

Draft consolidated baseline methodology for industrial fuel switching from coal or oil to natural gas

1. Sources

This consolidated baseline methodology is based on elements from the following methodologies:

- NM0131 “Baseline methodology for project activities involving fuel-switching measures at an industrial facility” prepared by MGM International and Alicorp S.A.
- NM0132 “Industrial fuel switching from petroleum fuels to natural gas without extension of capacity and lifetime of the facility where barriers to switching exist” prepared by Nexant, Inc. and Sinai Cement Company
- AM0008 “Industrial fuel switching from coal and petroleum fuels to natural gas without extension of capacity and lifetime of the facility”, which was based on the NM0016-rev “Graneros Plant Fuel Switching Project” whose project design document was prepared by MGM International, Inc., in August 2003.

For more information regarding the proposals and their consideration by the Executive Board please refer to <http://cdm.unfccc.int/methodologies/approved>.

2. Applicability

This methodology is applicable to project activities that switch in one or several *element processes*¹ of an industrial facility from coal or oil to natural gas. The fuel switching is undertaken in processes for heat generation that are located at and directly linked to an industrial process with a main output other than heat. Furthermore, the following conditions apply:

- Prior to the implementation of the project activity, only coal or oil (but not natural gas) have been used in the element processes;
- Regulations/programs do not constrain the facility from using the fossil fuels being used prior to fuel switching;
- Regulations do not require the use of natural gas or any other fuel in the element processes;
- The project activity does not increase the capacity of thermal output or lifetime of the element processes during the crediting period (i.e. emission reductions are only accounted up to the end of the lifetime of the relevant element process), nor is there any thermal capacity expansion planned for the project facility during the crediting period;
- The proposed project activity does not result in integrated process change;
- The natural gas used in the project activity is not generated from liquified natural gas (LNG) or compressed natural gas (CNG).

¹ An “*element process*” is defined as fuel combustion in an equipment at one point of an industrial facility, for the purpose of providing thermal energy (the fuel is not combusted for electricity generation or used as oxidant in chemical reactions or otherwise used as feedstock). Examples of an element process are steam generation by a boiler and hot air generation by a furnace”. Each element process should generate a single output (such as steam or hot air) by using mainly a single fuel (not plural energy sources). For each element process, energy efficiency is defined as the enthalpy of the thermal output divided by the enthalpy of the fuel provided.. This methodology covers fuel switch in several element processes, i.e. project participants may submit one CDM-PDD for fuel switch in several element processes within one industrial facility.

This baseline methodology shall be used in conjunction with the approved consolidated monitoring methodology for industrial fuel switching from coal or petroleum fuels to natural gas (ACMXXXX).

3. Project boundary

The project boundary covers CO₂ emissions associated with fuel combustion in each element process subject to the fuel switching. The project boundary is applicable to both baseline emissions and project emissions.

For the purpose of determining **project activity emissions**, project participants shall include carbon dioxide emissions from the combustion of natural gas in each element process.

For the purpose of determining **baseline emissions**, project participants shall include carbon dioxide emissions from the combustion of the quantity of coal or oil that would be used in each element process in the absence of the project activity.

The **spatial extent** of the project boundary encompasses the physical, geographical site of the industrial facility.

Table 1: Emission sources included and excluded in the project boundary

	Source	Gas	Included?	Justification / Explanation
Baseline	Baseline fuel burning	CO ₂	Yes	Main emission source
		CH ₄	No	Minor source
		N ₂ O	No	Minor source
Project Activity	Natural gas burning	CO ₂	Yes	Main emission source
		CH ₄	No	Minor source
		N ₂ O	No	Minor source

4. Identification of the baseline scenario

Project participants shall determine the most plausible baseline scenario through the application of the following steps. Where the project activity involves fuel switching in several element processes, the steps should be applied to each element process.

Step 1: Identify all realistic and credible alternatives for the fuel use in the element process

Project participants should at least consider the following alternatives:

- Continuation of the current practice of using coal or oil;
- Switching from coal or oil to a different fuel than natural gas (such as biomass);
- The project activity not undertaken under the CDM (switching from coal or oil to natural gas);
- Switching from coal or oil to natural gas at a future point in time during the crediting period;

Step 2: Eliminate alternatives that are not complying with applicable laws and regulations

Eliminate alternatives that are not in compliance with all applicable legal and regulatory requirements. Apply Sub-step 1b of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board.

