

CDM-EB90-AA-A14

Concept note

Approaches for additionality demonstration

Version 01.0



United Nations
Framework Convention on
Climate Change

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1. Procedural background

1. At its eighty-second meeting, the Clean Development Mechanism (CDM) Executive Board (hereinafter referred to as the Board) requested the secretariat to prepare a concept note to look into additionality in a more holistic way, by describing the work done in the past, approaches that have already been incorporated in methodologies, lessons learned, what could be done further, including possible alternative approaches and, where possible, giving examples for changes in specific methodologies. In this process, the secretariat shall consider inputs from stakeholders, such as designated operating entities, project proponents and external experts.
2. At its eighty-fifth meeting, the Board requested the secretariat to prepare a concept note, assessing the possibility and potential implications of:
 - (a) Introducing probabilistic approaches for additionality, taking into account, inter alia, their usability, the data requirements and how they may relate to the sensitivity analysis of investment analysis;
 - (b) Determining criteria for negative lists and developing negative lists of project types that are clearly not additional;
 - (c) Reassessing in, specific situations, the baseline scenario at the time of renewal of the crediting period;
 - (d) Removing the requirement of prior consideration;
 - (e) Removing the first of its kind as an approach to demonstrate additionality;
 - (f) Introducing a threshold beyond which CDM projects are considered in the common practice analysis. The work is also included in the approved workplan for panels and working groups 2016.
3. This work relates to the activity 'Simplification of methodologies including digitization to reduce transaction costs' under 'Objective 1(c): Develop simplified and user - friendly standards and procedures that increase efficiency and ensure environmental integrity' with a resource allocation as referred to in table 4 on page 15 of the CDM two-year business plan 2016–2017 and management plan 2016 (EB87, annex 1).

2. Purpose

4. The secretariat prepared the first draft of this document and consulted with the Methodologies Panel (MP) at its sixty-seventh meeting and with the Small-Scale Working Group (SSC WG) at its forty-eighth meeting. Later, at MP 70 and SSC WG 51, the panel and working group considered the combined note prepared by the secretariat and provided their inputs.

3. Scope of work

5. The scope of this document is set by the work requested by the Board, as referred to in paragraph 2 above. This document describes the approaches for additionally demonstration using probabilistic approaches, negative lists, prior consideration, first of

