



Tool for the demonstration and assessment of additionality

1. This document provides for a step-wise approach to demonstrate and assess additionality. These steps include:

- Identification of alternatives to the project activity;
- Investment analysis to determine that the proposed project activity is not the most economically or financially attractive;
- Barriers analysis;
- Common practice analysis; and
- Impact of registration of the proposed project activity as a CDM project activity.

Based on information about activities similar to the proposed project activity, the common practice analysis is to complement and reinforce the investment and barriers analysis. The steps are summarized in the flow-chart at the end of this document.

2. The document provides a general framework for demonstrating and assessing additionality and is to be applicable to a wide range of project types. Particular project types may require adjustments to this framework.

3. The use of this tool to assess and determine additionality does not replace the need for the baseline methodology to provide for a stepwise approach justifying the selection and determination of the most plausible baseline scenario alternatives. Project participants proposing new baseline methodologies shall ensure consistency between the determination of additionality of a project activity and the determination of a baseline scenario.

4. Project participants proposing new baseline methodologies may incorporate this consolidated tool in their proposal. Project participants may also propose other tools for the demonstration of additionality to the Executive Board for its consideration.

Step 0. Preliminary screening based on the starting date of the project activity

The Marrakesh Accords and decision 18/CP.9 provide guidance on the eligibility of a proposed CDM project activity which started before registration¹.

1. If project participants wish to have the crediting period starting prior to the registration of their project activity, they shall:

- (a) Provide evidence that the starting date of the CDM project activity falls between 1 January 2000 and the date of the registration of a first CDM project activity, bearing in mind that only CDM project activities submitted for registration before 31 December 2005 may claim for a crediting period starting before the date of registration; and
- (b) Provide evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project activity. This evidence shall be based on (preferably

¹ For more information see decisions 17/CP.7 and 18/CP.9 (documents FCCC/CP/2001/13/Add.2, FCCC/CP/2003/6/Add.2) and the Glossary of CDM terms contained in the guidelines for completing the project design document (CDM-PDD) available on the UNFCCC CDM web site: unfccc.int/cdm.



official, legal and/or other corporate) documentation that was available to third parties at, or prior to, the start of the project activity.

Step 1. Identification of alternatives to the project activity consistent with current laws and regulations

(Note: In accordance with guidance by the Executive Board, consistency is to be ensured between “baseline scenario” and “baseline emissions”²)

Define realistic and credible alternatives³ to the project activity(s) that can be (part of) the baseline scenario through the following sub-steps:

Sub-step 1a. Define alternatives to the project activity:

1. Identify realistic and credible alternative(s) available to the project participants or similar project developers⁴ that provide outputs or services comparable with the proposed CDM project activity⁵. These alternatives are to include:

- The proposed project activity not undertaken as a CDM project activity;
- All other plausible and credible alternatives to the project activity that deliver outputs and on services (e.g. electricity, heat or cement) with comparable quality, properties and application areas;
- If applicable, continuation of the current situation (no project activity or other alternatives undertaken).

Sub-step 1b. Enforcement of applicable laws and regulations:

2. The alternative(s) shall be in compliance with all applicable legal and regulatory requirements, even if these laws and regulations have objectives other than GHG reductions, e.g. to mitigate local air pollution.⁶ (This sub-step does not consider national and local policies that do not have legally-binding status.⁷).

² Please refer to paragraph 2 of Annex 3 of the report of the Executive Board at its ninth meeting, see: <http://cdm.unfccc.int/EB/Meetings/009/eb09repa3.pdf>.

³ Reference to “alternatives” throughout this document denotes “alternative scenarios”.

⁴ For example, a coal-fired power station or hydropower may not be an alternative for an independent power producer investing in wind energy or for a sugar factory owner investing in a co-generation, but may be an alternative for a public utility. Alternatives are, therefore, related to technology and circumstances as well as to the investor.

⁵ For example, the outputs of a cogeneration project could include heat for on-site use, electricity for on-site use, and excess electricity for export to the grid. In the case of a proposed landfill gas capture project, the service provided by the projects includes operation of a capped landfill.

⁶ For example, an alternative consisting of an open, uncapped landfill would be non-complying in a country where this scenario would imply violations of safety or environmental regulations pertaining to landfills.

