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Suggestions for … simplified modalities for demonstrating additionality for project activities up to 5 megawatts

Background

KPSR is a small designer/consultant/construction services provider in the field of anaerobic digestion of industrial waste water in SE Asia. A common project would be methane capture projects in the Oil Palm Industry. KPSR is directly involved in project assessments, feasibility studies and baseline studies, and liaises with CDM services providers but does not provide CDM services directly.

In Malaysia and Indonesia there are many opportunities for methane capture projects that are not proceeding, or are proceeding very slowly. A lack of clarity about eligibility for AMS III-H is a factor in the slow implementation of these projects.

Comments

All projects based on Palm Oil Mill Effluent (POME) can be successfully presented as additional. In some cases effort needs to be put into the project financial structure to conform with additionality criteria. In some cases an organisation may possibly intend to proceed with a methane capture project regardless of the eligibility for CERs. Nevertheless, in all cases the projects fit easily into the spirit of a CDM project, and arguably are eligible given conformance to other requirements.

Further, the very large numbers of waste ponds spewing methane into the atmosphere represent an obvious means of reducing the overall global warming potential, and are exactly the kind of project that CERs can encourage. Methane capture in this area had very little uptake prior to the emergence of the CDM.

Therefore it is logical to state that these projects (small scale, POME) be exempt from the requirement to demonstrate additionality.

The consequence of such an exemption would hopefully give greater confidence to skeptical management in the ability of a project to finally earn a modest amount of CERs, and also lower the CDM services cost and significantly reduce the scope for price gouging by qualified validators.

This principle of exemption may also apply to other industry categories, especially those instances of open anaerobic ponds which have been in operation for at least 5 years.

Metering

A further comment is made about the requirement in AMS III-H for annual calibration of meters. While clearly a reasonable degree of accuracy in measurement is highly desirable, many projects are not located close to calibration facilities. A meter might easily be out of

service for one month a year, which does little to promote overall accuracy. Thsus an annual calibration is considered neither necessary nor helpful.

A methane measuring instrument is best checked with a bottle of reference gas on site. The verifier can perform this check in addition to site staff.

Flow meters vary in type. Biogas is not perfectly clean and the sensing element on thermal dispersion types can get dirty and under-read. These meters are in any case calibrated on air, the thermal properties of which are quite different from wet biogas, rendering the calibration virtually meaningless.

There is a more-or-less fixed ratio at any site between COD removed and biogas produced, and also stoichiometric limits to the biogas that may be produced. It is suggested that a verifier check these ratios over time, and if there is a significant increase in biogas produced with no corresponding increase in input COD, then the verifier may request calibration and/or correction of data.

Yours faithfully,

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