

Deviations from methodologies and changes in PDD contents

According to the guidance of “Clarification for project participants on when to request a revision, clarification to an approved methodology or deviation” in the EB 31st Meeting Report,

When do we request a revision?

When an approved methodology is not applicable to a project activity but the project activity is broadly similar to the project activities to which the approved methodology is applicable, based on the nature (technology/measure) of the project activity and sources of the emissions affected by the project activity.

A request for revision may be made in advance of requesting registration or issuance of CERs.

For example:

The procedures provided in the methodology for estimating emissions from sources are not applicable because of slight variations in the approach, flow of events or structure chosen in the project activity.

Tips:

- The request for revisions shall not include changes to the approved methodology that would result in the exclusion, restriction, narrowing of the applicability conditions of the approved methodologies for other project activities. Should the request result in the above the project participant is advised to submit a new proposed methodology.
- If the request for revision to an approved methodology is likely to result in the addition of new procedures or scenarios to more than half of the sections of an approved methodology, it is advisable that project participants propose a new methodology.

When do we request a deviation from methodologies?

If a DOE finds at validation that project participants deviated from an approved methodology when applying it to a proposed project activity and the DOE considers

that the deviation was due to a project specific issue, it may seek guidance on the acceptability of the deviation from the Executive Board prior to requesting registration of the proposed project activity.

A request for deviation may be made in advance of requesting registration or issuance of CERs

For example:

- 1). A proposed project activity does not have access to the data sources specified by the methodology for a certain parameter;
- 2). A different source of data can be accessed by the project activity to estimate the parameter with equal reliability and accuracy.

Procedures for requests to the EB for deviation from an approved methodology:

As per “Procedures for requests to the Executive Board for deviation from an approved methodology (version 01)” [EB49 Annex 04],

If guidance is sought, the DOE shall submit the form for submission of a request for deviation “CDM: Request for deviation form” (F-CDM-DEV-METH) through the dedicated internet interface on the UNFCCC CDM website. The submission by the DOE shall provide clear and precise assessment of the case. It shall also include a description of the impact of the deviation on the emission reductions from the project activity, for the Executive Board to evaluate.

When do we request changes in PDD contents?

As per “Guidelines on assessment of different types of changes from the project activity as described in the registered PDD” [EB48 Annex 67],

If there are permanent changes which would impact at least one of the following aspects, the DOE must notify and request approval of changes from the project activity as described in the registered PDD.

1) Changes which may impact the additionality of the project activity:

- (a) Changes in the effective output capacity due to increased installed capacity or increased number of units, or installation of units with lower capacity or units with a technology which is less advanced than that described in the PDD;
- (b) Addition of component or extension of technology;
- (c) Removal or addition of one (or more) site of a project activity registered with multiple-sites;
- (d) Different values of those actual operational parameters relevant to determination of emission reduction which result in the IRR passing the benchmark in the registered PDD.

2) Changes in the scale of CDM project activity

Within this category are the changes which cause a project activity no longer meeting the criteria for small-scale CDM project activities, therefore, simplified modalities, including the applicability and the application of relevant small-scale baseline methodologies, may no longer be applicable.

3) Changes which impact the applicability/application of baseline methodology

Within this category are the changes in the implementation of project activity which result in:

- (a) The original methodology would no longer be applicable; or
- (b) Another methodology would have been applicable; or
- (c) Another baseline scenario would be more appropriate.

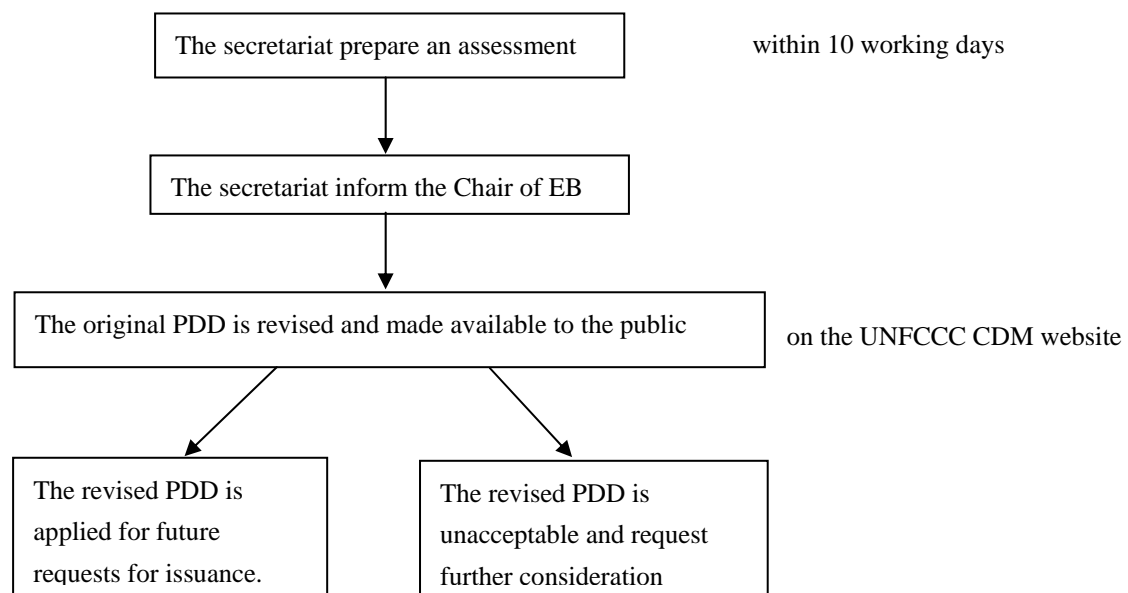
As per “Procedures for notifying and requesting approval of changes from the project activity as described in the registered project design document” [EB48 Annex 66], The procedure shall be applied by the DOE for permanent changes from the registered project activity under situations (a) the project has never been implemented in accordance with description in the registered PDD, (b) permanent changes occur after the project activity has been implemented in accordance with the description in the PDD and issuance of CERs has taken place.

Submission of Notification and Request for Approval of Changes from Project Activity as described in the registered PDD

Prior to requesting issuance of CERs, the DOE shall submit a notification or a request for approval of changes from Project Description in PDD, as appropriate, to the secretariat via a dedicated interface on the CDM website.

The submission by the DOE shall contain:

- (a) A Validation Opinion;
- (b) Revised Project Design Document;
- (c) Supplemental documentation.



Upon receipt of submission by the DOE the secretariat shall expeditiously process the request to determine whether all information and documentation requested has been provided by the DOE.

Once deemed complete, the secretariat shall proceed with processing the notification of the changes as outlined in “Processing Notification of Changes from Project Activity as described in the registered PDD” showing in the above figure.

Or the request for approval of changes as outlined in “Processing Request for Approval of Changes from Project Activity as described in the registered PDD” showing in the following figure

The Board’s consideration will be determined on a case by case basis and may vary, depending on the type of change and its potential impact on the Board’s earlier decision to register the project. The Board, in certain cases, may request, the relevant panel(s) and/or working group(s) to provide technical inputs on the submission. The Board shall decide on each request whether:

- (a) To accept the changes and allow the subsequent requests for issuance;
- (b) To accept the changes and allow the subsequent requests for issuance, but limit the Certified Emission Reductions up to the level estimated in the original PDD;
- (c) To reject the changes and not allow the subsequent requests for issuance.