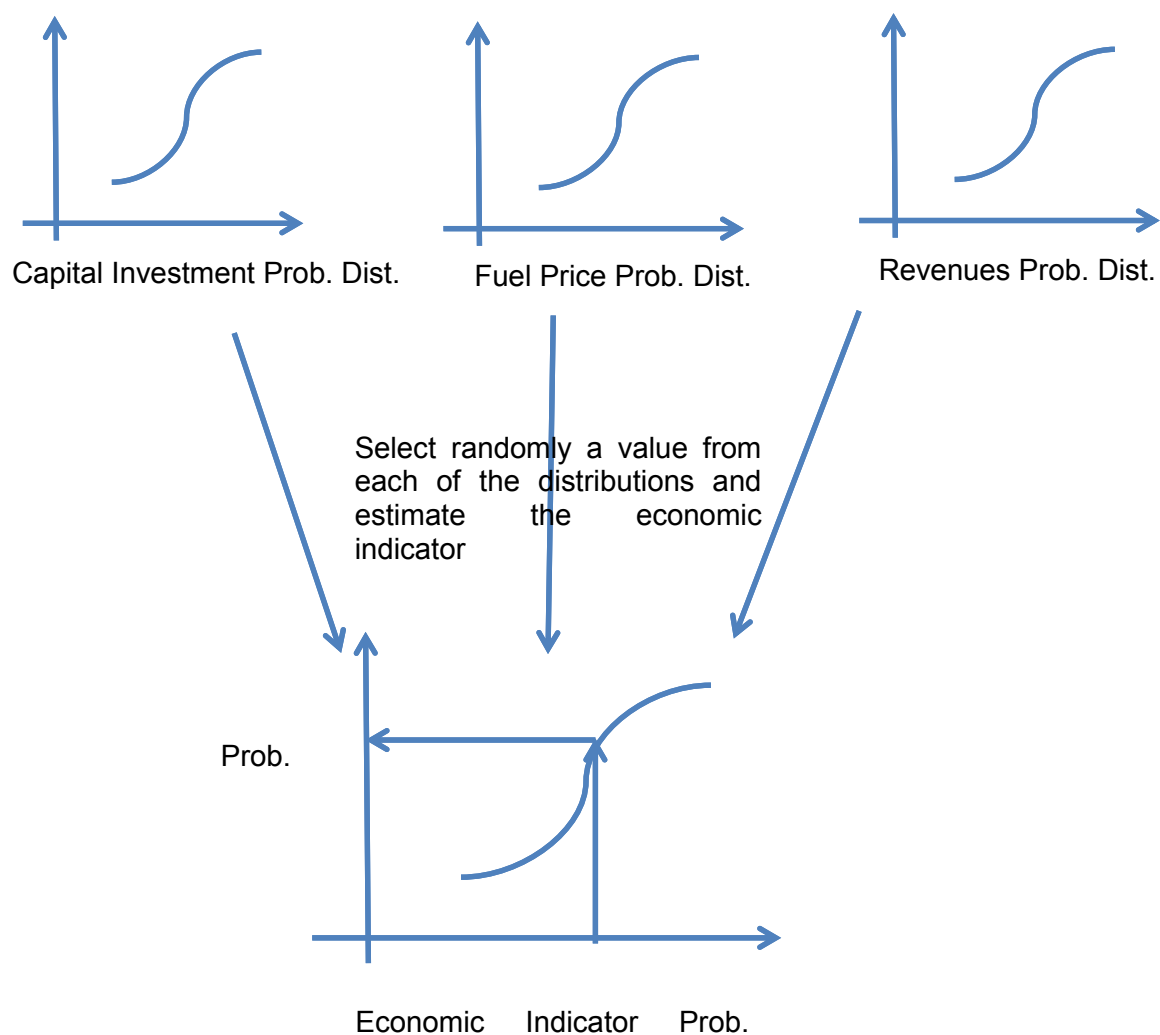
its kind and common practice analysis. The work on reassessing baseline scenario at the time of renewal of the crediting period would be undertaken in the next stages.

4. Key issues and proposed solutions

4.1. Probabilistic approach

6. Analysis of the current situation: Currently, investment analysis has been conducted intensively for the purpose of demonstrating additionality of the proposed project activity. In doing so, the economic indicator (e.g. Net Present Value or Internal Rate of Return) is calculated by the project proponent for checking the viability of the proposed project activity using the relevant financial parameters associated with the project (e.g. capital investment, operation costs, fuel prices). Such a calculation of the economic indicator is supplemented by a sensitivity analysis, allowing the financial parameters to vary with a typical range of +/- 10 per cent.
7. The result of investment analysis is binary, i.e. the proposed project activity is either additional or not. If it is not additional, no credits from emission reductions are claimable. Some criticism has been received from stakeholders on such an approach. For example, one project will be able to claim 100 per cent of the certified emission reductions if it is slightly over the financial benchmark, whereas another project will be disqualified to claim any credit if it is just slightly below the same financial benchmark.
8. Exploration of the probabilistic approaches: The underlying approach explored by the MP is to associate a probabilistic distribution to the main financial parameters used for investment analysis and then to determine the probability distribution of the economic indicator (e.g. NPV or IRR) from the investment analysis by using Monte Carlo Simulation, where inputs selected randomly from the probability distribution of each of the input financial parameters are used. An illustration of the approach is shown in Figure 1 below.

