

November 5, 2013

Chair and Members of the Small-Scale Working Group  
UNFCCC Secretariat  
Martin-Luther-King-Strasse 8  
D 53153 Bonn  
Germany

Honourable Chair and Members of the Small-Scale Working Group,

**Subject: Automatic additionality - Positive list for Small-scale. Flaring/use of landfill gas (LFG) CDM activities, AMS-III.G**

The Caribbean Water and Wastewater Association thank you for the opportunity to provide our comments on Call for public inputs on "Information note - Questions for public inputs on expansion and framework for assessing graduation of the positive list of technologies" (from 07 October to 06 November 2013, 24:00 GMT).

The Caribbean Water and Wastewater Association is committed to the advancement of the science, practice, and management of water supply and waste disposal for the benefit of Caribbean people through the development of human resources, public education, and professionalism, as well as promotion of appropriate technologies in the water, wastewater, and solid waste sectors.

The Caribbean Water and Wastewater Association suggest the following:

To expand the current positive list by adding (up to 60 ktCO<sub>2</sub>/year) in paragraph 2 and by including a new paragraph (2.e) in the current *Guidelines on the Demonstration of Additionality of Small-scale Project Activities*, v09.0, stating<sup>1</sup>:

Paragraph 2. Documentation of barriers, as per paragraph 1 above, is not required for the positive list of technologies and project activity types that are defined as automatically additional for project sizes up to and including the small-scale CDM thresholds (e.g. installed capacity up to 15 MW, **emission reductions up to 60 ktCO<sub>2</sub>/year**). The positive list comprises of:

**2.e. Project activities capturing and combusting methane from landfills (i.e. solid waste disposal sites) used for the disposal of residues from human activities including municipal, industrial, and other solid wastes containing biodegradable organic matter. These project activities apply small-scale methodology, AMS-III.G.**

**The reasons why we propose to include small-scale flaring/use of LFG activities in the positive list are as follows:**

- To reduce transaction costs of consultancy work/payment – project by project approach is costly (barrier/investment analysis needs to be carried out).

---

<sup>1</sup> [http://cdm.unfccc.int/Reference/Guidclarif/meth/methSSC\\_guid05.pdf](http://cdm.unfccc.int/Reference/Guidclarif/meth/methSSC_guid05.pdf)

- To avoid unnecessary effort (positive list or standardized baseline submissions require DNAs understanding and approval, DOEs assessment report (if applicable), and consultancy payment)
- To attract potential project developers in the sector as this type of activity is one of the most profitable under the CDM –methane reduction activities can reach 60%<sup>2</sup> returns on investment (assuming flaring component only/requested issuance).
- To support the environment in countries/cities facing landfill space constrains with efficient management practices.

**The scope is as follows:**

- Small-scale methodology AMS-III.G, with reductions less than 60 ktCO<sub>2</sub>/year.

**What is the approach? How to decide?**

Based on whether there are regulations requesting the collection and use of landfill gas (methane) in landfill sites. In case, regulations exist to demonstrate whether if they are being enforced. Refer to decision making diagram 1 in Annex 1.

**Case study- How does this approach apply to the Caribbean region<sup>3</sup>?**

Out of the 16 Caribbean countries (part of the CDM) there is only one (1) country, Dominican Republic, which has a legal 'norm' to manage landfill sites (2003); however, this norm is not being enforced. The rest (15) of the countries do not have a specific regulation requiring the use/flare of landfill gas from landfill sites. Refer to table 1 in Annex 1 which summarizes a review carried out in the 16 countries, this shows details on the source of information and/or contact details for each of the countries.

Alphonsus Daniel

CWWA , V.P




---

<sup>2</sup> UNEP-Risoe, 2012, p12. *Penny Wise Pound Foolish* <http://www.unclearn.org/sites/www.unclearn.org/files/inventory/unep210.pdf>

<sup>3</sup> There are only four (4) landfill gas CDM activities. Out of the four (4) activities, two (2) are large-scale located in Cuba and Dominican Republic and the other two (2) are small-scale ones in Bahamas and Belize.

