

Clarification request:

DNV is herewith seeking a clarification on the application of the “Guidelines on accounting of specified types of changes in AR CDM project activities from the description in registered PDD” (Version 2.0) to changes identified as part of the verification.

As described in paragraph 2 of the guidelines, the referred document provides project participants of A/R CDM project activities with guidelines on addressing specified types of changes (in implementation and/or monitoring) from the description contained in the registered PDD that do not require prior approval by the Executive Board of the clean development mechanism (CDM). The referred document provides in paragraph 4 a list of post-registration changes which do not require prior-approval from the board. Following the provisions of the “CDM Project Standard” (Version 01.0) paragraphs 209, 215 and 218, in the case permanent changes to the monitoring plan or the project description are identified the project participants shall prepare a revised PDD which describes the nature and extent of the proposed or actual changes. Following the provisions of paragraph 206, in the case of temporary deviations to the monitoring plan or applied methodology are identified, project participants shall describe such change in the monitoring report.

DNV’s understanding is that if “Changes specific to afforestation or reforestation project activities” are identified, the same provisions specified in the previous paragraph above with regard to different type of changes would have to be followed, i.e. changes would have to be described in the monitoring report (i.e. Section B.2.6 for “Changes specific to afforestation or reforestation project activities”) and in the case of permanent changes the project participants would have to prepare a revised PDD.

However, clarification is sought on how some of the changes listed in paragraph 3 of the guidelines shall be addressed by the project participant, mainly changes in the project description (which would require an update of the PDD), since:

- 1) Some of the changes listed are aspects that might keep changing throughout the project’s lifetime which is specific to A/R CDM activities so it would not make much sense to update a PDD which will keep changing; AND
- 2) As indicated in the previous version of the guideline (version 01, EB63, Annex 27) the types of changes listed “are identified as minor in nature, and therefore shall be addressed through the verification stage by the designated operational entity without submitting a notification or a request for approval”, meaning that the listed changes are minor and would not require an update of the PDD, i.e. deviations from the project description would be acceptable.

For instance:

- ☐ According to paragraph 3(j) “Changes in inputs (e.g. fertilizers, certified seeds, watering);” is considered minor in nature. In the case such change is identified it would not be very useful to revise the PDD since it is expected that the inputs might change throughout the project lifetime.
- ☐ According to paragraph 3(k) “Changes in stratification for sampling;” is considered minor in nature. In the case such change is identified, even though this would be part of the monitoring plan, it would not be very useful to revise the PDD since it is expected that the stratification or the stratification criteria will change throughout the project’s lifetime.
- ☐ According to paragraph 3(e) “Changes in timing of harvest occurring before the third verification;” is considered minor in nature. In this case, it would not make sense to revise the PDD as otherwise the DOE carrying out the third verification would not be able to assess what was the timing of harvesting provided in the first version of the PDD which was initially registered.

Feedback

In your communication you requested clarification on how some of the changes listed in paragraph 3 of the “Guidelines on accounting of specified types of changes in A/R CDM project activities from the description in registered project design documents” shall be addressed by the project participant.

I would like to clarify that types of changes listed in paragraph 3 of the “Guidelines on accounting of specified types of changes in A/R CDM project activities from the description in registered project design document” do not require prior approval by the Board, in accordance with Appendix 1 to the Project standard. As per paragraph 135 of CDM Project Cycle Procedure (Version 03.1), the DOE that performs a verification of a registered CDM project activity or PoA shall submit the changes for acceptance by the Board as part of the request for issuance. The project participant or CME shall describe the changes in the monitoring report and the DOE shall assess and report the changes within the verification report combined with the request for issuance.