Figure 1. Demonstration of the probabilistic concept



9. After identifying the different probability distribution options of the economic indicator, different options can be considered to demonstrate additionality and/or determine eligible emission reduction:
- (a) **Option 1:** A project is considered additional if there is X per cent probability that the economic indicator is below the financial benchmark value. For example, a project is considered additional if there is 80 per cent probability that the IRR of the project is lower than 15 per cent (considering that 15 per cent is the benchmark in this case). Another example is that a project is considered additional if there is 80 per cent probability that the NPV is negative;
 - (b) **Option 2:** The carbon emission reductions (CERs) from a project are discounted based on the probability of the project being additional. For example, if there is 80 per cent probability that the project is additional in the example in Option 1 above, the CERs generated from the project could be discounted by 20 per cent). In this manner, environmental integrity could be safeguarded;
 - (c) **Option 3:** This option can be seen as a combination of the above two options, i.e. a minimum probability needs to be met for the project to be proven additional (e.g. 80 per cent), while at the same time the CERs are discounted by (1-minimum probability) (i.e. 20 per cent in this example). This could be seen as an improvement of the current sensitivity analysis by considering together the uncertainty on various parameters (instead of doing this separately) and going beyond the current “black and white” type of outcome (i.e. the project is not additional and no CERs are obtained if the NPV becomes positive if one of the input parameters is increased/decreased by 10%).
10. **Secretariat’s Proposal:** The MP acknowledged that a probabilistic approach the critical point is to correctly specify the probability distributions and the correlations between different input parameters, if any. It also noted that such an approach may not be favourable for all types of projects. In such a context, the MP would like to engage external expertise to help it to further define and develop such a potential approach. The Terms of Reference (ToR) for the probabilistic approach are also attached as appendix 1 to this concept note for the Board’s consideration.

Box 1. Methodologies Panel’s recommendation on probabilistic approaches

The MP agreed with Secretariat’s proposal to engage a consultant to define and develop probabilistic approaches.

4.2. Common practice analysis

11. **Analysis of the current situation:** As per common practice tool version 03.1 (EB 84 Annex 7), all large scale projects are subject to the common practice analysis, which is a credibility check designed to assess “the extent to which the proposed project type (e.g. technology or practice) has already diffused in the relevant sector and region”. However, few methodologies have specific guidelines for what constitutes common practice. Instead, project developers must discuss similar activities that are occurring (not including other CDM activities) and how extensively these other activities have diffused in the sector and region and describe essential distinctions between the proposed activity and the others. As per the existing common practice tool, a proposed project

activity is considered to be “common practice” in an applicable geographical area, if the factor F is greater than 0.2 and Nall-Ndiff is greater than 3. Factor F represents the share of similar projects (penetration rate of the measure/technology) using a measure/technology similar to the measure/technology used in the proposed project activity that deliver the same output or capacity as the proposed project activity. Nall are similar projects (both CDM and non-CDM) which have capacity or output range as +/-50 per cent of the total design capacity or output of the proposed project activity and fulfil all of the following conditions:

- (a) The projects are located in the applicable geographical area;
 - (b) The projects apply the same measure as the proposed project activity;
 - (c) The projects use the same energy source/fuel and feedstock as the proposed project activity, if a technology switch measure is implemented by the proposed project activity;
 - (d) The plants in which the projects are implemented produce goods or services with comparable quality, properties and applications areas (e.g. clinker) as the proposed project plant;
 - (e) The capacity or output of the projects is within the applicable capacity or output range calculated in Step 1;
 - (f) The projects started commercial operation before the project design document (CDM-PDD) is published for global stakeholder consultation or before the start date of the proposed project activity, whichever is earlier for the proposed project activity.
12. Within similar projects identified as Nall above, those projects that are neither registered CDM project activities, project activities submitted for registration, nor project activities undergoing validation, and apply technologies that are different to the technology applied in the proposed project activity categorized as Ndiff. Different technologies are technologies that deliver the same output and differ by at least one of the conditions stipulated under paragraph 12 of common practice tool version 03.1.
13. The proposed approach in this concept note is to bring consistency to the common practice tool, while identifying similar projects to the proposed project activity in a given sector as compared to other CDM tools/methodologies, i.e. to include the CDM projects to identify similar projects which have higher cost of fuel/feedstock/technology than the maximum cost of the fuels/feedstocks/technologies that contribute to at least 30 per cent of the output of the sector.
14. **Proposed threshold for considering CDM projects in the common practice analysis:** To date five projects have been rejected based on issues related to common practice and 10 projects have been withdrawn. It was observed that those 15 projects failed to comply with the requirement to determine to what extent similar and operational projects (e.g. using similar technology or practice), other than CDM project activities, had been undertaken in the defined region.
15. As per common practice tool version 03.1, the project participants can exclude both existing and prospective CDM projects (those “registered project activities and project activities which have been published on the UNFCCC website for global stakeholder

