Comments on Draft Methodological Tool

'Tool to estimate emissions associated with cultivation of lands to produce biomass"

I am a stakeholder, well informed person actually working in the projects related with agriculture emissions having the following issues related with the tool proposed:

The developers of tools has NOT taken into account that in reality the market forces defines the prices and interaction between produces, trader and user of biomass. Even at the best price available the revenue from sale of CERs are not sufficient enough to support the interaction between the player or even the dedicated energy plantation. The entire economics of biomass as fuel depends on its availability.

The view taken to develop this tool is very narrow……producers and users of biomass are NOT always same.

Few comments to illustrate above aspect are:

1. Applicability: In the first paragraph line 3 refers that 'the tool may be referred to methodologies that **use renewable biomass** for energy purposes or for the production of biofuels'.

The tool assumes that the emissions associated with the cultivation of land to produce biomass can be calculated by the user of biomass; **which is practically impossible**.

- The users of renewable biomss are entirely different with respect to producers. For example 8 MW biomass based power plant is installed with the XYZ industries limited and the biomass is procured from the nearby villagers or the oil mills (de oiled cakes etc.). Generally the power plant developer depends on the third party reports to ascertain biomass availability. They are no where associated with the fact how that renewable biomass is produced; him main concern is biomass availability for its plant operation. Therefore in this case the biomass based power plant developer although he is a user but he can not use this tool because he is no where associated with the production of biomass.

- In other prevalent case of sugar mills; the availability of biomass is generally ensured with the quantity of cane crushed and biomass produced. Most of the time, they purchase the sugar cane from farmers and have no control on the farmers way of cultivation.

- If the sugar mill has its own cogeneration plant and using the biomass by import (purchase) from other industries, biomass suppliers, in this case also the emissions associated with cultivation of lands to produce biomass can not be estimated.

In a different analogy if we consider the producer of biomass (farm house owner, farmers etc), it is unknown to them that where this biomass will be used.

- In case of a producer of biomass for example grain producer (wheat) which is producing the biomass as well sell biomass to a mediator (sales agent) and his interaction ends there. The sales agent collects biomass from different sources and sells to a user say biomass based power plant. Therefore in this cycle it is practically very difficult to know who has produced the biomass and who has used it.

In a nutshell in the tool there is a big flaw which is missing link between user of the biomass and producer of the biomass.

The tool may be made useful by incorporating default emission factors for all the factors mentioned otherwise we have seen that UNFCCC appointed experts, RIT team and Meth Panel members themselves are not clear which is the correct factor to be used; infact IPCC factors are quite often challenged. It would be a good opportunity to clear such ambiguities by providing emission factor under various conditions (as expected to be described by the user of this tool).

Applicability condition 2: to accounts for emission credits from use of by-products from biomass/biofuel production in the process;

NOT Covered in the tool.

This is the assumption which will demote the energy plantation which in fact helps the discussions of above point. This is against the core value of Clean Development Mechanism (CDM) to promote sustainable development. The credits associated with the use of by products from biomass/biofuel production process are very important because all the emissions associated with the plantation, fertilizer use and land change is considered here, therefore the biomass producer should be allowed to use the biomass residue (by product) and get the emission reduction credits out of this.

Following two points can be considered by Meth Panel:

1. It appears that the Meth Panel presumes that the bio mass residue is a fossil fuel based product and there should not be any emission credit for the same. (According to applicability condition it reflects that the Meth Panel considers that there should be credit for this but no

procedure made available). In any case its neither reflected in the tool nor clear to a informed reader. Means going forward will be left to interpretation (of DOE, RIT, Meth Panel, UNFCCC appointed experts etc…which is seldom same).

2. The Meth Panel considers that the biomass residue /biomass by products can directly (100% quantity) be claimed for emission reductions and no additional emission needs to be estimated. For example, for a biomass producer of 10 kg, if 3 kg is in form of by-products (or residues…not defined by tool which is another issue) then can this be considered that 3 kg by product is free of leakage. As per the tool all the emissions are on account of balance 7 kg part (say main product).

I did a rough calculation based on the available data (given in the tool and IPCC guidelines). Based on calculations; if the credit for biomass by products/residue is discounted than the emission associated with the cultivation of biomass are much more the emission credits given for the biomass use (say energy use by plants).

The possible inclusion in the tool suggested are:

1. Permitting the biomass residue to claim emission credits directly (100% emissions on the biomass product)
2. Proportioning the emissions based on the quantity of biomass products and residue

Therefore the tool should be modified accordingly either permitting the biomass residue/by products for emission credits without discounting for the associated emissions (as these emissions are taken care in the biomass product) or providing a procedure for the proportionate emissions to biomass product and by product.

Few more technical issues

- Emissions from Urea: It seems that the emissions from Urea uses are double counted because the emission are considered in the synthetic fertilizer manufacturing and again calculated for the use. This should be removed from the tool.
- Default emission factors: Not realistic. Example suggested electricity emission factors 1.2 T CO2 per MWh is not realistic. In a scenario where it is mentioned time and again that quality of data from Non Annex-I country is poor, there is a tendency of DOE to readily agree on such default values. Hence, the Meth Panel should act with

responsibility and should not force upon factors camouflaged as requirement of conservativeness.

We would like Meth Panel to revise this tool to address above issues. In its present form its more like a conglomeration of equations and do not serve the purpose.

In case of any clarifications, additional information please do write me.

Thanking you

Yours truly,