

Call for public inputs on the expansion of the usability of the small scale methodology AMS-III.AV "Low greenhouse gas emitting water purification systems"

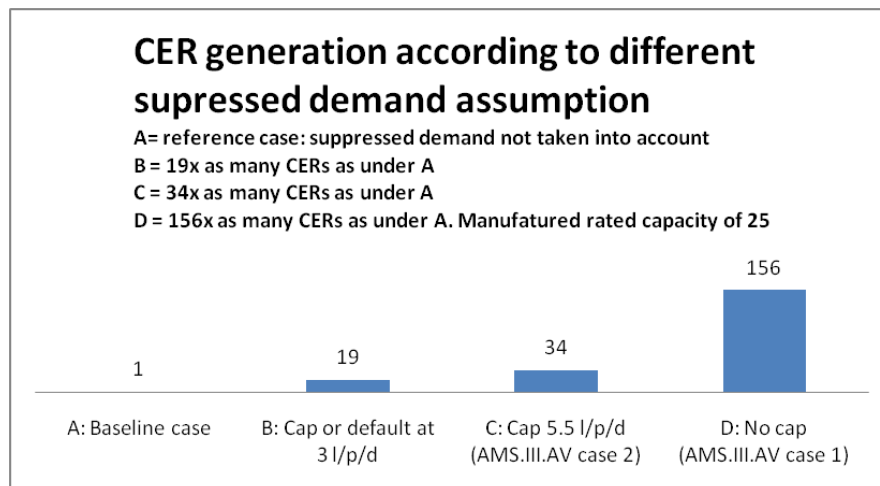
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CDM Watch welcomes the opportunity to provide input on SSC-III.AV and would like to highlight the following considerations.

The new methodology SSC-III.AV in its current version will lead to a disproportionate generation of CERs that are not based on actual emissions reductions (suppressed demand). Although suppressed demand needs to be addressed, it has to be balanced and cannot be done in a way that seriously undermines the environmental integrity of CDM projects.

Because non-energy or low energy purification methods such as filtering or chlorination are so much cheaper for purifying large quantities of water, boiling of water beyond basic drinking water needs is just not practiced. For example, no family of 4 would boil 100 liters of water per day every day, yet under case 1 of the current methodology, if such a family was provided with a filter that was capable of purifying 100 liters a day, the project could earn CERs for the energy consumption of 25 liters per person per day.

The figure below illustrates how many CERs would be generated using different ways of accounting for suppressed demand. We assumed that in the baseline 10 % of the population boil 2 liters per person each day.



The figure clearly illustrates that case 1 is non-conservative.

It is important to keep in mind that the amount of purified water credited is not the same as the amount that should be provided to all human beings to life healthily. Suppressed demand has to be accounted for but in a way that balances safeguarding the environmental integrity of the project type.

We therefore suggest that in order to preserve environmental integrity, a cap of 3 liters per day per person be used for all water purification projects
