I am Project Manager for myclimate, Swiss Foundation which develops CDM and GS emission reduction projects. We are currently doing the feasibility study for a POA on energy efficiency in the artisanal brick sector in Peru and evaluating which is the most applicable CDM methodology. Two methodologies we are considering are AMS III Z: Fuel Switch, process improvement and energy efficiency in brick manufacture and AMS II D: Energy efficiency and fuel switching measures for industrial facilities --- Version 12.0.

Regarding AMS III Z, this methodology seems to fit our project as it is dedicated to project activities achieving emission reductions in brick manufacturing through shifts to alternative production process switch from high carbon fossil fuel to low carbon intensive fuel or renewable biomass. The methodology also says that these measures may replace, modify or retrofit existing facilities or be installed in a new facility. In addition, a recent response provided by the small scale working group to SSC_607 <http://cdm.unfccc.int/methodologies/SSCmethodologies/clarifications/86276>, indicates that the switch from inefficient brick kilns to efficient brick kilns may apply III.Z.

Our project will replace inefficient, traditional ovens/kilns (i.e. production facilities as per this methodology) with high efficiency ovens/kilns and fans for brick production. The technology proposed by our project is composed of improved ovens/kilns and associated equipment, i.e. fans. The fans are therefore an integral part of the technology and the installation of both the improved oven/klin and the fan will result in energy efficiencies. The new ovens/kilns will have a capacity equal to or less than 1 MW.

We thus think that the technology proposed by our project qualifies under AMS III Z; however, our project reduces the use of biomass and includes both renewable and non-renewable biomass in the baseline and project scenarios, which appears not to be covered by AMS III Z.

Regarding AMS II.D, this methodology also seems to fit our project as it comprises any energy efficiency and fuel switching measures implemented at a single or several industrial or mining and mineral production facility(ies). The methodology also says that these measures may replace, modify or retrofit existing facilities or be installed in a new facility.
Our project will replace inefficient, traditional ovens/kilns (i.e. production facilities as per this methodology) with high efficiency ovens/kilns and fans for brick production. The technology proposed by our project is composed of improved ovens/kilns and associated equipment, i.e. fans. The fans are therefore an integral part of the technology and the installation of both the improved biomass oven/kiln and the fan will result in energy efficiencies. The new ovens/kilns will have a capacity equal to or less than 1 MW.

We thus think that this methodology could be feasible for our project, but would like to clarify if it can be applied to projects that have renewable and non-renewable biomass in the baseline and project scenarios. This methodology does not explicitly say that biomass cannot be part of the baseline; it only says the following on page 1, paragraph 3:

>This category is applicable to project activities where it is possible to directly measure and record the energy use within the project boundary (e.g., electricity and/or fossil fuel consumption).”

This paragraph could imply that no biomass is permitted, but as the methodology does not explicitly say this, we are not certain about this part.

We would therefore appreciate if your team could clarify if we can use any of these 2 methodologies- AMS-III.Z or AMS-II.D -for our project (which considers the replacement of inefficient biomass-fired kilns with efficient biomass-fired kilns + fans for brick production) if an NRB Assessment is included as per the rules of the CDM. Would this be possible?

We look forward to your clarification on this subject.

With kind regards,

Paloma Sarria

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**Recommendation by the SSC WG:**

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

Please refer to paragraph 31 of the meeting report of the SSC WG 37 <http://cdm.unfccc.int/Panels/ssc_wg>.

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**Answer to authors of query by the SSC WG:**

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

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

The submission questions the applicability of the AMS-II.D and AMS-III.Z to a project activity involving replacement of inefficient biomass fired ovens/kilns with high efficiency ovens/kilns in brick production facilities that results in decreased consumption of the use of renewable and non-renewable biomass to produce the equivalent baseline quantity of bricks.

The SSC WG agreed to clarify that the project activity described is not covered under AMS-II.D as it is not intended to cover project that involves the use of biomass and the methodology required direct measurement of energy consumption. See paragraph 3 that states “This category is applicable to project activities where it is possible to directly measure and record the energy use within the project boundary (e.g., electricity and/or fossil fuel consumption)”. The monitoring procedure further states "Metering the energy use of the industrial or mining and mineral production facility, processes or the equipment affected by the project activity."

The group further agreed to clarify that the methodologies that involve displacement of non-renewable biomass are limited to end-use technologies and thus project activities involving production facilities applying methodologies such as AMS-II.D and AMS-III.Z are not eligible.
**Signature of SSC WG Chair:** Mr. Peer Stiansen  
**Date:** 08/06/2012  
**Signature of SSC WG Vice-Chair:** Ms. Fatou Gaye  
**Date:** 08/06/2012

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**SECTION TO BE FILLED IN BY THE UNFCCC SECRETARIAT**

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