

**CDM-PA10418-RULE01**

## Ruling note

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# Request for issuance for “San Pedro Bio-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 (PA) 10418 "San Pedro Bio-Energy Project", for the monitoring period of 04 June 2020 - 31 Dec 2020, on 20 March 2025 in accordance with the "CDM project cycle procedure for project activities" (PCP-PA), ver. 03.0, paragraph 245. Further, in accordance with paragraph 251 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 E-0051: KBS Certification Services Ltd. (KBS) failed to verify the data applied in calculating the GHG emission reductions and the submitted energy balance in accordance with paragraphs 372, 373 (c) and 374 (c) of "CDM validation and verification standard for project activities", ver. 03.0 (VVS-PA).
  - (b) The relevant requirements are:
    - (i) Applied methodology (ACM0006 ver. 14) and the registered monitoring plan require crosschecking the measurements with an annual energy balance that is based on purchased quantities and stock changes.
    - (ii) VVS-PA, paragraph 372 states that "The DOE shall assess the data and calculations of GHG emission reductions or net anthropogenic GHG removals achieved by from the registered CDM project activity".
    - (iii) VVS-PA, paragraph 373 (c) states that "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.....".
    - (iv) VVS-PA, paragraph 374 (c) states that "A confirmation that appropriate methods and formulae for calculating baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals and leakage GHG emissions have been followed".
  - (c) The reason and rationale for the final decision is:
    - (i) The data on the emission reduction calculation spreadsheet Tab "INPUT DATA A" (used for the emission reductions calculation) is different from the data on the emission reduction calculation sheet Tab "Energy Balance" (used for crosschecking measurements) as shown below and the DOE has failed to justify for the inconsistencies in the data parameters:
      - a. Quantity of bagasse ( $BR_{B5,bag,2020}$ ) applied in the emission reduction calculation is 74,790 tonnes and  $BR_{B5,bag,2020}$  applied in "Energy Balance" is 142,943 tonnes;
      - b. Quantity of wood from dedicated plantations ( $BR_{B5,wood,2020}$ ) applied in the emission reduction calculation is 726 tonnes and  $BR_{B5,wood,2020}$  applied in "Energy Balance" is to 907 tonnes;
      - c. Quantity of coal ( $FF_{f,h,y}$ ) applied in the emission reduction calculation is 5,629 tonnes and the consumption applied in "Energy Balance" is 13,288 tonnes.

- (ii) The monthly ratio of energy output to energy input during the monitoring period varies from 0.38 in August 2020 to 1.24 in October 2020 and the DOE has failed to justify on this variation (specifically for October 2020 which has more energy output than energy input).
2. Please note that, in accordance with paragraph 258 of the PCP-PA, ver. 03.0, 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

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	28 April 2025	Initial publication. Related to CDM project cycle procedure for project activities, version 03.0 (Paragraphs 245, 251 & 258).
Decision Class: Ruling Document Type: Ruling note Business Function: Issuance Keywords: E-0051, PA10418, monitoring plan, rejection of request for issuance		