⁷ This aspect may be modified based on forthcoming guidance from the Executive Board on national and sectoral policies.



3. If an alternative does not comply with all applicable legislation and regulations, then show that, based on an examination of current practice in the country or region in which the law or regulation applies, those applicable legal or regulatory requirements are systematically not enforced and that non-compliance with those requirements is widespread in the country. If this cannot be shown, then eliminate the alternative from further consideration;

4. If the proposed project activity is the only alternative amongst the ones considered by the project participants that is in compliance with all regulations with which there is general compliance, then the proposed CDM project activity is not additional.⁸

→ *Proceed to Step 2 (Investment analysis) or Step 3 (Barrier analysis). (Project participants may also select to complete both steps 2 and 3.)*

Step 2. Investment analysis

Determine whether the proposed project activity is the economically or financially less attractive than other alternatives without the revenue from the sale of certified emission reductions (CERs). To conduct the investment analysis, use the following sub-steps:

Sub-step 2a. Determine appropriate analysis method

1. Determine whether to apply simple cost analysis, investment comparison analysis or benchmark analysis (sub-step 2b). If the CDM project activity generates no financial or economic benefits other than CDM related income, then apply the simple cost analysis (Option I). Otherwise, use the investment comparison analysis (Option II) or the benchmark analysis (Option III).

Sub-step 2b. – Option I. Apply simple cost analysis

2. Document the costs associated with the CDM project activity and demonstrate that the activity produces no economic benefits other than CDM related income.

→ *If it is concluded that the proposed CDM project activity is not financially attractive then proceed to Step 4 (Common practice analysis).*

Sub-step 2b. – Option II. Apply investment comparison analysis

3. Identify the financial indicator, such as IRR⁹, NPV, cost benefit ratio, or unit cost of service (e.g., levelized cost of electricity production in \$/kWh or levelized cost of delivered heat in \$/GJ) most suitable for the project type and decision-making context.

⁸ This provision may be further elaborated depending on deliberation from the Board regarding requirements for the renewal of a crediting period.

⁹ For the investment comparison analysis, IRRs can be calculated either as project IRRs or as equity IRRs. Project IRRs calculate a return based on project cash outflows and cash inflows only, irrespective the source of financing. Equity IRRs calculate a return to equity investors and therefore also consider amount and costs of available debt financing. The decision to proceed with an investment is based on returns to the investors, so equity IRR will be more appropriate in many cases. However, there will also be cases where a project IRR may be appropriate.

***Sub-step 2b – Option III. Apply benchmark analysis***

4. Identify the financial indicator, such as IRR¹⁰, NPV, cost benefit ratio, or unit cost of service (e.g., levelized cost of electricity production in \$/kWh or levelized cost of delivered heat in \$/GJ) most suitable for the project type and decision context. Identify the relevant benchmark value, such as the required rate of return (RRR) on equity. The benchmark is to represent standard returns in the market, considering the specific risk of the project type, but not linked to the subjective profitability expectation or risk profile of a particular project developer. Benchmarks can be derived from:

- Government bond rates, increased by a suitable risk premium to reflect private investment and/or the project type, as substantiated by an independent (financial) expert;
- Estimates of the cost of financing and required return on capital (e.g. commercial lending rates and guarantees required for the country and the type of project activity concerned), based on bankers views and private equity investors/funds' required return on comparable projects;
- A company internal benchmark (weighted average capital cost of the company) if there is only one potential project developer (e.g. when the project activity upgrades an existing process). The project developers shall demonstrate that this benchmark has been consistently used in the past, i.e. that project activities under similar conditions developed by the same company used the same benchmark.

Sub-step 2c. Calculation and comparison of financial indicators (only applicable to options II and III):

5. Calculate the suitable financial indicator for the proposed CDM project activity and, in the case of Option II above, for the other alternatives. Include all relevant costs (including, for example, the investment cost, the operations and maintenance costs), and revenues (excluding CER revenues, but including subsidies/fiscal incentives¹¹ where applicable), and, as appropriate, non-market cost and benefits in the case of public investors.

