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Submissions on CDM AR WG Ninth Meeting Report Annex 1 Page 1

Double Counting of emissions sources between A/R and non A/R methodologies

Double counting would arise when

- CERs are granted to a A/R project AND
- CERs are granted to a non A/R project using as a raw material the output of the A/R project.

Typically an A/R CDM project methodology requires that the carbon density of the material within the project boundary is

1. Modelled for the project providing an expected carbon density over time
2. The base line is subtracted from this
3. The net change in carbon stocks are viewed for eligibility
4. These are then monitored and verified following a timetable

Biomass input for non A/R methodologies would fall into two broad categories

1. The actual biomass itself, for example wood where the crop is destroyed and re established over a regular rotation e.g plantation forestry
2. The harvested biomass, e.g seeds, where the crop is harvested regularly and the main biomass remains within the project boundary and some reduction occurs that is regularly replenished through further growth

We submit

- A. The permanence element of A/R methodologies would account for the carbon loss within the project boundaries and result in a reduction in the CER units granted to the project over time
- B. Any input then of the resulting biomass into a non A/R project for example biofuels could then simply count the emissions baseline as zero for the raw material component of the project, ie the material from the harvest of the A/R project is deemed to be unencumbered by the prior issuance of CERs
- C. The non A/R project methodology be revised to incorporate verification of the source of the raw materials and the absence of the issuing of CERs for the generation of the materials under A/R or that the project has accounted for the reduction in the carbon density of the A/R project.

Essentially double counting can be avoided by correctly subtracting the carbon removed from within the project boundaries of the A/R project. AND

Providing for a non A/R project activity to establish the sources of the biomass used in the project.



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A review the currently approved biomass CDM projects yields no projects that would appear to source fuels from a project that is registered and A/R.

The fuel sources appear to be by products of crop production such as rice husks and palm kernel material.

Both of these fuel sources are now viable due to improvements in technology and the CER income.