- consultation as part of the validation process”) from the common practice analysis. However, while this exclusion makes sense for projects with decisive cost or technical barriers, it can be problematic in situations where such barriers are not present – as has been the case for ultra-supercritical coal power plants in China –, since all projects would therefore pass the common practice test even if any of them are additional.
16. Currently, the following tools/guidelines are being used to determine baseline emission factor, first of its kind additionality and standardized baseline, and none of them restricts the consideration of CDM projects in the analysis:
- (a) Grid emission factor tool: As per the “tool to calculate the emission factor for an electricity system”, version 05.0 (EB 87 Annex 9), while calculating Operating Margin (OM) Emission Factor, the project participants consider the set of power units registered as CDM project activities in the calculation. In addition, out of three options to calculate the Build Margin Emission Factor, one option allows the project developers to *“include the set of power units which are registered as CDM project activities, starting with power units that started to supply electricity to the grid most recently, until the electricity generation of the new set comprises 20 per cent of the annual electricity generation of the project electricity system (if 20 per cent falls on part of the generation of a unit, the generation of that unit is fully included in the calculation) to the extent is possible”*.
 - (b) First of its kind additionality tool: As per the tool to demonstrate “additionality of first-of-its-kind project activities”, version 03.0 (EB 84 Annex 6), while demonstrating first of its kind barrier analysis, the project participants may include the registered CDM project activities in the analysis and the aforementioned tool is rather flexible to include CDM projects in identifying similar projects which states that *“the project is the first in the applicable geographical area that applies a technology that is different from technologies that are implemented by any other project, which are able to deliver the same output and have started commercial operation in the applicable geographical area before the project design document (CDM-PDD) is published for global stakeholder consultation or before the start date of the proposed project activity, whichever is earlier”*.
 - (c) Standardized baseline guidelines: As per guidelines for the establishment of sector specific standardized baselines, version 02.0 (EB 67 Annex 23), the project participants may include the CDM projects while doing the analysis to establish standardized baseline in a particular sector. For example, CDM projects may be considered while demonstrating additionality of a technology that have lower greenhouse gas intensity than any of the technologies used to produce aggregately more than 80% for household energy of the total output of the sector and is less commercially attractive than any of these technologies, are deemed additional.
17. However, paragraph 13 (step 3) of the common practice analysis requires the project developers to identify similar projects that are not registered CDM project activities, project activities submitted for registration, or project activities undergoing validation. This is not consistent with other methodological tools as discussed above.
18. **Secretariat’s Proposal:** The proposal is to make the requirement consistent with other tools and allow the inclusion of CDM project activities while identifying similar project activities which have higher cost of fuel/feedstock/technology than the maximum cost of

the fuels/feedstocks/technologies that contribute to at least 30% of the output of the sector.

Box 2. Methodologies Panel's recommendation on common practice analysis

The MP agreed to the secretariat's analysis, but wishes to further explore the idea of introducing a threshold of CDM projects using a particular technology which contributes to at least 30 per cent of the output of the sector in the context of barrier analysis while applying "Guidelines for objective demonstration and assessment of barriers, EB 50, Annex 13", **instead of revising common practice analysis.**

4.3. First of its kind approach

19. **Analysis of the current situation:** To date 36 CDM projects have been registered using the first-of-its-kind barrier. Out of them, 27 are renewable energy projects (15 wind, six photovoltaic, one geothermal, four biomass, and one biogas based power projects) and the remaining ones are energy efficiency, municipal solid waste and waste water treatment projects. Technologies implemented in the proposed projects have been claimed to be first of its kind in a particular sector, taking into account the general requirement of same measure, scale and output. An analysis has revealed that the majority of the first-of-its-kind CDM projects do not explain how the suggested barrier would actually prevent the implementation of the proposed project activity and how the CDM benefits would alleviate the barrier.
20. Currently, a proposed project activity is considered to be additional using the first-of-its-kind if:
 - (a) The project is the first in the applicable geographical area applying a technology different from technologies that are implemented by any other project, that is able to deliver the same output, and has started commercial operation in the applicable geographical area before the CDM-PDD is published for global stakeholder consultation or before the start date of the proposed project activity, whichever is earlier;
 - (b) The project implements one or more of the measures;
 - (c) The project participants selected a crediting period for the project activity that is a maximum of 10 years with no option of renewal.
21. **Exploration of potential improvement in the first-of-its-kind tool:** Currently, different technology is defined as technology delivering the same output and differing by at least one of the following (as appropriate in the context of the measure applied in the proposed CDM project activity and applicable geographical area):
 - (a) Energy source/fuel (e.g. energy generation by different energy sources such as wind and hydro and different types of fuels such as biomass and natural gas);
 - (b) Feed stock (e.g. production of fuel ethanol from different feed stocks such as sugar cane and starch, production of cement with varying percentage of alternative fuels or less carbon-intensive fuels);

