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To whom it may concern

Incentives for Global Health has asked TUEV SUED to comment on the feasibility of measuring emissions averted by technological innovations as would be required in operating the Green Impact Fund for Technology (GIFT) or a pilot for it.

As CEO of the Division Industry Service at TUEV SUED since 2017 and former CEO of TUEV Hesse in Germany, I have extensive experience in the field of technology assessment with regard to the low carbon energy transition.

The Green Impact Fund for Technology (GIFT) is designed so that innovative companies earn payments based on the assessed emission reductions attributable to the use of their GIFT-registered technologies – in low- and lower-middle income countries. Such assessments require comparison of actual emissions with those that would have occurred if the relevant technology had not been deployed. The viability of the GIFT presupposes that such assessments can be performed at reasonable cost.

Based on my own experience working in the field of green technology and after consultations with experts in the field of averted emissions measurement, I conclude that this is indeed feasible. Such assessments are similar to those TUEV SUED conducts regularly of projects meant to reduce emissions or to absorb emissions from the atmosphere. Those assessments take place based on existing standards (such as the Verified Carbon Standard or the Gold Standard) and TUEV SUED acts as a third party verifier. Those standards have been transparently developed, evaluated and improved over more than two decades after the Certified Emissions Reduction (CER) model was established under the Kyoto Protocol.

The GIFT mechanism is new and hence its performance should be assessed and improved during its operation. The GIFT aims to operate across countries, which each have different market conditions for green technologies. This creates challenges for assessing averted emissions under varying conditions. Furthermore, the field of technologies with impact on greenhouse gas emissions is broad and technologies may combine components originating from different companies so that attribution of emission reductions may not be straightforward. These are examples showing that measuring averted emissions within the GIFT concept comes with additional challenges compared to some projects currently being assessed and certified. However, we think that such challenges can be addressed; the proposed GIFT pilot, which I would be delighted to see funded, would provide an ideal testing ground.

In summary, assessment of emissions averted through deployment of new green technologies is feasible. TUEV SUED and similar organizations already have the pertinent practical experience needed for such an effort.

Yours sincerely,

Reiner Block