

Application of the Oeko-Institut/WWF-US/ EDF methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website [Site terms and Privacy Policy](#) apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: www.carboncreditquality.org

Criterion:	5.2 Transparency
Carbon crediting program:	Clean Development Mechanism (CDM)
Assessment based on carbon crediting program documents valid as of:	30 June 2021
Date of final assessment:	20 May 2022
Score:	4.09

Contact

info@oeko.de
www.oeko.de

Head Office Freiburg

P. O. Box 17 71
 79017 Freiburg

Street address

Merzhauser Straße 173
 79100 Freiburg
 Phone +49 761 45295-0

Office Berlin

Borkumstraße 2
 13189 Berlin
 Phone +49 30 405085-0

Office Darmstadt

Rheinstraße 95
 64295 Darmstadt
 Phone +49 6151 8191-0

Assessment

Indicator 5.2.1

Relevant scoring methodology provisions

“The program makes publicly available on its website the names and affiliations of all non-staff individuals or organizations serving in a professional capacity to support the administration of the program (e.g., members of the Board, advisory groups or expert committees).”

Information sources considered

- 1 Program website (<https://cdm.unfccc.int/EB/index.html>), last accessed on 24 June 2021.
- 2 Program website: (<https://cdm.unfccc.int/Panels/index.html>), last accessed on 24 June 2021.

Relevant carbon crediting program provisions

The websites sourced provide information relevant to the indicator.

Assessment outcome

Yes (1 Point).

Justification of assessment

The program website lists the names of all Executive Board members and other relevant bodies, including the Methodologies Panel, the Accreditation Panel, the Registration and Issuance Team, the Afforestation and Reforestation Working Group, and the Carbon Capture and Storage Working Group. The members of each body are identified on these website pages that link to a brief description of their background and current employment and any financial interests.

Indicator 5.2.2

Relevant scoring methodology provisions

“Minutes of Board of Directors or Trustees meetings are publicly available on the program’s website.”

Information sources considered

- 1 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 2 Program website (<https://cdm.unfccc.int/EB/index.html>), last accessed on 24 June 2021.
- 3 Decision 4/CMP.1 Guidance relating to the clean development mechanism. ANNEX I Rules of procedure of the Executive Board of the clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 1, Para.17, p.10: “The full text of all decisions of the Executive Board shall be made publicly available. The working language of the Executive Board shall be English. Decisions shall be made available in all six official languages of the United Nations.”
- Provision 2 Source 3, Rule 26, p.37: “Subject to the need to protect confidential information, the principle of transparency should apply to all the work of the Executive Board, encompassing the timely public availability of documentation and channels through which external comments by all Parties and all UNFCCC accredited observers and stakeholders can be submitted for consideration by the Board. The posting of the Board’s meetings on the Internet is one way to ensure transparency.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Executive Board meeting reports are publicly available on the website and in the EB Meeting Archive.

Indicator 5.2.3

Relevant scoring methodology provisions

“The conflict of interest provisions identified in indicator 5.1.5 for non-staff individuals serving in a professional capacity to support the administration of the program (e.g., members of the Board, advisory groups or expert committees) and the code of conduct for staff and registry administrators identified in indicators 5.1.6 are publicly available on the program’s website.”

Information sources considered

- 1 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Online available at: https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 2 Procedure: Development, revision and clarification of baseline and monitoring methodologies and methodological tools. CDM-EB70-A36-PROC. Version 02.1. Document issued on 01 September 2017. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth_proc09.pdf.
- 3 Procedure: Development, revision and clarification of baseline and update of standardized baselines. CDM-EB70-A36-PROC. Version 06.0. Document issued on 14 December 2020. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20201215164053232/meth_proc07.pdf.
- 4 Standard Code of conduct. EB69 Annex01. Version 02.0, document issued on 13 September 2012. Online available at: https://cdm.unfccc.int/Reference/Standards/meth/gov_stan01.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, Para.27, p.12: “A designated operational entity shall: [...]

(d) Demonstrate that it, and its subcontractors, have no real or potential conflict of interest with the participants in the CDM project activities for which it has been selected to carry out validation or verification and certification functions.”

Provision 2 Source 2, Para.8, p.9: “Members, including alternate members, of the Executive Board shall: [...]