Step 3: Eliminate alternatives that face prohibitive barriers

Scenarios that face prohibitive barriers should be eliminated by applying step 3 of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board.

Step 4: Compare economic attractiveness of remaining alternatives

Compare the economic attractiveness without revenues from CERs for all alternatives that are remaining by applying Step 2 of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board. The economic investment analysis shall use the net present value (NPV) analysis, and explicitly state the following parameters:

- Investment requirements (incl. break-up into major equipment cost, required construction work, installation);
- A discount rate appropriate to the country and sector
(Use government bond rates, increased by a suitable risk premium to reflect private investment in fuel switching projects, as substantiated by an independent (financial) expert);
- Efficiency of each element process, taking into account any differences between fuels;
- Current price and expected future price (variable costs) of each fuel
(Note: As a default assumption the current fuel prices may be assumed as future fuel prices. Where project participants intend to use future prices that are different from current prices, the future prices have to be substantiated by a public and official publication from a governmental body or an intergovernmental institution.)
- Operating costs for each fuel (especially, handling/treatment costs for coal);
- Lifetime of the project, equal to the remaining lifetime of the existing heat generation facility; and
- Other operation and maintenance costs.

The NPV calculation should take into account the residual value of the new equipment at the end of the lifetime of the project activity. Provide all the assumptions in the CDM-PDD.

Compare the NPV of the different scenarios and select the most cost-effective scenario (i.e. with the highest NPV) as the baseline scenario. Include a sensitivity analysis applying Sub-step 2d of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board. The investment analysis provides a valid argument that the most cost-effective scenario is the baseline scenario if it consistently supports (for a realistic range of assumptions) this conclusion. In case the sensitivity analysis is not fully conclusive, select the baseline scenario alternative with least emissions among the alternatives that are the most economically attractive according to the investment analysis and the sensitivity analysis.

This methodology is only applicable if the continuation of the use of coal or oil throughout the crediting period is the most plausible baseline scenario.

5. Additionality

The assessment of additionality comprises three steps:

Step 1: Investment & sensitivity analysis

Demonstrate that the project activity undertaken without the CDM is economically less attractive than the most plausible baseline scenario, by following the instructions given in step 4 of the chapter “Identification of the baseline scenario” above. Include a sensitivity analysis applying Sub-step 2d of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board. 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.

Step 2: Common practice analysis

Demonstrate that the project activity is not common practice in the relevant country and sector by applying Step 4 of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board.

Step 3: Impact of CDM registration

Describe the impact of the registration of the project activity by applying Step 5 of the latest version of the “Tool for demonstration assessment and of additionality” agreed by the CDM Executive Board.

If all 3 steps are satisfied, then the project is considered additional.

6. Project emissions

Project emissions (PE_y) include CO₂ emissions from the combustion of natural gas in all element processes i . Project emissions are calculated based on the quantity of natural gas combusted in all element processes i and respective net calorific values and CO₂ emission factors for natural gas (EF_{NG,CO_2}), as follows:

$$PE_y = FF_{project,y} \cdot NCV_{NG,y} \cdot EF_{NG,CO_2,y} \quad (1)$$

with

$$FF_{project,y} = \sum_i FF_{project,i,y} \quad (2)$$

where:

PE_y	Project emissions during the year y in t CO ₂ e
$FF_{project,y}$	Quantity of natural gas combusted in all element processes during the year y in m ³
$FF_{project,i,y}$	Quantity of natural gas combusted in the element process i during the year y in m ³
$NCV_{NG,y}$	Average net calorific value of the natural gas combusted during the year y in MWh/m ³
$EF_{NG,CO_2,y}$	CO ₂ emission factor of the natural gas combusted in all element processes in the year y in t CO ₂ /MWh

For the determination of emission factors and net calorific values, guidance by the 2000 IPCC Good Practice Guidance should be followed where appropriate. Project participants may either conduct measurements or they may use accurate and reliable local or national data where available. Where such data is not available, IPCC default emission factors (country-specific, if available) may be used if they are deemed to reasonably represent local circumstances. All values should be chosen in a conservative manner (i.e. higher values should be chosen within a plausible range) and the choice should be justified and documented in the CDM-PDD. Where measurements are undertaken, project participants may estimate the emission factors or net calorific values ex-ante in the CDM-PDD and should document the measurement results after implementation of the project activity in their monitoring reports.

