 CDM: Response form for Request for revision of approved methodologies (version 01.1)	
<i>Date of Meth Panel meeting:</i>	26 – 30 March 2007
<i>Title and number of Request for revision</i>	The proposed revised methodology will expand ACM0003 / Version 04 scope to include projects that source biomass from dedicated plantations as an alternative fuel / AM_REV_0039
Summary of the query: Please use the space below to summarize the request for revision on the related approved methodologies.	
ACM0003 is currently applicable to project activities that use waste from fossil sources or biomass residues in cement plants. The request proposes to amend ACM0003 to the use of renewable biomass. For this purpose, the methodology proposes procedures <ul style="list-style-type: none"> (a) to ensure that any shifts of pre-project activities do not result in significant GHG emissions and (b) to estimate the emissions associated with the cultivation of renewable biomass. 	
Recommendation by the Meth Panel: (a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
The Meth Panel recommends not approving the request. The proposed amendment of ACM0003 is well developed, clearly structured and includes all aspects (emissions from biofuel cultivation, shifts of pre-project activities) that have to be considered when broadening the applicability to renewable biomass. The approach to estimate emissions from the cultivation of biomass is generally appropriate (some minor improvements may be possible). The only major issue that needs further work to accept the request is the proposed approach to address shifts of pre-project activities (see details below) – however, this is an issue which may require some further thinking. The Meth Panel would like to highlight that it is undertaking own work to develop approaches to address shifts of pre-project activities. Furthermore, based on this request and another request for review, the Meth Panel will recommend a revision to ACM0003 which will broaden the applicability to projects using biomass from a dedicated plantation. Nevertheless, project participants are encouraged to suggest a modified proposal to address the issue of shifts of pre-project activities.	
(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 methodology proposes the following three applicability conditions to ensure that any shift of pre-project activities will not result in deforestation: <ul style="list-style-type: none"> (a) The renewable biomass is planted in a host country where total forest areas do not exceed 10% of the total area of the country to ensure that shift in pre-project activities does not lead to deforestation elsewhere. (b) Abundance of land in the surrounding area that is not forest should be demonstrated or evidence that there are no forest areas at all in the surrounding areas should be provided to ensure that no 	

deforestation will occur outside the project boundary;

- (c) At least 50% of the total area enclosed within 200 km radius from the project activity should be land with lower biomass (less than 50%) compared to that which existed in the areas of the plantation before project implementation. This is to ensure that even if shift in pre-project activity occurs, no loss of biomass will take place as a result of such shift;

While in general the approach to assess whether shift of pre-project activities may result in significant emissions in a certain country may be an appropriate way forward, the proposed three conditions do not yet ensure that shifts of pre-project activities do not occur, as illustrated with the following example:

Assume a country where 90% of the land area is desert. The remaining area may be used as follows: 5% natural forests, 3% cropland and 2% settlements. Assume further that the land area of the project activity was cropland before the start of the project activity. All three applicability conditions could possibly be fulfilled because most of the land around the project (within a 200 km radius) could be desert but nevertheless the few forest land could be affected by the project activity, as all fertile land is already used in the country and as it may not be possible to shift the cultivation of biomass to the desert.

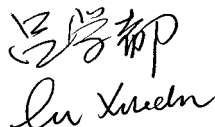
Even if a country has only 1% remaining forest, deforestation may be an issue if this forest area is not protected, in particular if the majority of other land is not suitable for cultivation of biomass. In this regard, it seems questionable that the forest area alone is a good indicator to assess whether shifts of pre-project activities may result in deforestation. Possibly historical time series information on whether deforestation was occurring in the past or is currently occurring could give an indication whether deforestation is an issue in the country. Alternatively or in addition a potential approach could be to evaluate to what extent sufficient fertile land that is not used is available.



Signature of the Meth Panel Chair

Date: 30/03/2007

(Akihiro Kuroki)



Signature of the Meth Panel Vice-Chair

Date: 30/03/2007

(Xuedu Lu)

Information to be completed by the secretariat

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