required for comparison in the Investment Comparison Analysis. For instance, considerations of plant cost, land cost, labour cost, maintenance cost, cost of capital, and other relevant factors. Specifying these generic parameters will ensure a more consistent and thorough comparison across all options, leading to more accurate and fair evaluations.

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5.5.2	48	The current criteria for the application of the barrier analysis approach seem to restrict its use to specific types, such as individual households or small public or private entities, with certain investment and emission reduction thresholds. However, it is unclear why these thresholds have been set, as other sectors, like industries, may also encounter significant barriers in upgrading technologies or systems.	It is recommended not to restrict the application of the barrier analysis approach solely to individual households or small public or private entities. Consider allowing its use for larger entities, including industries, that may face significant barriers in implementing mitigation activities. This would provide a more comprehensive and inclusive framework for identifying and addressing barriers across various sectors and project scales.
5.6.1	52(d)	The current criteria for a performance-based approach require that data on the performance of mitigation activities be available, recent, disaggregated, reliable, accurate, and verifiable. However, it is unclear how this approach can be effectively implemented if there are issues with data availability, such as insufficient or inaccessible data.	It is recommended to provide additional guidance on how to proceed with a performance-based approach when data availability is limited or problematic. This could include outlining alternative methods for estimating performance indicators, such as using proxy data, expert judgment, or conservative assumptions, and specifying the conditions under which these alternatives may be acceptable.