7. Baseline emissions

Baseline emissions (BE_y) include CO₂ emissions from the combustion of the quantity of coal or oil that would in the absence of the project activity be used in all element processes i . Baseline emissions are calculated based on the quantity of coal or oil that would be combusted in each element processes i in the absence of the project activity and respective net calorific values and CO₂ emission factors. The quantity of coal or oil that would be used in the absence of the project activity in an element process i ($FF_{baseline,i,y}$) is calculated based on the actual monitored quantity of natural gas combusted in this element process ($FF_{project,i,y}$) and the relation of the combustion efficiencies and the net calorific values between the project scenario (use of natural gas) and the baseline scenario (use of coal or oil).

$$BE_y = \sum_i FF_{baseline,i,y} \cdot NCV_{FF,i} \cdot EF_{FF,CO_2,i} \quad (3)$$

with

$$FF_{baseline,i,y} = FF_{project,i,y} \cdot \frac{NCV_{NG,y} \cdot e_{project,i}}{NCV_{FF,i} \cdot e_{baseline,i,y}} \quad (4)$$

where:

BE_y	Baseline emissions during the year y in t CO ₂ e
$FF_{baseline,i,y}$	Quantity of coal or oil that would be combusted in the absence of the project activity in the element process i during the year y in a volume or mass unit
$FF_{project,i,y}$	Quantity of natural gas combusted in the element process i during the year y in m ³
$NCV_{NG,y}$	Average net calorific value of the natural gas combusted during the year y in MWh/m ³
$NCV_{FF,i}$	Average net calorific value of the coal or oil that would be combusted in the absence of the project activity in the element process i during the year y in MWh per volume or mass unit
$EF_{FF,CO_2,i}$	CO ₂ emission factor of the coal or oil type that would be combusted in the absence of the project activity in the element process i in t CO ₂ /MWh
$e_{project,i,y}$	Combustion efficiency of the element process i if fired with natural gas
$e_{baseline,i}$	Combustion efficiency of the element process i if fired with coal or oil respectively

Note that the most plausible baseline scenario may be that several fuel types would be used in the different element processes or that several fuel types would be used in one element process. Where several fuel types have been used in one element process prior to the implementation of the project activity and where the continuation of this practice is the most plausible baseline scenario, project participants should, as a conservative approach, select the fuel type with the lowest CO₂ emission factor from the fuels used in that element process during the last three years as the baseline emission factor ($EF_{FF,CO_2,i}$) and the baseline net calorific value ($NCV_{FF,i}$).

For the determination of emission factors and net calorific values, guidance by the 2000 IPCC Good Practice Guidance should be followed where appropriate. Project participants may either conduct measurements or they may use accurate and reliable local or national data where available. Where such data is not available, IPCC default emission factors (country-specific, if available) may be used if they are deemed to reasonably represent local circumstances. All values should be chosen in a conservative manner (i.e. lower values should be chosen within a plausible range) and the choice should be justified and documented in the CDM-PDD. Where measurements are undertaken, project participants may estimate the emission factors or net calorific values ex-ante in the CDM-PDD and should document the measurement results after implementation of the project activity in their monitoring reports.

The combustion efficiencies have to be determined for each element process for the project activity ($e_{project,i}$) and the baseline scenario ($e_{baseline,i}$). The efficiencies should be determined by undertaking measurements at the element process firing the relevant fuels. Efficiencies for the project activity ($e_{project,i}$) should be measured monthly throughout the crediting period and annual averages should be used for emission calculations. Efficiencies for the baseline scenario ($e_{baseline,i}$) should be measured monthly during 6 months before project implementation and the 6 months average should be used for emission calculations. Project proponents can choose not to measure efficiencies for the baseline scenario. In this case, either efficiencies indicated by the equipment manufacturer should be used or a conservative default efficiency of 100% may be assumed.

