Call for public input on the draft revision of the methodological tool "TOOL06: Project emissions from flaring"

Generally speaking, the tool is too complex.

1) §19. PP should not have to decide at the time of PDD writing which option shall be applied. The decision is taken at the time of implementation, which can be years after the PDD. It must be acceptable.

   Replace:
   "(…) project participants may choose between the following two options to determine the flare efficiency for minute m and shall document in the CDM-PDD which option is selected"
   By:
   "Two options are proposed to determine the flare efficiency"

2) §20. Anyone who was capable of reading, understanding and implementing this tool, had noted that there was a 10% discount there. The addition of a "non-binding best practice example" is not useful (furthermore, it is not "non-binding").
   The tool and the revision are related to ACM0001, as highlighted in the cover note. In all landfill gas projects, the flares are "low height". So all the PP are supposed to discount arbitrarily 10% of the credits. How can the UNFCCC justify to take away 10% of the results of a project by simply stating "as a conservative approach" without any more explanation? What is the background for "shall be adjusted, as a conservative approach, by subtracting 0.1 from the efficiency"? Why 10%? Why not 40% or 2%? Please give us some content to make the drastic, arbitrary and unfair decision acceptable.
   In case of option B.2., if the monitored amount of CH_4 in the exhaust gas every minute for ten years is proven to be zero, as measured by a duly calibrated gas analyser with high accuracy, then the combustion is 100% efficient, there is no methane released and it is quantifiable / demonstrable / proven / real.

3) §21. Default value
   a. There are actually three conditions there (as in §23):
      1. Temperature of the flare
      2. Flow rate
      3. Flame detection

   b. What is the purpose of monitoring the flame detector? Whether there is a flame or not is already reflected in the flare temperature (ambient temperature vs. combustion temperature). Monitoring the flame brings nothing and adds complexity for the project monitoring, for instance:
      - connection of the device to a data logger
      - difficulty to calibrate in CDM countries
      - cost of calibration
      - if the flame detector/the signal failed, no ER would be claimed even if the flare was working – as proven by the flare temperature and the flow rate and all other monitoring instruments.

c. Monitoring every minute is complex. **Please allow some flexibility.** For instance records every 5 minutes, every 10 minutes, or any frequency of at least every hour.

4) §5.2.2.2.1. The contrast in terms of constraint and accuracy between the biannual measurement for one hour (20 records in 10 years) and the obligation to monitor every minute (5.25 million records in 10 years) at least 3 parameters or at worse 6 parameters and carry out heavy and complex calculations is quite striking.

5) §5.2.2.2.2. Can you harmonize the name of the parameters in this tool with the "tool to determine the mass flow of a greenhouse gas in a gaseous stream" and ACM0001?

6) §6.1 Table 4 $T_{EG,m}$.
"Unexpected changes such as a sudden increase/drop in temperature occur for different reasons. These events should be noted in the site records along with any corrective action that was implemented to correct the issue."
What is the added value of including this in the tool? It is just an example of a technical failure at the time of monitoring, which, as any other event, should be reported in the monitoring report (for instance, failure of the thermocouple, failure of the signal, invalid values, electricity blackout etc.).
What is meant by "sudden"? Do we exclude all the routine cases when the temperature drops because the flare is shutting down and increases because the flare is starting up?
Suggest to delete these two sentences.

7) §6.1 Table 5 $V_{i,RG,m}$ volumetric fraction of component *i* in the residual gas.
"Measurements may be made on either dry or wet basis. If value is made on wet basis, then it shall be converted to dry basis for reporting".
Provide a guideline to convert the volumetric fraction of component *i* in the residual gas from wet basis to dry basis.

8) §6.1 Tables 6 and 7 $V_{RG,m}$ and $M_{RG,m}$.
Provide a guideline to convert the flow from wet basis to dry basis.

9) §6.1 Table 11 $Maintenance_y$.
What is the logic of this parameter? What is its added value apart from increasing – again – the complexity of the monitoring?
   a. "Records of maintenance logs must include all aspects of the maintenance including the details of the person(s) undertaking the work, parts replaced, or needing to be replaced, source of replacement parts, serial numbers and calibration certificates."
   Even the guidelines for completing the monitoring report do not require such a level of details (name of the persons!) to be reported.

   b. "Monitoring of this parameter is required for the case of enclosed flares and the project participants selects Option B to determine flare efficiency. These dates are required so that they can be compared to the maintenance schedule to check that maintenance events were completed within the minimum time between maintenance events specified by the manufacturer ($SPEC_{flare}$)"
   $SPEC_{flare}$ is defined in §21 as the flare temperature and the flow rate according to the flare manufacturer.

1. These two parameters are thus already covered in tables 4, 6 and 7.

2. The $SPEC_{flare}$ and therefore the parameter “maintenance” are thus related to the thermocouple and the flow meter. Any other “maintenance event [not] completed as within the minimum time between maintenance events specified by the manufacturer” would not have any impact on the calculations.

3. What would be the impact of “maintenance event [not] completed as within the minimum time between maintenance events specified by the manufacturer” in terms of calculations other than a calibration delay (and the related discounts to be applied) of the thermocouple and the flowmeter? How is it quantified?

4. To be consistent, if this parameter was somehow linked to $SPEC_{flare}$ then it should be applicable to Option A as well.

Suggest to delete table 11 as it leaves room for interpretation and subjectivity, it does not have any impact on claimed ER (other than calibration delays which are already covered) and it only increases complexity.

10) As for the “tool to determine the mass flow of a greenhouse gas in a gaseous stream”, **provide a calculation tool in excel format to facilitate the application of the Tool**.

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