

**DRAFT****Annex 3****INFORMATION NOTE****THIRD ANALYSIS REPORT TO THE CDM EXECUTIVE BOARD ON THE RESULT
OF THE DOE PERFORMANCE MONITORING****(Version 01.0)****CONTENTS**

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**DRAFT****ABBREVIATIONS**

BE	Baseline Emissions
CAR	Corrective Action Requests
CC	Completeness Check
CDM	Clean Development Mechanism
CDM-AP	Clean Development Mechanism - Accreditation Panel
CDM-AT	Clean Development Mechanism- Assessment Team
CER	Certified Emission Reductions
CL	Clarification Request
DOE	Designated Operational Entity
E+/E-	E-Policy (e.g., E+/E-)
EB	Executive Board
ER	Emission Reductions
FAR	Forward Action Request
GEF	Grid Emission Factor
HFC	Hydro Fluoro Chloro
I2	DOE Performance Indicator - Rate of requests for review
IRC	Information and Reporting Check
LOA	Letter of Approval
MAP	Management Action Plan
MP	Monitoring Plan
PA	Project Activity
PCP	Project Cycle Procedures
PDD	Project Design Document
PE	Project Emissions
POA	Programme of Activity
PS	Project Standard
Q	Quarter (e.g., Q4 means fourth quarter of the year)
UNFCCC	United Nations Framework Convention on Climate Change
VVM	Validation and Verification Manual
VVS	Validation and Verification Standard
WACC	Weighted Average Cost of Capital

**DRAFT****I. Background**

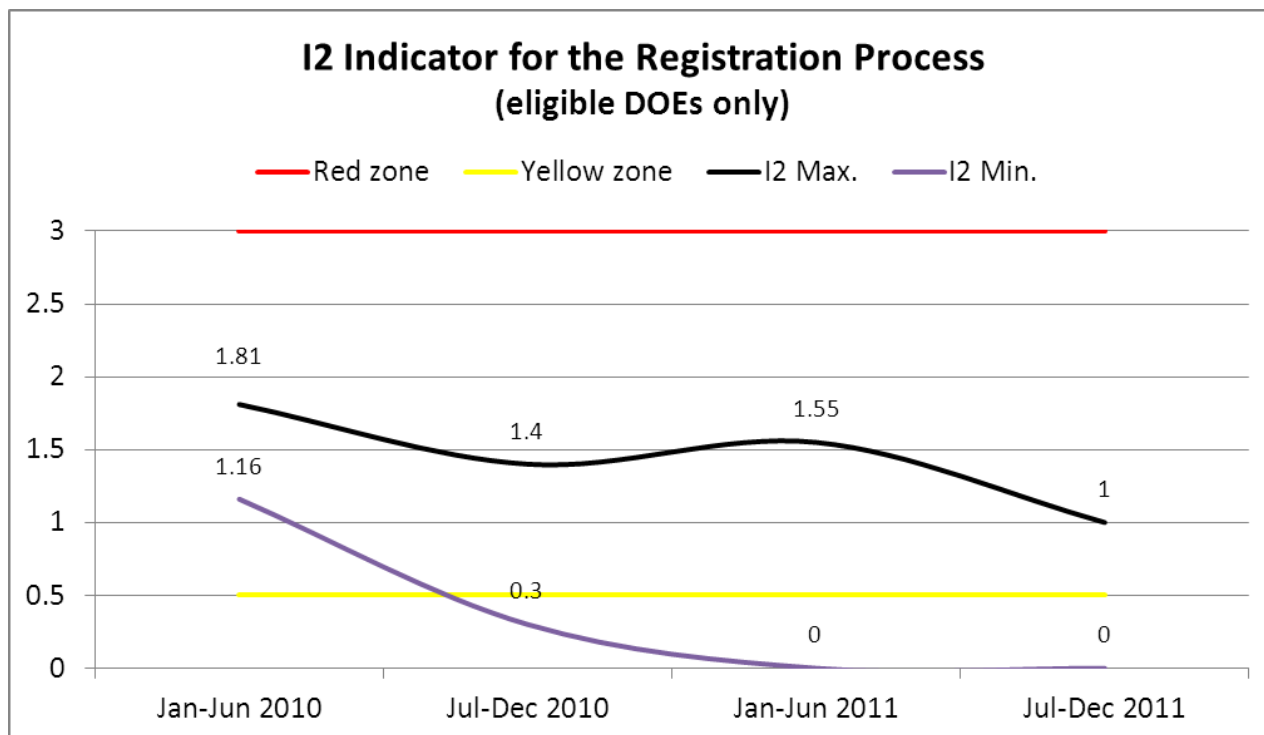
1. The CDM Executive Board (hereinafter is referred to as the Board) at its fifty-eight meeting adopted the “Procedure on performance monitoring of designated operational entities”. This procedure provides for monitoring, classification and rating of all DOEs non-compliances. It is applicable from completion of the initial assessment process and accreditation of an entity by the Board until expiration of its accreditation. However, a DOE is eligible for monitoring only when it has finalized a tenth request of registration or issuance in a given monitoring period of six months.
2. The procedure provides for regular reporting to the DOEs, the CDM-AP, the Board and the public on individual DOEs performance, to allow the DOEs to take actions in the areas where most of the issues were identified, to allow the CDM-AP to have a better planning of its assessment of DOEs and to inform EB and the public on the performance of individual DOEs.
3. However, the Board as the final decision making body shall be provided with all relevant data for its decision making. Such data shall also allow system wide improvement via identification of issues where guidance or requirements lack clarity or are non-existent.
4. Therefore, in addition to the regular reports on individual DOE performance, a report containing a more detailed analysis of the issues arising from the DOE performance especially those identifying shortcomings in the CDM-requirements, procedures and guidance is to be provided to the Board on a bi-annual basis.
5. The present report is the third of such reports. It summarises and analyses the finding from the first, second, third and fourth monitoring periods running respectively: from 1 January 2010 to 30 June 2010, from 1 July 2010 to 31 December 2010, from 1 January 2011 to 30 June 2011, and from 1 July 2011 to 31 December 2011 and accounting for data and submissions finalised as of the 30 June 2012.
6. The trends observed in the first and second monitoring periods of 2010 and 2011 are similar, therefore for the present report the data from first and second monitoring periods of each year were combined. Hence, it is possible to analyse the performance of the DOEs for years 2010 and 2011 as a whole, as well as compare with each other.
7. In this report, issues arising from registration of project activities will be dealt with first and then analysis of the issues arising from issuance of CERs followed by summary and general recommendations.

II. Registration**A. Overview**

1. DOE Performance Indicator (I₂ - Rate of requests for review):
8. A trend of I₂ Indicator (Rate of requests for review) in the registration process for eligible DOEs and a trend of DOE wise I₂ Indicator for major DOEs for the monitoring periods of 1 January 2010 to 31 December 2010 and 1 January 2011 to 31 December 2011 are presented below. Both of the graphs

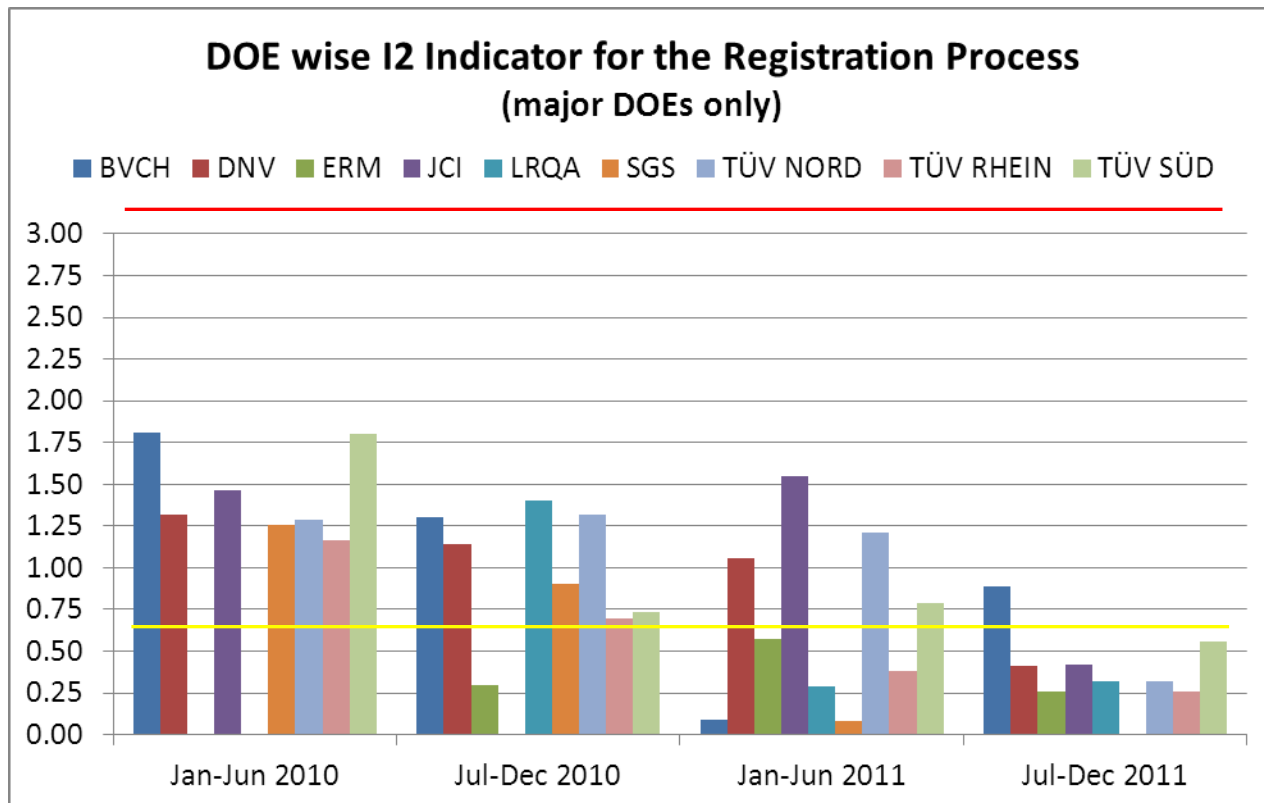
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indicate that DOE performance in the registration process has improved over the past two years. During this period, the maximum values of the indicator I_2 has never crossed the higher threshold and is in the 'yellow zone'.





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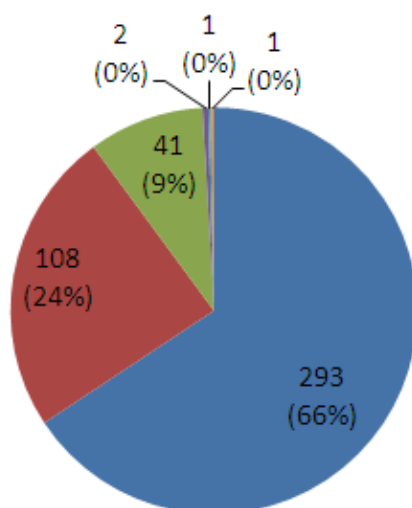
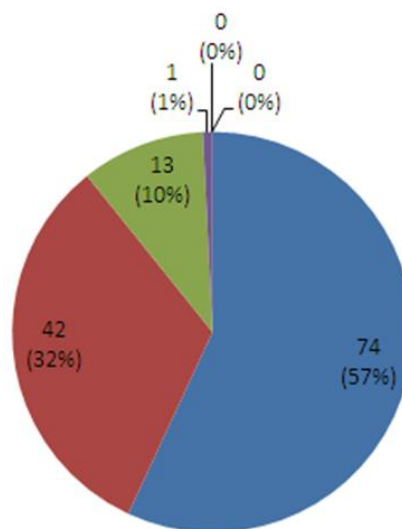


9. From the above analysis, it is evident that the upper threshold is far away from the value of the indicator I_2 . Given that the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) started from 1 May 2012, the future reporting periods are expected to capture the impact of the implementation of these new documents on the Indicator I_2 .

2. DOE Performance Indicator (I_2): - Classification of issues raised

10. An overview matrix compiling the issues raised in registration requests for all DOEs (eligible for monitoring and non-eligible for monitoring) for the monitoring periods of 1 January 2010 to 31 December 2010 and 1 January 2011 to 31 December 2011 are provided in appendices A and C and graphics picturing these results are presented below.

