



CDM Executive Board  
c/o UNFCCC Secretariat  
Martin-Luther-King-Strasse 8  
D-53153 Bonn  
Germany

Att: Mr. Jean-Jacques Becker, Chair of the Methodology Panel

DET NORSKE VERITAS  
DNV Certification  
International Climate Change Services  
Veritasveien 1  
NO-1322 Høvik  
Norway  
Tel: +47-6757 9900  
Fax: +47-6757 9911  
<http://www.dnv.com>  
NO 945 748 931 MVA

Your ref.:

Our ref.:  
MLEH/ETEL

Date:  
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## **Request for clarification on step 0 of the “Tool for the demonstration and assessment of additionality”**

Dear Mr. Becker

We refer to our earlier letter sent to you on 17 June 2005 to which as of today have not yet received a response.

We kindly request you, as the Chair of the Meth Panel, to - through consultations with the other members of the Methodology Panel - provide clarifications on step 0 (preliminary screening based on the starting date of the project activity) of the *Tool for the demonstration and assessment of additionality*. We see an urgent need for the below questions to be addressed by the Board.

According to Step 0, “if project participants wish to have the crediting period starting prior to the registration of their project activity, they shall: (a) Provide evidence that the starting date of the CDM project activity falls between 1 January 2000 and the date of the registration of a first CDM project activity [...]; and (b) Provide evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project activity.”

The above text allows at least two interpretations:

- a) It can be argued that a project that has started prior to its registration and that can not provide evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project is not additional.
- b) However, the above text also allows the alternative interpretation that, even if a project can not provide the requested evidence, it can still be considered additional if it meets the other steps of the tool. However, the project can in this case not claim a crediting period starting prior to the registration of the project, but has to select a crediting period that starts after the project is registered.

We kindly ask you to clarify whether interpretation a) or b) is correct.

It must be noted that the draft text in the Meth Panel’s proposal for step 0 of the tool was less ambiguous and clearly stated that “Without any such evidence, the authenticity of which can be verified by the DOE, the project is not additional.”\* However, this statement was removed by the Board and is no longer included in the final version of the tool.

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\* Annex 3 to meeting report of EB 15

Related to the above, we also kindly ask you to provide further guidance on the necessary evidence that shall be presented in order to demonstrate that the incentive from the CDM was seriously considered in the decision to proceed with the project, i.e. Step 0 of the *Tool for the demonstration and assessment of additionality* requires that “This evidence shall be based on (preferably official, legal and/or other corporate) documentation that was available to third parties at, or prior to, the start of the project activity”.

Kindly clarify whether it is necessary to provide evidence which explicitly mentions the CDM or whether it would be sufficient to provide evidence that shows that the reduction of GHG emissions and the mitigation of climate change was one of the main drivers for the project to be implemented without an explicit reference to the CDM. Moreover, we kindly ask you to clarify whether also anecdotal evidence, if it is confirmed by third parties, can be considered.

It is our experience that in particular projects implemented prior and shortly after the adoption of the Marrakesh Accords - a time where there was still a lot of political uncertainty concerning the CDM - have difficulties providing evidence which explicitly mentions the CDM, while they can provide evidence that the project was to a large extent implemented in order to mitigate climate change.

We look forward to your response on the above two issues with regard to step 0 of the *Tool for the demonstration and assessment of additionality*.

Yours faithfully  
for DNV



Einar Telnes  
Technical Director  
Climate Change Services



Michael Lehmann  
Deputy Technical Director