

Comments and input to following documents as per SB008 by CDM DOE TÜV NORD CERT GmbH

A6.4-SB008-AA-13 Concept note: Availability of Article 6.4 mechanism designated operational entities Version 02.0

General:

The entire document only speaks about verification/certification service. How about validation service e.g. validation of renewal of CP?

§8 the Supervisory Body could decide that CDM DOEs conduct verification of requests for issuance from transitioned activities within the scope of paragraph 17 of the Procedure for the transition of CDM activities to the Article 6.4 mechanism (version 01.0) to be read in conjunction with the paragraphs 20, 29 and 30 of the Standard for the transition of CDM activities to the Article 6.4 mechanism (version 01.0)

DOE question/comment:

a) Preferred to change to

"The SB decided that DOEs conduct verification of requests ..."

b) Further, paragraphs 20 of the Standard for the transition of CDM activities to the Article 6.4 mechanism states that

"A CDM project activity, or PoA and CPAs therein, that may transition to the Article 6.4 mechanism may continue to apply the currently applied CDM methodology until the earlier of the end of the current crediting period or PoA period as applicable, or 31 December 2025. After that date, it shall apply an Article 6.4 mechanism methodology (hereinafter referred to as mechanism methodology)."

This means all PAs, PoAs and CPAs which CP ended between 01/01/2021 and today have to apply a A6.4 methodology.

What if the related A6.4 methodology is not available?

Can verifications be conducted for these PAs, PoAs and CPAs?

As the same rules apply for projects/PoAs/CPAs already assessed but under provisional request

How to deal with projects/PoAs/CPAs which CP ended after 30 June 2023 and could not submit a request for renewal either under provisional request nor under A6.4 esp. if the transitioning of the project/PoAs/CPAs will take beyond 30 June 2024 and the one-year requirement (e.g. CDM PCP §278) cannot be met?

§9

Preferred option is a) Option 1. Due to time constraint reasons as related rules and requirements have to be available in final version released by SB for accreditation standard, accreditation procedure, project and PoA cycle procedure as well as project / PoA standard and VVS besides related templates in order to adjust the DOEs' QM system. Further transition rules have to be available in final version and if all rules are available DOEs need also time to adjust their QM system before related documents could be sent for any kind of assessment also as indicated in §11.

A6.4-SB008-AA-A11 Draft Standard: Article 6.4 mechanism accreditation Version: 03.0

Appendix 2 refers to Scope 17 Other activities involving removals:

What is the difference to Scope 14 and Scope 16 as typical activities are given as "[...] activities removing CO₂ from the atmosphere and durably storing it in **geological**, terrestrial, or ocean **reservoirs** [...]" includes existing and potential anthropogenic enhancement of biological, geochemical or chemical CO₂ sinks, [...]"

Please clarify which additional competencies are required next to those under Scope 16 as well as mass and energy balance as well as chemistry. How would a typical project activity under Scope 17 look like?