(e) [t]ake a written oath of service witnessed by the Executive Secretary of the UNFCCC or his/her authorized representative before assuming his or her duties.

(f) [h]ave no pecuniary or financial interest in any aspect of a CDM project activity or any designated operational entity;”

Provision 3 Source 2, Para.4, p.4: “This procedure defines the processes for the development of new methodologies and methodological tools for the revision of approved methodologies and methodological tools, and for the provision of clarifications of approved methodologies and methodological tools.”

Provision 4 Source 4, Para.1, p.1: “Each member and alternate member of the Executive Board of the CDM will: [...]

(d): Exercise personal discretion in deciding whether s/he has a real or perceived conflict with respect to any matter under consideration by the Board and take appropriate action, which may include remaining silent and/or leaving the room during deliberations and decisions of the Board, and disclose to the Board any actual or perceived conflicts of interest of a direct or indirect nature of which s/he is aware and which s/he believes could compromise in any way the reputation or performance of the Board;”

Provision 5 Source 4, Para.2, p.1: “A “conflict of interest” refers to any current professional, financial or other interest which could:

- i) significantly impair the individual's objectivity in carrying out his or her duties and responsibilities for the Board, or
- ii) create an unfair advantage for any person or organization.

For the purposes of this code, circumstances that could lead a reasonable person to question an individual's objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest.”

Assessment outcome

No (0 Points).

Justification of assessment

The publicly available program provisions provide the conflict of interest statement but it is only identified as a requirement for Executive Board (EB) members and alternative members to the EB

and does not include members of technical or expert committees. The indicator is therefore not fulfilled.

Indicator 5.2.4

Relevant scoring methodology provisions

“The program defines and publicly discloses the level at which activities are allowed under the program (e.g., project-based, program of activities, etc.) and scope of eligible activities (e.g., which sectors, project types, or geographic locations are or are not included within the scope of the program).”

Information sources considered

- 1 Program website: CDM Methodologies (<https://cdm.unfccc.int/methodologies/index.html>), last accessed on 17 February 2022.
- 2 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf.
- 3 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf.
- 4 Procedure: Development, revision and clarification of baseline and monitoring methodologies and methodological tools. CDM-EB70-A36-PROC. Version 02.1. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth_proc09.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 2, para.9, p.20: “While designing as well as implementing and monitoring a CDM project activity, the project participants shall consider and use any applicable standards, methodologies, standardized baselines, methodological tools, guidelines and other regulatory documents adopted by the CMP or the Board in accordance with this standard.”
- Provision 2 Source 2, para.34, p.11: “The project participants shall determine the type of the CDM project activity they intend to design and implement from the following:
- (a) Large-scale project activity;
 - (b) Small-scale project activity;
 - (c) Large-scale A/R project activity;
 - (d) Small-scale A/R project activity;

(e) CCS project activity.”

Provision 3 Source 3, para.20, p.9: “While designing as well as implementing and monitoring a CDM PoA, the coordinating/managing entity shall consider and use any applicable standards, methodologies, standardized baselines, methodological tools, guidelines and other regulatory documents adopted by the CMP or the Board³ in accordance with this standard.”

Provision 4 Source 3, para. 31, p.10: “The coordinating/managing entity shall determine the type of CDM PoA it intends to design and implement from the following:

(a) PoA that will include only large-scale and/or small-scale non-A/R CPAs;

(b) PoA that will include only large-scale and/or small-scale A/R CPAs (hereinafter referred to as A/R PoA).”

Assessment outcome

Yes (1 Point).

Justification of assessment

Under the CDM, project-based and programmes of activities are allowed (Source 2 and 3). Provision 1 and 2 state that project activities must be implemented in accordance with applicable methodologies and what project types are eligible. Provision 3 and 4 are the respective provisions for programs of activities. The program website (Source 1) provides for a list of sectoral scopes covered by the CDM and the applicable methodologies. Each methodology defines the eligible activities for using the respective methodology and limits the scope of those activities. Additionally, Source 4 describes the development and approval process of methodologies to ensure that the methodologies abide by the programmatic rules.

Indicator 5.2.5

Relevant scoring methodology provisions

“The normative program documents are publicly available on the program's website”

Notes: In the definitions section the Methodology for assessing the quality of carbon credits defines normative program documents as follows: “The documents adopted under a carbon crediting program that specify requirements, procedures, and administrative and operational aspects of the program. This typically includes standards, (such as quantification methodologies), procedures, manuals, guidance documents, and forms.”

