Name of submitter: Rohit Lohia

Affiliated organization of the submitter (if any): Climate Secure

Contact email of submitter: rohit.lohia@climate-secure.com

Date: 15 Apr 2024

Legend for Columns

0 = A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)

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

0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Meths	4.1	18	The total creditable amount of emission reductions may progressively increase despite a reduction in the project's emission reduction intensity over time, in case of projects including phased implementation / progressive installations (cookstoves). Thus, the methodologies therefore shall be developed to ensure that specific emission reductions remain constant or are progressively reduced to encourage ambition of activities over time, rather than total emission reductions.	Mechanism methodologies shall contain provisions to ensure that specific total creditable amount of emission reduction remains constant or is are-progressively reduced to encourage ambition of activities over time
Meths	4.3	28	Para 18 above already requires mechanism methodologies to have progressively reducing emission reduction volumes. Setting up baseline below BAU levels could be increasingly prohibitive to projects in addition to para 18 approach. Additionally, the BAU scenario may already be an undermined baseline for projects with supressed demand. Most of the project with suppressed demand are not able to claim supressed demand benefit due to challenges in quantifying the extent of suppression, and hence will be hugely disincentivized by fixing the baseline lower than BAU. Lowering the baseline below the BAU shall therefore not be imposed but optional.	Relevant changes to A6.4-SB009-A01, considering the comment
Meths	4.4	31a)	Conditions to ensure that the total length of the crediting period(s) of activities is shorter than the lifetime of the technology implemented may not be suitable for projects that involve short/medium lifespan products like improved cookstoves, water purifiers, domestic solar lights etc., wherein the units are replaced after end of their lifespan or the crediting period for each unit is limited to corresponding lifespan	Conditions to ensure that the total length of the crediting period(s) of activities is limited to shorter than the lifespan time of the technology implemented unless the lifespan of the project technology is extended by replacements to cover the total length of the crediting period.
Meths	5	80(b)(i)	Seeking the reasons why investment analysis is not suitable in case of additionality demonstration via barrier route, shall not be mandated. It should be at the discretion of the PP to determine if one wants to demonstrate additionality via investment analysis or via barrier route.	Describe the barriers, including the reasons why investment analysis is not suitable
Meths	5	80(b)(iii)	Demonstration of additionality is usually an ex-ante exercise and not an ex-post exercise. Further additionality demonstration is not usually required at the renewal of crediting period. The inclusion of monitoring parameters to demonstrate, how barriers are overcome, may not be possible in various circumstances, especially after initial couple of years of project implementation.	Include parameters in the monitoring plan to demonstrate how the barriers are overcome.