Template for comments

Date:	Document:

TABLE FOR COMMENTS

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#	**Initials**	**Para No./ Annex / Figure / Table**	**Line Number**	**Type of comment** **ge =** general **te =** technical **ed =** editorial	**Comment** **(including justification for change)**	**Proposed change** **(including proposed text)**	**Assessment of comment** **(*to be completed by UNFCCC secretariat*)**

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1	HI		64 – 66 128 – 134	Te	**In my opinion, CH_4 emissions from anaerobic digesters (AD) should be a concern only for the elaboration of GHG emission inventories. They should not be treated as emissions that occur due to the project activity.** **Considering that the project shall directly measure the amount of captured methane, any methane leaked from the digester will naturally not be accounted in the calculation of baseline emissions.** **Imposing project emissions due to CH_4 leaks implies in double counting the discount on emission reductions and harms the effort of highly efficient systems.** **In an extreme example, if a perfect system operates continuously during the year and captures 100% of the generated CH_4, if it is a covered lagoon, it will have to consider project emissions equivalent to 10% of the CH_4 captured, where it should be zero.** **On another extreme example, the same digester faces maintenance issues and, during the year, it is able to capture only 10% of the CH_4 generated in the AD (the rest is vented to the atmosphere because the cover is removed). As a result, it will result in $PE_{CH4,y}$ equal to 1% of the total CH_4 generated in the AD. However, in fact, 90% of the CH_4 was emitted to the atmosphere. Ultimately, an AD that remains uncovered during the whole year and that 'leaks' 100% of the CH_4, will have 0% of $PE_{CH4,y}$, based on the proposed rationale.** **In all cases, the flow meter installed at the project will directly reflect the efficiency in capturing CH_4 and baseline emissions will vary accordingly.** **If the concept of $PE_{CH4,y}$ is to reflect the possibility that the project AD may be more efficient in generating CH_4 than the treatment system in the baseline scenario, or if it is to consider uncertainties, then a different approach should be used to reduce baseline emissions (maybe with the combination of MCFs of the baseline and project scenarios).**		

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