6. Present the investment analysis in a transparent manner and provide all the relevant assumptions in the CDM-PDD, so that a reader can reproduce the analysis and obtain the same results. Clearly present critical techno-economic parameters and assumptions (such as capital costs, fuel prices, lifetimes, and discount rate or cost of capital). Justify and/or cite assumptions in a manner that can be validated by the DOE. In calculating the financial indicator, the project's risks can be included through the cash flow pattern, subject to project-specific expectations and assumptions (e.g. insurance premiums can be used in the calculation to reflect specific risk equivalents).

7. Assumptions and input data for the investment analysis shall not differ across the project activity and its alternatives, unless differences can be well substantiated.

¹⁰ For the benchmark analysis, the IRR shall be calculated as project IRR. If there is only one potential project developer (e.g. when the project activity upgrades an existing process), the IRR shall be calculated as equity IRR.

¹¹ This provision may be further elaborated depending on deliberations by the Board on national and sectoral policies.



8. Present in the CDM-PDD submitted for validation a clear comparison of the financial indicator for the proposed CDM activity and:
- (a) The alternatives, if Option II (investment comparison analysis) is used. If one of the other alternatives has the best indicator (e.g. highest IRR), then the CDM project activity can not be considered as the most financially attractive;
 - (b) The financial benchmark, if Option III (benchmark analysis) is used. If the CDM project activity has a less favourable indicator (e.g. lower IRR) than the benchmark, then the CDM project activity cannot be considered as financially attractive.

Sub-step 2d. Sensitivity analysis (only applicable to options II and III):

9. Include a sensitivity analysis that shows whether the conclusion regarding the financial attractiveness is robust to reasonable variations in the critical assumptions. The investment analysis provides a valid argument in favour of additionality only if it consistently supports (for a realistic range of assumptions) the conclusion that the project activity is unlikely to be the most financially attractive (as per step 2c para 8a) or is unlikely to be financially attractive (as per step 2c para 8b).

→ If after the sensitivity analysis it is concluded that the proposed CDM project activity is unlikely to be the most financially attractive (as per step 2c para 8a) or is unlikely to be financially attractive (as per step 2c para 8b), then proceed to Step 3 (Barrier analysis) or Step 4 (Common practice analysis).

→ Otherwise, unless barrier analysis below is undertaken and indicates that the proposed project activity faces barriers that do not prevent the baseline scenario(s) from occurring, the project activity is considered not additional.

Step 3. Barrier analysis

If this step is used, determine whether the proposed project activity faces barriers that:

- (a) Prevent the implementation of this type of proposed project activity; and
- (b) Do not prevent the implementation of at least one of the alternatives.

Use the following sub-steps:

Sub-step 3a. Identify barriers that would prevent the implementation of type of the proposed project activity:

1. Establish that there are barriers that would prevent the implementation of the type of proposed project activity from being carried out if the project activity was not registered as a CDM activity. Such barriers may include, among others:

Investment barriers, other than the economic/financial barriers in Step 2 above, *inter alia*:

- Debt funding is not available for this type of innovative project activities.
- No access to international capital markets due to real or perceived risks associated with domestic or foreign direct investment in the country where the project activity is to be implemented.



Technological barriers, *inter alia*:

- Skilled and/or properly trained labour to operate and maintain the technology is not available and no education/training institution in the host country provides the needed skill, leading to equipment disrepair and malfunctioning;
- Lack of infrastructure for implementation of the technology.

Barriers due to prevailing practice, *inter alia*:

- The project activity is the “first of its kind”: No project activity of this type is currently operational in the host country or region.

The identified barriers are only sufficient grounds for demonstration of additionality if they would prevent potential project proponents from carrying out the proposed project activity if it was not expected to be registered as a CDM activity.

2. Provide transparent and documented evidence, and offer conservative interpretations of this documented evidence, as to how it demonstrates the existence and significance of the identified barriers. Anecdotal evidence can be included, but alone is not sufficient proof of barriers. The type of evidence to be provided may include:

- (a) Relevant legislation, regulatory information or industry norms;
- (b) Relevant (sectoral) studies or surveys (e.g. market surveys, technology studies, etc) undertaken by universities, research institutions, industry associations, companies, bilateral/multilateral institutions, etc;
- (c) Relevant statistical data from national or international statistics;
- (d) Documentation of relevant market data (e.g. market prices, tariffs, rules);
- (e) Written documentation from the company or institution developing or implementing the CDM project activity or the CDM project developer, such as minutes from Board meetings, correspondence, feasibility studies, financial or budgetary information, etc;
- (f) Documents prepared by the project developer, contractors or project partners in the context of the proposed project activity or similar previous project implementations;
- (g) Written documentation of independent expert judgements from industry, educational institutions (e.g. universities, technical schools, training centres), industry associations and others.