- (c) Size of installation (power capacity)/energy savings:
 - (i) Micro (as defined in paragraph 24 of decision 2/CMP.5 and paragraph 39 of decision 3/CMP.6);
 - (ii) Small (as defined in paragraph 28 of decision 1/CMP.2);
 - (iii) Large.
22. However, the tool does not describe a possible situation in which a technology delivers the same output and uses the same energy source, feed stock and size of installation, but still may be categorized as different technology based on its distinct process or function. For example, the following technologies may be installed in an anaerobic waste water treatment plant in the same industry/sector (e.g. sugar industry) delivering same output and using same feedstock and size of installations:
- (a) Anaerobic contact reactor;
 - (b) Up flow anaerobic sludge blanket (UASB);
 - (c) Fixed-bed reactor;
 - (d) Expanded-bed reactor.

Figure 2. Depiction of different technology as per first-of-its-kind tool, version 03.0

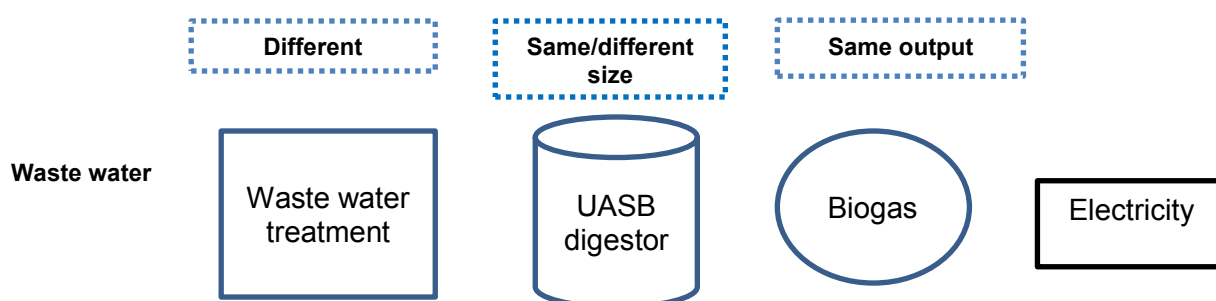
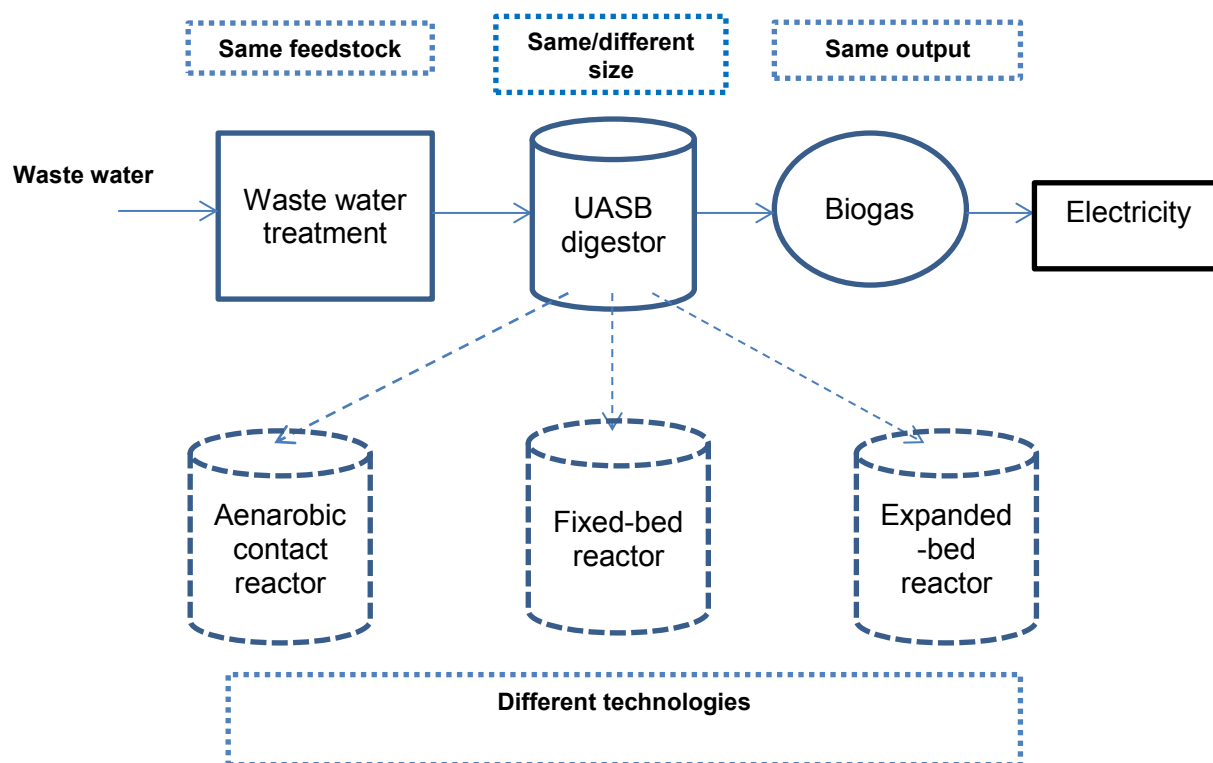