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Registration (2010)

Registration (2011)


- Additionality
- Application of baseline methodology
- Application of the monitoring methodology
- Project description
- Procedural and related requirements
- Other CDM requirements

11. Analysis of the matrix and the graphic shows that 66% of the issues raised are related to the additionality of the project activity, 24% related to applicability of the baseline methodology, 9% related to the application of the monitoring methodology and 0% in the other categories (project description, procedural and related requirements and other CDM requirements) for the year 2010.

12. Analysis of the matrix and the graphic shows that 57% of the issues raised are related to the additionality of the project activity, 32% related to applicability of the baseline methodology, 10% related to the application of the monitoring methodology and 1% and less in the other categories (project description, procedural and related requirements and other CDM requirements) for the year 2011.

13. From the two graphs, it can be concluded that the same trends in 2010 are still observed in 2011. However, the number of requests for review and the number of issues raised dropped significantly by about 71% from 2010 (446 request for review issues raised in 2010 Vs. 130 in 2011), indicating improvement in performance by the DOEs. The main reasons for the improvement in performance is due to: (i) more, improved, revised and new guidance/documents being provided by the Board; (ii) enhancement in the DOE interaction through different workshops and interactions; (iii) organisation of trainings across various regions; and (iv) the increase in overall experience and skills of the DOEs over a

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period of time. Given that the performance of has improved, therefore, it is recommended maintain the duration of the 6-monthly monitoring period and the frequency of the monitoring of data, same as that in 2010 and 2011.

14. In 2011, significant number of issues still continue to be raised on the additionality and the Application of the baseline methodology, in particular on Investment analysis and the algorithms and/or formulas to determine emission reductions, respectively. Therefore, this report provides deeper analysis (from July- Dec 2011) on the issues raised on these.

B. Analysis of the issues raised

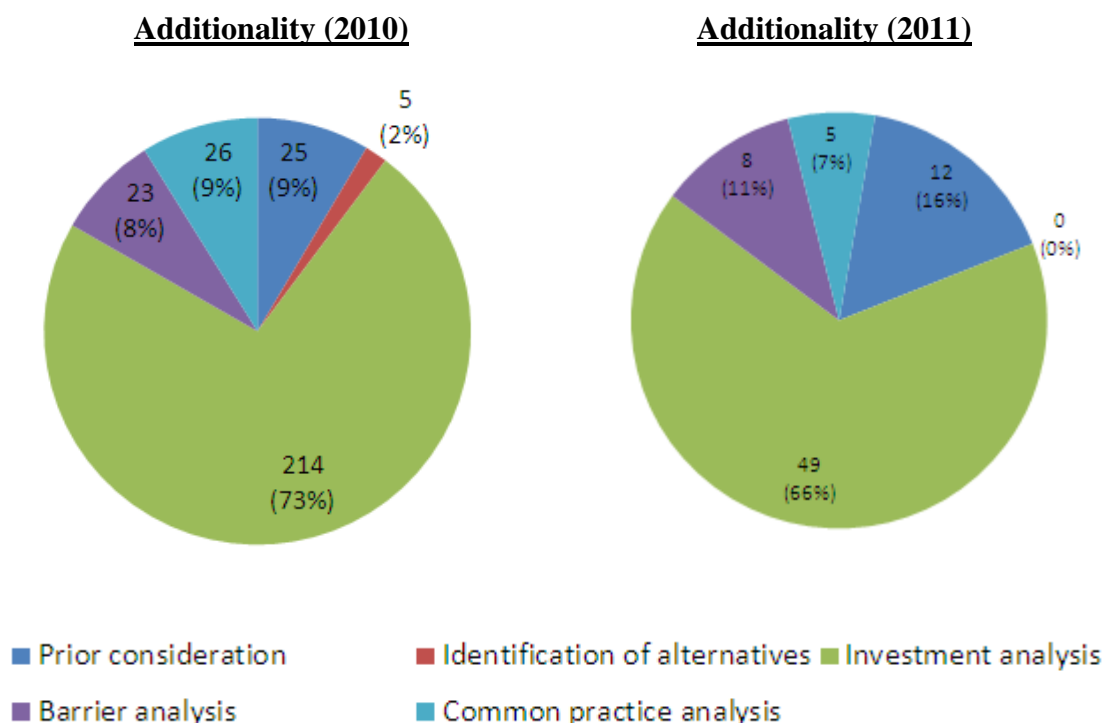
15. This section provides a summary and analysis of the issues raised within the main components checked for registration submissions:

- (a) Additionality;
- (b) Application of the baseline methodology;
- (c) Application of the monitoring methodology;
- (d) Project description.

16. It is to be noted that, in project description, only one issue in 2010 and one issue in 2011 were raised, consequently no analysis was carried out.

**DRAFT**1. Additionality

17. The graphics below illustrate the distribution of the issues raised that are related to additionality.

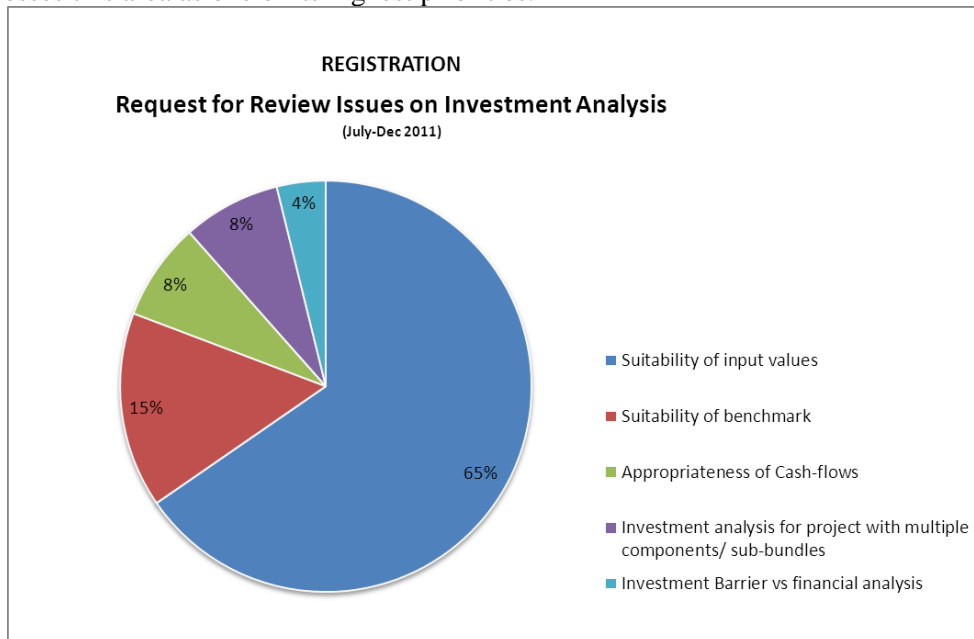
**Investment analysis**

18. The analysis shows that majority of the issues raised (73% in 2010 and 66% in 2011) are related to investment analysis. Particularly with reference to paragraph 108 to 114 of the VVM version 01.2 and 'Guidelines on the assessment of the investment analysis' (EB 51 Annex 58) and 'Guidelines for reporting and validation of Plant Load Factors' (EB 48 Annex 11).

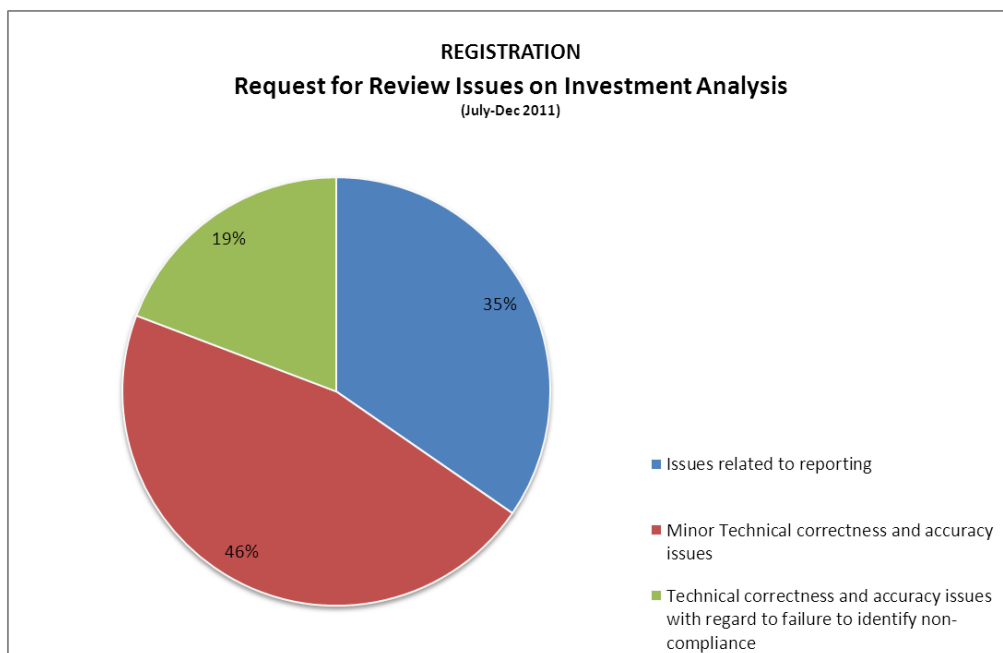
19. However, the number of requests for review and the number of issues raised have reduced significantly by about 77% from 2010 (214 request for review issues raised in 2010 Vs. 49 in 2011), indicating improvement in performance by the DOEs on Investment analysis. The Regional Calibration workshops in Pune, India and Beijing, China in 2011, focussed on Investment Analysis adopting case-study approach and therefore are a reason, among many others including the revisions in the Investment Analysis guidelines, for reduction in request for reviews on additionality, particularly on Investment Analysis.

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20. As presented earlier in the second analysis report, these graphics show that should the Board address the issues in this area, the rate of reviews will drop further. Therefore, it is recommended that the Board addresses this area as one of its highest priorities.



21. Most of the issues raised on Investment Analysis (from July- Dec 2011, data as of April-June 2012) are related to the DOE's lack of substantiation of the suitability of the validated input values to the investment analysis and suitability of benchmark.

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22. The issues raised on Investment analysis (from July- Dec 2011, data as of April-June 2012) are mostly due to technical correctness and accuracy issues (65%) and reporting issues (35%). Therefore, providing standardised templates for reporting and enhancing the technical capability, including trainings, will contribute to reducing the requests for reviews and issues on Investment Analysis.

23. In an attempt address some of these issues, the Board revised the “Guidelines on the assessment of the investment analysis” (version 05.0/ EB62/ Annex 5). The revision provides further guidance/clarifies that: (i) in situations where an investment analysis is carried out in nominal terms, project participants can convert the real term values provided in the table in the appendix to nominal values by adding the inflation rate; (ii) on the calculation of the expected return on equity, the cost of debt and the percentage of equity and debt funding; and (iii) it includes a new Appendix with default values for the expected return on equity, to facilitate the assessment for cases where the information is not publicly available and clarifies that the default values for the expected return on equity showed in the table in the appendix are calculated after taxes.