Information sources considered

- 1 Program website (<https://cdm.unfccc.int/Reference/index.html>), last accessed on 24 June 2021.
- 2 Decision 4/CMP.1 Guidance relating to the clean development mechanism. ANNEX I Rules of procedure of the Executive Board of the clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.

- 3 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 2, Rule 26, p.38: “Subject to the need to protect confidential information, the principle of transparency should apply to all the work of the Executive Board, encompassing the timely public availability of documentation and channels through which external comments by all Parties and all UNFCCC accredited observers and stakeholders can be submitted for consideration by the Board. The posting of the Board’s meetings on the Internet is one way to ensure transparency.”
- Provision 3 Source 3, Para.17, p.10: “The full text of all decisions of the Executive Board shall be made publicly available. The working language of the Executive Board shall be English. Decisions shall be made available in all six official languages of the United Nations.”

Assessment outcome

Yes (2 Points).

Justification of assessment

Provision 3 shows that the full text of decisions by the CDM Executive Board needs to be made publicly available. On the website of the CDM, all normative and regulatory documents are available (Source 1).

Indicator 5.2.6

Relevant scoring methodology provisions

“Input received through public consultations relating to material program updates (e.g., new or updated normative program documents) is documented and the program reports back to the public on how raised issues were addressed.”

Information sources considered

- 1 Procedure: Direct communication with stakeholders. CDM-EB62-A15-PROC. Version 02.0. Document issued on 20 February 2015. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20150224183036545/eb_proc03.pdf.
- 2 Procedure: Development, revision and clarification of baseline and monitoring methodologies and methodological tools. CDM-EB70-A36-PROC. Version 02.1. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170830140938685/Meth_proc09.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, Para.33 and 34, p.7-8: “When preparing a new regulatory document or a major revision of an existing document that has a significant impact on stakeholders, the secretariat, on behalf of the Board, shall:

(a) Launch a call for input to seek the views of stakeholders on the areas to be covered/revised in the document and the concerns that it should address; and/or

(b) Organize a workshop, including that for practitioners, to have the views of stakeholders. [..]

Once inputs are received from stakeholders, whether from a call for inputs or from a consultation workshop, the secretariat shall consider the inputs with a focus on matters related to the topic under consultation. The secretariat shall prepare a summary of the inputs received and the status of their consideration:

(a) Where an input has been incorporated into a regulatory document: how and where it has been reflected;

(b) Where an input has not been incorporated into a regulatory document: justification of why the particular input was not incorporated;

(c) Where an input is still being considered in ongoing work on a regulatory document: identification of which regulatory document is expected to take into account the particular input and relevant estimated timelines where appropriate.”

Provision 2 Source 1, Para.59, p.11: “Stakeholders may initiate process-based communications with the Board in accordance with defined steps in a dedicated procedure for a specific CDM process for a specific case. The processes for such communications include, but are not limited to: (a) The CDM project cycle process including the withdrawal of letter of approval (LoA); (b) The CDM registry; (c) The CDM accreditation; or (d) The development, revision, update or clarification of baseline and monitoring methodology, methodological tool or standardized baseline.”

Provision 3 Source 1, Para.60, p.11: “Examples of channels and modalities of process-based communications are contained in the attachment.”

Provision 4 Source 1, Para.61, p.11: “The secretariat shall prepare an annual report on all communications received through the dedicated interface on the UNFCCC CDM website and inputs received during workshops and events, in relation to: (a) The number and type of stakeholder inputs; (b) The issues addressed in these communications; (c) Statistics on responses (type/outcome/timelines) provided to these inputs; (d) The impact of the stakeholder inputs on the regulatory framework and/or operations of the CDM.”

Provision 5 Source 1, Para.46, p.9: “Stakeholders may communicate to the secretariat. The secretariat shall maintain a dedicated interface on the UNFCCC CDM website to receive communications from stakeholders.

The secretariat should respond to a communication addressed to the secretariat as soon as possible and within 15 days of its receipt. The secretariat’s responses are not

endorsed by the Board, and the content of the communication or response will not be published on the UNFCCC CDM website.”

