

Call for public input	A6.4-MEP003-A01: Draft Standard: Setting the baseline in mechanism methodologies (v. 01.0)
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Affiliated organization of the submitter (if any): Currently working with General Carbon, and an enabling Affiliate and ambassador with ESDW-ESDN, Sustainable Procurement Pledge, UNEP, UNDP, UNSDGs and multiple standard setting boards (IFRS, SBTi, GRI and TCFD etc.)

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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

A6.4-MEP003-A01 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
1	23, page no.5	Objective section: Other than setting crediting baselines, identifying baseline scenario and determining baseline emissions, the objective should also include managing baselines as “What cannot be managed cannot be measured or determined” The traction between avoidance and additionality is important tool between baseline emissions and project emissions quantification.	It is requested to include, management of baseline scenarios and emissions including risks associated while setting the crediting baselines and managing it. Example: How flaring of gas baselines is made eligible towards baselines (what technology is applied etc., heat recovery, switch over and replacement).
3	Page no.7	Scope, Applicability and Entry into Force: Why the methodologies and the scope of amendment over the years has also focused on mitigation activity. Only mitigation interventions and emission reductions and removals are quantified and tools and methodologies are revised, no entry into force of and applicability of incorporating adaptation activities – for mitigation to be effective adaptation measures are equally important, so it “shall” be the requirement to include adaptation activities as well in quantification tools.	It is requested to include adaptation measures in the scope and applicability section.
4	Page no.8	Principles section: Why there is no mention of uncertainty and risks associated, accuracy principle only covers the bias or unbiased nature or extent level but does not completely include risks associated. So, either in the accuracy principle risks and uncertainty be included or a separate “ Uncertainty and Risks ” principle be added	It is requested to include in the section of principle: Uncertainty and Risks.
5	Page no. 9	Application of baseline approaches at different levels of aggregation: Stakeholder impact assessment: Methodologies and mitigation activity including standardized baselines are precisely placed, but why no inclusion of stakeholder impact assessment at the level of aggregation when that is base for setting even the simpler BAU or even setting credit baselines	It is requested to include in the section of Application of baseline approaches: stakeholder impact assessment
6	Page no. 6	Section on Approaches in setting baselines -sub-section: down ward and upward adjustment: Downward and upward adjustment approach are included separately when top down and bottom-up approach for emission quantification are easily applicable.	It is requested to include in the section of Approaches - Can be included “top down and bottom-up approaches for quantifying and setting baselines as these are the most conservative means of standardizing and measuring baselines

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Section no.	Para. no.	Comment	Proposed change (Include proposed text)
8	Page no. 18	Section on: Baseline Levels Aligned with NDCs, LEDS and the Temperature Goals of the Paris Agreement – Why there is no inclusion of ITMOs and NAMAs in the section. If NDCs, LEDS and temperature goals are align-able with baselines, then ITMOs should be a bigger priority for inclusion as without these no crediting principles of baselines pervade or penetrate in the carbon markets with project and leakages considered in totality. Also, when in the application of baselines approaches section – mitigation activity is included then why NAMAs also needs to be included in this section, as when perceived emission reductions and removals are traded either at domestic markets level (if available) or at international level arena both result are obvious and visible either through its adding into specific country's emission reduction contribution (NDCs) or at buyable by the international markets (if no domestic markets available) for their emission reduction targets or goals contribution.	It is requested to include ITMOs and NAMAs in the section of Baseline Levels Aligned with NDCs, LEDS and the Temperature Goals of the Paris Agreement.
9	Page no. 18 and 19	Comparison and selecting of baselines: Why there should be this section, when setting of baselines suffices the purpose? Also, there is no need for comparison of baselines as you cannot say for example compare an apple with an orange or say for example apply the carrot and stick approach (i.e. good and bad) as baselines are devoid of project activity and a benchmark for project level mitigation so that avoidance or emission removal accelerates.	It is requested to exclude this section of comparison and selecting of baselines. Selection of baselines be included or moved to the section of “setting of baselines” .