



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)

Date of SSC WG meeting:	27–30 October 2009, SSC WG 23
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Clarification on the eligibility of CFC-containing refrigerators in AMS-III.X
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-III.X
Name of the authors of the query:	Jessica Kyle Institution: ICF International jkyle@icfi.com

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:

We would like the SSC Working Group to clarify whether emission reductions associated with the replacement of refrigerators containing other refrigerants and blowing agents besides HFC-134a (e.g., chlorofluorocarbons) are eligible under AMS III.X. Paragraph 3(l) of the methodology reads: “The fluorinated gases used as refrigerants and foam blowing agents in refrigerator insulation material (including CFC-11, CFC-12, and HFC-134a) in the baseline refrigerators shall be recovered, reclaimed, and/or destroyed according to the voluntary WEEE household cold appliance recycling standard or alternatively in accordance with a national or international standard that meets or exceeds the WEEE requirements” [italics added]. However, Table 1 states that CFC foam and refrigerant in the baseline are not eligible, and the calculation of baseline and project emissions refer specifically to HFC-134a.

We would specifically ask the SSC Working Group to please clarify:

- 1) Whether the emission reductions associated with replacing CFC-containing refrigerators with project refrigerators eligible under the electricity component of this methodology (i.e., equation 6).
- 2) Whether the emission reductions associated with replacing CFC or HCFC refrigerants and blowing agents with no- or low-GWP gases eligible under the refrigerant component of this methodology (i.e., equation 8). For example, if a CFC-containing refrigerator was replaced with an isobutane refrigerator, would the emissions avoided by the reclamation/destruction of the CFC refrigerant and blowing agent be eligible?

Questions arising from a preliminary assessment:

This is with reference to your request for clarification on AMS-III.X below.

You may find the following information useful as regards question 2 of your query:

Paragraph 44 of the Modalities and Procedures for the CDM requires that “a baseline shall cover emissions from all gases, sectors and source categories listed in Annex A of the Kyoto Protocol within the project boundary” while paragraph 17 of EB 34 provides guidance on project/leakage emissions of GHGs as defined in paragraph 1 of the Convention but not included in Annex A of the Kyoto Protocol such as GHG gases (e.g., CFCs, HCFCs) covered under the Montreal Protocol. Hence, claiming emission reductions associated with the replacement of CFC or HCFC refrigerants and blowing agents with no-ODP and low-GWP gases is not eligible in accordance to CDM modalities and procedures.

Paragraph 17 of EB 34 meeting report is reproduced below:

“17. With reference to a proposed methodology, the Board considered the analysis of implication of different options proposed by the Meth Panel with regard to accounting emissions of GHGs and also implications on gases covered under the Montreal Protocol. The Board agreed that: (a) The project boundary shall encompass all anthropogenic emissions by sources of greenhouse gases, as defined in paragraph 1 of the Convention but not included in Annex A of the Kyoto Protocol, under the control of the project participants that are significant and reasonably attributable to the CDM project activity. (b) The leakage emissions from greenhouse gases, as defined in paragraph 1 of the Convention but not included in Annex A of the Kyoto Protocol, should be accounted, if the CDM project activity results in an increase of such emissions. (c) The global warming potentials used to calculate the carbon dioxide equivalence of anthropogenic emissions by sources of greenhouse gases not listed in Annex A, shall be those accepted by the Intergovernmental Panel on Climate Change in its third assessment report.”

Response from Stakeholder (submitted 16 Oct 2009):

Thank you very much for your response regarding our request for clarification on the refrigerant component of AMS-III.X (our second question).

Regarding question 1 of your query:

A project activity that solely claims emission reduction through electricity savings (energy efficiency) shall fall under Type II SSC category. You are requested to provide reasons why SSC Type II cannot be applied to the project in question. For example, you may explain why paragraph 3 of AMS-II.C that states “If the energy efficient equipment contains refrigerants, then the refrigerant used in the project case shall be CFC free. Project emissions from the baseline refrigerant and/or project refrigerants shall be considered in accordance with the guidance of the Board (EB 34, paragraph 17). This methodology credits emission reductions only due to the reduction in electricity consumption from use of more efficient equipment/appliances.” is not applicable to the described project. The additional information is required in order to consider your submission complete. Please send your response by COB 16th October (CET).

Response from Stakeholder (submitted 16 Oct 2009):

Regarding our query on the electricity component (our first question), we are aware that AMS-II.C could be used to capture the energy efficiency benefits of replacing CFC-containing refrigerators with CFC-free refrigerators, but our question is rather:

If AMS-III.X is preferred by the project proponent for other reasons, and a project gathers both CFC- and HFC-134a containing baseline refrigerators, would the emission reductions associated with replacing BOTH the CFC-containing and HFC-134a refrigerators be eligible under the electricity component of AMS-III.X? For a project replacing both CFC- and HFC-134a based refrigerators, the project proponent would also claim emission reductions for HFC-134a under the refrigerant component of AMS-III.X, and account for leakage associated with the CFC refrigerant, if appropriate.

We thank you again for your consideration of this query, and will be happy to provide any further clarification as needed.

Recommendation by the SSC WG:

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

Please refer to paragraph 17 of the meeting report of the SSC WG 23
(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.

AMS-III.X is applicable for project activities involving replacement of existing, functional domestic refrigerators containing refrigerant (e.g., HFC-134a) with more efficient units utilizing refrigerants and foam blowing agents having no ozone depleting potential (ODP) and low global warming potential (GWP). The emission reduction results from electricity savings as well as avoiding the use of HFC-134a. The refrigerator de-manufacturing including recycling of refrigerator materials and recovery of baseline refrigerant (e.g., HFC-134a) and foam blowing agent is an integral part of the project activity. Also footnote 6 of AMS-III.X states “Similarly high-GWP non-Kyoto gases such as CFC 11 and CFC 12 are also recovered, recycled and/or reclaimed for environmental co-benefits.”

The SSCWG noted that the underlying project activity is intended to apply AMS-III.X to replace refrigerators, some containing HFC-134a and some containing CFC with efficient refrigerators containing no-ODP and low-GWP gases.

As regards the clarification on whether the emission reductions associated with replacing both the CFC-containing and HFC-134a refrigerators are eligible under the electricity component of AMS-III.X, the SSC WG agreed to clarify that AMS-III.X is intended for project activities where emission reductions are on account of electricity savings as well as avoidance of HFC-134a, implying that baseline refrigerators shall also include fridges containing HFC refrigerant besides those charged with CFCs. Thus SSC WG clarified that if the proposed project activity includes any HFC refrigerant recovery, AMS-III.X is applicable (provided all other elements of the methodology are satisfied).

However, for project activities solely involving CFCs in the pre-project situation and that claim emission reduction through electricity savings shall fall under Type II SSC category (energy efficiency) for example AMS-II.C.

Baseline emissions for CFC or HCFC refrigerants (GHG gases not included in Annex-A of the Kyoto Protocol) and blowing agents are not eligible in accordance to CDM modalities and procedures (see paragraph 44).



Signature of SSC WG Chair

(Hugh Sealy)

Date: 30/10/2009



Signature of SSC WG Vice-Chair

(Peer Stiansen)

Date: 30/10/2009

Information to be completed by the secretariat

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