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Action Plan and Recommendations to Reduce Request For Reviews on Investment Analysis - 2013				
Request for Review Issues on Investment Analysis (July-Dec 2011)			Evaluate the need to Clarify/Revise Existing Rules	Recommended Actions
				New Guidance Training and Capacity Building
Issues related to reporting	35%	Suitability of input values	Insufficient breakdown of the values	1) Develop Validation Templates which shall include specific detailed reporting requirements on the validation of Investment Analysis
			All Input values not mentioned or not sufficiently demonstrated to be appropriate	
			Estimated Input values applied instead of real values, despite being available at the time of investment decision	
		Suitability of benchmark	All Input values not corresponding to the date of investment decision and appropriateness of sensitivity analysis	2) Develop Generic Standardized Spreadsheets for Investment Analysis
			Data vintage for calculation of input values for WACC (risk free rate, beta value, market return) not justified	
Minor Technical correctness and accuracy issues	46%	Suitability of input values	Return on equity for calculation of WACC is calculated as per the guideline for Investment Analysis and whether calculated Benchmark is pre-tax or post-tax	3) Introduce a requirement in the Accreditation Standard: To have the financial expert, who has competence in financial accounting and costing of projects, in the validation team for CDM projects applying investment analysis
			Incremental Savings as compared to the baseline scenario not accounted	
			Investment costs estimated based on existing projects from a different geographical region than applied for common practice analysis.	
			Insufficient breakdown of the values, particularly the quantities and price of each fuel types	
			Inconsistency of input values in investment analysis and emission reduction calculations	
			Input values not corresponding to the same level of service as that of the project	
			Inconsistent application of escalation across input values	
			Avoided costs associated with the prolonged operation of the old equipment and Residual value of the equipment retired from the old facility not accounted	
Technical correctness and accuracy issues with regard to failure to identify non-compliance	19%	Suitability of input values	Accuracy and suitability of input values not demonstrated using the available evidence and expertise in relevant accounting practices.	1) Regional Calibration Workshops in 2013 to include a focus on the Investment analysis
			Data vintage for calculation of input values for WACC (risk free rate, beta value, market return) not justified	
			Common Investment analysis for project with multiple components/ sub-bundles instead of individual investment analysis for each, particularly when investment decision dates are different	
		Investment Barrier vs financial analysis	Sunks Costs not applied or incorrectly applied	
			Inconsistent application of escalation across input values	
		Investment Barrier vs financial analysis	All Input values not mentioned or not sufficiently demonstrated to be appropriate	
			Investment Barrier due to access to finance does not demonstrate or present complete picture of whether CDM revenues are essential and overcome the barriers and full financial analysis may provide complete picture.	

24. The above table mentions the action plan based on issues raised on Investment Analysis (from July- December 2011, data as of April-June 2012) and recommendations to further reduce the Request for Review issues on Investment analysis. The following recommendations are proposed:
Evaluating the need to clarify or further revise the existing guidelines on the Investment Analysis to address the issues below:

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- (a) Estimated Input values applied instead of real values, despite being available at the time of investment decision;
- (b) Data vintage for calculation of input values for WACC (risk free rate, beta value, market return) not explicit in the investment analysis guidelines;
- (c) Incremental Savings as compared to the baseline scenario either accounted in the cash-flow analysis or justified;
- (d) Investment costs estimated based on existing projects from a different geographical region than applied for common practice analysis;
- (e) Inconsistency of input values in investment analysis and emission reduction calculations;
- (f) Input values not corresponding to the same level of service as that of the project; and
- (g) Individual Investment analysis for project with multiple components/ sub-bundles instead of common investment analysis for each, particularly when investment decision dates are different.
 - (i) Provide the new guidelines and templates on Investment analysis, including to:
 - (h) Develop Validation Templates which shall include specific detailed reporting requirements on the validation of Investment Analysis to reduce the reporting issues;
 - (i) Develop generic Standardized spread-sheets for Investment Analysis (e.g for renewable energy projects such as wind, hydro-power, etc.) to reduce the reporting issues;
 - (j) Introduce a requirement in the Accreditation Standard to enhance the technical capability: To have the financial expert, who has competence in financial accounting and costing of projects, in the validation team for CDM projects applying investment analysis; and
 - (i) To hold trainings on investment analysis for DOEs. Such training could also be part of the Regional Calibration Workshops in 2013 with a focus on the Investment analysis applying case-study approach.

25. In 2012, the CDM MAP work-plan has provided mandate to the secretariat to further revise the rules on additionality including the investment analysis. It is recommended that the secretariat continues investigating the reasons why DOEs continue facing difficulties with the validation of investment analysis.

Barrier analysis

26. 8% in 2010 and 11% in 2011 of the issues raised in additionality category are related to barrier analysis, VVM paragraph 116 and 117 and the annex 13 of EB 50 “Guidelines for objective demonstration and assessment of barriers” in particular demonstration that the access-to-finance barrier is

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real and project specific and CDM alleviates each of the identified barriers to a level that the project is not prevented any-more from occurring.

27. It could be assumed from these results and as the issues identified are less frequent than that in comparison with the Investment Analysis and it is proposed to train DOEs on means of validation of barrier analysis for further improvement.

Prior consideration

28. 9% in 2010 and 16% in 2011 of the issues raised in additionality category are related to prior consideration, especially to VVM paragraphs 99 to 102, Glossary of CDM terms and annex 22 of EB 49 “Guidelines on the demonstration and assessment of prior consideration of the CDM”. The issues raised are related to the project start date, final investment decision, and continuous and real actions.

29. Given that these results and as the issues are identified among large range of DOEs further guidance or clarifications were provided by the Board by revision of the “Guidelines on the demonstration and assessment of prior consideration of the CDM” (EB62, Annex 13), which provides further clarifications regarding the validation of real and continuing actions. It is expected that review requests will decrease further in future.

Common practice analysis

30. 9% in 2010 and 7% in 2011 of the issues raised in additionality category are related to common practice analysis especially to VVM paragraph 119, 120, 121 and annex 12 of EB 63 “Guidance on common practice” version 01.0, in explaining how the project activity is different from other projects in the region/country.

31. In 2011, the Board at its sixty-fifth meeting revised the additionality tool (version 6/ EB65, Annex 21) by integrating and inclusion of the requirements from the guidelines on Common Practice and first-of-its kind.

32. In 2012, the CDM MAP work-plan has provided mandate to the secretariat to further revise the rules on additionality including the Common practice and first-of-its-kind, to overcome the concerns from the stakeholders including DOEs. It is expected that there may be an increase in the request for reviews on Common Practice and first-of-its kind in Q4 of 2012, given the transition time may be required to adjust to the new approach stipulated in the revised documents.

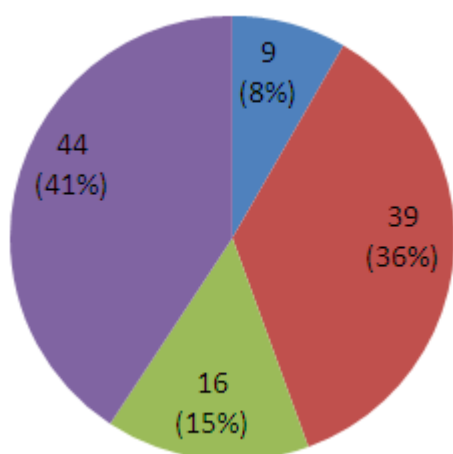
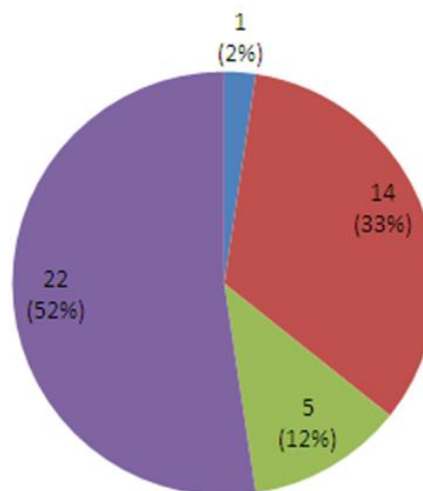
2. Application of baseline methodology

33. 24% in 2010 and 32% in 2011 of the issues are related to the application of baseline methodology. The graphics below illustrate the distribution of the issues raised that are related to the application of the baseline methodology.

34. However, the number of requests for review and the number of issues raised decreased significantly by about 61% from 2010 (108 request for review issues raised in 2010 Vs. 42 in 2011), indicating improvement in performance by the DOEs on application of baseline methodology. This

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decrease in 2011 in issues raised in this sub-category might be linked to Regional Calibration workshops held in 2010 and more clarity provided by the revision of existing requirements.

Application of baseline methodology**(2010)****Application of baseline methodology****(2011)**

- Project boundary
- Baseline identification
- Compliance with applicability conditions
- Algorithms and/or formulae to determine emission reductions

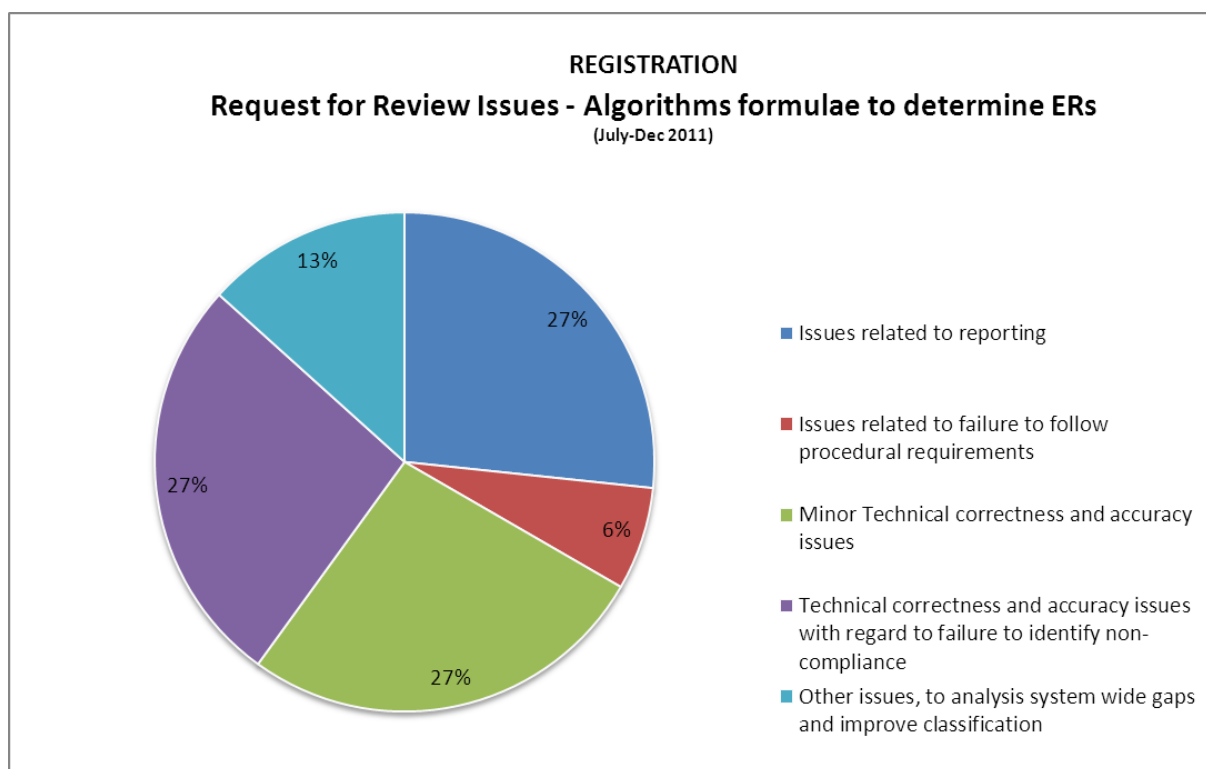
35. Among the issues raised in this category, 41% in 2010 and 52% in 2011 are related to algorithms and/or formulas to determine emission reductions and 36% in 2010 and 33% in 2011 are related to baseline identification. 15% in 2010 and 12% in 2011 of the issues are related to compliance with applicability conditions on the application of the baseline methodology.

Algorithms and/or formulas for the calculation of emission reductions

36. The issues raised (from July- Dec 2011, data as of April-June 2012) are mostly due to technical correctness and accuracy issues (54%) and reporting issues (27%), in particular related to the calculation of the grid emission factor (GEF), establishing the alternative and credible baseline scenarios and

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calculation of emission reductions (baseline, project and leakage emissions), including the data requirements and calculation methods.



37. With the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) started from 1 May 2012, work-plan on top-down improvement of the methodologies and the tools and the further development of standardized baselines it is expected that the rate of reviews will drop significantly. The development of standardized templates and spread-sheets on calculation of grid emission factors have been developed (available on UNFCCC website) and work on development of the grid emission factors of 6 countries is also under progress. Further, providing focussed trainings, will contribute to reducing the requests for reviews and issues.

