



**CDM: Response form for request for clarification on
Approved Methodologies
(version 01.1)**

<i>Date of Meth Panel meeting:</i>	22 - 26 June 2009
<i>Title and number of request for clarification</i>	Applicability of methodology for PoA and practical issues of RDF production and usage AM_CLA_0151

Summary of the query:

Please use the space below to summarize the request for clarification on the related approved methodologies.

The request for clarification refers to methodology AM0025 version 11 “Avoided emissions from organic waste through alternative waste treatment processes”.

The project activity underlying this request for clarification is the installation of more than **15 plants** in all regions of Pakistan to process municipal waste into **fuel and compost**. This request is mainly to determine if project activities using AM0025 can be implemented in the framework of a PoA or have to be registered as separate CDM project activities.

The project proponents stated that “Being permitted to use the PoA approach would greatly speed up commissioning of the plants as well as add necessary flexibility to increase capacities where needed to match economic development during the project period. Combining several RDF production facilities and consumers also increases reliability of waste processing and fuel supply. This is instrumental to reduce the technical and financial risk for the investors as well as provide the RDF consumers with delivery guarantees”.

Further guidance is needed on how AM0025 can be applied to the industrial practice of RDF production and utilization.

This request seeks clarification on the following:

1. Regarding the *applicability of project activities using AM0025 for PoA*:

1.a) Is it possible to apply AM0025 in the framework of PoA provided that:

- All installations are in the same country;
- The technologies used for treatment are all covered by the CDM-PDD (various forms of mechanical treatment of municipal waste);
- The management company is identical for all CPA;
- The monitoring procedure for all CPA is standardized;
- The legal conditions for each CPA are very similar at each site;
- The situation of waste disposal is identical (no other form of waste disposal than dumping);
- The baseline for each individual CPA is dynamically adapted to local conditions according to the "Tool to determine methane emissions avoided from disposal of waste at a solid waste disposal site";
- All individual CPA will record all monitoring data according to AM0025;
- Monitoring data of all CPA-facilities will be centrally recorded and are available for verification;
- All consumers of RDF will be subject to monitoring as required by AM0025;
- All RDF consumers are within the same country as the PoA.

- 1.b) Is a local stakeholder consultation necessary for each CPA in addition to a nation-wide stakeholder consultation in the framework of the initial PoA approval, provided that each site is already subject to an environmental impact study according to national law?
2. Regarding **usage of agriculture wastes and other waste materials to increase calorific value of RDF** from municipal waste: The project management intends to mix RDF from municipal solid waste with agriculture waste and other waste-materials to reach necessary calorific value as required by industrial consumers. This is the industrial practice for RDF production worldwide and especially necessary in the context of developing countries where the calorific value of municipal solid waste is generally too low for direct utilization. Agriculture waste and other wastes (like waste paper, waste wood, used tires) would be specifically **purchased** in the framework of the project activity to be mixed with the RDF originating from municipal solid waste. RDF consumers demand constant monitoring of the RDF consistence and calorific value. Waste-materials that would be actively purchased would not be included into the baseline for avoided landfill gas emissions.
- 2.a) Is it possible to assess the combined organic carbon content of the RDF for substitution of fossil fuel? (It is technical feasible to assess the complete organic fuel content by C14 tests without any changes in the methodology, whereby a separate assessment of biogenic carbon from municipal solid waste and additional waste-materials is technically not feasible). It is essential for the project to claim also the emission reductions that derive from the organic content of the purchased waste materials.
- 2.b) Is it possible to dose RDF and other wastes necessary to provide sufficient calorific value at the side of the RDF consumer or has the RDF to be readily dosed at the municipal solid waste plant site? Provided complete inclusion of all mass flow measurements on the RDF dosing device on consumer site in the monitoring plan of the project activity, permission to include the dosing device at the RDF consumer into the project boundary would greatly reduce costs and emissions from transport of agriculture and other waste-materials. This additional waste materials could be directly delivered to the consumer site and mixed there under supervision of the CDM project management.
- 3) Is it possible to ignore any potential emissions from transport of RDF and waste materials used for RDF production within the country the PoA takes place provided:
- The fossil fuel replaced by the project activity is completely imported and is transported for far longer distances than the RDF;
 - All transport related emissions to import any waste-materials to increase the calorific value of the RDF are separately monitored and added to the project related emissions.

Recommendation by the Meth Panel:

Please use the space below to provide amendments /changes (in your expert view, if necessary).

The Meth Panel clarifies the following:

- 1.a) AM0025 can be used for a PoA provided that the latest version of the “Procedures for registration procedures for registration of a programme of activities as a single CDM project activity and issuance of certified emission reductions for a programme of activities” [\(<https://cdm.unfccc.int/Reference/Procedures/PoA_proc01.pdf>](https://cdm.unfccc.int/Reference/Procedures/PoA_proc01.pdf) is followed;
- 1.b) The local stakeholder consultation can be done either at a PoA level or at a CPA level. The “Procedures for registration procedures for registration of a programme of activities as a single CDM project activity and issuance of certified emission reductions for a programme of activities” (Version 03) further clarified that “If comments by local stakeholders were invited with regard to the total PoA, information on how comments by local stakeholders were invited, a summary of the comments received and how due account was taken of any comments received, as applicable. If such comments are to be sought at the CPA level this shall be described and reflected in the CDM-POA-DD and the CDM-CPA-DD;”
- 2.a) and 2.b):

The use of other waste materials to increase the calorific value of the RDF is not allowed under the current version of the methodology. Therefore, a **request for revision** should be submitted, taking also into account leakage from previous uses of the waste that is now used to improve the RDF calorific value;
- 3) Off site transportation is estimated in the methodology as leakage emissions due to transportation ($L_{t,y}$). The methodology states that “The project may result in a change in transport emissions. This would occur when the waste is transported from waste collecting points, in the collection area, to the treatment facility, instead of to existing landfills. When it is likely that the transport emissions will increase significantly, such emissions should be incorporated as leakage. In this case, project participants shall document the following data in the CDM-PDD: an overview of collection points from where the waste will be collected, their approximate distance (in km) to the treatment facility, existing landfills and their approximate distance (in km) to the nearest end-user”. The methodology also estimates emissions from fuel use on-site ($PE_{fuel, on-site,y}$), in which emissions from fossil fuels used in vehicles used on-site are accounted for. The current version of the methodology does not allow neglecting transportation emissions if it cancels out with other sources of emissions in the baseline. A request for revision should be submitted in case such approach is proposed.

Answer to authors of the request for clarification by the Meth Panel :

Please use the space below to provide an answer to the authors of the above query

Please refer to the text above.



Signature of Meth Panel Chair

Date: 26/06/2009

(Philip Gwage)



Signature of Meth Panel Vice-Chair

Date: 26/06/2009

(Pedro Martins Barata)

Information to be completed by the secretariat

F-CDM-AM	AM_CLA_0151
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