[Hyderabad, 11/10/2022]

Call for inputs on the documents (annexes 7 and 8).

Dear UNFCCC A6.4 Mechanism Secretariat Team,

We are submitting our comments and suggestions to Document A6.4-SB002-AA-A07 Draft Recommendation "Requirements for the development and assessment of mechanism methodologies", and A6.4-SB002-AA-A08 Information note "Requirements for the development and assessment of mechanism methodologies".

Comments on : A6.4-SB002-AA-A07- Draft Recommendation "Requirements for the development and assessment of mechanism methodologies Version 01.0."

Para 18 (e) states that "By incentivizing new low-emission technologies with very low penetration rates (e.g. <10% penetration rate) by designating them as 'first-of-its-kind' or 'automatically additional' and excluding technologies with high penetration rates (e.g. >50% penetration rate) by designating them as 'common practice' or 'business-as-usual';"

Inputs:-Currently, the common practice threshold used in CDM TOOL24 is 20 per cent. However, in the methodologies, thresholds applied for common practice include 20 per cent, 33 per cent and 50 per cent. Thus, common practices should need to be defined for different technologies, sectors, and regions. Similarly, thresholds applied to demonstrate automatic additionality in the existing CDM methodologies and tools include 2 per cent, 5 per cent, 10 per cent and 50 per cent based on the different types of technologies. SB may consider maintaining the same rates based on the sector and technology for first-of-its-kind as well as common practice analysis instead of standardizing one figure.

As per the Para 49 under the category for global positive list of activities established by the supervisory body, under para (c) it is defined as "(c) Are not financially attractive in any circumstances;"

Inputs: Defining a positive list will not be financially attractive in any circumstances and will hinder many technologies from failing to qualify. Technology such as improved cookstoves and biogas digeters is financially attractive for each household if they want to invest in fuel saving. However, it faces substantial barriers in mass adoption without offset, so it needs to be put under a positive list.

Comments on A6.4-SB002-AA-A08 Information note "Requirements for the development and assessment of mechanism methodologies".

As per the Para 9 (d), Avoiding activities undertaken in a value chain for which the carbon footprint of the end-product(s) is higher than the carbon footprint of the baseline product(s) satisfying the same need.

Inputs- A fundamental tenet of defining the comparative carbon footprint of the end product is to take into account its carbon footprint impacts from 'cradle to grave. This consists of indirect inputs to the production process, associated wastes and emissions, and the product's future (downstream) fate. The analysis quantifies materials flows and transformations, including energy fluxes such as fuels and combustion products. This is a valuable exercise if all the input information is available. However, the data required to accomplish this are often not normally available from published sources. It is also observed that theoretical process descriptions from open sources may not correspond to the actual carbon footprint estimation. Moreover, so-called 'confidential' data are unverifiable, may well be erroneous, and differs from region to region and case-specific. The option may lead to a misleading comparison without formal, transparent data availability.

CoreCarbonX requests consideration of the comments and suggestions mentioned above. We are available for further discussion if appropriate.

Yours Sincerely,

Niroj Kumar Mohanty,
Core CarbonX Sols Pvt Ltd

Core CarbonX Solutions Pvt Ltd.
CIN:U72200TG2008PTC058117
5R, Block A, Kanthi Shikara Complex, 6-3-668/9, Punjagutta, Hyderabad-500082, India,
Tel: +91-40-64102137, Fax: +91 40 23410367, www.corecarbonx.com