

Call for public input	A6.4-MEP003-A01: Draft Standard: Setting the baseline in mechanism methodologies (v. 01.0)
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Legend for Columns

- 1 = Section Number in the document
- 2= Paragraph number
- 3 = Comment – the actual feedback or observation, including justification for what needs changing
- 4 = Proposed change – suggest the text if possible

A6.4-MEP003-A01 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
2	5 (c)	BAT is a moving target continuously changing with time and progress in technology development.	In the first line insert words “at any given point of time” after the words “the practice/technology/measure that” to read as 5 (c) Best available technology (BAT) – the practice/technology/measure that at any given point of time provides a similar output
2	5 (c)	The definition of BAT includes last sentence “under viable conditions, taking into consideration costs and benefits”. This will mean BAT is different for different end users depending on their financial position that decides what is viable for them.	Suggest removing the text “under viable conditions, taking into consideration costs and benefits”
2	5(g)	Definition of “Legal requirements”. In many host countries there are legal requirements, that are systematically not adhered to.	At the end of the sentence add the words “which are enforced in the host country”
2	5(m)	Definition of Remaining Lifetime – since major repair and overhaul may extend the remaining lifetime of an equipment, this possibility should not be allowed.	Insert the words “without undergoing any major repair or overhaul,” after the words “certain practice would remain in place,”. To read as “the remaining lifetime during which an equipment would continue operating and/or a certain practice would remain in place, without undergoing any major repair or overhaul, given limitations such as technical lifetime, economic lifetime, requirements of laws or regulations, or any other factor which would lead to the discontinuation of the use of the equipment and/or practice”
5(1)	17	This para requires need to consider “global conditions when setting the baseline”. However, it is not appropriate for Art 6.4 Mechanism activities since they are for generating credits which are tradable across national borders. Although the technological factors may be globally applicable, trade parameters like taxes and tariffs are host country specific.	Delete the requirement pertaining to global references and conditions from this para.
5(1)	19	This para suggests that Mechanism methodologies shall encourage ambition through decreasing the crediting baseline for emission reductions activities. Further, it is suggested that this may be operationalised either as an annual change relying on an annual improvement, or as a larger step-change at the renewal of the crediting period, with justification and where applicable. However, this is unfair to the project owner, who has undertaken a A6.4 Mech activity having considered the baseline as on the Starting date of the activity. They do not have any control over changes in technology or level of penetration of the adopted technology.	It is suggested that changes in baseline should be applicable only at the renewal of the crediting period.

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Section no.	Para. no.	Comment	Proposed change (Include proposed text)
6.1	31 (a)	The last line of this para reads as “An economically viable course of action does not need to be viable for all companies under all circumstances”. With this qualification it is not clear which BAT is to be considered as baseline scenario.	Clarify and revise the sentence.
6.1	31 (b)	The last line of this para ends with words “seeks to reasonably minimize environmental harm”. This is a subjective statement. It is not clear “reasonable” from whose point of view?	Consider revising this statement to remove the subjectivity.
9	64 to 70	The entire section 9 is unfair to the project activity owners. The conditions in 65 (a) are beyond the Activity owners’ control, who may default on delivery of emission reductions to the buyer of credits. The conditions stipulated in the registered project activity should be valid at least for the first crediting period. At the renewal of crediting period this can be checked.	This entire Section should be removed.