Sub-step 3 b. Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity):

3. If the identified barriers also affect other alternatives, explain how they are affected less strongly than they affect the proposed CDM project activity. In other words, explain how the identified barriers are not preventing the implementation of at least one of the alternatives. Any alternative that would be prevented by the barriers identified in Sub-step 3a is not a viable alternative, and shall be eliminated from consideration. At least one viable alternative shall be identified.

→ If both Sub-steps 3a – 3b are satisfied, proceed to Step 4 (Common practice analysis)

→ If one of the Sub-steps 3a – 3b is not satisfied, the project activity is not additional.



Step 4. Common practice analysis

The above generic additionality tests shall be complemented with an analysis of the extent to which the proposed project type (e.g. technology or practice) has already diffused in the relevant sector and region. This test is a credibility check to complement the investment analysis (Step 2) or barrier analysis (Step 3). Identify and discuss the existing common practice through the following sub-steps:

Sub-step 4a. Analyze other activities similar to the proposed project activity:

1. Provide an analysis of any other activities implemented previously or currently underway that are similar to the proposed project activity. Projects are considered similar if they are in the same country/region and/or rely on a broadly similar technology, are of a similar scale, and take place in a comparable environment with respect to regulatory framework, investment climate, access to technology, access to financing, etc. Other CDM project activities are not to be included in this analysis. Provide quantitative information where relevant.

Sub-step 4b. Discuss any similar options that are occurring:

2. If similar activities are widely observed and commonly carried out, it calls into question the claim that the proposed project activity is financially unattractive (as contended in Step 2) or faces barriers (as contended in Step 3). Therefore, if similar activities are identified above, then it is necessary to demonstrate why the existence of these activities does not contradict the claim that the proposed project activity is financially unattractive or subject to barriers. This can be done by comparing the proposed project activity to the other similar activities, and pointing out and explaining essential distinctions between them that explain why the similar activities enjoyed certain benefits that rendered it financially attractive (e.g., subsidies or other financial flows) or did not face the barriers to which the proposed project activity is subject.

3. Essential distinctions may include a serious change in circumstances under which the proposed CDM project activity will be implemented when compared to circumstances under which similar projects were carried out. For example, new barriers may have arisen, or promotional policies may have ended, leading to a situation in which the proposed CDM project activity would not be implemented without the incentive provided by the CDM. The change must be fundamental and verifiable.

→ If Sub-steps 4a and 4b are satisfied, i.e. similar activities cannot be observed or similar activities are observed, but essential distinctions between the project activity and similar activities can reasonably be explained, please go to step 5 (Impact of CDM registration).

→ If Sub-steps 4a and 4b are not satisfied, i.e. similar activities can be observed and essential distinctions between the project activity and similar activities cannot reasonably be explained, the proposed CDM project activity is not additional.



Step 5. Impact of CDM registration

Explain how the approval and registration of the project activity as a CDM activity, and the attendant benefits and incentives derived from the project activity, will alleviate the economic and financial hurdles (Step 2) or other identified barriers (Step 3) and thus enable the project activity to be undertaken. The benefits and incentives can be of various types, such as:

- Anthropogenic greenhouse gas emission reductions;
- The financial benefit of the revenue obtained by selling CERs,
- Attracting new players who are not exposed to the same barriers, or can accept a lower IRR (for instance because they have access to cheaper capital),
- Attracting new players who bring the capacity to implement a new technology, and
- Reducing inflation /exchange rate risk affecting expected revenues and attractiveness for investors.

→ *If Step 5 is satisfied, the proposed CDM project activity is not the baseline scenario.*

→ *If Step 5 is not satisfied, the proposed CDM project activity is not additional.*



Flowchart: Additionality scheme

