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)

Date of SSC WG meeting:	31 August - 1 September 2006
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Proposed amendment to category III.D. of Appendix B of the simplified modalities and procedures for small-scale CDM project activities
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-III.D
Name of the authors of the query:	Chambal Fertilisers and Chemicals Limited

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.

Chambal Fertilisers and Chemicals Limited argues that the Version 10 of 'AMS III D Methane Recovery in Agricultural and Agro-Industrial Activities' excluded the possibility that projects involving methane recovery from non-biogenic sources could apply the category. The author is proposing to expand again the applicability condition of AMS III D, to address methane recovery from industrial waste gases of non-biogenic sources. The similarity between the two activities is argued. The proposed title for the expanded III-D would be "methane recovery in agricultural and agro-industrial and other non-biogenic sources". A draft proposal for the amendment to the AMS is presented.

Recommendation by the SSC WG:

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

Please refer to Paragraph 15 of the meeting report of the SSC WG 07 (http://cdm.unfccc.int/Panels/ssc_wg)

Answer to authors of query by the SSC WG:

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

The small scale-working group (SSC-WG) of the CDM Executive Board would like to thank the authors for this submission.

The change recommended in SSC WG 06 and adopted by the EB, to limit the applicability of AMS III D to Agricultural and agro-industrial activities is justified by the fact that the underlying fundamentals for the methane generation in biological processes are quite different from the thermal and chemical processes that can convert non-biogenic sources of carbon into methane.

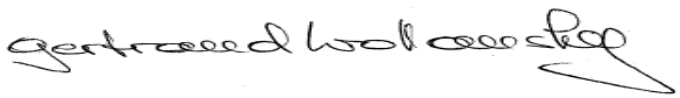
For example, the methane generation from biogenic wastes/sludge is achieved in anaerobic digesters or reactors, where the biodegradation occurs under well known conditions of temperature, particle size, moisture, nutrients etc. If the waste/sludge leaving the reactor shows a remaining methane generation potential its proper application or end-use must be monitored. Biogas has composition and conditions for combustion and/or flaring that is well known and may vary only slightly depending on the kind of substrates and reactors/digesters. The combustion or flaring of the methane in biogas can be monitored under simplified procedures, because it is readily inflammable. The resulting CO_2 is considered carbon neutral.

A methane recovery project (applying AMS III D) is also only one of the options available for project proponents that manage biogenic materials. They can also decide to avoid the methane formation by controlled aerobic treatment, composting or combustion of the biosolids, which are always climate neutral. In these cases, the non-recovered methane emissions must be demonstrated as the baseline.

In case of non-biogenic sources of methane, the underlying processes and the management practices are totally different. Methane emissions from coalmines, waste gases from oil and petrochemical industries can be generated under diverse conditions. Gas streams containing methane can show a wide range of constituents and/or concentrations, either between different processes or within the same process, under different operational conditions. The CO_2 emissions from the flaring/combustion of methane and also from all the other non-biogenic component gases and vapours that accompany methane in the flue gas mixture (e.g. C2 and C3 components) should be monitored and deduced as project emissions. The flaring or combustion of the waste gases is not always guaranteed, since the gas composition may fall outside the inflammability limits, that can demand the use of auxiliary fuels for flaring or combustion.

In the case of non-biogenic methane sources, the possibilities for the methane avoidance can also be considered as potential CDM Projects (e.g. changing conditions for the operation of the industrial processes and equipments, changing routes or steps for the transformation of raw materials into final products and substitution of the raw materials themselves). These measures/technologies can be addressed as methane avoidance activities and new methodologies can be proposed.

Therefore, the SSC-WG considers that the proposal presented shall be submitted not as an amendment to the existing category AMS III D, but as a proposal for a new methodology. In order to substantiate the proposal, a submission including a completed draft PDD (section A to E) is necessary.



Signature of SSC WG Chair ……..
Date: 06/ 09 /06 *(Gertraud Wollansky)*

Signature of SSC WG Vice-Chair ……..
Date: 06/ 09 /06 *(Richard Muyungi)*

Information to be completed by the secretariat	
SSC-Submission number	SSC_063
Date when the form was received at UNFCCC secretariat	6 September 2006
Date of transmission to the EB	6 September 2006
Date of posting in the UNFCCC CDM web site	6 September 2006