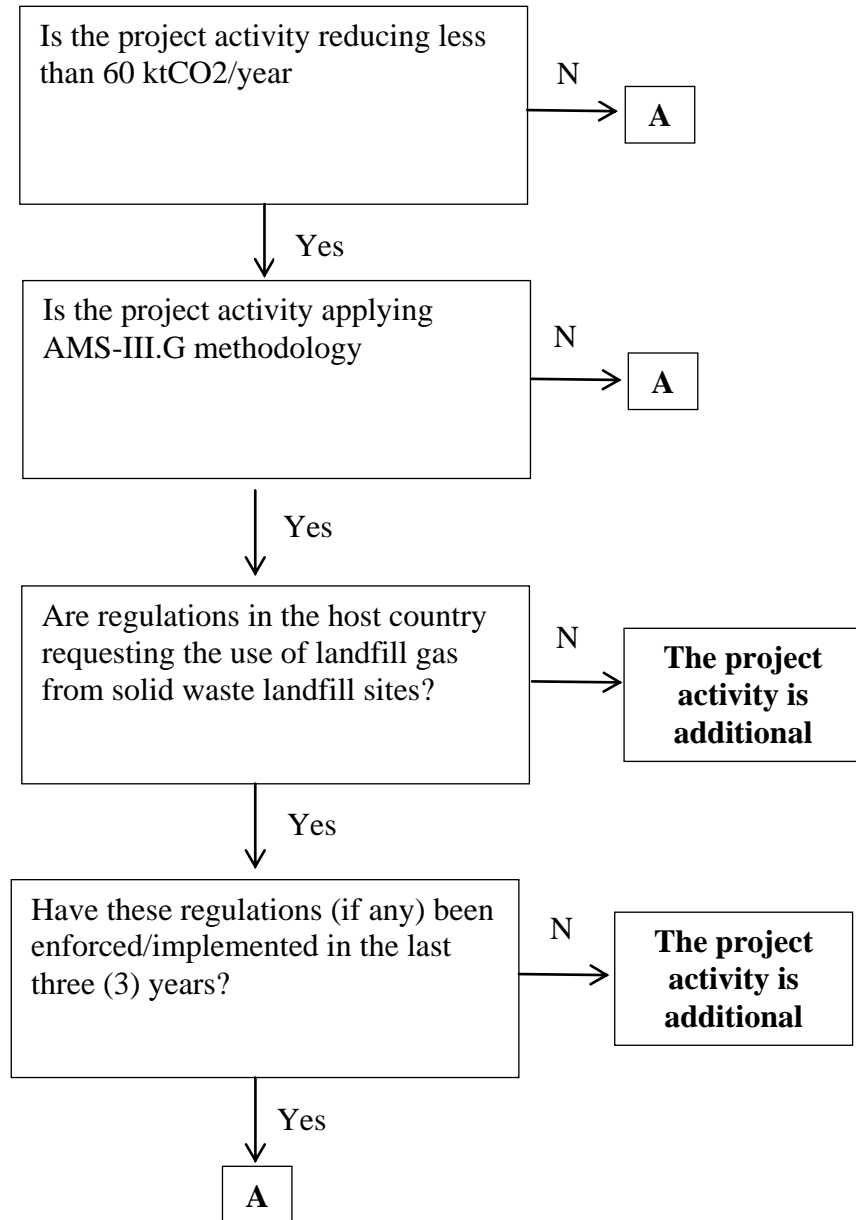
**Annex 1**

**Diagram 1 – Positive list for use/flare of landfill gas, AMS-III.G**

Legend:

**A**

Means use other means to demonstrate additionality such as *Guidelines on the demonstration of additonality of small-scale project activities*.



**Table 1 Summary of legislation available for landfill gas flare/use**

Country	Legislation on LFG flare/use (Yes/No)	Source	Additional information
Antigua and Barbuda	No	National Solid Waste Management Act	1995
Bahamas	No	PDD, VR, CDM 5620 (AMS-III.G) – Barrier analysis. DOE validated that there are not regulations.	2011 (CDM registration date)
Barbados	No	Environmental Protection Department Ministry of the Environment, Water Resources and Drainage	<a href="http://www.epd.gov.bb/category.cfm?category=6">http://www.epd.gov.bb/category.cfm?category=6</a>
Belize	No	PDD, CDM 'Mile 24 Regional Sanitary Landfill LFG Project	2013 (CDM, global stakeholder consultation)
Cuba	No	PDD (page11), VR, CDM 2260	2009
Dominica	No	Solid Waste Management Act No. 1, 2002	Global Partnership on Solid Waste Management 2010.
Dominican Republic	Yes	CDM (2595). Norm to manage Landfill sites, recommending taking measures to control gas emissions. It is no enforced.	2003
Grenada	No	Grenada Solid Waste Management Act No. 11 and Act No. 16	1995 and 2001
Guyana	No	Guyana's Laws are currently not sufficiently comprehensive to adequately deal with solid waste management issues.	<a href="http://www.guyenterprise.com/solidwaste/legal.htm">http://www.guyenterprise.com/solidwaste/legal.htm</a>
Jamaica	No	National Solid Waste Management Act	Global Partnership on Solid Waste Management, 2010
Saint Lucia	No	MSW legislation is fragmented and need for long term delegation of activities.	Global Partnership on Solid Waste Management, 2010.
Saint Kitts and Nevis	No	Solid Waste Management Act was passed.	2000
Saint Vincent and the Grenadines	No	Waste Management Act and Regulations, Act No.31 - Solid Waste regulations No. 11	2000, 2005
Suriname	No	Country Analytic Report, Solid waste Management by PAHO	2002
Trinidad and Tobago	No	Municipal Solid Waste is referenced in some regulations that are limited in scope.	Global Partnership on Solid Waste Management, 2010

For further information please contact Mr. Alphonsus Daniel, Vice President of the CWWA Secretariat, Tel: 473 440 1939, 473 407 3837 or via e-mail: [altheus@spiceisle.com](mailto:altheus@spiceisle.com), [adaniel@dandplumbingsol.com](mailto:adaniel@dandplumbingsol.com)