Figure 3. Different technology options within the same sector/industry



23. As explained above, there may be technologies considered as different, based on their distinct functions to process the same type of feedstock in an industry. Therefore, projects using such technologies do not fit under the current requirements of different feedstock which are provided under the first-of-its-kind tool i.e. paragraph 11 (b) -for example, production of ethanol fuel from different feed stocks such as sugar cane and starch, production of cement with varying percentage of alternative fuels or less carbon-intensive fuels.
24. **Secretariat's Proposal:** An additional paragraph may be included under paragraph 11 of the tool to demonstrate "additionality of first-of-its-kind project activities", version 03.0 (EB 84 Annex 6) to cover projects installing different technology in the same sector/industry, using same feedstock, i.e. technology categorized or defined as different from another technology within the same process line as per published technical papers, journals, industry associations, designated national authorities and the like.

Box 3. Methodologies Panel's recommendation on first-of-its-kind analysis

The MP agreed with the secretariat's analysis and noted that there is a gap in the existing guidance by not allowing technological difference to be a means to demonstrate the first-of-its-kind barrier. Therefore a revision is required.

While revising the guidance, the panel noted that the lessons learned from the application of exiting guidance can be used and the means of justifying claims on first of its kind can be included.

4.4. Negative list

25. **Analysis on the development of negative list:** The essence of a negative list is to establish a list of certain categories of CDM projects that are automatically ineligible to register as CDM projects. The MP has considered that while developing a negative list, the specificity of the countries and technology should be considered.
26. The CDM Modalities and Procedures has designed and implemented the CDM as a technology neutral mechanism. To date, the CMP has decided that only two types of technologies are ineligible under the CDM – nuclear and bunker fuel. Limiting the scope of project activity types eligible under the CDM is being discussed at Subsidiary Body for Implementation level related to CDM M&P revision.
27. When the EB, has identified any issues related to the environmental integrity of certain types of projects, it has addressed such issues at the methodological level rather than limiting certain types of technologies or projects from certain countries¹. The EB has also not systematically rejected the registration of specific types of projects based on their technologies or geographical locations.
28. **Secretariat's Proposal:** It is proposed that no negative list of project activities be created.

Box 4. Methodologies Panel's recommendation on negative list

The panel agreed with the secretariat's analysis not to develop negative lists of the technologies.

4.5. Prior consideration

29. **Analysis of the current situation:** At its sixty-eighth meeting, the MP had various views to remove the requirement of prior CDM consideration for project activities that are deemed automatically additional using the global positive list; one view was that individual project activities may have circumstances that differ of the global positive list.
30. At present, the EB requires that for project activities with a starting date on or after 2 August 2008, the project participants must inform a host-party designated national authority and/or the UNFCCC secretariat in writing of the commencement of the project activity and of their intention to seek CDM status (EB49. Annex 42). Such notification must be made within six months of the project activity start date and shall contain the

¹ Such approach has been taken in AMS-II.J for efficient lighting technologies, lowering the w factor for HFC projects as well as revising the benchmark emission factors for N₂O.

precise geographical location and a brief description of the proposed project activity. Such notification is not necessary if a PDD has been published for global stakeholder consultation or a new methodology proposed to the EB before the project activity start date. Project participants are required to submit a CDM Prior Consideration Form in order to fulfil this requirement.

