

	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 of ACM0003 to extend applicability to new plants AM_REV_0162
Summary of the query:	
Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>ACM0003 “Emissions reduction through partial substitution of fossil fuels with alternative fuels or less carbon intensive fuels in cement manufacture” is applicable to project activities in the cement industry where fossil fuel(s) used in an existing clinker production facility are partially replaced by one or more [less] carbon intensive fossil fuel(s) and/or alternative fuels.</p> <p>This request for revision aims at expanding the applicability of the methodology to the new plants. The project participants argue that it is difficult and less efficient to later integrate the possibility of alternative fuel usage than to integrate it in initial plant design.</p> <p>The request for revision also proposes some editorial changes to the methodology, not related to the revision request above.</p>	
Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
Please, refer to the box below.	
(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.	
Please, refer to the box below.	
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	
<p>The Methodologies panel recommends <u>not to approve</u> the request for revision.</p> <p>The Methodologies panel welcomes the project participants’ effort to expand the applicability of the methodology to the new plants. However, the panel does not agree with the proposed approach. The following points need be addressed:</p> <ul style="list-style-type: none"> ▪ The approach used to determine the specific energy consumption in the absence of the project activity ($SEC_{clinker,BL}$) is not acceptable. The proposal to determine $SEC_{clinker,BL}$ based on plant manufacturer specifications based on operation of the project plant using only fossil fuels does not ensure conservativeness. The parameter $SEC_{clinker,BL}$ can be best represented by the regional, national or international benchmark, or by a best available technology; 	

- It is not clear how the baseline fuel mix is selected in case there are no other cement plants in the region of the project activity (which is the case of the underlying project activity). The proposed methodology states that “if the region comprises less than 5 cement plants, the emission factor of the national sales market should be used as the default region”. Project participants should better explain the meaning of “emission factor of the national sales market” and how it should be determined. What types of fuels and what type of fuel applications are included in the so-called “sales market”? The PDD simply presents anthracite as being the baseline fuel without further justifications. The rationale for this choice should be further explained;
- Furthermore, concerning the underlying project activity described in the CDM-PDD, project participants are requested to describe the nature of the biomass used in the project scenario. It seems that the biomass used can be characterized as neither “biomass residues” (as proposed in the PDD) nor “renewable biomass from dedicated plantations”, and therefore this type of biomass would not be eligible to use the methodology. The PDD explains that the biomass used in the project activity is “locally available encroacher bush”. It is not clear whether this “encroached bush” can be deemed to be a “by-product, residue or waste stream from agriculture, forestry and related industries”, and thus comply with the definition of biomass residues. Moreover the PDD explains that the baseline scenario for the biomass is that it would have been partly cut down or sprayed and left to decay in the field without utilizing them for energy purposes, and partly burnt without utilization for energy purposes. Further explanations should be provided as to why the “encroacher bush” would have been partly cut down or sprayed, and partly burnt without utilization for energy purposes in the baseline. The PP is advised to clearly describe the source of the biomass, their fate in the absence of the CDM activity and show that it satisfies the definition of biomass residue.

The Meth Panel would like to thank the project participants for pointing out errors and suggesting editorial changes to the methodology. The Meth Panel recommends that the methodology be editorially revised to incorporate those changes.



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_0162
Name of the authors of the query:	TUEV NORD
Date when the form was received at UNFCCC secretariat	18 September 2009
Date of transmission to the EB	18 September 2009
Date of posting in the UNFCCC CDM web site	18 September 2009