Response to the Call for public input on determination and verification manual (DVM)

Name and Affiliation

"Guide to determination and verification procedures under the Kyoto Protocol's Flexibility Mechanisms JI and CDM according to good practice"

Expected nature and purpose of a DVM

The Guide should provide insight into good practice of determination and verification procedures under JI and CDM and should regulate the respective services market. It should set quality levels and timelines for the performance of these services, and appropriate amounts of manpower input for the different steps required. It should build on experience collected by A6SC, CDM EB, and by DOEs and AIEs in different countries during the development of different project types and seizes.

Areas of the DVM that may be relevant to the development of a DVM, as appropriate

1.) The DVM should provide transparency on JI and CDM practice for businesses which would be willing to participate in the implementation of or to perform projects under the Joint Implementation and Clean Development Mechanisms but which did not collect respective experience so far.

2.) Standardization in environmental reporting procedures is urgently needed. The DVM should therefore refer to standards, requirements and schemes for environmental reporting which were developed by different organizations during the past years such as

ISO 14063

http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=34676

ISO 14064 http://www.iso.org/iso/catalogue_detail?csnumber=38381

ISO 14065 http://www.iso.org/iso/catalogue_detail?csnumber=40685

ISO 14066

http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=43277

ISO 14067

http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=43278

The EU Eco-Management and Audit Scheme (EMAS) http://ec.europa.eu/environment/emas/index_en.htm

the WBCSD/WRI's GHG Protocol http://www.ghgprotocol.org/

the Global Reporting Initiative <u>http://www.globalreporting.org/</u>

the Climate Registry's General Reporting Protocol http://www.theclimateregistry.org/protocols.html

practice collected under SEIS http://ec.europa.eu/environment/seis/index.htm and under

EMEP/CORINAIR Emission Inventory

http://reports.eea.europa.eu/EMEPCORINAIR4/en/page002.html

Reporting under the EU ETS http://ec.europa.eu/environment/climat/emission/mrg_en.htm

Reporting under the Western Climate Initiative WCI http://www.westernclimateinitiative.org/WCI_Documents.cfm

The European Environmental Agency's European Environment Information and Observation Network <u>http://www.eionet.europa.eu/seris</u>

The US DOE's Voluntary Reporting of Greenhouse Gases (1605(b)) Program http://www.pi.energy.gov/enhancingGHGregistry/keydocslinks.html

The US EPA's Greenhouse Gas Reporting Rule <u>http://www.epa.gov/climatechange/emissions/ghgrulemaking.html</u>,

in order to provide businesses with certainty that

- determination and verification procedures under the Kyoto Protocol's Flexibility Mechanisms JI and CDM are in accordance with major reporting initiatives which have developed so far and that
- procedures applied during the determination and verification are standardized at a global level.

This way a quick and efficient development of the respective services market can be supported which is attractive for organizations being interested to offer their services on a world-wide basis.

Reason(s) for the suggestion

Setting this type of standard will allow integrating the implementation of JI and CDM projects into regular business planning with regard to time, effort and budget required during project development, and with existing environmental reporting as well.

The various environmental reporting systems being applied so far look un-coordinated which decreases their acceptance. Standardising determination and verification services and procedures under the JI and the CDM with applied environmental reporting systems will create trust, streamline services and reduce cost for business.

Other comments

See also http://ec.europa.eu/environment/climat/emission/pdf/way_forward/ws2/a_barkmann_eea.pdf

Mit freundlichen Grüßen / Best regards

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P.S.: Similar standardization tasks apply to financial product risk management.