31. Since the adoption of the above decision, eight years have passed, during which the Board has issued three positive lists granting automatic additionality to a range of projects meeting certain types of criteria:
 - (a) Demonstration of additionality of micro-scale project activities (EB86, Annex 14);
 - (b) Demonstration of additionality of small-scale project activities (EB83, Annex 14);
 - (c) Additionality of first-of-its-kind project activities (EB84, Annex 6);
 - (d) Methodology specific positive lists (e.g. ACM0001, ACM0002).
32. Since additionality is already proven for projects meeting the defined criteria, it would appear unnecessary to continue the practice of submitting a Prior Consideration Form as a proof for CDM consideration.
33. **Secretariat's Proposal:** For CDM project activities and programme of activities which fall under the **global automatic additionality list**, the project participants no longer be required to notify the secretariat of their intention to seek CDM status in accordance with the project cycle procedure version 09.0. To avoid any free-riders, it is proposed that the EB specify that the decision would be effective for project activities with a CDM start date after the date of adoption of this decision.

Box 5. Methodologies Panel's recommendation on prior consideration

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| The MP agreed with the Secretariat's approach and requested to explore the possibility of removing the prior consideration requirement for all types of projects instead of projects which fall under positive lists. |
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5. Impacts

34. The proposed work would further simplify and streamline the requirements for additionality while ensuring environmental integrity.

6. Proposed work and timelines

35. The agreed proposals will be reflected in the relevant CDM regulatory documents, tools and methodological standards for the consideration of the Board as per the following timeline:

Table 1. Proposed timeline to revise the relevant CDM regulatory documents, tools and methodological standards

| Item | Affected relevant CDM tools/guidelines/procedures/standards | Proposed Timeline |
|--------------------------|---|---|
| Probabilistic Approaches | Combined tool to identify the baseline scenario and demonstrate additionality”, version 06.0 (EB85, Annex 11) and “Tool for the demonstration and assessment of additionality, version 07.0 (EB70, Annex 8) | After the 1 st meeting of the MP in 2017 |
| Barrier Analysis | Guidelines for objective demonstration and assessment of barriers, version 01.0 (EB 50, Annex 13) | EB92 |
| First of its Kind | Additionality of first-of-its-kind project activities, version 03.0 (EB 84, Annex 6) | EB92 |
| Prior Consideration | CDM Project Standard, version 09.0 (EB82, Annex 13), Project Cycle Procedure, version 09.0 (EB82, Annex 53) and Validation and Verification Standard version 09.0 (EB82, Annex 14). | EB91 |
| Negative list | No work | NIL |

7. Recommendations to the Board

36. The secretariat recommends that the Board agree to the solutions provided in section 4 above and requests the secretariat to reflect them in the relevant CDM regulatory documents such as guidance, tools and methodological standards.

Appendix 1. Terms of Reference “Technical Inputs on the application of probabilistic approach for additionality demonstration in the CDM”

1. Mandate and background

1. According to the modalities and procedures of the clean development mechanism (CDM) a proposed project activity is eligible under CDM only when it can demonstrate that it is additional, i.e. the proposed project activity would not happen in the absence of the incentive from the CDM.
2. One possible way to demonstrate the additionality of a proposed project activity is to evaluate its economic viability by conducting an investment analysis. Currently, the investment analysis is conducted with “average” values of the input parameters used for deriving the economic indicator of the proposed project. For example, parameters of capital investment, operation costs, fuel prices, etc. have been widely used for calculating IRR or NPV of a proposed project. Such calculation is then supplemented by a sensitivity analysis allowing input parameters to vary +/- 10 per cent.
3. In the eighty-fifth meeting the Executive Board of the Clean Development Mechanism (hereafter referred as the CDM EB), the Board agreed to explore the possibility of introducing probabilistic approaches for additionality demonstration.

