

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

A6.4-MEP002-A01 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
4.1	16	The considerations in the draft standard are different to the additionality requirements being considered in the recommendations for the mechanism methodologies – such as on the Whitelists.	Alignment between the mechanism methodology recommendations and this standard. And, also with respect to the frameworks and regulations of host parties which have e.g. published whitelist of activities and technologies.
4.1	16	Are all of the approaches (a), (b) and (c) are required.	May be good to put it clearly that all of these approaches are mandatory.
4.1	16 (a)	What should be the robustness of the provisions to demonstrate that the emissions reductions due to a certain activity is not influenced by or is interacting with a legal requirement – should this be at the level of correlation or causation!	A clear stepwise procedure to demonstrate the regulatory additionality with the degree of robustness. It is straightforward in cases where there are no related regulations – but would also depend on the type of regulation such as a tax or a subsidy. However, this provision would may need to be analysed further going forward in the context where higher level regulatory ambitions are required to achieve PA goals and the NDCs.
4.1	16 (c)	Common practise analysis could be linked to the effectiveness of the regulatory requirements and in cases where there are no related regulatory requirements to prove that the technology or practise is not common practise.	May be included as provisions to understand the effectiveness of regulatory analysis, if related regulations exists. However, include the need to carry out the analysis even if there are no regulations.
4.1	20 (a)	Could contexts (country, regions, practise) influence the approaches and therefore proving additionality is applicable more at the MA level.	Deciding on approaches at the methodological level would help decision making and efficiency – but may dilute the contexts e.g. how are the mitigation benefits shared.
4.1	20 (c)	Is standardised baseline a parameter/tool or a level similar to the mitigation activity or the mechanism methodology.	May be examples of which approaches and at what level the standard baseline can be used with some examples rather that put it as a level.
4.1	21 (a)	Could additionality through regulatory analysis be applied with a standardised baseline - as in a single value for example of market penetration. Then, will there be a tool to establish this baseline, or can be derived from the literature – if available. There may be several values in the literature.	Proposal same as above.
4.1	22	Since this concept of applicability of additionality at different levels and with standardised baselines is different/new – examples could be useful.	May be examples of these applications of different approaches at different levels – similar to Box 1 will be useful for easy understanding.
5	24	May be not include “enforced” – since regulations are of different types and degree of enforcement.	Remove “enforced” – but may be recommend a tool to carry out the regulatory analysis that captures the level of the applicability, stringency and influence of related regulations.

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5.2	30 (C)	Why identify a technology only in the context of if they have long lifetime, shouldn't all technologies be those with the lowest GHG intensity irrespective of technology or activity durations.	May be good to define what a long lifetime is – and these may be activity dependent.
5.2	30 (d) that is important for mitigating climate change or achieving other policy objectives – what does this allude to.	Replace with “compared to the best available technologies/solutions”.
5.5. and 5.6	5.5. and 5.6	Financial viability allows transparency and a back-up also in the absence of financial safeguards similar to the social and environmental safeguards (SD Tool) – also in relation to emerging considerations such as equitable sharing of benefits. So, these other approaches should kick-in only in cases where financial analysis is not applicable, or as additions to the financial analysis. The applicability conditions are somewhat contrary/confusing as if under given conditions Barrier and Performance based is allowed without considering the default financial viability approach.	May be good to put some explainers for clarification.