



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)

<i>Date of SSC WG meeting:</i>	30 January–02 February 2012, SSC WG 35
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Revision of AMS-III.AU concerning the element “guidance for and control of efficient fertilization”
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-III.AU “Methane emission reduction by adjusted water management practice in rice cultivation”
<i>Name of the authors of the query:</i>	Stephan Brunner Institution: Bayer CropScience AG stephan.brunner@bayer.com , felix.nickel@future-camp.de

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 PP:

The SSC methodology’s text contains two elements that aim at ensuring the efficient application of supplemental nitrogen fertilizer (“N fertilizer”) at farms that are covered by the project activity. The accordant requirements can be found in paragraph 3(d) and 17: each farmer shall individually determine the supplemental N fertilization need prior to applying fertilizer to the field, with the help of a leaf colour chart (LCC) or alternative technical means.

Such methods were in fact parts of scientific and agronomic approaches to obtain knowledge about fertilization needs of different regions, varieties, soils and other conditions influencing the plant’s need for nutrients. However, in the context of the development of the first CDM project activity under AMS-III.AU in Indonesia and after more in-depth review of the suggested methods, establishing and controlling the individual analysis of N fertilization need by each farmer seems to be neither feasible nor necessary:

- **Why is the individual pre-fertilization analysis by each farmer hardly feasible?**

The project type aims at disseminating climate friendly cultivation practices over wide areas. These areas are – particularly in developing countries – characterized by smallholder farming (which shall not be changed by a CDM project activity) and by farmers learning how to grow rice from parents and their community rather than being educated in modern forms of rice cultivation. Attempts to successfully and sustainably implement adjusted water management practice therefore have to be simple, clear and focussed. Adding a sophisticated form of fertilization management to the already challenging adaptation of an adjusted water management can lead to overburden the “package” of adjustments to be implemented by farmers. And not only implementation, but also control is hardly feasible: while the methodology in paragraph 17 asks for a “statement by farmers” on whether they have individually determined the plants’ N fertilization need before applying fertilizer, such statements are generally deemed to be weak evidence by verifiers.

- **Why is the individual pre-fertilization analysis by each farmer not necessary?**

When referring to the leaf colour chart (LCC), the methodology is focussing on a tool that has its

limitations when using it as stand-alone. It is not applicable in the very early growing stage, leaves too much room for misinterpretation (e.g. leaf colours can also change due to pest or disease rather than nitrogen deficiency), does not provide guidance on timing and addresses only nitrogen. IRRI has used the tool for many years of scientific research, but does also not promote it as stand-alone tool for large scale individual application by farmers due to low practical acceptance, its limitations and cumbersome handling (see “IRRI_comment_LCC” attached). In fact, more comprehensive and applicable tools have been developed out of the knowledge gained from technical applications like LCC and others. Nowadays, region-specific guidance and tools are available, based on mobile phone or web applications or provided on leaflets. Such guidance is easier to use and therefore more reliable in achieving efficient fertilization than when farmers have to individually apply technical tools and analysis before fertilization. For the Philippines or Indonesia for instance, region specific guidance has been developed by IRRI and its local partner institutes, based on longtime site specific experience and research (see <http://irri.org/our-science/crop-environment/site-specific-nutrient-management>). Such tools and recommendations are available for Java (see “IRRI_quick_guide_Java” attached) and shall be applied by the project activity to ensure efficient fertilizer application. The methodology’s applicability would thus be broadened by allowing project developers to resort to local recommendations from research institutes or governments.

Against the background of advanced knowledge and better tools available from such institutions like IRRI, we think that the formulation in the methodology should be adjusted to allow for more flexibility and not bind the project developer to "technical means" applied by each single farmer. This requirement seems to be formulated too narrow and may too much limit the methodology’s applicability.

Therefore, we suggest amending the applicability criteria’s paragraph 3(d) as highlighted in the draft methodology attached and delete paragraph 17 from the monitoring requirements.

Recommendation by the SSC WG:

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

Please refer to paragraph 26 of the meeting report of the SSC WG 35
<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.

The SSC WG agreed to recommend a revision of AMS-III.AU “Methane emission reduction by adjusted water management practice in rice cultivation”, as contained in annex 14 of the SSC WG 35 meeting report.

Signed by the Chair, Ms. Fatou Gaye

Date: 02/02/2012

Signed by the Vice-Chair, Mr. Peer Stiansen

Date: 02/02/2012

Information to be completed by the secretariat

SSC-Submission number	SSC_600
Date when the form was received at UNFCCC secretariat	02 February 2012
Date of transmission to the EB	02 February 2012
Date of posting in the UNFCCC CDM web site	02 February 2012