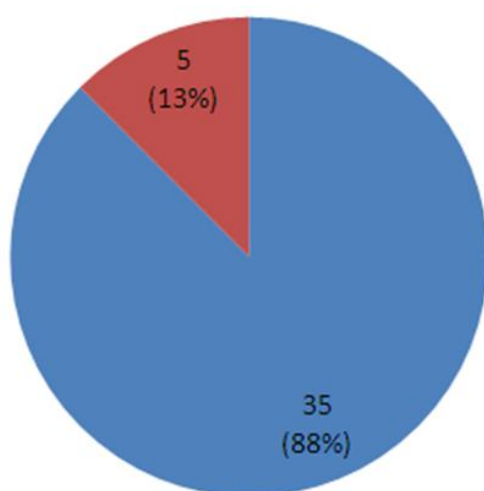
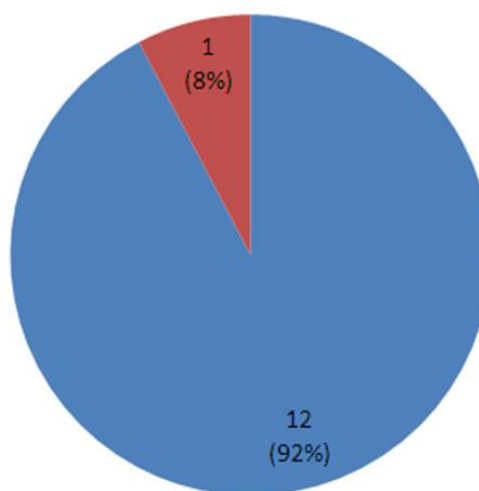
Baseline identification

38. Most of the issues identified in this category are related to the substantiation of the elimination of other baseline alternatives and selection of credible baseline scenario.

39. The issues raised on baseline identification in 2011 are almost same as compared to 2010 and are related to the demonstration of credible baseline alternatives by providing the sound justification supported with credible evidences. Therefore, trainings may also include how to assess the identification of the baselines.

DRAFT3. Application of the monitoring methodology

40. 9% in 2010 and 10% in 2011 of the issues identified are related to the application of the monitoring methodology. The graphics below illustrate the distribution of the issues raised and related to the application of the monitoring methodology.

Application of the monitoring methodology**(2010)****Application of the monitoring methodology****(2011)**

- Compliance of the Monitoring Plan (i.e. list of parameters complete or not)
- Implementation of the Monitoring Plan (i.e. monitoring arrangement feasible or not)

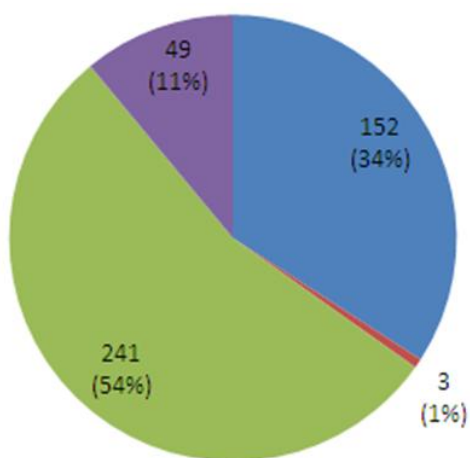
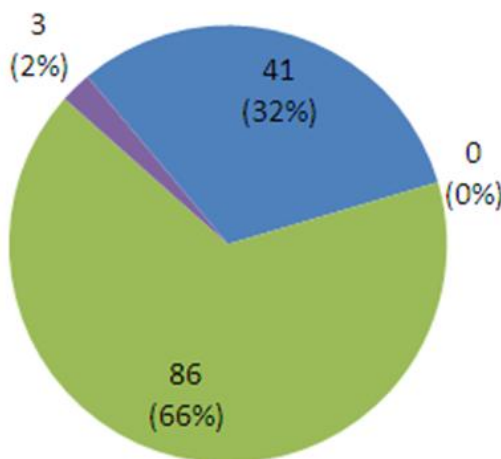
41. The vast majority of the issues identified within the area of the application of monitoring methodology are related to the compliance of the monitoring plan with monitoring methodology (88% in 2010 and 92% in 2011).

42. The issues raised are however very diverse but fundamentally are raised because the monitoring plan in the registered PDD is either not in compliance with the monitoring methodology or the monitoring is not complete or deficient or the monitoring requirements are not clearly defined.

43. With the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) that started from 1 May 2012, work-plan on top-down improvement of the methodologies and the tools and the further development of standardized baselines, the future reporting periods are expected to capture the impact of the implementation of these new documents on the Indicator I₂. Further, providing focussed trainings, will contribute to reducing the requests for reviews and issues.

**DRAFT**4. Categories of issues

44. The current report presents the issues identified classified by category. The graphics below illustrate the distribution of the issues raised for registration cases.

Registration (2010)**Registration (2011)**

■ I Issues related to reporting

■ II Issues related to failure to follow procedural requirements

■ III Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements

■ IV Other issues, to analysis system-wide gaps and improve classification

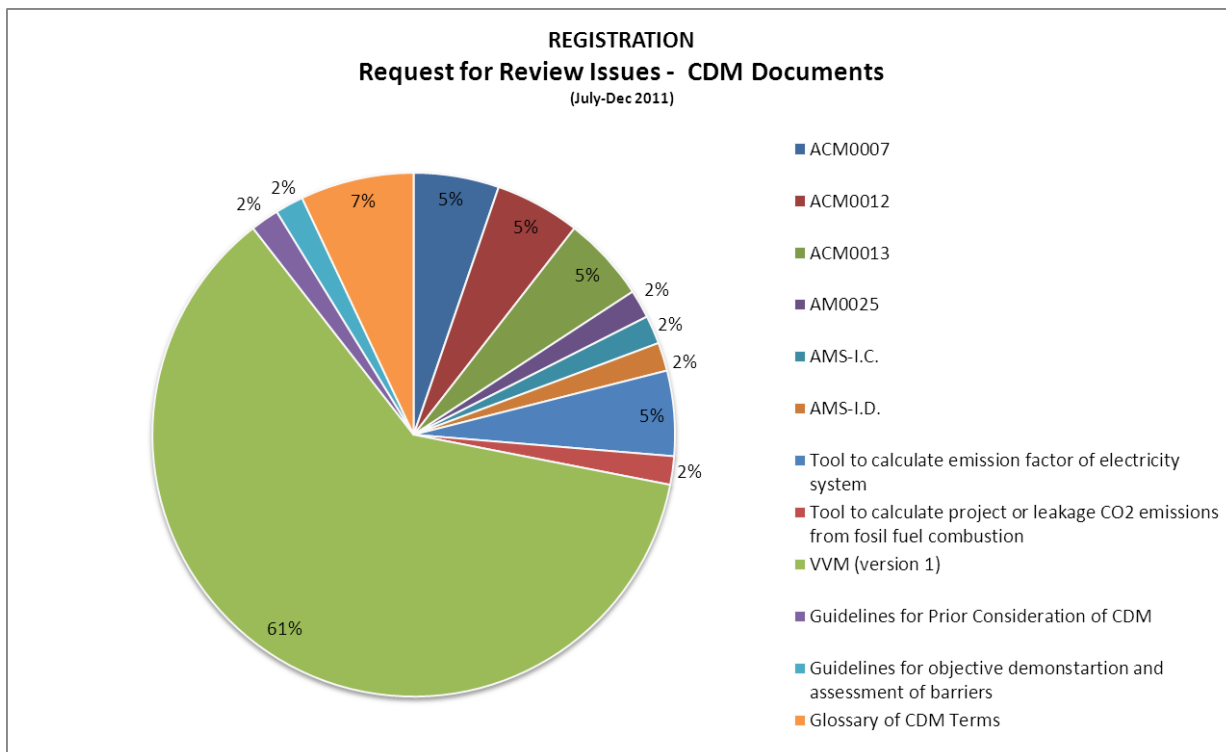
45. Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements and issues related to reporting are preponderant, with 54% in 2010 and 66% in 2011.

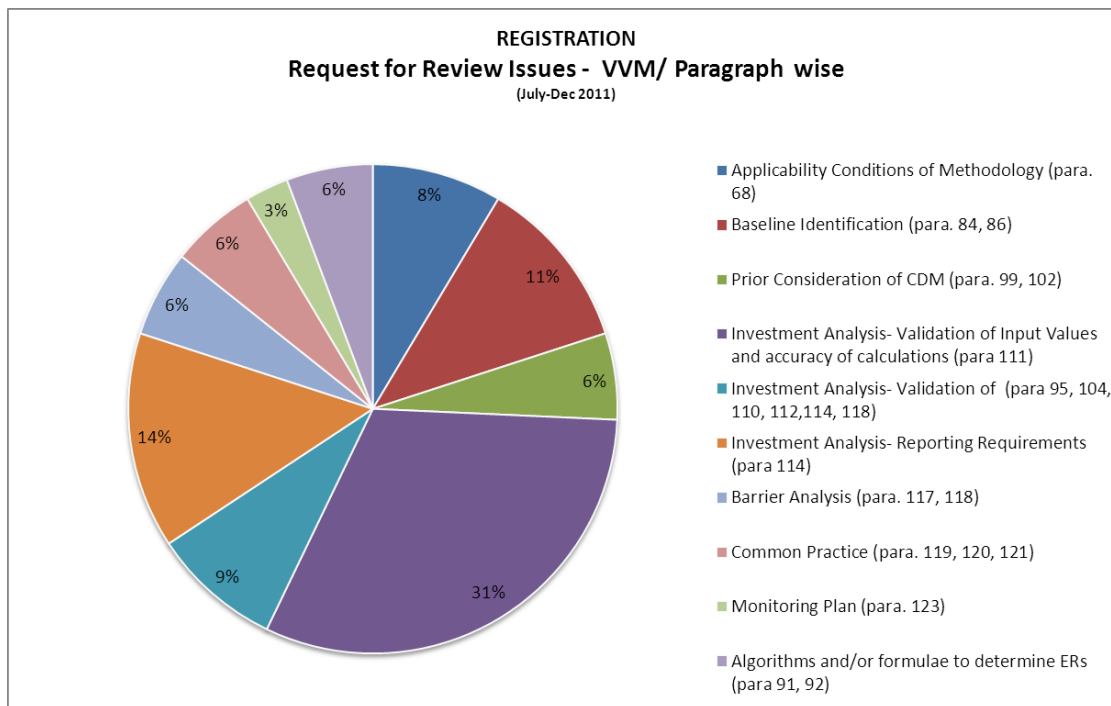
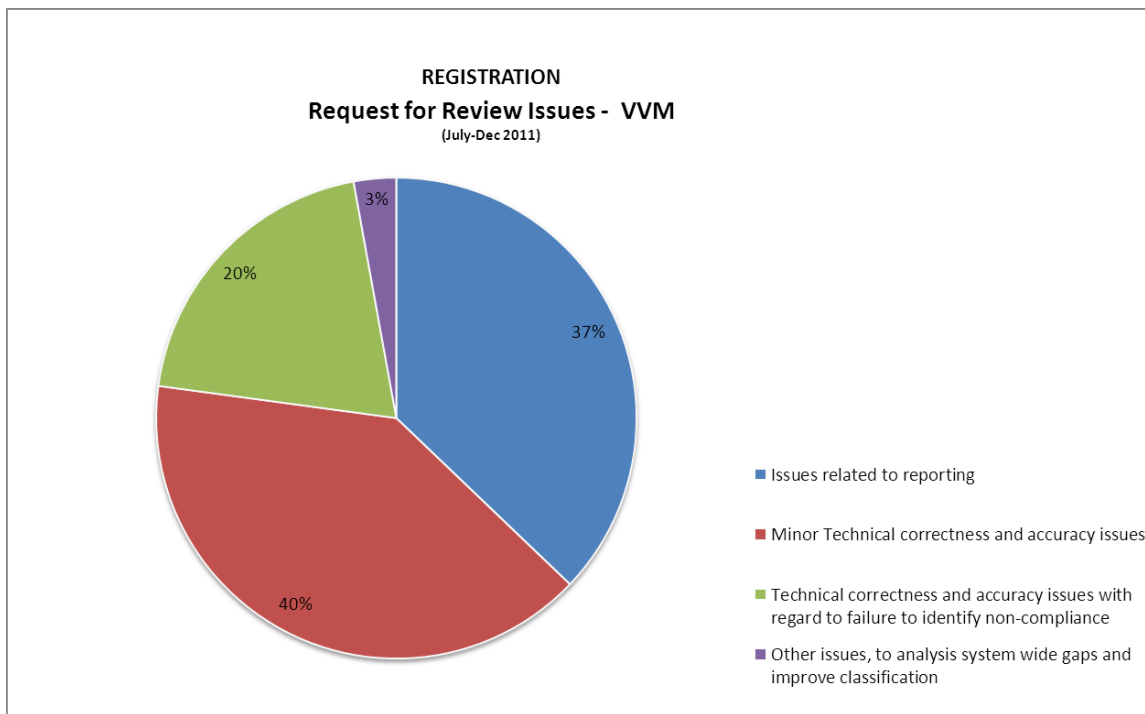
46. Issues related to reporting continue to be high. In 2012, the CDM MAP workplan has provided mandate to the secretariat to develop standardised templates for validation and verification. Therefore, it is recommended to prioritise the work on standard template for reporting of validation and Verification.

