

 <p style="text-align: center;">CDM: Response form for Request for revision of approved methodologies (version 01.1)</p>	
<i>Date of Meth Panel meeting:</i>	22–26 February 2010
<i>Title and number of Request for revision</i>	<p>Clarification with regards to the applicability of the methodology to greenfield plants and modification of the equations (4) and (13) to have consistent units of parameters</p> <p>AM_REV_0179</p>
<p><u>Summary of the query:</u></p> <p>Please use the space below to summarize the request for revision on the related approved methodologies.</p> <p>ACM0015 “Consolidated baseline and monitoring methodology for project activities using alternative raw materials that do not contain carbonates for clinker production in cement kilns” is applicable to project activities that use alternative raw materials that do not contain carbonates for clinker production in cement kilns. The alternative raw materials partially or fully substitute raw materials that contain carbonates (e.g. limestone) and that would otherwise be used in the kilns.</p> <p>The methodology is deemed to be applicable to existing as well as greenfield facilities. Notwithstanding, as already recognized by the meth panel in the response to AM_CLA_0084, the current version of the methodology lacks procedures to estimate some of the parameters required for the application of the methodology to greenfield plants. In this regard, the methodology cannot be applied by greenfield plants due to the lack of those procedures, although the applicability conditions state otherwise.</p> <p>The request thus seeks to revise the methodology in order to:</p> <ol style="list-style-type: none"> (1) Introduce procedures to clarify the applicability of the methodology to greenfield cement plants; (2) Modify the equations (4) and (13) to have consistent units in the parameters; (3) Modify the definition of region; (4) Change the definition of some parameters in order to make their identification clearer; (5) Combine the electricity consumption parameters for the different steps of the clinker production; (6) Change the equation (16) and (18) and the definition of the parameter CO₂ leakage due to lower clinker consumption in blended cements during the year y ($LE_{Cto,y}$). 	
<p><u>Recommendation by the Meth Panel:</u></p> <p>(a) Please use the space below to provide amendments /changes (in your expert view, if necessary).</p> <p>Please, refer to the box below.</p> <p>(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.</p> <p>Please, refer to the box below.</p>	

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

The Meth Panel recommends to approve partially the request for revision, as described below:

Not to approve request (1), applicability of the methodology to greenfield cement plants. The Meth Panel acknowledges that the current version of the methodology is deemed to be applicable to existing as well as greenfield cement plants, but lacks procedures to estimate some of the parameters required for the application of the methodology to greenfield plants. The panel however cannot accept the procedures proposed in the request for revision for the following reasons:

- The proposed procedures do not explain how the data required to determine the baseline cement plant will be obtained. In the underlying CDM-PDD a report is mentioned but without being appropriately quoted or presented as part of the submission. The access to accurate data from other cement plants in the region of the proposed project activity is crucial for the determination of the baseline cement plant and procedures for that should be substantiated in the proposed revision;
- The proposal of using default values, design values or conservative industry norm values as an alternative to define the baseline values cannot be accepted either. The default values, design values or conservative industry norm values should be clearly presented and the basis for their determination explained;
- Furthermore, it is not acceptable that if the project activity only claims emission reductions from some project components (e.g. calcination), then other components (e.g. combustion of fuels) would not need to be considered in the calculation of emission reductions. The whole cement plant needs to be included in the calculations because the substitution of raw materials may affect emissions related to other components of the cement plant, and that need to be accounted for in the calculation of emissions reductions.

As explained in the response to AM_CLA_0084, the Meth Panel has been working on the development of appropriate procedures to make the approved methodology ACM0015 applicable to greenfield plants, including the involvement of an external expert. However, the use of conservative default parameters and/or appropriate benchmarks has proven to be difficult due to the difficulties in accessing data from competitors that can be adequately validated and verified by third parties.

As a consequence, in order to avoid further misunderstandings related to the approved methodology ACM0015, the panel recommends that the application of the methodology be restricted to existing cement plants only. Notwithstanding, the Meth Panel is still open to requests for revision of the methodology to make it applicable to greenfield plants and invites project participants to do so.

To approve request (2), modification of equations (4) and (13) to have consistent units in the parameters. The Meth Panel agrees that the equations currently presented in the methodology are inconsistent and need to be corrected.

Not to approve request (3), modification of the definition of region. The change in the definition of the region cannot be accepted because the proposed change could render the region of the project activity to have less than 10 cement plants or less than 200 km radius around the project activity cement plant. The purpose of having 200 km radius around the project activity cement plant and at least 10 cement plants is to ensure that a reasonable number of cement plants are covered for the identification of the baseline scenario.

To approve request (4), change of some parameter definitions to make them clearer. The Meth Panel agrees that the definition of some parameters should be changed in order to reflect the fact that they represent 'emissions' rather than 'emission factors'.

Not to approve request (5), combination of electricity consumption parameters. The Meth Panel believes

that the separate monitoring of the different electricity consumption parameters adds transparency to the calculation of emissions reductions and should be kept as is. Project participants can still monitor those parameters together in specific project activities and adequately justify a deviation from the methodology.

Not to approve request (6), change of equations (16), (18). As a consequence of the previous decision, this request was not accepted.

To approve request (6), change of the definition of the parameter $LE_{CO_2,y}$. The Meth Panel agrees that the definition of this parameter should be changed from “CO2 leakage due to lower clinker consumption in blended cements during the year y (tCO2)” to “CO2 leakage due to higher clinker consumption in blended cements during the year y (tCO2)”.



Signature of Meth Panel Chair

Date: 26/02/2010

(Lex de Jonge)



Signature of Meth Panel Vice-Chair

Date: 26/02/2010

(Philip Gwage)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0179
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