

Project Developer Forum Ltd.

Europe: ++49 171 279 8223
office@pd-forum.net
www.pd-forum.net

CHAIRPERSON:
Sven Kolmetz
sven.kolmetz@pd-forum.net

CO VICE CHAIRPERSONS:
Philipp Hauser (also BoD)
Philipp.HAUSER@pd-forum.net
Christiaan Vrolijk
christiaanvrolijk@gmail.com

Board Member:
Rachel Child
Rachel.child@pd-forum.net

To Gajanana Hedge
From Sven Kolmetz
Date 18 March 2019
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Subject **EB102 Concept note on non-renewable biomass in households (Annex 6)**

Dear Members of the Executive Board,

The Project Developer Forum (PD Forum) is a collaborative association and collective voice of companies and practitioners that are developing and financing greenhouse gas emission reduction projects worldwide. Our members work on a global scale and evaluate opportunities to deploy climate financing and carbon market instruments to accelerate investments for greenhouse gas mitigation and sustainable development.

Following the publication of the EB102 annotated agenda, we would like to take the opportunity for sharing our views on Concept Note CDM-EB102-AA-A06: *Methodological approaches for calculating emission reductions from project activities, resulting in the reduced use of non-renewable biomass in households*. We have previously commented on the approaches for calculating emission reductions from the displacement of non-renewable biomass in our submission dated 25 September 2018. This short intervention builds on our earlier communicated views.

First of all, we wish to commend the Parties to the Kyoto Protocol for raising the issue during CMP 14 and providing the Board with a mandate to revisit the current approach of using an emission factor based on fossil fuel. As expressed earlier, we consider this practice an arbitrary and punitive discount on the emission reductions awarded to household scale technologies such as efficient cook stoves or biogas digesters that benefit the most vulnerable people. The issue also is of material concern to many of our members, who despite the current market conditions are actively seeking to raise investment for these important technologies.

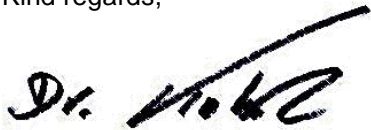
We therefore wish to express our full support to the proposal 5 of paragraph 14 of the concept note, which suggests that the Board mandates the Methodologies Panel to further consider the issue and make recommendations. We agree with the assessment made in paragraph 15 and support the use of an emission factor based on wood for non-renewable biomass. For us the issue is straightforward and we encourage members of the Board and the Methodologies Panel to come to a swift decision. In case the use of a wood based emission factor is positively decided, we also encourage the Board to swiftly implement the changes to relevant methodologies, in order for our members and vulnerable communities to start benefitting from the change.

We also like to align ourselves with proposal 6 of the concept note suggesting further work be carried out for non-CO2 greenhouse gas emissions such as methane and nitrous oxide emissions that are not considered in the current methodologies. Methane emissions alongside other carbon compounds and particulates (black carbon) result from the incomplete combustion of biomass. Nitrous oxide emissions arise from nitrogen fixed in the biomass. These emissions are significantly reduced by project activities that reduce the amount of biomass burned. However, current

methodologies do not credit project activities such as efficient cook stoves with this climatic benefit, even though the IPCC has already adopted default values for methane and nitrous oxide from the combustion of wood. We therefore strongly support this proposal and suggest the adoption of IPCC default values, where available, to estimate the resulting emission reductions.

We wish to thank the members of the Board for the opportunity to provide our inputs, and hope that these are of value to future discussions.

Kind regards,

A handwritten signature in black ink, appearing to read "Dr. Kolmetz", with a long, sweeping horizontal stroke above the name.

Dr. Sven Kolmetz
Chairman, Project Developer Forum