



**CDM: Recommendation Form for Small Scale Methodologies (version 01)**  
*(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)*

<i>Date of SSC WG meeting:</i>	15–18 March 2011, SSC WG 30
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Clarification on leakage estimation for project activities using biomass briquettes
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMC-I.C, AMS-I.D, AMS-I.F and General guidance on leakage in biomass project activities
<i>Name of the authors of the query:</i>	Subhendu Biswas Institution: First Climate (India) Pvt. Ltd. <a href="mailto:Subhendu.biswas@firstclimate.com">Subhendu.biswas@firstclimate.com</a>

**Summary of the query:**

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from Stakeholder:

As per paragraph no. 11 of the SSC methodology AMS-I.C., version 18, project activities using biomass briquette are allowed to use the methodology under the following conditions: “If solid biomass fuel (e.g. briquette) is used, it shall be demonstrated that it has been produced using solely renewable biomass and all project or leakage emissions associated with its production shall be taken into account in emissions reduction calculation”. Further, as per clarification titled “Consideration of biomass briquettes as one biomass type (F-CDM-SSCwg ver 01 SSC\_438)”, biomass briquettes are to be considered as single biomass type.

Further, as per paragraph 14 of the “General Guidelines to SSC CDM methodologies, Version no. 15” and paragraph 49 (b) of the SSC methodology AMS IC version 18 for PoA, small-scale project / biomass project activities should estimate leakage emission for biomass project activities as per the “General guidance on leakage in biomass project activities” (latest version).

In general, biomass briquettes are made from biomass residues or wastes available in the region and/or from biomass from energy plantations (dedicated or non-dedicated to the project activity) or existing forests. As per paragraph 17 of the “General guidance on leakage in biomass project activities” competing uses for biomass are not relevant, where the biomass is generated as part of the project activity (new forests or cultivations). Our understanding is that as per the guidance, leakage due to competing use from the use of biomass briquettes manufactured from biomass generated from plantations may be ruled out.

As per paragraph 18 of the “General guidance on leakage in biomass project activities”; for biomass project activities based on biomass residues, competing use of biomass is a possible leakage emission source and has to be considered, unless it is demonstrated ex-ante at the beginning of each crediting period by the project proponent that the biomass type being used is in surplus. Guidance on surplus availability demonstration is available in the same guidance. Biomass briquettes are generally made from several types of biomass residues based on the desired properties of the produced biomass briquettes. Generally, project proponents buy biomass briquettes from briquette manufacturer/supplier who would not manufacture any surplus briquette unless there is a market demand for the same. It is further

requested to note that demonstration of surplus availability of all types of biomass residues being used in the manufacture of briquettes would be a tedious process and would be contrary to the intention of the small-scale methodology. The surplus availability of the constituents which comprise major portion of the briquettes (around 80% of the biomass briquette by weight) might be demonstrated as the rest would be marginal and required for conformance with final product quality i.e. w.r.t. NCV and moisture. Furthermore there are instances wherein biomass briquettes are produced from biomass sourced from plantations (dedicated or non-dedicated) along with biomass residue. There is no guidance on determination of leakage in such scenario in line with “General guidance on leakage in biomass project activities”. Leakage determination in such scenario may be restricted to the portion which corresponds to the use of biomass residue only (for the major constituents only, as discussed above).

Accordingly, clarification is requested on:

- a. Whether our interpretation on non requirement of estimation of leakage due to competing use of biomass for briquettes manufactured from biomass from plantations is correct,
- b. Treatment of leakage for biomass briquettes comprising of several biomass residues and whether the same can be restricted to major constituents only, and
- c. The treatment of leakage for biomass briquettes comprising of biomass from plantations as well as several biomass residues

#### **Recommendation by the SSC WG:**

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

Please refer to paragraph 23 of the meeting report of the SSC WG 30  
<[http://cdm.unfccc.int/Panels/ssc\\_wg](http://cdm.unfccc.int/Panels/ssc_wg)>.

#### **Answer to authors of query by the SSC WG:**

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

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

With reference to the treatment of leakage associated with the utilization of biomass briquettes composed of renewable biomass residues, the SSC WG agreed to clarify the following:

- Leakage due to competing use of biomass residues can be neglected only if the project participants demonstrate at the beginning of each crediting period (e.g. through surveys, official reports, or published literature etc.) that the total/aggregated quantity of available biomass in the region is at least 25% greater than the quantity of biomass utilized in the region, (including by the project activity), as per paragraph 18 of the “General guidance on leakage in biomass project activities”. It is the view of the SSC WG that assessment of the surplus availability of the main constituents of the briquettes may not be representative of the overall biomass availability in the region;
- If the collection, processing and/or transportation of the biomass residues used to produce the biomass briquettes is outside the project boundary, then leakage emissions from the collection, processing and/or transportation of biomass residues shall be estimated and accounted for, as per the paragraphs 11 and 46 of AMS-I.C;
- Biomass briquettes composed of various biomass residues can, in principle, be treated as one type of biomass, however the relevant procedures of AMS-I.C shall be followed in order to monitor the mass and moisture content of the biomass residues used in the briquette production process, and to accurately determine the composition, mass, moisture content and NCV of the resulting briquettes, as clarified in the response to SSC\_438 “Consideration of biomass briquettes as one biomass type”;

- The author of the submission may also wish to explore the recently approved AMS-I.I “Biogas/biomass thermal applications for households/small users” for project activity comprising generation of thermal energy using biomass briquettes for households/small users.

Regarding the treatment of leakage emissions associated with the utilization of biomass from plantations for briquette production (i.e. biomass from forests and/or biomass from croplands or grasslands), the area where the biomass is extracted or produced shall be included within the project boundary as per paragraph 2 of the “General guidance on leakage in biomass project activities”, and any potential emission sources due to competing use of biomass, shift of pre-project activities and biomass cultivation/production shall be assessed and estimated. In conclusion, the SSC WG would like to point out that potential leakage sources associated with utilization of biomass from forests and grassland/croplands cannot be ignored.

Signed by the Chair, Ms. Fatou Gaye

Date: 18/03/2011

Signed by the Vice-Chair, Mr. Peer Stiansen

Date: 18/03/2011

**Information to be completed by the secretariat**

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