- Provision 6 Source 1, Para.47, p.9: “All responses provided by the secretariat through this process shall bear a disclaimer stating that the responses shall not supersede or preempt decisions and regulations of the Board, or the validation/verification opinions of DOEs on specific CDM project activities or PoAs.”
- Provision 7 Source 1, Para.48, p.9 “A communication directed to the secretariat may be redirected to the Board track referred to in section 3.2.3 below if the secretariat finds that it requires the attention of or further guidance from the Board. If the secretariat decides to do so, it shall inform the submitter and provide a justification for redirecting the communication to the Board.”
- Provision 8 Source 2, Para.43, p.11: “The secretariat shall make the draft recommendation to the Board publicly available on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 15 days. After this period, the secretariat shall make all comments received publicly available on the UNFCCC CDM website.”
- Provision 9 Source 2, Para.44, p.11: “The relevant methodological panel or working group shall finalize the recommendation to the Board on the draft new methodology or methodological tool taking into account the comments received in the global stakeholder consultation, and publish it in its corresponding meeting report. For a draft new methodological tool, the recommendation shall also include a list of the existing approved methodologies that would need to be revised due to the effectiveness of the new methodological tool. The secretariat shall place the recommendation to the Board on the agenda of the next Board meeting.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Public stakeholder comments may be requested by the CDM through various processes and the CDM responds to received comments and as identified in the provisions makes the comments public including how these comments were addressed through published summary reports, publishing comments on their website, and/or through annual reports.

Indicator 5.2.7

Relevant scoring methodology provisions

“The program clearly distinguishes mandatory requirements from recommendations and guidance (e.g., by uniformly applying “shall” for mandatory requirements and “should” for recommendations or guidance throughout its normative program documents).”

Information sources considered

- 1 Program website: Reference / Documentation, See figure “CDM Decision & documentation framework” (<https://cdm.unfccc.int/Reference/index.html>), last accessed on 9 June 2021.
- 2 CDM Executive Board decision and documentation framework. Version 04.0. Online available at: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20150529122719486/Info_Note02.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, Website: “Clarifications:

- Standards: Mandatory level of attainment of performance and/ or specification
- Procedures: Mandatory steps to achieve CMP decisions or Board standards
- Tools: Means of demonstrating specific requirements in standards and procedures
- Guidelines: Supplemental information for satisfying requirements such as recommended approaches or best practice examples
- Supplementary documents: Information notes, forms, glossaries.”

Provision 2 Source 2, Para.9, p.5: “The CDM body of documents includes:

- (a) Standards: Standards are designed to achieve a uniform approach to compliance with the CDM modalities and procedures. A standard describes mandatory levels of performance (policy standard) or provides mandatory specifications (methodological standard), and as such, is used as a reference point against which compliance is evaluated. Methodological standards include methodologies and methodological tools;
 - i. Methodologies: A baseline and monitoring methodology prescribes requirements to establish the baseline scenario, demonstrate additionality, define the project boundary and calculate and monitor emission reductions for CDM project activities and programme of activities;
 - ii. Methodological Tools: A methodological tool is used to calculate, determine, demonstrate, estimate, identify and/or test information relating to a CDM project activity or programme of activities. If a methodology refers to some or all components of a methodological tool, then the use of that tool is mandatory when applying that methodology.
- (b) Procedures: A procedure contains a mandatory series of actions that must be undertaken to demonstrate in a uniform and consistent way that the Board, the secretariat, project participants, DOEs and other stakeholders comply with the CDM modalities and procedures and the standards issued by the Board. Procedures relate to processes in the CDM project cycle and the operations of the Board and its support structure including, the rules of procedures of the Board and the terms of reference for the support structure;
- (c) Guidelines: A guideline contains supplemental information such as acceptable methods for satisfying requirements identified in standards or procedures, or instructions on how to fill out forms. Guidelines describe processes and are designed to promote a uniform approach to compliance with the applicable standards or procedures;

