CDM: Response form for Request for revision of approved methodologies (version 01.1)

Date of Meth Panel meeting:	19 - 23 January 2009
Title and number of Request for revision	Amendments to ACM0010, version 4.1 AM_REV_0124

Summary of the query:

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

This request for revision is regarding ACM0010 "Consolidated baseline methodology for GHG emission reductions from manure management systems, version 4.1" which is applicable to manure management on livestock farms where the existing anaerobic manure treatment system, within the project boundary, is replaced by one or a combination of more than one animal waste management systems (AWMSs) that result in less GHG emissions.

Further to request for revision AM_REV_0082, the PPs have examined ACM0010 and NM0239. The critical points of difference are set out below:

ACM0010	NM0239
Envisages on-farm treatment without storage or pre-treatment in the project case.	Envisages centralised treatment following on-farm storage in the project case.
Emissions from mechanised transportation are not included.	Emissions from mechanised transportation are included.
It is implied that waste is transported to the treatment system raw and solid.	It is explicit that waste is transported to the centralised treatment system diluted in tankers.
Double counting would be difficult.	Double counting could occur.
Only livestock waste is included.	Livestock waste and wastewater are included.

Since the Landhi case conforms in the main to the conditions for ACM0010, but does not meet NM0239 applicability criteria, some additional amendments are proposed to ACM0010 which do not blur the distinctions between these two methodologies, but borrow insights from NM0239.

In sum the proposed amendments are:

- Broadening the applicability criteria to allow dedicated cattle colonies to be treated, effectively, as a large farm with a treatment facility in the project boundary, close to the point of production of the waste;
- Exclusion from participation of farms where pre-treatment or storage of waste is practiced. This avoids double-counting. On-farm storage or pre-treatment is not undertaken in the subject case. This is a critical distinction between the two methodologies. Where storage or pre-treatment is practiced, and longer haul transportation of slurry is required, NM0239 is a more suitable methodological approach;
- Suggested inclusion of an applicability condition covering time between excretion and delivery of the waste to the project treatment facility. This has not been included formerly in ACM0010, though could be equally relevant to the MCF in the on-farm digestion scenario currently envisaged. It would address the concern to identify the conditions where storage and transportation of manure does not result in CH4 emissions;

- Inclusion of the equations to calculate emissions from transportation from ACM0006. This does not weaken the focus or intent of ACM0010 in its present form. To avoid unnecessary complication, it might be acceptable to specify a round trip length, perhaps 5-10 kms, below which this step could be omitted as insignificant;
- Inclusion of a requirement to identify a baseline or baselines for both farms and for the central treatment facility. Though these do not differ in the subject case, this requirement would make provision for possible future projects where baselines could differ;
- Inclusion and monitoring of all participant farms. In the subject case, there are 1,994 of these in the project boundary. It has been suggested that as they are tightly agglomerated in an area of only 750 acres, the GPS co-ordinates of the project boundary, and the names and street addresses of the farmers within it will suffice for identification and verification purposes;
- It has been suggested that some parameters could be verified with reference to data provided by a competent animal health professional. In the subject case, a Government Veterinarian runs a veterinary hospital and has responsibility for oversight of all cattle in the colony. As many farmers are illiterate, the Veterinarian is a more credible, reliable and independent source of information than the farmers. Data from the Veterinarian may be regarded as an authoritative cross-check for sampled validation and verification data.

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.

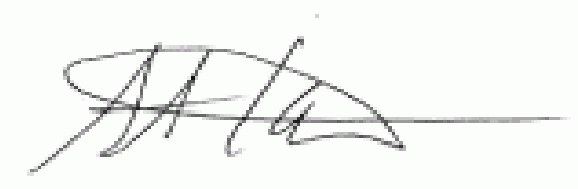
Not applicable.

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 recommendation is **not to approve** the request for revision.

The Meth Panel evaluated the proposal submitted by the project participants. The Meth Panel was of the view that if this revision is to be approved, the baseline for each individual farm should be assessed. The methodology should only be applicable if it is demonstrated that the baseline for each individual farm (although validation can be based on sampling) is the treatment of the manure in an anaerobic manure treatment system. The Meth Panel communicated this to the project participants and the feedback of the participants revealed that the baseline of each individual farm is the discharge of the manure into water bodies (Quotation from Project Proponents reply: "Thus, in the absence of the proposed project, the waste will continue to be discharged into the open drains"). The current version of the methodology is not applicable when the manure is discharged into natural water resources since there are no procedures to estimate methane emissions from such water bodies. The submitted revision does not include procedures to estimate methane emissions when the manure is discharged into water bodies in the baseline. Therefore, the Meth Panel recommends not approving the requested revision.



Signature of Meth Panel Chair ……..

Date: 23/01/2009 *(Akihiro Kuroki)*

Signature of Meth Panel Vice-Chair ……..

Date: 23/01/2009 *(Philip Gwage)*

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0124
Name of the authors of the query:	TUEV-SUED
Date when the form was received at UNFCCC secretariat	23 January 2009
Date of transmission to the EB	23 January 2009
Date of posting in the UNFCCC CDM web site	23 January 2009