



**CDM: Response form for request for clarification on  
Approved Methodologies  
(version 01.1)**

<i>Date of Meth Panel meeting:</i>	2 - 6 May 2011
<i>Title and number of request for clarification</i>	Applicability of the methodology for an existing project considering the activity starting date at the beginning of the operational phase  AM_CLA_0207

**Summary of the query:**

Please use the space below to summarize the request for clarification on the related approved methodologies.

The approved methodology AM0080 “Mitigation of greenhouse gases emissions with treatment of wastewater in aerobic wastewater treatment plants” is applicable to project activities that implement a new aerobic wastewater treatment plant for the treatment of domestic and/or industrial wastewater. The project activity either replaces an existing anaerobic open lagoons system, with or without conversion of the sludge treatment system, or is an alternative to a new, to be built anaerobic open lagoons system.

The request seeks clarification on whether the methodology is applicable to an existing inoperative wastewater treatment plant. The underlying project activity concerns a wastewater treatment plant, the investment decision and start of construction of which occurred in 2003, when no institutional arrangements existed in the host country to implement CDM projects. Subsequently that plant faced problems and did not start operation. In 2006, the project participants confirmed that the CDM was necessary for the viability of the project. Operation started in 2008.

**Recommendation by the Meth Panel:**

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

Please refer to the next section.

**Answer to authors of the request for clarification by the Meth Panel :**

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

The Meth Panel clarifies that the approved methodology AM0080 is applicable to new wastewater treatment plants and, in that context, new wastewater treatment plants are those which are built and operated as part of the CDM project activity. The term “implement a new” in the applicability conditions of the current version of the methodology means that both construction and operation of the aerobic wastewater treatment plant are part of the project activity. Therefore the operation of an aerobic treatment system alone cannot be considered in isolation as a CDM project activity.

Furthermore, the Meth Panel cannot provide clarifications on the appropriateness of the starting date chosen for the project activity referred to in the request for clarification. The starting date of a CDM project activity has to be validated by a DOE in light of, inter alia, the definitions provided in page 28 of the “Glossary of CDM terms”, repeated below for ease of reference:

*“The starting date of a CDM project activity is the earliest date at which either the implementation or construction or real action of a project activity begins. Project activities starting between 1 January 2000 and the date of the registration of a first clean development mechanism project have to provide documentation, at the time of registration, showing that the starting date fell within this period, if the project activity is submitted for registration before 31 December 2005.*

*In light of the above definition, the start date shall be considered to be the date on which the project participant has committed to expenditures related to the implementation or related to the construction of the project activity. This, for example, can be the date on which contracts have been signed for equipment or construction/operation services required for the project activity. Minor pre-project expenses, e.g. the contracting of services /payment of fees for feasibility studies or preliminary surveys, should not be considered in the determination of the start date as they do not necessarily indicate the commencement of implementation of the project. For those project activities which do not require construction or significant pre-project implementation (e.g. light bulb replacement) the start date is to be considered the date when real action occurs. In the context of the above definition, pre-project planning is not considered “real action”.*

*The Board further noted that there may be circumstances in which an investment decision is taken and the project activity implementation is subsequently ceased. If such project activities are restarted due to consideration of the benefits of the CDM the cessation of project implementation must be demonstrated by means of credible evidence such as cancellation of contracts or revocation of government permits. Any investment analysis used to demonstrate additionality shall comply with the requirements of paragraph 7 of the “Guidance on the assessment of investment analysis” (version 02).”*

Signed by the Chair, Mr. Philip Gwage

Date: 05/05/2011

Signed by the Vice-Chair, Lex de Jonge

Date: 05/05/2011

**Information to be completed by the secretariat**

F-CDM-AM	AM_CLA_0207
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