All measurements should be conducted at a representative load factor (or operation mode). Where a representative load factor (or operation mode) can not be determined, measurements should be

conducted for different load factors (or operation modes) and be weighted by the time these load factors (or operation modes) are typically operated. The same load factor(s) (or operation mode(s)) and weight factors should be used in the determination of $e_{project,i}$ and $e_{baseline,i}$.

Where project participants can reasonably demonstrate that the efficiency of the element process does not change due to the fuel switch or that any changes are negligible (i.e. $e_{project,i} - e_{baseline,i} < 1\%$) or that $e_{project,i}$ can be expected to be smaller than $e_{baseline,i}$, project participants may assume $e_{project,i} = e_{baseline,i}$ as a simplification.

The values determined for $e_{baseline,i}$ should be documented in the CDM-PDD and shall remain fixed throughout the crediting period.

8. Leakage

Leakage emissions comprise mainly fugitive CH₄ emissions from fuel production and, in the case of natural gas, from fuel transportation and distribution.

Project participants should estimate these emission sources as leakage emissions, apart from emissions that occur in an Annex I country with a commitment inscribed in Annex B that has ratified the Kyoto Protocol.

For the purpose of determining fugitive methane emissions associated with the production – and in case of natural gas, the transportation and distribution of the fuels – project participants should multiply the quantity of natural gas consumed in all element processes i with a methane emission factor for these upstream emissions ($EF_{NG,upstream,CH_4}$), and subtract for all fuel types k which would be used in the absence of the project activity the fuel quantities multiplied with respective methane emission factors ($EF_{k,upstream,CH_4}$), as follows:

$$L_{CH_4,y} = \left[FF_{project,y} \cdot NCV_{NG,y} \cdot EF_{NG,upstream,CH_4} - \sum_k FF_{baseline,k,y} \cdot NCV_k \cdot EF_{k,upstream,CH_4} \right] \cdot GWP_{CH_4} \quad (5)$$

with

$$FF_{project,y} = \sum_i FF_{project,i,y} \quad \text{and} \quad (6)$$

$$FF_{baseline,k,y} = \sum_i FF_{baseline,i,k,y} \quad (7)$$

where:

$L_{CH_4,y}$	Leakage emissions due to upstream fugitive CH ₄ emissions in the year y in t CO ₂ e
$FF_{project,y}$	Quantity of natural gas combusted in all element processes during the year y in m ³
$FF_{project,i,y}$	Quantity of natural gas combusted in the element process i during the year y in m ³
$NCV_{NG,y}$	Average net calorific value of the natural gas combusted during the year y in MWh/m ³
$EF_{NG,upstream,CH_4}$	Emission factor for upstream fugitive methane emissions from production, transportation and distribution of natural gas in t CH ₄ per MWh fuel supplied to final consumers
$FF_{baseline,k,y}$	Quantity of fuel type k (a coal or oil type) that would be combusted in the absence of the project activity in all element processes during the year y in a volume or mass unit
$FF_{baseline,i,k,y}$	Quantity of fuel type k (a coal or oil type) that would be combusted in the absence of the project activity in the element process i during the year y in a volume or mass unit
NCV_k	Average net calorific value of the fuel type k (a coal or oil type) that would be combusted in the absence of the project activity during the year y in MWh per volume or mass unit

$EF_{k,upstream,CH_4}$	Emission factor for upstream fugitive methane emissions from production of the fuel type k (a coal or oil type) in t CH ₄ per MWh fuel produced
GWP_{CH_4}	Global warming potential of methane valid for the relevant commitment period

Where reliable and accurate national data on fugitive CH₄ emissions associated with the production, and in case of natural gas, the transportation and distribution of the fuels is available, project participants should use this data to determine average emission factors by dividing the total quantity of CH₄ emissions by the quantity of fuel produced or supplied respectively.² Where such data is not available, project participants may use the default values provided in Table 2 below.

Note that the emission factor for fugitive upstream emissions for natural gas ($EF_{NG,upstream,CH_4}$) should include fugitive emissions from production, processing, transport and distribution of natural gas, as indicated in the Table 2 below. Note further that in case of coal the emission factor is provided based on a mass unit and needs to be converted in an energy unit, taking into account the net calorific value of the coal.

