

## Note on permanence of emission reductions

### I. Introduction

While the modalities and procedures for a clean development mechanism<sup>1</sup> stipulate that net reductions in anthropogenic emissions have to be real, measurable and attributable to the project activity, there is no explicit reference to permanence of emission reductions associated with a non-afforestation/reforestation project activity.

In the case of afforestation/reforestation project activities, the issue of non-permanence is addressed by introducing temporary Certified Emission Reductions (tCERs and ICERs).<sup>2</sup>

The Meth panel considers that the issues of potential non-permanence may be of concern for underlying project activities of the two proposed new methodologies, as described below, and seeks guidance from the Board on how to such types of project activities.

### II. NM0267: Shuixi Gou Coal Field Fire Extinguishing Project

The proposed new methodology is for project activities aiming at extinguishing and preventing the uncontrolled burning of coal in underground coal mine fires. Coalfield fires have to be anthropogenically induced prior to 11 December 1997 and remain burning, in the absence of the project activity, for longer period of time than the duration of the crediting period. The fire zone is in the expanding stage or stable stage of combustion. After completion of the coalfield fire extinguishing project activity, the coal saved from potential burning within the crediting period shall not be mined and utilized in the future.

The report of an expert, who was contracted to provide information on technologies and approached for coal mine fire extinguishing, prevention and monitoring, confirmed that it can not be fully ensured that the fires would not resume or occur at a later stage in the future (during later years of the project activity or even after the end of the crediting period). Underground coal mine fires can resume if the underground coal seam is exposed to oxygen. For example, this may occur if the sealing device of the coal seam, which is installed under the project to prevent the diffusion of oxygen to the coal seam, is damaged.

The panel therefore considers that there is an issue of potential non-permanence of emission reductions achieved under the proposed project activity.

### III. NM0297: Carbon dioxide and methane emissions avoidance from Block-C, Central Kalimantan

The proposed new methodology is designed for project activities implemented in degraded tropical peat whose combustibility has been enhanced by artificial drainage for agriculture or another economic purpose and which is exposed to ongoing fire risk. The project activity will aim at avoiding CO<sub>2</sub> and CH<sub>4</sub> emissions by fire suppression and prevention through such measures as, *inter alia*, partial or total re-hydration of area; restoration of above ground land cover to increase surface humidity and recreate as far as possible the natural system which is more or less immune to fire; and provision and maintenance of fire fighting mechanisms. The project activity area was severely degraded by drainage as a result of policies or economic activity prior to 2000. The prevailing cause of ignition of the peat is anthropogenic. There is typically 5 years or more of historical record encompassing one or more 'el Niño' years to provide a sound statistical basis for determining the

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<sup>1</sup> Decision 3/CMP.1.

<sup>2</sup> Decision 5/CMP.1.

project fire baseline. It is possible to monitor and measure ongoing levels of fire in the project area and apply the technical and statistical methods outlined under this methodology.

The panel considers that the proposed mitigation measures cannot ensure that fire will not reoccur in the future. For example, peat land fires are likely to start if the management system established under the project activity that prevents, detects and extinguishes the fires stops operating.

The panel therefore considers that there is an issue of potential non-permanence of emission reductions achieved under the proposed project activity.

#### **IV. Guidance requested from the Board**

As described above, the panel is of the opinion that with the mitigation measures proposed under the two new methodologies, it is not possible to prove that the emission reductions from these project activity types are permanent. In the worst case scenario, the project activities may only delay the release of the GHG emissions.

Since the project activities under discussion do not qualify as afforestation or reforestation project activities, there exists no procedure to handle potential non-permanence of emission reductions.

The panel therefore requests guidance from the Board on whether there is a need to address the issue of potential non-permanence of emission reductions achieved under certain types of non-A/R project activities.

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