

CDM Executive Board
UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D 53153 Bonn, Germany

20th August 2012

Call for Public Inputs

SSC-III.BE "Substitution of virgin raw materials and fuels by secondary materials recovered from scrap tires"

Honourable members of the CDM Executive Board,

Groon Limited is a UK based but internationally focused company, working within the carbon, energy and water saving sector. We have several DSM projects underway, CDM projects in the pipeline, and have done a lot of work in the UK carbon schemes including CERT. We are actively focussed on a Tyre recycling project currently and as such would like to have a public input into the above methodology.

1. We are pleased to read that the current suggested methodology is more general to the technologies that are applicable. In the first incarnation of the methodology it was specifically limited to 'mechanical grinding' of tyres. Pyrolysis is another extremely effective way to recycle tyres. It involves the thermal degradation of tyres into their constituent parts. This is done in an oxygen sealed calciner, as such meaning CO₂ released during processing is virtually zero. The end products are Carbon Black (re-used in the tyre & rubber industry), Oil, Steel (from the beading of the tyres) and Syngas (re-used to fuel the calciner), and excess used to generate power. We feel that pyrolysis should be included in this methodology as an accepted form of processing, as the CO₂ savings from using these secondary products instead of virgin products is significantly larger than the mechanical recycling of tyres (as the Syngas makes the plants self-sufficient or even energy positive). Further to this the accredited end product definition would need to be expanded to include Carbon Black, Oil, and Syngas.
2. We understand that currently the methodology is being considered as a 'Small Scale' methodology and as such has a cap limiting the annual carbon savings. Is the plan to extend this to a Large Scale methodology? The necessary size of the plant and the

investment required for pyrolysis would generate savings in carbon above the Small Scale cap and hence we would be keen to see the methodology expanded to Small and Large Scale to enable this innovative and highly efficient technology to be developed and used.

3. Tyre failures created inadvertently as part of the production process present a very real and significant waste tyre stream. As such should these be included in this methodology?

In summary we feel that for an effective CDM methodology for tyre recycling, it should not be limited to mechanical processing of tyres, and should encompass pyrolysis as well. Pyrolysis when done with the correct equipment will produce virtually zero GHG emissions, and will be effectively self-sufficient. We believe it is a very carbon and energy efficient way to tackle the problem of waste tyres.

Thank you for the opportunity to comment on this methodology, we welcome any further questions to help in the process of finalising this methodology,

Yours sincerely,



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