Where total leakage effects are negative ($L_y < 0$), project participants should assume $L_y = 0$.

² GHG inventory data reported to the UNFCCC as part of national communications can be used where country-specific approaches (and not IPCC Tier 1 default values) have been used to estimate emissions.

Table 2: Default emission factors for fugitive CH₄ upstream emissions

Activity	Unit	Default emission factor	Reference for the underlying emission factor range in Volume 3 of the 1996 Revised IPCC Guidelines
Coal			
Underground mining	t CH ₄ / kt coal	13.4	Equations 1 and 4, p. 1.105 and 1.110
Surface mining	t CH ₄ / kt coal	0.8	Equations 2 and 4, p.1.108 and 1.110
Oil			
Production	t CH ₄ / PJ	2.5	Tables 1-60 to 1-64, p. 1.129 - 1.131
Transport, refining and storage	t CH ₄ / PJ	1.6	Tables 1-60 to 1-64, p. 1.129 - 1.131
Total	t CH ₄ / PJ	4.1	
Natural gas			
USA and Canada			
Production	t CH ₄ / PJ	72	Table 1-60, p. 1.129
Processing, transport and distribution	t CH ₄ / PJ	88	Table 1-60, p. 1.129
Total	t CH ₄ / PJ	160	
Eastern Europe and former USSR			
Production	t CH ₄ / PJ	393	Table 1-61, p. 1.129
Processing, transport and distribution	t CH ₄ / PJ	528	Table 1-61, p. 1.129
Total	t CH ₄ / PJ	921	
Western Europe			
Production	t CH ₄ / PJ	21	Table 1-62, p. 1.130
Processing, transport and distribution	t CH ₄ / PJ	85	Table 1-62, p. 1.130
Total	t CH ₄ / PJ	105	
Other oil exporting countries / Rest of world			
Production	t CH ₄ / PJ	68	Table 1-63 and 1-64, p. 1.130 and 1.131
Processing, transport and distribution	t CH ₄ / PJ	228	Table 1-63 and 1-64, p. 1.130 and 1.131
Total	t CH ₄ / PJ	296	
Note: The emission factors in this table have been derived from IPCC default Tier 1 emission factors provided in Volume 3 of the 1996 Revised IPCC Guidelines, by calculating the average of the provided default emission factor range.			

9. Emission reductions

The emission reduction by the project activity during a given year y (ER_y) is the difference between the baseline emissions (BE_y) and project emissions (PE_y) and leakage emissions (L_y), as follows:

$$ER_y = BE_y - PE_y - L_y \quad (8)$$

Where,

ER_y	Emissions reductions of the project activity during the year y in t CO ₂ e
BE_y	Baseline emissions during the year y in t CO ₂ e
PE_y	Project emissions during the year y in t CO ₂ e
L_y	Leakage emissions in the year y in t CO ₂ e

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10. Sources

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For more information regarding the proposals and their consideration by the Executive Board please refer to <http://cdm.unfccc.int/methodologies/approved>.

11. Applicability

This methodology is applicable to project activities that switch in one or several *element processes*³ of an industrial facility from coal or oil to natural gas. The fuel switching is undertaken in processes for heat generation that are located at and directly linked to an industrial process with a main output other than heat. Furthermore, the following conditions apply:

- Prior to the implementation of the project activity, only coal or oil (but not natural gas) have been used in the element processes;
- Regulations/programs do not constrain the facility from using the fossil fuels being used prior to fuel switching;
- Regulations do not require the use of natural gas or any other fuel in the element processes;
- The project activity does not increase the capacity of thermal output or lifetime of the element processes during the crediting period (i.e. emission reductions are only accounted up to the end of the lifetime of the relevant element process), nor is there any thermal capacity expansion planned for the project facility during the crediting period;
- The proposed project activity does not result in integrated process change;
- The natural gas used in the project activity is not generated from liquified natural gas (LNG) or compressed natural gas (CNG).

This consolidated monitoring methodology shall be used in conjunction with the approved consolidated baseline methodology for (ACMXXXX).

