



## CDM: Recommendation form for Small Scale Methodologies (Version 01.1)

*(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)*

<b>Date of SSC WG meeting:</b>	09–12 October 2012, SSC WG 39
<b>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</b>	Clarification on the requirement of testing standard referred in AMS-II.O
<b>Indicative methodology to which your submission relates</b> <i>(refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable:</i>	AMS-II.O "Dissemination of energy efficient household appliances"
<b>Name of the authors of the query:</b>	Anne Arquit Niederberger Institution: Policy Solutions <a href="mailto:policy.solutions@comcast.net">policy.solutions@comcast.net</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:

1 There is confusion in AMS II.O. about which testing standards may be used to determine the energy consumption of the project appliances: This is because the way the methodology is written contradicts the EU legislation behind the "EU label system" that is quoted on page 4 of the methodology. The EU Directive 2010/30/EU and related regulations are more flexible in the choice of testing standards, which would be important when trying to apply the methodology to developing countries around the world.

With respect to Equation 4 of AMS II.O., the methodology says that the standard used in the EU energy label system must be used (and then goes on to specify EN 153/EN ISO 15502); however, these standards are not required by the EU energy label Directive 2010/30/EU (nor by any related EU regulations). Para. 8 of the EU Energy Label Directive states: "Energy consumption of and other information concerning the products should be measured in accordance with harmonised standards and methods". EN 153 and EN ISO 15502 are not explicitly mentioned in the label Directive or related regulations.

We therefore seek clarification whether PPs may apply other nationally or internationally recognized standards, in keeping with the EU Directive, the precedent in other CDM methodologies and the way that the appliance market actually operates (models are tested according to standards applicable to different markets).

An editorial modification to the description of the parameter  $AEC_{PJ,k}$  in Equation 4 would clarify this (changes made to section indicated in RED), consistent with the EU label scheme:

Equal to the annual electricity consumption of the project refrigerating appliance model k (kWh/y). Value is to be provided, and certified, by the appliance manufacturer and determined according to **Paragraph 8 of the Directive 2010/30/EU (e.g., using CENELEC Standard (European Committee for Electrotechnical Standardization) EN 153, February 2006/EN ISO 15502, October 2005 or subsequent standard).**

However, a more generic and explicit alternative might be preferable (and more in keeping with other CDM methodologies):

Equal to the annual electricity consumption of the project refrigerating appliance model k (kWh/y). Value is to be provided, and certified, by the appliance manufacturer and determined according to **a nationally or internationally recognized testing standard.**

Or, as in many other CDM methodologies, the reference to testing standard could be left out altogether,

given that any certification would need to state the testing standard on which it is based.

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

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

Please refer to paragraph 31 of the meeting report of the SSC WG 39  
<[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.

As a general principle, project proponents should use the same testing method/standard for both project and baseline energy consumption and emissions scenarios. However, baseline energy consumption per AMS-II.O is based on a specific high-efficiency benchmark consumption rating. As the author of the query correctly indicates, the quoted EU directive does not specify the testing standard for the benchmark. Therefore, while the SSC WG believes it is preferable to use the same testing standard for calculating project energy consumption as used to define the benchmark ratings. The SSC WG also believes, for this methodology, it is sufficiently conservative to define project energy consumption with any nationally or internationally recognized testing standard.

Thus, the SSC WG agrees to clarify that the definition of  $AEC_{PJ,k}$  should be modified to indicate: "Equal to the annual electricity consumption of the project refrigerating appliance model k (kWh/y). The value is to be provided, and certified, by the appliance manufacturer and determined according to a nationally or internationally recognized testing standard."

Further, the SSC WG agreed to reflect the above clarification in a future revision of the methodology.

Signature of SSC WG Chair: Mr. Peer Stiansen

Date: 12/10/2012

Signature of SSC WG Vice-Chair: Ms. Fatou Gaye

Date: 12/010/2012

#### **SECTION TO BE FILLED IN BY THE UNFCCC SECRETARIAT**

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## History of the document

Version	Date	Nature of revision(s)
01.1	12 April 2012	Editorial changes to include new logo and other improvements.
01.0	2005	Initial publication.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Methodology		