5. Document wise distribution of issues

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47. The graphics below illustrate the distribution of the issues raised in the monitoring period (from July- Dec 2011, data as of April-June 2012) with respect to various CDM documents. Majority of the issues (61%) raised are related to compliance with the requirements of Validation and Verification Manual (VVM).



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48. The issues raised regarding compliance with the requirements of VVM (from July- Dec 2011, data as of April-June 2012) are mostly due to technical correctness and accuracy issues (60%) and reporting issues (37%). The graphics presented above provides comparative frequency of the issues raised against the corresponding paragraphs of VVM.

49. Given that the graphics above define the paragraphs on which most of the issues are raised during assessment of request for registration, therefore this information and analysis provided may be used by various actors, including DOEs, to further reduce the request for reviews or define the focussed audit scope or define improvements in the language in VVM. The analysis in graphics above may be used by the DOEs for drafting checklists for auditors during validation and used as a check points for focussed technical reviews. Similarly, the CDM-AP and CDM-AT team may use this analysis in defining the focussed audit scope during re-accreditation, surveillance audits, performance assessments, etc. Similarly, the Board and the Secretariat may use this information in bringing clarity both in language and in substantive requirements in the paragraphs mentioned to be most frequently referred.

50. From the analysis, significant issues are raised on reporting and the technical accuracy issues, which is an area of improvement for the DOEs. The issues on reporting can be addressed by means of standardized templates for validation and verification. For reducing technical accuracy issues, it is recommended that the DOEs to further strengthen their quality check procedures prior to sending submission to the Board, their technical review process and train their personnel on the issues where most of the request for review issues are triggered.

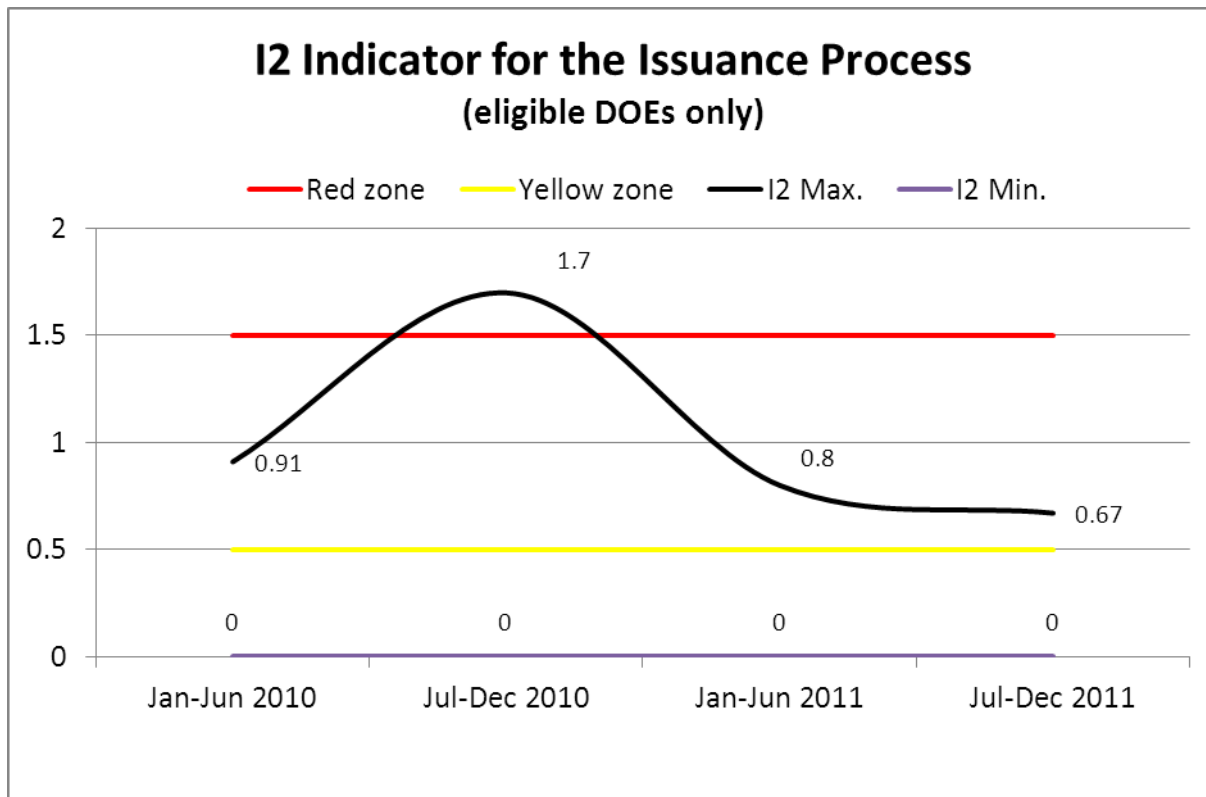
51. The recommendations and action plan to reduce request for review issues in registration during 2013 is provided in Appendix E.

III. Issuance**A. Overview****1. DOE Performance Indicator (I₂ - Rate of requests for review):**

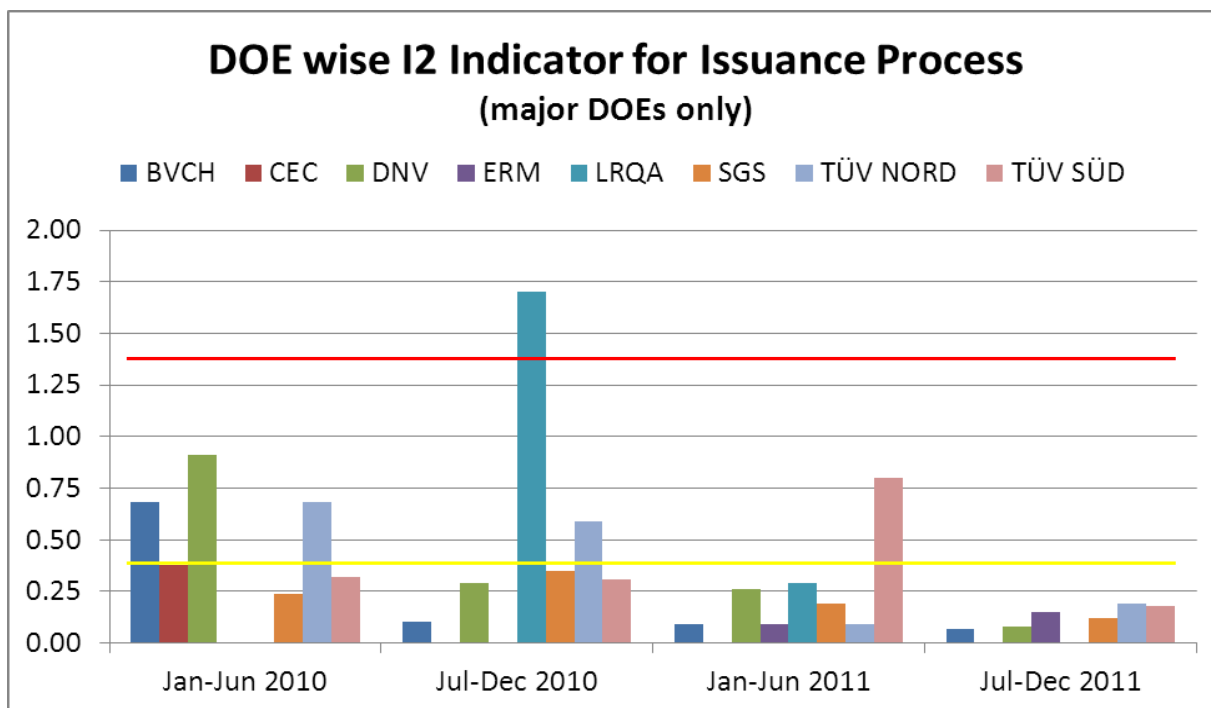
52. A trend of I₂ Indicator (Rate of requests for review) in the issuance process for eligible DOEs and a trend of DOE wise I₂ Indicator for major DOEs for the monitoring periods of 1 January 2010 to 31 December 2010 and 1 January 2011 to 31 December 2011 are presented below. Both of the graphs indicate that DOE performance in the registration process has improved over the past two years. During this period, the maximum values of the indicator I₂ has crossed the higher threshold once and triggered a spot-check.



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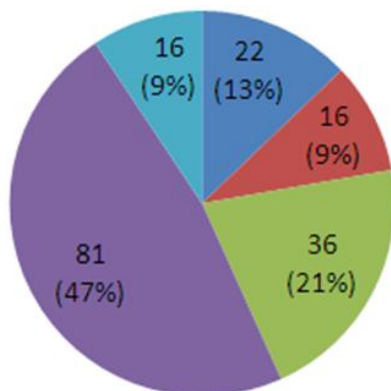
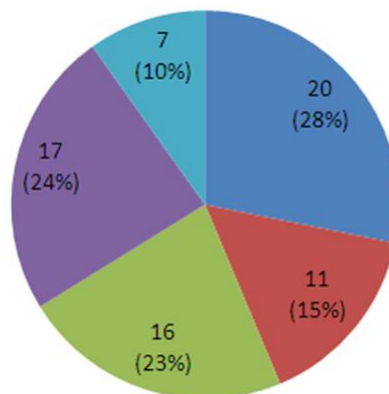
53. From the above analysis, it is evident that the upper threshold is lower than the value of the indicator I_2 . Given that the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) started from 1 May 2012, it is expected that the implementation of these new documents may have an impact on the Indicator I_2 which is expected to be realised by Q1-Q2 of 2013.

2. DOE Performance Indicator (I_2): - Classification of issues raised

54. An overview matrix compiling the issues raised in issuance requests for all DOEs (eligible for monitoring and non-eligible for monitoring) for the monitoring periods of 1 January 2010 to 31 December 2010 and 1 January 2011 to 30 June 2011 are provided in appendices B and D and the graphics picturing these results are presented below.



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Issuance (2010)Issuance (2011)

- Implementation of the PA
- Compliance of the monitoring plan with the monitoring methodology
- Compliance of monitoring with the monitoring plan
- Assessment of data and calculation of greenhouse gas emission reductions (BE, PE, ER calculation)
- Procedural and related requirements

55. Analysis of the matrix and the graphic shows that 47% of the issues raised are related to the assessment of data and calculation of greenhouse gas emission reduction, 21% related to compliance of monitoring with the monitoring plan, 13% related to implementation of the PA, 9% related to the compliance of the monitoring plan with the monitoring methodology, 9% procedural and related requirements for the year 2010.

56. Different trends are observed in the issues raised in 2011. Where, 28% of the issues are related to implementation of the PA, 24% are related to the assessment of data and calculation of greenhouse gas emission reductions, 15% related to the compliance of the monitoring plan with the monitoring methodology, 23% are related to compliance of monitoring with the monitoring plan, and 10% procedural and related requirements.