³ An “*element process*” is defined as fuel combustion in an equipment at one point of an industrial facility, for the purpose of providing thermal energy (the fuel is not combusted for electricity generation or used as oxidant in chemical reactions or otherwise used as feedstock). Examples of an element process are steam generation by a boiler and hot air generation by a furnace”. Each element process should generate a single output (such as steam or hot air) by using mainly a single fuel (not plural energy sources). For each element process, energy efficiency is defined as the enthalpy of the thermal output divided by the enthalpy of the fuel provided.. This methodology covers fuel switch in several element processes, i.e. project participants may submit one CDM-PDD for fuel switch in several element processes within one industrial facility.

12. Methodology

The monitoring methodology involves monitoring of parameters with regard to the combustion of natural gas in the project activity. Monitoring of parameters for calculating baseline emissions or leakage is not needed.

The annual natural gas consumption for each element process i ($FF_{project,i,y}$) should be measured on a continuous basis.

The energy efficiency of each element process using natural gas ($e_{project,i,y}$), the net calorific value ($NCV_{NG,y}$) and the CO₂ emission factor of natural gas (EF_{NG,CO_2}) should be monitored at least monthly. Based on the monthly measurements, annual averages are calculated which are used in the equations presented in the baseline methodology.

13. Project emissions and baseline emissions

ID number	Data type	Data variable	Data unit	Measured (m) calculated (c) estimated (e)	Recording frequency	Proportion of data monitored	How will data be archived? (electronic/ paper)	For how long is archived data kept?	Comments
$FF_{\text{project},i,y}$	Mass	Natural gas consumed in process element i in year y	m^3	m	Continuousl y	100%	Electronic	Project lifetime	Monitored by operation pattern (e.g., normal, start-up, holiday, etc.) at the process i (e.g., boiler). To be monitored for each element process. Confirmed by natural gas purchase record.
$e_{\text{project},i}$	Energy efficiency	Fuel efficiency of natural gas used at the process i	%	m	Monthly	100%	Electronic	Project lifetime	To be determined for each process i according to 1)
$e_{\text{project},i,y}$	Energy efficiency	Average fuel efficiency of natural gas used at the process i in year y	%	c	Annually	Calculated from 12 monthly $e_{\text{project},i}$	Electronic	Project lifetime	
NCV_{NG}	Calorific value	Net calorific value of natural gas	MWh/m^3	m	Monthly	Sample to assure 95% confidence level	Electronic	Project lifetime	Not necessary when default values for $NCV_{\text{NG},y}$ are used

ID number	Data type	Data variable	Data unit	Measured (m) calculated (c) estimated (e)	Recording frequency	Proportion of data monitored	How will data be archived? (electronic/paper)	For how long is archived data kept?	Comments
$NCV_{NG,y}$	Calorific value	Average net calorific value of natural gas in year y	MWh/ m^3	c	Annually	Calculated from 12 monthly NCV_{NG}	Electronic	Project lifetime	Alternatively, use default values according to 2)
EF_{NG,CO_2}	Emission factor	CO ₂ emission factor of the natural gas combusted	t CO ₂ /MWh	m	Monthly	Sample to assure 95% confidence level	Electronic	Project lifetime	Not necessary when default values for $EF_{NG,CO_2,y}$ are used
$EF_{NG,CO_2,y}$	Emission factor	average CO ₂ emission factor of the natural gas combusted in year y	t CO ₂ /MWh	c	Annually	Calculated from 12 monthly EF_{NG,CO_2}	Electronic	Project lifetime	Alternatively, use default values according to 2)

Notes:

- 1) The efficiencies should be determined by undertaking measurements at the element process firing the relevant fuels. All measurements should be conducted at a representative load factor (or operation mode). Where a representative load factor (or operation mode) can not be determined, measurements should be conducted for different load factors (or operation modes) and be weighted by the time these load factors (or operation modes) are typically operated.
- 2) For the determination of emission factors and net calorific values, guidance by the 2000 IPCC Good Practice Guidance should be followed where appropriate. Project participants may either conduct measurements or they may use accurate and reliable local or national data where available. Where such data is not available, IPCC default emission factors (country-specific, if available) may be used if they are deemed to reasonably represent local circumstances. All values should be chosen in a conservative manner (i.e. lower values should be chosen within a plausible range) and the choice should be justified and documented in the CDM-PDD.

14. Leakage

No additional parameters to be monitored.