- (d) Clarifications: A clarification is issued to alleviate confusion relating to the application of requirements in a standard or procedure. Two types of clarifications are issued by the Board:
- i. Policy clarification: A clarification issued to alleviate confusion relating to the application of requirements in a policy standard or procedure. A policy clarification is published as an annex to the report of a Board meeting. It does not change the scope of the policy standard, procedure or requirements that it is clarifying. A policy clarification is transitory in nature, pending the subsequent revision¹ of the related policy standard or procedure which takes into account and incorporates the clarification;
 - ii. Methodological clarification: A clarification issued in response to a project participant(s), DOE or other stakeholder wishing to seek clarification on the applicability of a methodology or a methodological tool. A methodological clarification is issued in accordance with the relevant procedure.
- (e) Ruling notes. A ruling note explains the rationale behind a negative decision (ruling) of the Board regarding, inter alia, accrediting an operational entity (DOE), registering a project activity or programme of activities or issuing certified emission reductions (CERs). Ruling notes are made available as annexes to Board meeting reports or directly on the UNFCCC CDM website in cases where the secretariat is mandated to produce such notes;
- (f) Information notes: An information note contains factual information on a particular subject matter relating to the CDM rules and requirements, the functioning of the Board and its support structure, or rulings of the Board. Information notes do not contain requirements and may be published as annexes to the Board meeting annotated agendas or reports, or directly on the UNFCCC CDM website in cases where the secretariat is mandated to produce such notes. Information notes include concept notes for developing or revising regulatory or operational documents, summary notes, performance monitoring notes, and other types of notes explaining or providing information.
- (g) Forms: Forms are used to facilitate the submission of data or information required in the CDM project cycle. A form contains pre-defined data fields to be filled in by project participants or AEs/DOEs. Completing and submitting forms is part of a mandatory series of actions (how to), required by the CDM modalities and procedures, or a standard or procedure issued by the Board. Forms do not contain requirements and are published directly on the UNFCCC CDM website;
- (h) Glossaries: A glossary is an alphabetical list of terms relating to the CDM issued by the Board to facilitate a common understanding of terminology used in Board documentation;
- (i) Recommendations: A recommendation is a document recommending, endorsing or supporting a course of action. Recommendations from panels or working groups to the Board are published as annexes to the meeting reports of the panels or working groups, or directly published on the UNFCCC CDM website. Recommendations from the Board to the CMP may be published as annexes to the meeting reports of the Board and are included in the Board's annual report to the CMP."

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 2 defines the CDM document types and provides a clear distinction between mandatory requirements and guidance.

Indicator 5.2.8

Relevant scoring methodology provisions

“The program’s registry and project database are publicly accessible through the program's website. The registry includes for each carbon credit information on its status (active or cancelled), its serial number, and its issuance date. The project database includes detailed information on each credited activity, including all documentation required for the approval of the activity (e.g., project design documents, auditing reports, and supporting documentation), and all documentation required for the issuance of carbon credits (e.g., monitoring reports including reproducible emission reductions and/or removal calculations, auditing reports, and supporting documentation).”

Information sources considered

- 1 Program website: Project search (<https://cdm.unfccc.int/Projects/projsearch.html>), last accessed on 25 June 2021.
- 2 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 3 Program website: Issuance of CERs (https://cdm.unfccc.int/Issuance/cers_iss.html), last accessed on 25 June 2021.

Relevant carbon crediting program provisions

Provision 1 Source 2, Para.5, p.8: “The Executive Board shall supervise the CDM, under the authority and guidance of the COP/MOP, and be fully accountable to the COP/MOP. In this context, the Executive Board shall:(m) Develop and maintain a publicly available database of CDM project activities containing information on registered project design documents, comments received, verification reports, its decisions as well as information on all CERs issued;”

Assessment outcome

Yes (1 Point).

Justification of assessment

The project search on the CDM homepage (Source 1) lists all CDM projects in any phase of the registration process. For each project detailed information on the project documentation, such as

project design documents, monitoring reports, auditing reports, and supporting documents which constitute all documents required to reproduce emission reduction or removal calculations are made available.

Indicator 5.2.9

Relevant scoring methodology provisions

“The program requires that all relevant non-confidential project documentation, including reports from validation and verification entities, be disclosed. The program defines what information would qualify as “confidential”.”

Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Available at https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf.
- 2 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 3 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. APPENDIX D Clean development mechanism registry requirements. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 4 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX 1 Rules of procedure of the Executive Board of the clean development mechanism. Available at https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 5 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Available at https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf.
- 6 CDM project cycle procedure for programmes of activities. CDM-EB93-A09-PROC. Version 02.0. Document issued on 29 November 2018. Available at https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC_proc02v02.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, Para.19, p.8: “Disclose sufficient and appropriate project activity-related information in a truthful manner to allow intended users to make decisions with reasonable confidence. Do not disclose proprietary or confidential information marked as such by project participants without the written consent of the provider of the information, except as required by national law. In this context, information used to determine additionality, to describe the baseline methodology and its application, and

to support an environmental impact assessment shall not be considered as proprietary or confidential.”

