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**To** cdm-info@unfccc.int  
**From** Robert Müller, atmosfair gGmbH, Jati Kusumowati, BORDA Indonesia  
**Date** 30 October 2011  
**Subject** **Call for Input:** How to further improve and clarify the guidelines of the "Guidelines on the consideration of suppressed demand in CDM methodologies", as well as to revise methodologies to integrate the aspects of suppressed demand

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Honourable Members of the CDM Executive Board,

In response to your call for public input on suppressed demand, please consider the following input from atmosfair and BORDA on this subject.

We refer specifically to the problem of collection of municipal solid waste in urban areas, thinking on projects that introduce systems of waste collection and treatment (e.g., using AMS-III.E or AMS-III.F) in areas where this service did not exist before (e.g., the "KIPRAH community based integrated waste management project, Indonesia", <http://cdm.unfccc.int/ProgrammeOfActivities/Validation/DB/J8AS7C008XO90OT9BMYLY2T23DSUS/view.html>).

Particularly in poor urban areas in non-annex 1 countries, the absence of waste collection systems generally leads to wild dumping of household waste within human settlements (EAWAG 2008) with negative effects on health (e.g., abundance of pests and vectors for infections), social cohesion and the environment (e.g., contamination of ground water) (see CWG 2003). The importance of waste collection systems and the negative effects of the absence of such systems are also treated in the Agenda 21 (chapter 21, UNCED 1992).

The basic human needs of the population of such areas are clearly not met.

The reason of missing waste collection systems in urban areas are poverty and poor financial capacity of the responsible governments – we therefore argue that among the populations of corresponding urban areas there is a suppressed for waste collection systems.

From the perspective of those whose basic needs are in question, the minimum service level would be guaranteed by an organised waste collection, possibly through a connection to existing systems of waste collection and treatment in more developed urban areas. The applicable baseline technology for waste handling in specific projects introducing waste collection and treatment would therefore be a centralised waste handling according to the common practise in similar urban areas where a waste collection service exists.

We suggest to define a minimum service level for waste collection in urban areas as follows:

**“In urban areas, a minimum level of waste collection service means that all households can have their household waste collected by an organised waste collection system. The emission scenario related to this minimum service level should be established according to the common practise of waste treatment for such urban areas in the host country of a project where organised waste collection and treatment services exist. The determination of this common practise should be based on, e.g., national/international peer reviewed research or relevant studies.”**

With reference to section II.B.9.a) of the guidelines on suppressed demand, we think that in this specific case, the simple introduction of a waste collection system is the baseline measure required to satisfy the basic need (i.e., the need for a life free from the negative effects of informal waste dumping). Therefore, in step 1 of the step-wise procedure suggested in III.A.11, only this single measure would be identified and no alternative technologies/measures would need to be discussed.

With reference to section II.B.9.b), the baseline service level would also just be the existence of a functioning waste collection system for the whole population of an area; thus, there would be no need to further quantify the baseline service level.

The discussion of technologies for the treatment of the collected waste is not directly related to the satisfaction of the basic need; as mentioned above, it would be most plausible to assume that, along with urban development, the waste originating from urban areas without a waste collection service would sooner or later receive a treatment according to the common practise of waste treatment in the host country of a project.

Please do not hesitate to contact us for further information and/or discussions.

Kind regards,



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#### References:

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