The Chairman and Members of the CDM Executive Board

c/o the UNFCCC Secretariat

P.O. Box 260124

D-53153 Bonn

Germany

Dear Sir/Madam,

Re: Call for Public Inputs on Draft Revised Methodology AM0031

The Institute for Global Environmental Strategies (IGES) welcomes this opportunity to provide input on the draft revised methodology AM0031 "Baseline and Monitoring Methodology for Bus Rapid Transit."

IGES commends the CDM MP's decision to consider BRT projects implemented in least developed countries (LDCs) to be automatically additional. While the additionality barrier is removed, there are other compelling challenges to facilitate deployment of much needed transport infrastructure in LDCs which could reduce carbon emissions. We would like to share our input recognizing the needs of LDCs based on feedbacks from the recent "Workshop on Enhancing the Regional Distribution of CDM Projects in Asia and the Pacific" jointly organized by ADB, IGES and co-funded by the UNFCCC Secretariat (For detailed information and presentations, please refer to http://www.iges.or.jp/en/cdm/activity_regional110906.html).

We highly appreciate if our input would be considered during the preparation of an information note by the secretariat and be taken into account by the Board in its future meetings.

Introduction of regional or national default values in setting the baseline

Availability of reliable transport data necessary for *ex ante* estimation is scarce if non-existent at all in many LDCs. Often there is no system in place on which agency is responsible for collection and management of which transport data. AM0031 requires baseline emissions based upon emissions per transported passenger from data on the following indicators:

- Transport modes in the absence of BRT project
- Fuel consumption of such modes
- Fuel types used by the different transport modes and their carbon emission factor
- Occupancy rate of different modes
- Trip distance taken by different modes
- Total number of new passengers on the new system

Default values for specific fuel consumption of different transport modes and fuel types as well as fuel emission factors are already being used in the AM0031 methodology. To establish the other baseline parameters, the following traffic surveys should ideally be carried out:

- Traffic volume count
- Vehicle occupancy survey
- O-D (origin-destination) surveys
- Bus boarding and alighting counts

The intention of providing appropriate default values for certain parameters like average occupancy and average trip distance is primarily to lessen the burden of data gathering thereby reducing cost at the outset of the project preparation in LDCs. The implications on actual emission reduction, either under or over estimation, could be corrected by necessary surveys to monitor and validate actual emission reduction.

Conservative values for average occupancy rate and average trip distance could be based on previous empirical research, expert opinion, and other sources such as the Global Environment Facility's (GEF) *Manual for Calculating Greenhouse Gas Benefits of GEF Transportation Projects* or based on PDDs of similar projects in the same region with near-like circumstances. To illustrate, if allowed, a potential BRT project in Cambodia or Lao PDR may utilize the parameters in table 1.

Table 1. Key parameters for AM0031 baseline establishment and data sources

| Indicator	AM0031	Proposed default values
The transport modes used in the absence of BRT project	Passenger survey	
Fuel types of different modes	Local statistics	
Average speeds	Project data of local statistics	
Specific fuel consumption by mode and fuel type	Local statistics, national or international literature, or IPCC values multiplied by an annual technology improvement factor of 0.99 for buses, taxis and passenger cars, 0.997 for motorcycles	
Fuel emission factor	IPCC values	
Average occupancy rate of the vehicles by mode1	Project statistics or official statistics	Bus: 39.33 Car: 1.86 Taxi: 1.86 3-wheeler: 4.25 2-wheeler: 1.48
Average trip distance for	Project statistics or official statistics	Bus: 3.753

each mode2	Car: 6.25
	Taxi: 6
	3-wheeler: 5
	2-wheeler: 7.5
Total number of passengers on the new system	Recorded per entry station

Note: [1] Based on PDD for Indore BRT; [2] Based on values derived in Vientiane from Onnavong and Nitta (2005) *"Identifying inequality of transportation mobility: developed country vs developing country"* (http://www.easts.info/on-line/proceedings_05/1065.pdf); [3] The GEF's *"Manual for Calculating Greenhouse Gas Benefits of GEF Transportation Projects"* suggests 6 km as a conservative default value for average trip distance however the lower value derived from Onnavong and Nitta (2005) is deemed more appropriate especially for LDCs

Adjustment of baseline values after the verification to enhance the accuracy of emission reductions

To ensure the environmental integrity of the carbon emission reductions, recognizing the potential under or over estimation based on using initial default values, the baseline values will be updated based on actual local values generated by conducting the abovementioned surveys to monitor and validate the project once it is implemented. This process of enhancing and updating the values is continuous.

Default values (*ex-ante* estimation)	⇒	Actual survey (Monitoring)	⇒	Adjusted values (*ex-post* verification)
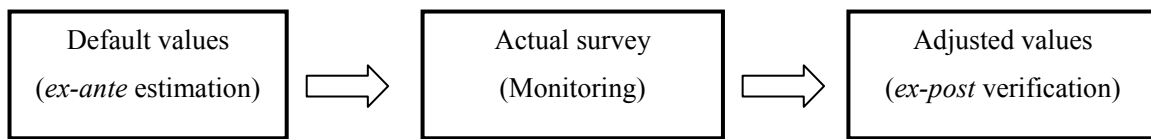
Currently there are no existing BRT systems in less developed countries like Cambodia and Lao PDR. Exploring ways to simplify and lessen the project data needed through the introduction of standardized baselines and default values could encourage such public transport projects to be in place in emerging cities early on before traffic congestion paralyze the transport system as seen in many Asian mega cities.

We will be available to discuss issues on default values further with the members of the Methodology Panel if this would be helpful.

Again, we thank you for the opportunity to provide input to further develop AM0031.

Sincerely yours,

Jane Romero
Policy Researcher, Climate Change Group