

	CDM: Response form for Request for revision of approved methodologies (version 01.1)
Date of Meth Panel meeting:	4 - 8 September 2006
Title and number of Request for revision	AM_REV_0016 Inclusion of swing plants producing only CFC in the past and converted to produce HCFC 22 according to a previous agreement with an intergovernmental entity to avoid HFC 23 release where no regulation requires its destruction
Summary of the query:	
Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>Det Norske Veritas Certification Ltd. (DNV) proposes to widen the definition of the maximum HCFC production level allowed. The current version of the methodology states that this amount is</p> <p>“ ... limited to the maximum historical annual production level at this plant (in tonnes of HCFC22) during any of the last three (3) years between beginning of the year 2000 and the end of the year 2004, including CFC production at swing plants adjusted appropriately to account for the different production rates of HCFC22 and CFCs. “</p> <p>DNV proposes the following addition to this paragraph:</p> <p>“If an industrial facility has several plants or production lines with swing capacity, where some (but not all) of these plants are only producing CFC (e.g. some plants are exclusively dedicated to CFC production due to practical production reasons), the CFC production of these plants –adjusted appropriately to account for the different production rates of HCFC 22 and CFCs– can be also included if and only if:</p> <ul style="list-style-type: none"> • there are at least three (3) years of operating history of these swing plants between beginning of the year 2000 and the end of the year 2004; • there is official, legal and/or other corporate documented evidence that proves that CFC production would have been phased out to produce HCFC 22 instead, dated on any date between beginning of the year 2000 and the end of the year 2004 (e.g., an agreement with the Multilateral Fund of the Montreal Protocol as a consequence of the phasing out program for CFCs).” 	
Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
Not applicable.	
(b) Please use the space below for providing guidance, as per Para 93 of EB25 Report, on what type of projects need to revise the PDD as a consequence of the suggested revision, if the recommendation is to revise the methodology.	
Not applicable.	
Answer to authors of the request for revision by the Meth Panel :	
Please use the space below to provide an answer to the authors of the above query	

- The Meth Panel recommends NOT to revise AM0001 as suggested by the DOE for the reasons given below.
- The Meth Panel is of the view that from a technical view point AM0001 could be expanded to swing plants that did not produce HCFC22 between 2000 and 2004. The Meth panel would undertake further work to analyse the implications, if the EB is of the view that the methodology could be expanded to cover such project activities.

Explanation:

The Meth Panel informs the EB that the current definition of existing capacity of HCFC22 production seems not to be clear. It reads:

“ ... limited to the maximum historical annual production level at this plant (in tonnes of HCFC22) during any of the last three (3) years between beginning of the year 2000 and the end of the year 2004, including CFC production at swing plants adjusted appropriately to account for the different production rates of HCFC22 and CFCs. “

It may be interpreted in two different ways with regard to inclusion of swing plants:

- **Interpretation No.1: only swing plants that actually have a history of production of HCFC22** during 2000 and 2004 are considered when defining existing capacity.
- **Interpretation No.2: all swing plants** are eligible when defining existing capacity. I.e. all plants that have been in operation during 2000 and 2004 AND that could have theoretically produced HCFC-22. In this case also such plants that produced only CFC and NO HCFC22 during 2000-2004 would be accounted for when defining existing capacity.

The Meth Panel noted that the EB seems to have decided how it interprets this definition by setting a precedent at EB24. Para 69a of the report states:

“The Board agreed to register the project activity: Quimobásicos HFC Recovery and Decomposition Project (0151)”, if the project participants submit a revised PDD which removes the CFC production line from the project boundary. The only eligible emission reductions are those arising from the existing HCFC 22 stream. After the submission of this documentation, the secretariat, in consultation with the Chair of the Board, will check the revised documentation before the activity is displayed as registered.

By the above decision it seems that the EB is of the view that present applicability should be interpreted as per interpretation 1 above , i.e. only including swing plants that have produced HCFC22 during 2000 and 2004. It is noted that the CDM-PDD submitted along with the request for revision is also for the Quimobásicos’ industrial facility.

In addition, the proposed change may imply a change of the definition of “old HCFC-22 facilities” stated in AM0001. The existing definition of AM0001 is presently in line with the definition adopted by CoP/MoP decision on “Implications of the establishment of new hydrochlorofluorocarbon-22 (HCFC-22) facilities seeking to obtain certified emission reductions for the destruction of hydrofluorocarbon-23 (HFC-23)” (Decision -/CMP.1). Therefore, if the EB changed the definition as suggested by the DOE, the revised AM0001 might not be in line with this CoP/MoP decision any longer.



Signature of the Meth Panel Chair
 Date: 13/09/2006 (Rajesh Kumar Sethi)



Signature of the Meth Panel Vice-Chair
 Date: 13/09/2006 (Jean-Jacques Becker)

Information to be completed by the secretariat

F-CDM-AM	F-CDM-AM-REV-0016
Name of the authors of the query:	DNV-CUK
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