Provision 2 Source 2, Para.6, p.9: “Information obtained from CDM project participants marked as proprietary or confidential shall not be disclosed without the written consent of the provider of the information, except as required by national law. Information used to determine additionality as defined in paragraph 43 below, to describe the baseline methodology and its application, and to support an environmental impact assessment referred to in paragraph 37 (c) below, shall not be considered as proprietary or confidential.”

Provision 3 Source 2, Para.27, p.12: “A designated operational entity shall: [...]

(h) Make information obtained from CDM project participants publicly available, as required by the Executive Board. Information marked as proprietary or confidential shall not be disclosed without the written consent of the provider of the information, except as required by national law. Information used to determine additionality as defined in paragraph 43 below, to describe the baseline methodology and its application, and to support an environmental impact assessment referred to in paragraph 37 (c) below, shall not be considered as proprietary or confidential.”

Provision 4 Source 2, Para. 40, p.15: “The designated operational entity shall: [...]

(b): In accordance with provisions on confidentiality contained in paragraph 27 (h) above, make publicly available the project design document;”

Provision 5 Source 2, Para. 62, p.18: “In accordance with the provisions on confidentiality in paragraph 27 (h) above, the designated operational entity contracted by the project participants to perform the verification shall make the monitoring report publicly available.”

Provision 6 Source 3, Para. 9, p.28: “The CDM registry shall make non-confidential information publicly available and provide a publicly accessible user interface through the Internet that allows interested persons to query and view it.”

Provision 7 Source 4, VII. Committees, panels and working group, Para. 5: “Reports of committees, panels and working groups to the Executive Board shall be made publicly available, subject to confidentiality provisions.”

Provision 8 Source 5 & 6, Para.55,167,169; p.15 and 31: “The secretariat shall maintain a publicly available list of all submitted requests for deviation on the UNFCCC CDM website, excluding supporting documentation provided by the DOE as confidential. The secretariat shall make publicly available the schedule of processing the requests for deviation, including the expected date of commencement. The secretariat shall schedule the commencement of the processing of the requests for deviation in accordance with the secretariat’s operational plans, that is, monthly quotas, which shall also incorporate any relevant instructions from the Board.

The secretariat may engage the DNAs of the Parties involved in the respective registered CDM project activity whenever issues resulting from insolvency and/or disputes over the designation of focal points are communicated to the secretariat. The

secretariat may provide information, subject to the confidentiality of such information, and/or administrative assistance to the DNAs, if so requested by the respective DNAs.

The secretariat shall display indicative information, subject to the confidentiality, on the respective registered CDM project activity page on the UNFCCC CDM website, related to the notifications to the secretariat of issues resulting from insolvency and/or of disputes only in the cases where the forwarding of CERs has been temporarily put on hold pending the resolution of the issues.”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires that all non-confidential information shall be made publicly available, including reports from validation and verification entities, reports of committees, project design documents panels and working groups to the Executive Board etc. No program provisions were located to define what may be considered confidential information. Therefore, the indicator is not fulfilled.

Indicator 5.2.10

Relevant scoring methodology provisions

“The program requires that information related to the determination of the baseline scenario, additionality, or the calculation of emission reductions or removals must be disclosed and cannot be considered confidential.”

Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Available at https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, Para. 19, p.9: “Disclose sufficient and appropriate project activity-related information in a truthful manner to allow intended users to make decisions with reasonable confidence. Do not disclose proprietary or confidential information marked as such by project participants without the written consent of the provider of the information, except as required by national law. In this context, information used to determine additionality, to describe the baseline methodology and its application, and to support an environmental impact assessment shall not be considered as proprietary or confidential.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program specifies that “information used to determine additionality, to describe the baseline methodology and its application, and to support an environmental impact assessment shall not be considered as proprietary or confidential” (Provision 1). The indicator is therefore fulfilled.

Scoring results

According to the above assessment, the carbon crediting program receives 9 out of 11 achievable points. Applying the scoring approach of the methodology, this results in a score of 4.09.