



CDM: Response form for request for clarification on Approved Methodologies (version 01.1)

<i>Date of Meth Panel meeting:</i>	26–30 March 2012
<i>Title and number of request for clarification</i>	Use of historical data if the key components of a HCFC-22 plants have been retrofitted or replaced AM_CLA_0191

Summary of the query:

Please use the space below to summarize the request for clarification on the related approved methodologies.

This query seeks clarification on how the waste generation rate w should be determined in cases where key components of a HCFC-22 production plant have been replaced or retrofitted. In the case of the attached PDD, the reactor to produce HCFC-22 as well as process control equipment were exchanged in the year 2009. This exchange is independent of the CDM project activity but required due to normal deterioration of the reactor, i.e. the reactor would have been exchanged at the same point in time in the baseline scenario as under the project activity.

Equation (5) in version 5.2 of AM0001 defines w as the “Waste generation rate (HFC 23)/(HCFC-22) for the originating plant”. The methodology then provides guidance how a “historical” waste generation rate should be determined (page 5), which is based on historical data from the period from 2000 to 2004. The methodology is not fully clear how the waste generation rate should be determined in other cases (i.e. where a “historical” waste generation rate does not provide the waste generation rate of the “originating plant”). The methodology further specifies that the “DOE shall verify if the estimates obtained in this way [using historical data] can reasonably be used to calculate w or if it shall be considered that insufficient data are available to calculate HFC23 release for this plant (and therefore require the use of a default value of 1.5%)”.

This query seeks clarification whether in cases where key components of the HCFC-22 production plant were replaced or retrofitted it should be assumed that “insufficient data are available to calculate HFC23 for this plant” and therefore a default value of 1.5% should be used, as per the guidance by the methodology for such cases, or whether other procedures should be applied in this case to determine the waste generation rate w .

Recommendation by the Meth Panel:

Please use the space below to provide amendments /changes (in your expert view, if necessary).

Not applicable.

Answer to authors of the request for clarification by the Meth Panel :

Please use the space below to provide an answer to the authors of the above query

The Meth Panel clarifies that for the project activities using approved methodology AM0001, any retrofit or replacement of key components of the reactor/column/condenser system carried out in the project plant may impact the value of HFC23 generation in year y.

It further clarifies that in case a retrofit or replacement of key components of the reactor/column/condenser system is carried out that is not clearly like-for-like (e.g. change to the physical shape or size of any of the key components and change that resulted in different operating conditions of temperature or pressure) and the implementation and/or operation of the CDM project activity does not conform anymore with the description contained in the registered Project Design Document (PDD). The historical data used to establish the w rate will become invalid, the project may no longer be eligible to request for subsequent issuance and the relevant procedure and guidance i.e. "Procedures for notifying and requesting approval of changes from the project activity as described in the registered project design document" (EB 48, Annex 66) and the "Guidelines on assessment of different type of changes from the project activity as described in the registered PDD" (EB 48, Annex 67) are to be applied.

Additionally, the project participants should be aware that as of 1 May 2012 the above mentioned procedures will be replaced by the "Post-registration Changes" provisions of the newly adopted "Project Cycle Procedure" version 02.0 (EB 66 annex 64) and "Clean development mechanism project standard" version 01.0 (EB 65 annex 5). All submissions after this date must comply with these provisions and the project participants should verify whether these requirements are applicable for their projects.

Signed by the Chair, Mr. Thomas Bernheim

Date: 30/03/2012

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 30/03/2012

Information to be completed by the secretariat

F-CDM-AM	AM_CLA_0191
Name of the authors of the query:	TUEV NORD
Date when the form was received at UNFCCC secretariat	30 March 2012
Date of transmission to the EB	30 March 2012
Date of posting in the UNFCCC CDM web site	30 March 2012