

Validation and verification of CDM projects and the stakeholder comment process

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Background

Objective of stakeholder consultations:

- To secure that the view of all parties are considered in the assessment of a CDM project.

Two tiers of stakeholder consultations are required:

- Local stakeholder comments (MA 37(b))
 - Project proponent must invite and summarise local stakeholder comments and report these to the validator
- Comments from Parties, stakeholders and UNFCCC-accredited NGOs on the PDD (MA 40 (b)& (c))
 - Validator must take into account comments provided and the project developers response to local stakeholder comments

Also requirements for public disclosure of monitoring and verification reports, but no option here for comments

Confidential information

- No obligation to disclose confidential information to stakeholders (except when required by law)
- Validator/verifier should have access to confidential information under secrecy agreements
- Stakeholders may be granted the same access, given project developer's consent

Who comments?

- NGO's
- Individuals
- Representatives for governmental institutions
- Research agencies

What is commented?

- Technical issues, calculations
- Project additionality
- Baseline selection
- Leakage effects

Project comments

- Some projects receive no comments (mainly JI and renewable small-scale projects)
- Some receive a lot of comments
- Most projects receive one or two comments

Most comments are good, but...

- The public comment process is not a place to present research
- The public comment process is not a place to assert unsubstantiated claims or disagree with the official policies of a sovereign country
- The public comment process is not a place to start debating issues already resolved in the CoPs
- The public comment process is not a place to start a discussion with the validator

The public comment process..

- ..works well. Comments that are provided demonstrates that the comment mechanism works as intended.
- It is a help to all parties involved.
- It will improve the transparency and development of future CDM projects