



Climate

GREEN-E CLIMATE ENDORSEMENT OF GHG PROJECT CERTIFICATION PROGRAMS *Electronic Comment Form*

GHG Project Certification Program: The Clean Development Mechanism
Date of Form: December 5, 2007
Comment Due Date: January 10, 2007
Response Recipient: CRS at comments@resource-solutions.org
Response Options: E-mail to comments@resource-solutions.org
Facsimile to (415) 561-2105
U.S. mail to address provided below

The Center for Resource Solutions (CRS) is excited to invite stakeholders to comment on the proposed Green-e Climate endorsement of the United Nations Framework Convention on Climate Change's Clean Development Mechanism: <http://cdm.unfccc.int>

Green-e Climate seeks stakeholder feedback to ensure that endorsed GHG Project Certification Programs meet the Green-e Climate Standard, and that GHG reductions certified by endorsed programs result in real, verifiable, enforceable, permanent and additional reductions. The specific principles and criteria of the Green-e Climate Standard that apply to regulatory project certification are Principle 1(a) and 1(e); Principle 3(d-g); Principle 4(c) and Principle 5(a-c, e) as well as Project Specific Criteria (Section 7.2). The Green-e Climate Standard can be found at: http://resource-solutions.org/mv/docs/Ge_GHG_Product_Standard_V1.pdf

Background information on the Clean Development Mechanism can be found on the Green-e Climate website at http://www.green-e.org/getcert_ghg_endorsed.shtml. Based on comments received during this stakeholder consultation, the Green-e Governance Board will make a determination on the proposed endorsement of the Clean Development Mechanism.

More information about how the Green-e Climate program will interact with endorsed programs can be found on the Green-e Climate website at www.green-e.org/climate

Stakeholder comments on these Programs are due by the 10th of January 2008.

How the Comment Forms will be Recorded and the Process Going Forward:
Stakeholders have until January 10, 2008 to submit comments. The Green-e Governance Board will weigh the balance of comments and degree of consensus

Green-e Climate Stakeholder Process
Comment Form: The Clean Development Mechanism

achieved in making their final decision of which GHG Project Certification Programs to endorse.

All comments received and a written synopsis of how issues raised were addressed will be placed on the Green-e website.

Electronic Comment Form: The Clean Development Mechanism

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Comment Space:

(Add additional pages if necessary)

1. Comments addressing the Clean Development Mechanism conformance with Green-e Climate Standard (please cite section of standard and the specific procedure/requirements in the endorsed program):

The CDM acknowledges hydro power projects beyond 10 MW (non-compliance with section 7.2 of the standard) and A/R projects (problem of “permanence” criteria). Forestry emission reduction credits are by definition temporary credits, under the CDM even explicitly temporary. Therefore, a mechanism assuring replacement of the temporary credits by other CERs/credits in case of expiring has to be found. The same is true for VCS and VER+ forestry credits where there is some kind of safeguard measure but no actual replacement guarantee

2. Other Comments:

In order to guarantee promotion of sustainable energy projects the following CDM project types should not be included in Green-e Climate Standard:

- HFC, SF6, N20 projects
- Fossil fuel (efficiency and switch) projects