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

Date of Meth Panel meeting:	14 - 18 September 2009
Title and number of Request for revision	Revision to incorporate a baseline scenario for a cattle colony that is a counterfactual anaerobic treatment system that generates methane without destruction by flaring or energy production AM_REV_0156

Summary of the query:

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

ACM0010 "Consolidated baseline methodology for GHG emission reductions from manure management systems" 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.

The request for revision seeks the following amendments to the methodology:

1. The proposed amendment includes cattle colonies where **no pre-treatment of waste is practiced**. It clarifies applicability criteria for this case.
2. On the recommendation of the Methodology Panel, AM_CLA_0052 dated 28.09.07; it addresses the situation where an **existing anaerobic treatment system** that would be the baseline **is not functioning**. A replacement anaerobic treatment system is substituting for the baseline digester without destruction by flaring or energy generation but cannot yet accommodate all the waste from the cattle colony in which it is located.
3. The amendment further provides procedures for estimation **transport emissions** where the project is in a livestock colony and the manure is treated in a centralised facility.
4. The proposed revision opens the applicability of the methodology to cases where the participant farms may utilise a **variety of baselines** or treatment systems (although this is not the case with the associated project).
5. The revision also proposes that animal health professionals may be regarded as reliable informants for some data. It suggests that empirical data could be used to determine input and output COD. This would safely allow shorter residence periods for the digestate where very warm temperatures or advanced technologies shorten the time required for effective destruction of the COD.

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 revise the methodology.**

Specific comments:

1. The revised methodology has an applicability condition that states that "In the case where the project manure management system is a centralised facility, there is no on-farm storage or pre-treatment and the fresh wet manure is delivered to the treatment facility within 12 hours of excretion". **No monitoring procedures** are presented to assess this applicability condition, which should be added.

2. An applicability condition is added that states that "The identified baseline scenario to be replaced by the project activity may be a **counterfactual anaerobic treatment system** that generates methane without destruction by flaring or energy production", no further guidance is provided in the Identification of the baseline scenario section on how this will be assessed.. Moreover, the project proponents state that the counterfactual baseline scenario does not accommodate the total amount of manure that will be treated in the project. This difference in level of service should be tackled in the baseline scenario determination section. It should also be noted that if the revision is accepted, it can only be applicable to the project activity if it can be proven that the baseline of the manure is the treatment in the counterfactual baseline anaerobic treatment system, which will be thoroughly checked by the DOE.

3. Procedures to estimate transport emissions are found to be correct.

4. The concept of "**variety of baselines"** is not clear. It is stated in the submitted revised methodology that "Where more than one farm is participating in the project, baselines may differ from one farm to another, and from the project manure management system. In this event the baseline for each different system and the location(s) where it is used must be clearly identified, and its emissions separately quantified." Procedures are not provided on how this statement should be reflected in equations. Further, the methodology is only applicable when the baseline scenario is an anaerobic manure treatment system, as equations are presented for that particular case. Equations in the methodology should reflect the baseline for which it is represents. The submitted revision is not clear on which are the possible baselines and which equations to use..

5. A local animal health professional is not an acceptable source to provide data. Only monitored data onsite should be used as per the procedures of the methodology.

6. It is not clear from the submission which MCF values will be used for anaerobic digesters. Also, the rationale of reducing the COD inside the anaerobic digester by only 70% is not clear. The current version of the methodology does not provide MCF values in case anaerobic digesters is used in the baseline scenario since table 10.17, chapter 10, IPCC 2006 guidelines presented in annex 3 is not complete. The methodology used in this table to estimate MCF from anaerobic digesters should be utilized. The reduction in COD in the system is dependent on the retention time of the organic material inside the system. The retention time of the anaerobic digester identified as the baseline should be used in order to estimate the corresponding MCF value in the baseline. If the system is not functioning, the design retention time can be used in the experiments to determine the MCF value. Procedures for conducting the experiment and associated monitoring procedures should be included.

Further comments:

- The methodology now states that "This methodology is applicable generally to manure management on or **near** livestock farms …" The concept of "near" should be further explained.
- The submitted revision changed the applicability condition which states that "Farms where manure is not discharged into natural water resources" and added that this is applicable only to project case. This change is not correct and not accepted. The methodology is not applicable to farms which discharge manure to water bodies in the baseline.

Signature of Meth Panel Chair ……..
Date: 18/09/2009 *(Philip Gwage)*

Signature of Meth Panel Vice-Chair ……..
Date: 18/09/2009 *(Pedro Martins Barata)*

Information to be completed by the secretariat	
F-CDM-AM	AM_REV_0156
Name of the authors of the query:	TUEV-SUED
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