

	CDM: Response form for Request for revision of approved methodologies (version 01.1)
Date of Meth Panel meeting:	04 - 08 May 2009
Title and number of Request for revision	Request for modification of procedure for accounting of leakage of emissions from physical leakage of the initial charge of refrigerant in the new chiller AM_REV_0148
Summary of the query: Please use the space below to summarize the request for revision on the related approved methodologies.	
<p>This request for revision is pertaining to the project emission procedure of approved methodology AM0060 (ver. 1.1) for charge of refrigerant in the new chiller which replaces an existing chiller. The CDM project activity of the project proponents of this request involves replacement of old, inefficient chillers with more efficient chillers. The methodology requires refrigerant emissions to be estimated for at the following sources: 1. Emissions from the total quantity of initial recharge of refrigerant in the new chiller, accounted at the start of its operation; 2. Annual leakage of refrigerant in the new chiller throughout the crediting period.</p> <p>For point no. 1, the methodology requires, according to footnote 8 on page 9 that, "In some countries, systems to recover and destroy or re-utilize refrigerants may be common practice. In this case, project participants may develop approaches to consider this and request for a revision of this methodology".</p> <p>India, where the CDM project activity is located, is currently in the process of developing and establishing refrigerant management systems, which aim to ensure that refrigerants in chillers will not be released in the atmosphere at the end of their lifetime.</p> <p>The proposed amendment to the methodology allows for consideration of the on-going processes of national governments to establish such recovery systems.</p>	
Recommendation by the Meth Panel:	
(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).	
<p>The Meth Panel recommends not to <u>approve</u> the request for revision due to following reasons.</p> <p>The project proponents have provided the following options in the methodology to estimate the emissions due to charge of refrigerant in new chiller:</p> <ul style="list-style-type: none"> • Option I: The host country does not have a refrigerant management system and it is assumed that all refrigerant used in the new chiller is released to the atmosphere. The initial charge of refrigerant of the new chiller is accounted in the first year of the first crediting period. • Option II: The host country is in the process of developing a refrigerant management system, which aims to ensure that the charge of refrigerant in the new chiller will be recovered at the end of its lifetime and not be released into the atmosphere. In the last year of the first crediting period for each chiller, the project proponent shall either demonstrate that a system has been established in the host country or account for the initial charge of refrigerant. • Option III: The host country has a refrigerant management system and refrigerant will not be released to the atmosphere. Emissions from the release of refrigerant at the end of the lifetime of the new chiller are not accounted. 	

The project specific case falls under option-II and therefore to address the equation 8 to cover this case, the variable $Q_{ref,PJ,start}$ is converted to $Q_{ref,PJ,ONCE}$ in order to be able to claim the project emissions at the end of crediting period in case a refrigerant management system is not established in the country by the end of crediting period.

There are following problems in this approach:

- (1) In the current methodology, the purpose of accounting emissions from physical leakage of the initial refrigerant charge in the first year of the crediting period is to ensure that at no time during the crediting period more CERs are issued than the project may actually reduce. However, with the proposed approach of accounting refrigerant emissions in the last year of the crediting period, this principle is not ensured. For example, the overall emission reductions of the last year could be negative if refrigerant emissions have to be accounted, leaving no scope for claiming back the already issued CERs. Similarly, project proponents may simply not submit a monitoring report for the last year of the crediting period. In this case, the overall CERs issued for the crediting period could be potentially higher than the emission reductions achieved over the crediting period. Any approach to accounting of this emission source shall ensure that any potential over-issuance of CERs is avoided.
- (2) The revision does not provide procedures to estimate any emissions associated with recycling, destroying or reclaiming of refrigerant at the end of the lifetime of the new chillers. For instance, there could be some project emissions associated with the process which are not discussed.

Therefore, it is advised to the project proponents take these issues into account when submitting another request for revision.

It is understood that there is no refrigerant management system available in the country where the project is implemented, however, that a system is planned to be in place in due course of time. The project proponents may consider an approach in which the official timelines about establishment of refrigerant management system are provided at the validation. Then all emissions due to future release of the initial charge are accounted in the first year of the crediting period. However, after implementation of a refrigerant management system in the host country and after evidence is provided that the refrigerant contained in existing chillers will be destroyed, recycled or reused, the CERs could be adjusted accordingly in future years of the crediting period.

(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

Please see above.



Signature of Meth Panel Chair

Date: 08/05/2009

(Philip Gwage)



Signature of Meth Panel Vice-Chair

Date: 08/05/2009

(Pedro Martins Barata)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0148
Name of the authors of the query:	TUEV-NORD
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