Santiago, Tuesday June 13th, 2006

Mr. José Domingos Miguez
Chair of the Executive Board
UNFCCC

Ref.: Submission on AM0006 Methodology revision related to Animal Waste Management Systems (AWMS).

Dear Members of the Executive Board,

During the 24th Meeting of the Executive Board, it was agreed that the revision of the methodologies AM0006 and AM0016 is significant; therefore they were put "on hold" in accordance with the procedure for revision of approved methodologies, until the monitoring of flares is addressed in these methodologies and considered by the Board. According to this decision, the Board has invited to send submissions for the revision of AM0006. Agrosuper kindly requests the EB to consider the following submission.

The preceding information of the 24th Meeting's report also takes into account, that the Meth Panel recommended to the Board to approve the consolidated methodology based on AM006 and AM0016. The Board considered the recommendation from the Meth Panel and requested it to continue the review of AM0006 and AM0016 in light of the observations by the Board members for the purpose of consolidation. The Board specifically requested the Meth Panel to revise these approved methodologies to include the monitoring of flares, for consideration at its twenty-fifth meeting. The Board also requested the Meth Panel to analyze the impact of revisions on the estimated emissions reductions.

We at Agrosuper have the goal of achieving appropriate projects that really conceive the Kyoto purpose of measurable greenhouse gas emission reductions. We are very concerned with the present decision to maintain AM0006 as "on hold", and probably be substituted by a consolidated methodology that has some points in common with the original Approved Methodologies, but several different evaluations, estimation and measuring criteria.

When putting all Approved Methodologies regarding AWMS "on hold", several factors have to had been taken into account and we would be pleased if the concerns and questionings may be made available to the public, since we believe that other issues may have also influenced such decision, and not only flare efficiencies.

Our comments are related in the first term with the flare efficiency issue. Notwithstanding, we will also make reference to other issues found in the Meth Panel proposal related to the consolidation of methodologies AM0006 and AM0016. Since the methodology we created is AM0006 and is the only one we use, most of our comments are related to that methodology.

1. Flare efficiency:

In order to comply with a representative quantification of emission reductions regarding the flare efficiency, the methane that is not being burned must be considered as fugitive emission source of GHG. For open candlesticks, were flare efficiency cannot be measured, a minimum Gas Handling Skid instrumentation must be required in order to guarantee appropriate flaring conditions of biogas. In addition, control requirements to achieve EPA air emission standards specified in EPA document ***40 CFR 60.18 General Control Device Requirements*** can be considered.

2. Other issues:

The revision of approved methodologies AM0006 and AM0016 has considered high discounts for baseline emissions and high project activity emissions. These discounts are inconsistent with IPCC guidance. AM0006 and AM0016 can be upgraded by implementing the following additional components and guidelines, in order to filter and separate those CDM project activities that achieve measurable and reliable emission reductions from those project that are not sustainable. Some improvements that can be considered are exposed below:

- In order to reassure that any anaerobic lagoon defined as the potential baseline scenario is strictly anaerobic, additional considerations should be requested as main design characteristics. Design properties such as height, average temperature, hydraulic retention time, and volatile solids input rate should be on hand for the DOE for validation.

- IPCC values where created in order to develop national inventories for greenhouse emissions. The parameters recommended in AM0006 as IPCC references are Bo (maximum methane generation potential), VS (volatile solids on raw manure) whenever this value cannot be monitored, and MCF (methane conversion factor). Each of these parameters must be analyzed in order to assure their reliability.

    - In AM0006, project proponents can use appropriate IPCC default values for Bo for developed countries, only if several conditions are met. These conditions involve genetic source of animals, animal weights, formulated feed rations, architecture and structural characteristics of barns and productivity range.
    - In AM0006, an additional alternative to represent volatile solids as a function of feed intake can be added. The use of this alternative to represent volatile solids does not consider a weight correction. In addition, AM0006 considers the use of corrected IPCC default values for volatile solids estimation, although it is not explained any clear criteria for their use. A conservative approach should be included, choosing the lowest corrected IPCC default value of volatile solids calculated. If the lowest value considers a developed country category, therefore this category should be used for all default values.

- In AM0006 we recommend to include the original Van't Hoff.-Arrhenius methodology for MCF estimation, which does not consider any correction factor for uncertainty or variability in the lagoon's characteristics. This representation of the MCF is only applicable to anaerobic lagoons, which must comply with the design properties required in the baseline definition.

- Nitrous oxide emissions from irrigation should be included in the project boundary. The complete manure management chain ends where the manure is finally used, and due to the effects of any advanced technology or manure management upgrade in the final effluent, irrigation is part of the boundary of the project.

- Guidelines to quantify project and baseline emissions from the waste management systems energy consumption should be included in order to be properly quantified as an emissions source.

- We recommend quantifying the emission reduction potential of biogas consumption as a source for renewable energy, as it is described in AMS-I.D and in ACM0002.

We agree that the quality of projects must be preserved and that only sustainable projects will make the carbon market work. Sustainability of the projects is based on the seriousness, the legal compliance within the host country and full compliance with the CDM methodologies and evaluation criteria, i.e. baseline and monitoring plan. So, it is important to consider a "conservative approach", to filter those initiatives that do not comply with the conditions of CDM project activities.

Finally, we would like to ask for one procedural clarification, regarding the status of AM0006 and AM0016 after the consolidation process is ready. According to EB 15 the CDM Executive Board agreed that "*(a) An approved methodology which is covered by a consolidated methodology shall continue to remain valid in its own right*". We would like to be informed if the recent consolidation process between AM0006 and AM0016, will affect withdrawn individual methodologies once the process of approval of the consolidated methodology is completed.

Agrosuper kindly requests the Executive Board to consider the experts technical advice towards transparency and public review during the consolidation of Approved Methodologies.

Yours sincerely,

Carlos Andrés Vives
Environmental Manager
Agrosuper