2. Terms of reference

4. Under the guidance of the Manager and the Team Lead of the Regulatory Development Unit and the relevant substantive programme officers, the consultant will assist the Sustainable Development Mechanism Programme of the UNFCCC in supporting the work of the CDM EB and its Methodologies Panel (MP) providing the following services:²
 - (a) Provide an overview of the application of Monte Carlo Simulation in the area of risk assessment in informing the decision making process with respect to the financial feasibility of investment projects, including:
 - (i) Identifying the most adequate profile of the probability distribution function for the key parameters normally used for sensitivity analysis (e.g. investment, inflation, energy prices, market growth);
 - (ii) Recommending standard probability distributions for common parameters used as input for investment analysis;
 - (iii) Providing the methodologies used to fit probability distributions for different parameters e.g. expert judgment or any other methodology;
 - (iv) Discussing the robustness of this approach versus the common practice of sensitivity analysis using +/-10% for major parameters;

² More information will be provided after the candidate is selected.

- (v) Defining investment decision criteria used by companies on the basis of this approach (e.g. a minimal probability to yield a positive NPV, others...);
 - (vi) Defining the preferred sectors or project types for application of a probabilistic approach, if any.
- (b) Provide step-wise illustrations for its application (recalculating scenarios with Monte Carlo Simulation) and the decision making process in the context of two project assessments (capital budgeting and profitability assessment flows will be supplied by the secretariat based on ACM0025 for a new Gas Power Plant and ACM0002 for a Wind Farm);
- (c) Draft a written report:
- Covering all the points described above, discuss findings with UNFCCC programme officers and MP members through teleconference(s), and use input from the teleconference(s) to revise the written report and its recommendations.

3. Competencies and qualifications

5. The consultant shall have the following competencies and qualifications:
- (a) Demonstrated technical expertise related to the subject matter in the energy sector for different scales. Professional certificate for conducting the aforementioned analysis is preferred;
 - (b) Good understanding of the additionality concept in CDM projects;
 - (c) Expert knowledge in Monte Carlo Simulation and add-in e.g. @Risk;
 - (d) Good analytical and drafting skills;
 - (e) University degree in Economics, Environmental Science, Social Science, Engineering or a related discipline;
 - (f) Good working knowledge of the English language; and
 - (g) Free from any interest that might cause him/her to act in other than an impartial and non-discriminatory manner.

4. Schedule of deliverables

6. The schedule of deliverables shall be as follows:
- (a) Start of the contract: as soon as possible;
 - (b) Date of draft outline: xx xx 2016;
 - (c) Date of first draft of the report: xx xx 2016;
 - (d) Date of final draft of the report: xx xx 2016;
 - (e) End of contract: xx xx 2016

Appendix 2. Feedback from the Methodologies Panel 70

1. Common practice

1. The panel was of the view that CDM projects should not be considered in the common practice analysis given the fact that CDM projects face certain barriers (investment/barrier analysis) and are not viable without CDM benefits. Hence, CDM projects are considered to be distinct from other similar projects operating in the applicable geographical region.
2. The solution provided in the note could be further explored in the context of the current “Guidelines for objective demonstration and assessment of barriers” to analyse whether CDM has helped a technology to penetrate a region and alleviated barriers (e.g. technology and/or access to technology). The idea of introducing a threshold of CDM projects using a particular technology contributing to at least 30 per cent of the output of the sector should be analysed under barrier analysis.

2. First of its kind

3. The panel recognized the existing gap and agreed to revise the first-of-its kind tool given the fact that it does not define technologies that are considered different based on their distinct function.
4. In order to provide further guidance on the tool, the panel realized the need to use the experience of existing first-of-its-kind projects and analyse the approach used by the projects.

3. Prior consideration

5. The panel considered the fact that the CDM has raised enormous awareness about its benefits around the globe in the last 8 years. Every mitigation activity implemented in developing countries explores the possibility of climate finance through mechanisms such as CDM. Therefore, prior consideration requirement can potentially hinder a few projects being registered as CDM.
6. The Panel therefore would like to explore the possibility of removing this step from the additionality demonstration for all type of project activities, in contrast to the proposal from the secretariat to remove this step only for projects on positive list.

4. Negative list

7. The Panel agreed with the recommendation by the secretariat to not create any negative list.

Document information

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