57. From the two graphs, it can be concluded that divergent trends are observed in 2011. However, the number of requests for review and the number of issues raised have decreased significantly by about 58% from 2010 (171 request for review issues raised in 2010 Vs. 71 in 2011), indicating improvement in performance by the DOEs. The main reasons for the improvement in performance is due to: (i) more, improved, revised and new guidance/documents being provided by the Board; (ii) enhancement in the DOE interaction through different workshops and interactions; (iii) organisation of trainings across

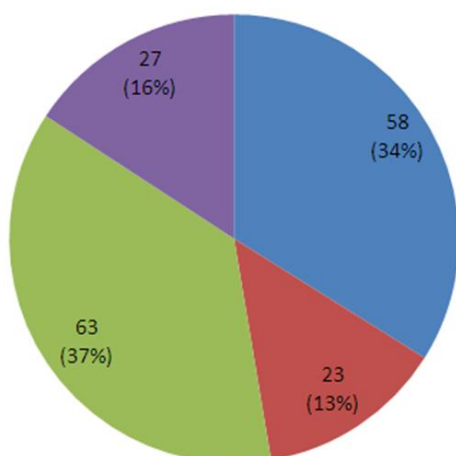
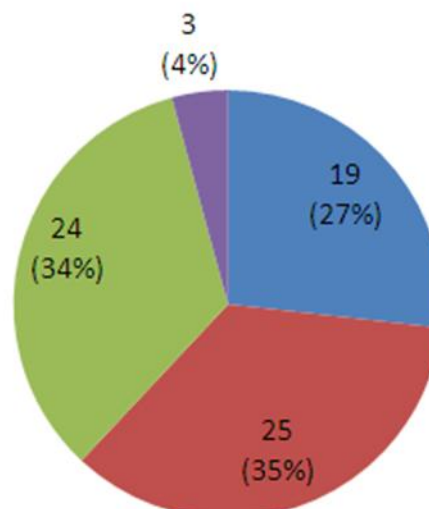
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various regions; and (iv) the increase in overall experience and skills of the DOEs over a period of time. Given that the performance has improved, therefore, it is recommended to maintain the duration of the 6-monthly monitoring period and the frequency of the monitoring of data, same as that in 2010 and 2011.

58. In 2011, regarding the implementation of the PA, most of the issues are related to the DOE's lack of clarification for divergences between the PDD and the monitoring plan, concerning higher values of electricity generation, reduction of monitored sites, calibration requirements and change in capacities of turbines and generators. Recently, the Board introduced the procedures on the post registration changes which will address this issue and reduce the request for reviews. However, it is recommended that the DOEs be trained on the application of post-registration changes.

B. Analysis of the issues raised**1. Categories of issues**

59. The current report presents the issues identified classified by category. The graphics below illustrate the distribution of the issues raised for issuance cases.

Issuance (2010)**Issuance (2011)**

■ I Issues related to reporting

■ II Issues related to failure to follow procedural requirements

■ III Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements

■ IV Other issues, to analysis system-wide gaps and improve classification

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60. Analysis of the matrix and the graphic shows that 37% of the issues raised are related to the technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements, 34% related to reporting, 16% related to other issues, 13% related to failure to follow procedural requirements for the year 2010.

61. Different trends are observed in the issues raised in 2011. Where, 35% of the issues raised are related to failure to follow procedural requirements, 34% related to the technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements, 27% related to reporting, and 4% related to other issues.

62. All the categories for issuance in 2010 have a significant number of issues while a majority of submission in 2011 have issues related to reporting, failure to follow procedural requirements and technical correctness and accuracy issues.

63. It is therefore recommended to concentrate assessment efforts on two categories viz. failure to follow procedural requirements and technical correctness and accuracy issues. However, it is expected that the new procedures for post registration changes would have an effect on this trend.

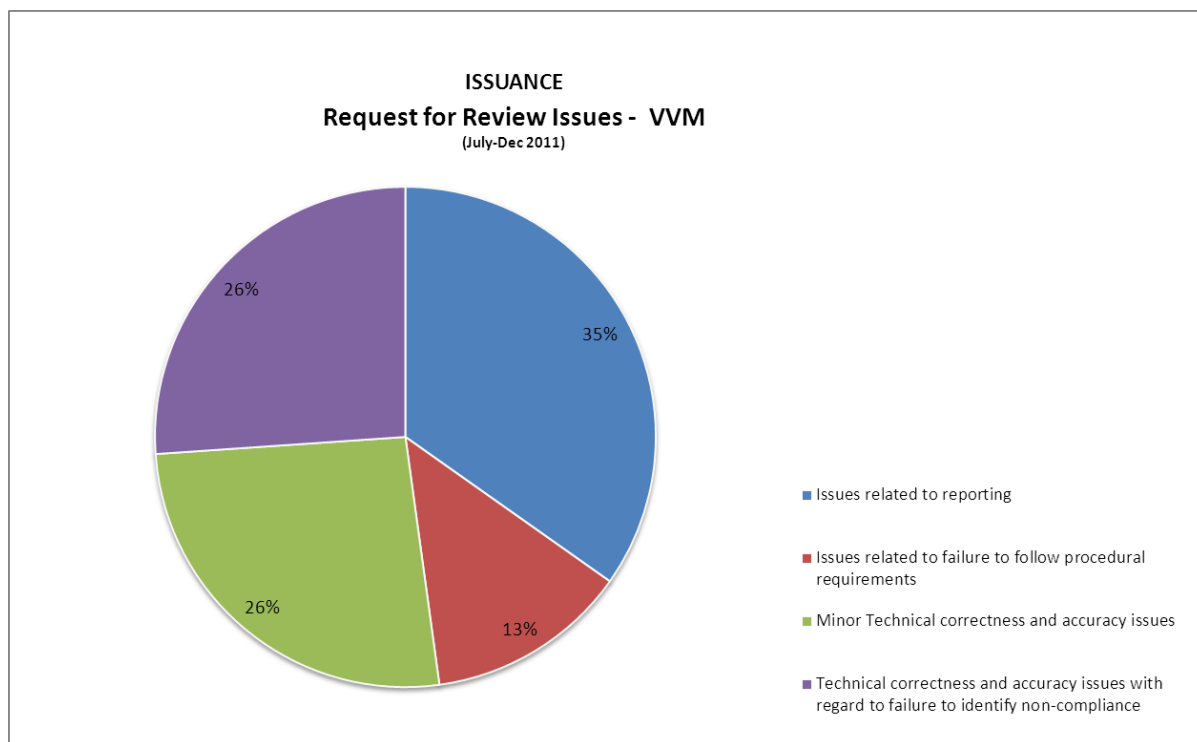
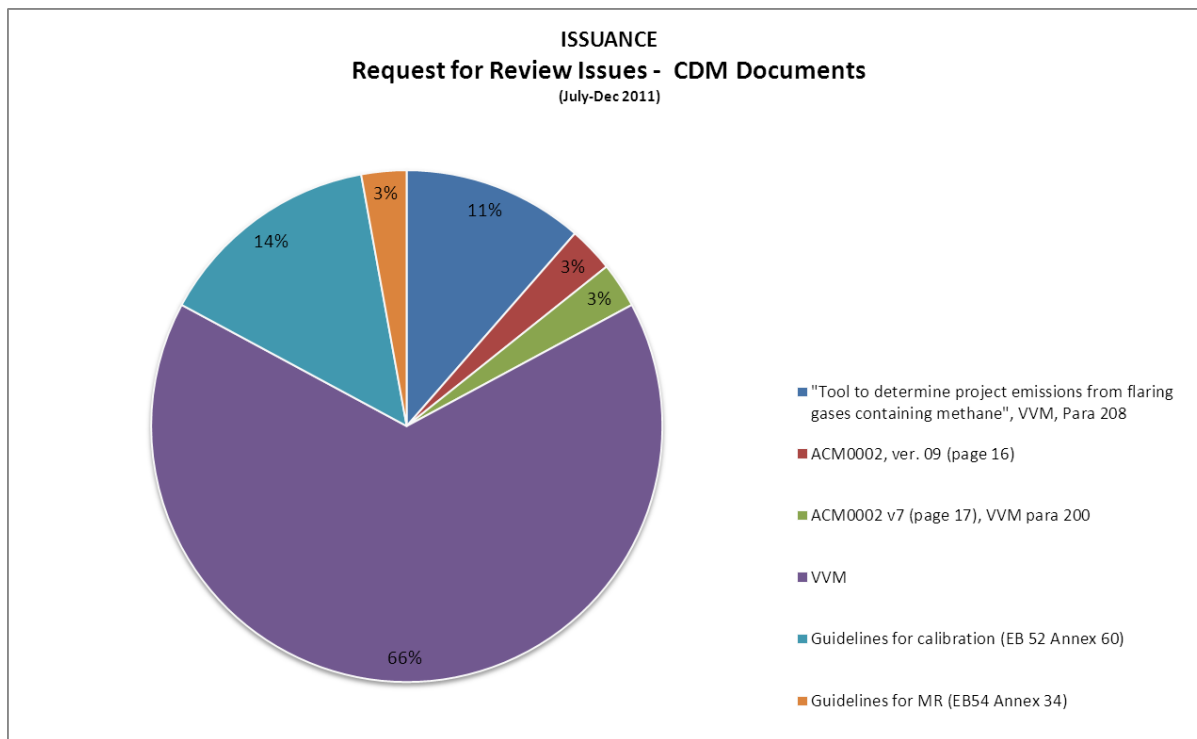
64. Issues related to reporting continue to be high. In 2012, the CDM MAP workplan has provided mandate to the secretariat to develop standardised templates for validation and verification. Therefore, it is recommended to prioritise the work on standard template for reporting of validation and Verification.

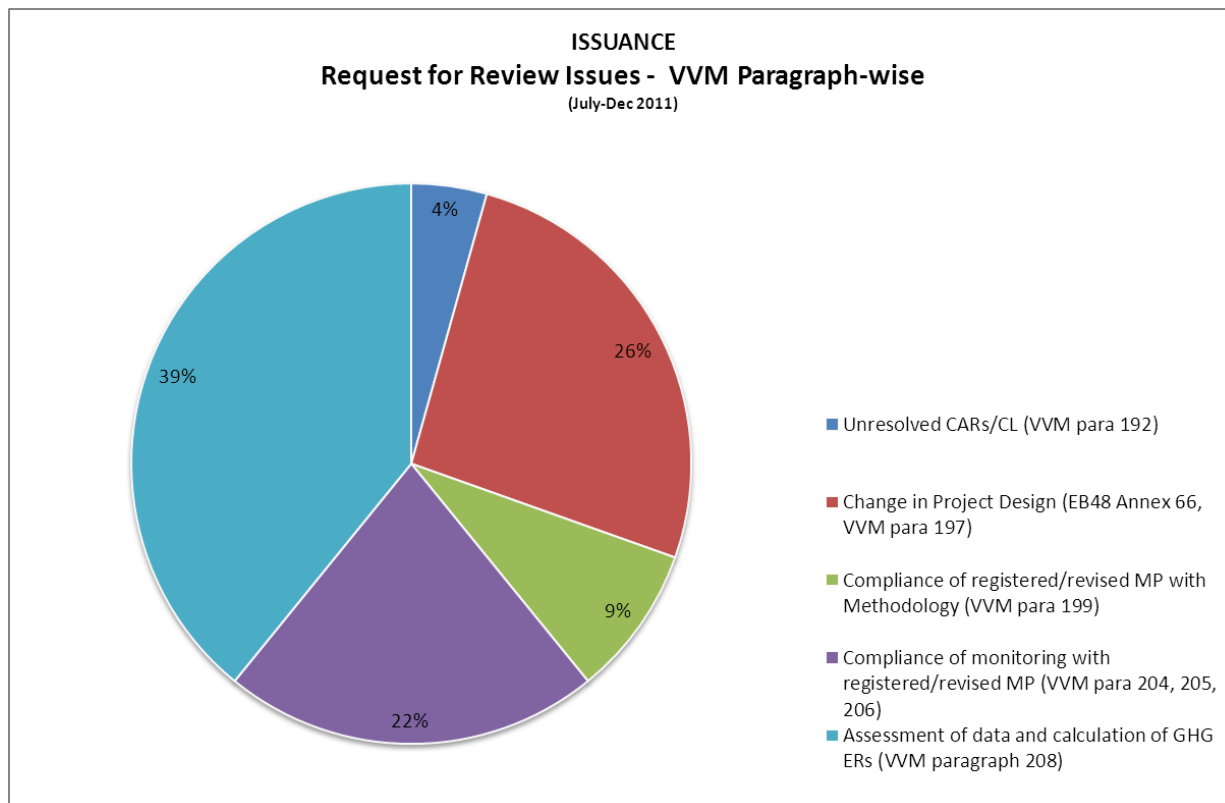
65. With the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) that started from 1 May 2012, including the post-registration changes related to request for temporary deviations, revision of the monitoring plan, change in project design, and the list of cases that do not need prior approval as contained in appendix 1 of the PCP, the future reporting periods are expected to capture the impact of the implementation of these new documents on the Indicator I₂. Further, providing focussed trainings on application of post-registration changes, would contribute to reducing the requests for reviews and issues.

