

CDM-PA2271-RULE01

Ruling note

Request for issuance for “Tecamac –
EcoMethane Landfill Gas to Energy Project”

Version 01.0



United Nations
Framework Convention on
Climate Change

1. The CDM-Executive Board decided to reject the proposed request for issuance for CDM project activity "Tecamac – EcoMethane Landfill Gas to Energy Project" for the monitoring period of 1 October 2010 – 20 March 2019 on 11 March 2022, in accordance with the "CDM project cycle procedure for project activities", version 02.0 (PCP-PA), paragraphs 239. Further, in accordance with paragraph 249 of the PCP-PA, the ruling shall contain an explanation of the reasons and rationale for the final decision, which are as follows:
 - (a) The DOE (TÜV NORD CERT GmbH, TÜV NORD) failed to:
 - (i) Validate the applied approach by the PP under temporary deviations from the registered monitoring plan in accordance with paragraph 282 of "CDM validation and verification standard for project activities", version 02.0 (VVS-PA), and paragraph 231 (b)(i) of "CDM project standard for project activities", version 02.0 (PS-PA);
 - (ii) Verify the compliance with the tool "Tool to determine project emissions from flaring gases containing methane" with regard to the determination of flare efficiency, in accordance with paragraph 373 (c) of VVS-PA.
 - (b) The relevant requirements are:
 - (i) VVS-PA paragraph 282 states "If the DOE identifies that the project participants have deviated from the registered monitoring plan, the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents, the DOE shall determine whether the project participants have proposed alternative monitoring arrangements or applied the most conservative values approach referred to in the "CDM project standard for project activities" for the non-conforming monitoring period.";
 - (ii) PS-PA paragraph 231 states "If the project participants are temporarily unable to monitor the registered CDM project activity in accordance with the monitoring plan in the registered PDD (hereinafter referred to as the registered monitoring plan), the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents, the project participants shall describe the nature, extent and duration of the non-conforming monitoring period in the monitoring report, and: ... (b) Apply the following most conservative values approach when alternative monitoring arrangements are not proposed. This does not require approval by the Board: (i) Apply zero for baseline GHG emissions for the entire non-conforming monitoring period; ... ";
 - (iii) VVS-PA paragraph 373(c) states "The DOE shall determine whether: ... (c) The calculations of baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals, and leakage GHG emissions have been carried out in accordance with the formulae and methods described in the registered monitoring plan, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents";
 - (iv) The "Tool to determine project emissions from flaring gases containing methane", page 10, states "In case of enclosed flares and use of the default

value for the flare efficiency, the flare efficiency in the hour h ($\eta_{flare,h}$) is: ... • 90%, if the temperature in the exhaust gas of the flare (T_{flare}) is above 500 °C for more than 40 minutes during the hour h and the manufacturer’s specifications on proper operation of the flare are met continuously during the hour h ”.

- (c) The reasons and rationale for the final decisions are:
 - (i) The PP/DOE applied provision from paragraph 231 (b)(i) PS-PA of the non-conforming periods under the temporary deviations from the registered monitoring plan. However, in addition to the baseline emissions being considered zero during these periods, the project emissions from the electricity consumption by the project activity are also considered zero, whereas the provision from paragraph 231 (b)(i) PS-PA only specifies the application of zero baseline emissions;
 - (ii) The emission reductions spreadsheet still shows and indicates instances where the flare operation did not conform to the manufacturer specification, but the default value of 90% for flare efficiency is applied. For example, on 13/04/2012 at 17:30 and 22/04/2016 at 21:15.

2. Please note that in accordance with paragraph 256 of the PCP-PA, the DOE may re-submit the request for issuance with revised documentation if the reasons for the rejection can be addressed by means of a revised verification report, based on a revised monitoring report as appropriate.

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Document information

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