2. Document wise distribution of issues

66. The graphics below illustrate the distribution of the issues raised in the monitoring period (from July- Dec 2011, data as of April-June 2012) with respect to various CDM documents. Majority of the issues (66%) raised are related to compliance with the requirements of Validation and Verification Manual (VVM).

67. The issues raised regarding compliance with the requirements of VVM (from July- Dec 2011, data as of April-June 2012) are mostly due to failure to follow procedural requirements (13%), technical correctness and accuracy issues (52%) and reporting issues (35%). The graphics presented above provides comparative frequency of the issues raised against the corresponding paragraphs of VVM.

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68. Given that the graphics above define the paragraphs on which most of the issues are raised during assessment of request for issuance, therefore this information and analysis provided may be used by various actors to further reduce the request for reviews or define the focussed audit scope or define improvements in the language in VVM and VVS. The analysis in graphics above may be used by the DOEs for drafting checklists for auditors during verification and used as a check points for focussed technical reviews. Similarly, the CDM-AP and CDM-AT team may use this analysis in defining the focussed audit scope during re-accreditation, surveillance audits, performance assessments, etc. Similarly, the Board and the Secretariat may use this information in bringing clarity both in language and in substantive requirements in the paragraphs mentioned to be most frequently referred.

69. From the analysis, significant issues are raised on reporting and the technical accuracy issues, which is an area of improvement for the DOEs. The issues on reporting can be addressed by means of standardized templates for validation and verification. For reducing technical accuracy issues, it is recommended that the DOEs to further strengthen their quality check procedures prior to sending submission to the Board, their technical review process and train their personnel on the issues where most of the request for review issues are triggered.

70. The recommendations and action plan to reduce request for review issues in issuance during 2013 is provided in Appendix F.

**DRAFT****IV. Summary**

71. The overall overview and the summary for Registration is provided below:

- (a) The over-all performance of the DOEs is seen to be improved in 2011 as compared to previous year. This is evident from the significant reduction, in the number of requests for reviews issues raised, by about 71% from previous year (446 requests for review issues raised in 2010 Vs. 130 in 2011¹), indicating improvement in performance by the DOEs. The main reasons for the improvement in performance is due to: (i) more, improved, revised and new guidance/documents being provided by the Board; (ii) enhancement in the DOE interaction through different workshops and interactions; (iii) organisation of trainings across various regions; (iv) the increase in overall experience and skills of the DOEs over a period of time ; (v) the introduction of information and reporting check² which detect issues related to information, reporting, repetitive and recurring ‘Summary Note’ issues, earlier in the process prior to publication of the submitted requests; and (vi) significant reduction in specific request for review issues from 2009-2010 (e.g., issues related to Grid emission factor, wind hydro tariff issue for projects from China, E⁺/E⁻ issues, etc.) subsequent to availability of Board’s guidance.
- (b) The improvement in performance of the DOEs in 2011 is also evident from the reducing trend of maximum value of I₂ Indicator (Rate of requests for review) in the registration process for eligible DOEs by 44% as compared to the previous year.
- (c) Given that the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) started from 1 May 2012, work-plan on top-down improvement of the methodologies and the tools and the further development of standardized baselines, the future reporting periods are expected to capture the impact of the implementation of these new documents on the Indicator I₂.
- (d) In 2011, significant number of issues still continues to be raised on the additionality (57%) and the Application of the baseline methodology (32%), in particular on Investment analysis (66%) and the algorithms and/or formulas to determine emission reductions (52%), respectively.
- (e) In 2011, significant number of issues still continues to be raised on the Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements (66%) and issues related to reporting (32%).
- (f) In 2011, majority of the issues (61%) raised are related to compliance with the requirements of Validation and Verification Manual (VVM), out of which reporting

¹ The results of the monitoring period (July –Dec 2011) may change a little due to availability of the 3rd update which includes data finalized as of 1 October 2012.

² The revised guidelines of the completeness check, included checking of reporting requirements, implemented from 1 September 2009 (EB48, paragraph 62 and 75), which later turned into two step process- completeness check (CC) and information and reporting check (IRC) from early 2010 as per the Board’s decision (EB54, Annex 28 and 35 dated 28 May 2010).

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issues contribute to 37% and about non-compliance of twenty-one paragraphs (68, 84, 86, 99, 102, 111, 95, 104, 110, 112, 114, 118, 117, 118, 119, 120, 121, 121, 123, 91, 92) of VVM contribute to 61% of total issues raised during request for reviews.

72. The overall overview and the summary for Issuance is provided below:

- (a) The over-all performance of the DOEs is seen to be improved in 2011 as compared to previous year. This is evident from the significant reduction, in the number of requests for reviews issues raised, by about 58% from previous year (171 requests for review issues raised in 2010 Vs. 71 in 2011³), indicating improvement in performance by the DOEs. The main reasons for the improvement in performance is due to: (i) more, improved, revised and new guidance/documents being provided by the Board; (ii) enhancement in the DOE interaction through different workshops and interactions; (iii) organisation of trainings across various regions; (iv) the increase in overall experience and skills of the DOEs over a period of time; (v) the introduction of information and reporting check, which detected issues, related to information, reporting, repetitive and recurring 'Summary Note' issues, earlier in the process prior to publication of the submitted requests; and (vi) significant reduction in specific request for review issues from 2009-2010 (e.g., issues related to HFC projects, etc.) subsequent to availability of Board's guidance.
- (b) The improvement in performance of the DOEs in 2011 is also evident from the reducing trend of maximum value of I₂ Indicator (Rate of requests for review) in the registration process for eligible DOEs by 60% as compared to the previous year when a spot-check was raised for one of the DOE.
- (c) Given that the implementation of the Project cycle procedure (PCP), Project Standard (PS), Validation and Verification Standard (VVS) started from 1 May 2012, including the post-registration changes related to request for temporary deviations, revision of the monitoring plan, change in project design, and the list of cases that do not need prior approval as contained in appendix 1 of the PCP, the future reporting periods are expected to capture the impact of the implementation of these new documents on the Indicator I₂.
- (d) It is expected that the new procedures for post-registration changes would have an effect on this trend and the rate of reviews will vary, at least during the transition time during initial adjustment period.
- (e) In 2011, significant number of issues still continues to be raised on the implementation of the project activity (28%), assessment of data and calculation of greenhouse gas emission reductions (24%), compliance of the monitoring plan with the monitoring methodology (15%), compliance of monitoring with the monitoring plan (23%), and procedural and related requirements (10%).

³ The results of the monitoring period (July –Dec 2011) may change a little due to availability of the 3rd update which includes data finalized as of 1 October 2012.

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- (f) In 2011, significant number of issues still continues to be raised on the failure to follow procedural requirements (35%), Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements (34%) and issues related to reporting (27%).
- (g) In 2011, majority of the issues (66%) raised are related to compliance with the requirements of Validation and Verification Manual (VVM), out of which reporting issues contribute to 35% and about non-compliance of seven paragraphs (192, 197, 199, 204, 205, 206, 208) of VVM contribute to 66% of total issues raised during request for reviews.

V. Potential areas of improvements

73. Taking into consideration the data gathered for the first, second, third and fourth monitoring periods of performance monitoring of DOEs and the analysis above, the following potential areas of improvement have been identified:

- (a) To further enhance efforts to enhance the Performance of the DOEs by:
 - (i) Continuing to monitor the performance of the DOEs and report to the Board;
 - (ii) Recommending this information and analysis is used by:
 - DOEs for drafting checklists for auditors during validation and used as a check points for focussed technical reviews;
 - CDM-AP and CDM-AT for defining the focussed audit scope during re-accreditation, surveillance audits, performance assessments, etc;
 - Secretariat in supporting the Board in taking measures for bringing clarity both in language and in substantive requirements in the respective paragraphs of CDM rules/ VVM/VVS mentioned to be most frequently referred;
- (b) To continue addressing the issues related to investment analysis, based on the action plan in this report on Investment Analysis and recommendations to further reduce the Request for Reviews by:
 - (i) Evaluating the need to clarify and propose revision of the existing guidelines on the Investment Analysis to address the issues raised in this report and the table above;
 - (ii) Providing new guidelines and templates on investment analysis, by:
 - Developing Validation Templates which shall include specific detailed reporting requirements on the validation of Investment Analysis to reduce the reporting issues;

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- Developing generic Standardized spread-sheets for Investment Analysis (e.g for renewable energy projects such as wind, hydro-power, etc.) to reduce the reporting issues;
- (iii) Introducing a requirement in the Accreditation Standard to enhance the technical capability: To have the financial expert, who has competence in financial accounting and costing of projects, in the validation team for CDM projects applying investment analysis;
- (iv) Providing training on investment analysis for DOEs.
- (c) To continue exploring innovative and simple approaches for the demonstration of additionality;
- (d) To Prioritise the work in preparing validation and verification templates in order to reduce reviews related to reporting and missing data which is expected to reduce the issues due to reporting;
- (e) To request DOEs to further strengthen their quality check procedures, their technical review process and train their personnel in the issues where most of the reviews are triggered which is expected to reduce technical and accuracy issues; and
- (f) To continue to provide training and capacity building for the DOEs focussed on additionality including investment analysis, barrier analysis, common practice analysis and first-of its kind, standardized baselines, POAs, application of sampling, and post-registration changes. .

VI. Recommendations

74. The Board may wish to take note of the recommendations made in the Third analysis Report on DOE performance monitoring.

75. The Board may also wish to request the secretariat to take into account the potential areas of improvements identified above in its current work and in the preparation of the management plan for 2013.



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Appendix 1

Compilation of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring)

Registration submissions of the 1 January 2010 to 31 December 2010

CRITERIA FOR CLASSIFICATION OF R&I ISSUES		Additionality					Application of baseline methodology				Application of the monitoring methodology		Project description		Procedural and related requirements	Other CDM requirements			
		Prior consideration	Identification of alternatives	Investment analysis	Barrier analysis	Common practice analysis	Project boundary	Baseline identification	Compliance with applicability conditions	Algorithms and/or formulae to determine emission reductions	Compliance of the Monitoring Plan (i.e. list of parameters complete or not)	Implementation of the Monitoring Plan (i.e. monitoring arrangement feasible or not)	Scale of project	Bundling & De-bundling		Letter of Approval (LoA)	Achievement of Sustainable development	Local stakeholder consultation	Environmental impacts
I	Issues related to reporting																		
1	Inconsistencies in the information presented in the documents presented/information supplied;			10			1			2	1				1				
2	Incomplete information/missing data;	4		24		6	4	7	1	11	6	3	2						
3	DOE has not fully reported how the	4	1	26	6	3		7	6	9	7								



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	compliance to the requirements are being met;																		
4	Not the latest PDD template is used;																		
II	Issues related to failure to follow procedural requirements																		
1	Failure to submit the corrections on time;																		
2	CAR/CLs in validation reports which are not closed out correctly: - Where the CAR resolution indicates that the PDD has been updated but it has not; - Where a CAR is marked as closed without explanation;	1																	
3	Failure to carry out the global public stakeholder consultation in line with the CDM requirements;																		
4	Failure to visit project site or provide justification;																		
5	Failure to request a deviation when non-compliance of the project activity with the requirements of the methodology has been identified						1		1										
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;																		
1	This sub-category includes cases for which the DOE has not precisely validated the project in accordance with the requirements of the VVM, however the failure is not likely to alter the	6	2	97	5	16	1	15	1	10	2								

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	<p>validation opinion</p> <ul style="list-style-type: none"> - Failure to ensure precise project start date where the change in the date does not impact additionality - Failure to fully validate all minor input values in an investment analysis - Failure to ensure that the common practice analysis has been conducted fully in accordance with the requirements - Failure to ensure that LoA refers to the precise title of the propose project activity - Failure to assess compliance with environmental impacts and/or local stakeholder consultation 																	
2	<p>This sub-category includes cases for which the DOE has failed to ensure compliance with a requirement which may ultimately be resolved during verification/issuance:</p> <ul style="list-style-type: none"> - The monitoring plan is incomplete; - The validation report or PDD contain conflicting information regarding the baseline which may lead to a request for review at issuance 		1	1			1	4	2	6	12	1						



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3	This sub-category includes cases for which the DOEs failure to ensure compliance with CDM requirements is likely to have an impact of the projects, or similar future projects, eligibility to receive the estimated quantity of CERs: - Errors in validation of additionality that would lead to the failure to identify non additional projects - Failure to apply or the misapplication of the requirements of the methodology that would lead to a non-applicable methodology being applied or the baseline being incorrectly established	9	1	23	8	1		6	4	4	2							
IV	Other issues, to analysis system-wide gaps and improve classification:																	
1	Absence of requirement / guidance by the Board	1		32	3		1			1						1		
2	Ambiguity of interpretation of requirements of methodology / guidance			1	1				1	1	5	1						

**DRAFT****Appendix 2****Compilation of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring)****Issuance submissions of the 1 January 2010 to 31 December 2010**

Categorization and weighting of issues identified at requests for issuance		Implementation of the PA	Compliance of the monitoring plan with the monitoring methodology	Compliance of monitoring with the monitoring plan	Assessment of data and calculation of greenhouse gas emission reductions (BE, PE, ER calculation)	Procedural and related requirements
I	Issues related to reporting					
1	This category includes errors covering - Inconsistencies in the information presented in the documents presented/information supplied; - Incomplete information/missing data; - DOE has not fully reported how the compliance to the requirements are being met	7	7	18	21	5
II	Issues related to failure to follow procedural requirements					
1	Failure to submit the corrections on time					
2	This sub category covers: - CAR/CLs in verification reports are not appropriately closed out; - Failure to follow up FAR from previous verification			1	1	1
3	This sub category covers failure to conduct site visit as per requirements of verification process; or provide justification					5
4	This sub category covers the failure to request, as appropriate:	12		2		1

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	<ul style="list-style-type: none"> - Deviation; - Revision Mon Plan; - Changes from PDD 					
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;					
1	This sub category covers basic verification to ensure the quality of required data measured and reported : <ul style="list-style-type: none"> - Failure to verify equipments/system/protocols/procedures; - Failure to cross check reported data/No clear audit trail (data generating,aggregating,reporting); - Calculation errors 	2	2	7	2	
2	This sub category covers failure to apply conservativeness approach when required				5	2
3	This sub category covers failures to correctly apply methodology requirements which may lead to incorrect CERs: <ul style="list-style-type: none"> - Failure to verify installation of monitoring system not per methodology; - Parameters required by methodology not being monitored; - Incorrect application of meth formulae, factors, default values 	1	6	8	26	2
IV	Other issues, to analysis system-wide gaps and improve classification					
1	Absence of requirement/guidance by the Board				25	
2	Ambiguity of interpretation of requirements of methodology/guidance		1		1	



Appendix 3

Compilation of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring)

Registration submissions of the 1 January 2011 to 31 December 2011

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II Issues related to failure to follow procedural requirements																		
1	Failure to submit the corrections on time;																	
2	CAR/CLs in validation reports which are not closed out correctly: - Where the CAR resolution indicates that the PDD has been updated but it has not; - Where a CAR is marked as closed without explanation;																	
3	Failure to carry out the global public stakeholder consultation in line with the CDM requirements;																	
4	Failure to visit project site or provide justification;																	
5	Failure to request a deviation when non-compliance of the project activity with the requirements of the methodology has been identified																	
III Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;																		
1	This sub-category includes cases for which the DOE has not precisely validated the project in accordance with the requirements of the VVM, however the failure is not likely to alter the validation opinion - Failure to ensure precise project start date where the change in the date does not impact additionality - Failure to fully validate all minor input values in an investment analysis - Failure to ensure that the common practice analysis has been conducted fully in accordance with the requirements - Failure to ensure that LoA refers to the	5		23	2	2		5		10	1							

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	precise title of the propose project activity - Failure to assess compliance with environmental impacts and/or local stakeholder consultation																	
2	This sub-category includes cases for which the DOE has failed to ensure compliance with a requirement which may ultimately be resolved during verification/issuance: - The monitoring plan is incomplete; - The validation report or PDD contain conflicting information regarding the baseline which may lead to a request for review at issuance									7	1							
3	This sub-category includes cases for which the DOEs failure to ensure compliance with CDM requirements is likely to have an impact of the projects, or similar future projects, eligibility to receive the estimated quantity of CERs: - Errors in validation of additionality that would lead to the failure to identify non additional projects - Failure to apply or the misapplication of the requirements of the methodology that would lead to a non-applicable methodology being applied or the baseline being incorrectly established	2		11	4	2		5	2	4								
IV Other issues, to analysis system-wide gaps and improve classification:																		
1	Absence of requirement / guidance by the Board			1						1								
2	Ambiguity of interpretation of requirements of methodology / guidance									1								

**DRAFT****Appendix 4****Compilation of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring)****Issuance submissions of the 1 January 2011 to 31 December 2011**

Categorization and weighting of issues identified at requests for issuance		Implementation of the PA	Compliance of the monitoring plan with the monitoring methodology	Compliance of monitoring with the monitoring plan	Assessment of data and calculation of greenhouse gas emission reductions (BE, PE, ER calculation)	Procedural and related requirements
I	Issues related to reporting					
1	This category includes errors covering - Inconsistencies in the information presented in the documents presented/information supplied; - Incomplete information/missing data; - DOE has not fully reported how the compliance to the requirements are being met	5	1	6	4	3
II	Issues related to failure to follow procedural requirements					
1	Failure to submit the corrections on time					
2	This sub category covers: - CAR/CLs in verification reports are not appropriately closed out; - Failure to follow up FAR from previous verification					
3	This sub category covers failure to conduct site visit as per requirements of verification process; or provide justification					
4	This sub category covers the failure to request, as appropriate:	14	7	2		2

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	<ul style="list-style-type: none"> - Deviation; - Revision Mon Plan; - Changes from PDD 					
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;					
1	This sub category covers basic verification to ensure to ensure the quality of required data measured and reported : <ul style="list-style-type: none"> - Failure to verify equipments/system/protocols/procedures; - Failure to cross check reported data/No clear audit trail (data generating, aggregating, reporting); - Calculation errors 	1	1	2	4	1
2	This sub category covers failure to apply conservativeness approach when required					
3	This sub category covers failures to correctly apply methodology requirements which may lead to incorrect CERs: <ul style="list-style-type: none"> - Failure to verify installation of monitoring system not per methodology; - Parameters required by methodology not being monitored; - Incorrect application of meth formulae, factors, default values 		2	6	6	1
IV	Other issues, to analysis system-wide gaps and improve classification					
1	Absence of requirement/guidance by the Board					
2	Ambiguity of interpretation of requirements of methodology/guidance				3	



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Appendix 5

Analysis of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring) Registration submissions of the 1 January 2011 to 31 December 2011																			
CRITERIA FOR CLASSIFICATION OF REGISTRATION ISSUES (Total issues = 132)		Additionality					Application of baseline methodology				Application of the monitoring methodology		Project description		Procedural and related requirements	Other CDM requirements			
		Prior consideration	Identification of alternatives	Investment analysis	Barrier analysis	Common practice analysis	Project boundary	Baseline identification	Compliance with applicability conditions	Algorithms and/or formulae to determine emission reductions:	Compliance of the Monitoring Plan (i.e. list of parameters complete or not)	Implementation of the Monitoring Plan (i.e. monitoring arrangement feasible or not)	Scale of project	Bundling & De-bundling		Letter of Approval (LoA)	Achievement of Sustainable development	Local stakeholder consultation	Environmental impacts
I	Issues related to reporting	5		16	2	1	1	4	3	6	4			1					
		4%		12%	1.5 %	1%	1%	3%	2%	4.5%	3%			1%					
II	Issues related to failure to follow procedural requirements																		
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements	7		34	6	4		10	2	14	8	1							
		5.5 %		26%	4.5 %	3%		7.5 %	1.5 %	10.5 %	6%	1%							
IV	Other issues, to analysis system-wide gaps and improve classification			1						2									
				1%						1.5%									
ACTION PLAN AND RECOMMENDATIONS TO REDUCE REQUEST FOR REVIEW ISSUES IN REGISTRATION- 2013																			

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Categorization of issues identified at requests for Registration		Period	Issues related to reporting	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements	Recommendations for Improvement - 2013			
					Existing Measures	Measures by DOE	New Guidance/Templates	Trainings
1	Additionality – Investment Analysis	2010	13.5%	27%				
		2011	12%	-	- Revision of investment Analysis guidelines in 2011		Validation and Verification Templates with focus on reporting of investment analysis	
			-	26%	- Workshops / Case Studies 2011		- Explore innovative and simple approaches for the demonstration of additionality - Further improve Investment Analysis guidelines - Introduce a requirement in the Accreditation Standard to have financial expert in validation team	Focus on Investment Analysis with Case study approach
2	Application of baseline methodology- Algorithms and/or formulae to determine emission reductions	2010	5%	5%				
		2011	4.5%	-			Validation and Verification Templates	
			-	10.5%	- Workshops / Case Studies 2011 - Top down revision of methodologies	- Request for deviation - Strengthen quality check procedures, technical review process and train their personnel		Focus with Case study approach

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Appendix 6

Analysis of the issues raised for all DOEs (eligible for monitoring and non-eligible for monitoring)							
Issuance submissions of the 1 January 2011 to 31 December 2011							
Categorization and weighting of issues identified at requests for issuance		Total issues = 71	Implementation of the PA	Compliance of the monitoring plan with the monitoring methodology	Compliance of monitoring with the monitoring plan	Assessment of data and calculation of greenhouse gas emission reductions (BE, PE, ER calculation)	Procedural and related requirements
I	Issues related to reporting	No. of Issues	5	1	6	4	3
		%	7%	1.5%	8.5%	5.5%	4%
II	Issues related to failure to follow procedural requirements	No. of Issues	14	7	2	-	2
		%	20%	10%	3%	-	3%
III	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements;	No. of Issues	1	3	8	10	2
		%	1.5%	4%	11%	14%	3%
IV	Other issues, to analysis system-wide gaps and improve classification	No. of Issues	-	-	-	3	-
		%	-	-	-	4%	-



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ACTION PLAN AND RECOMMENDATIONS TO REDUCE REQUEST FOR REVIEW ISSUES IN ISSUANCE- 2013								
Categorization of issues identified at requests for issuance		Period	Issues related to failure to follow procedural requirements	Technical correctness and accuracy issues with regard to failure to identify non-compliance with the CDM requirements	Recommendations for Improvement - 2013			
					Existing Measures	New Guidelines/ documents	New Templates	Trainings
1	Implementation of the PA	2010	7%	-	- Procedures and guidelines for Change in PDD	PCP, PS, VVS and procedures for Post-Registration Changes – will be implemented from 1 May 2012	No	Focus on Post Registration Changes with Case study approach
		2011	20%	-	- Workshops / Case Studies 2011			
2	Compliance of the monitoring plan with the monitoring methodology	2010	0%	-	- Procedures for Revision in Monitoring Plan - Workshops / Case Studies 2011		No	
		2011	10%	-				
3	Compliance of monitoring with the monitoring plan	2010	-	9%				
		2011	-	11%				
4	Assessment of data and calculation of greenhouse gas emission reductions (BE,PE, ER calculation)	2010	-	19%	- Workshops / Case Studies 2011	No	Focus with Case study approach	
		2011	-	14%				

**DRAFT****History of the document**

Version	Date	Nature of revision
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