



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:	16–19 June 2009, SSC WG 21
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Clarification on project activity selling refuse-derived fuel to consumers outside project boundary
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-III.E version 15
Name of the authors of the query:	Mohua Banerjee De Institution: CantorCO2e India Limited mbanerjeede@cantorco2e.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:

1. As per the methodology AMS III E, version 15.1, paragraph 12, it needs to be demonstrated that the *produced RDF/SB should not be stored in such a manner as resulting in high moisture and low aeration favouring anaerobic decay. Project participants shall provide documentation showing that further handling and storage of the produced RDF/SB does not result in anaerobic conditions and do not lead to further absorption of moisture.*

In our project activity, the PP is setting up an RDF production unit based on municipality solid waste and he plans to sell the RDF in open market, hence cannot identify the customers at this moment. It is normally not a long term contractual selling, hence the number of customers and the location of the sites would vary throughout the crediting period. Under these circumstances can the PP have a system of providing a guideline on the handling and storage of RDF while selling it to its customers. Would this satisfy the above requirement of the methodology. Kindly clarify.

2. As per the methodology AMS III E, version 15.1, paragraph 28 in monitoring section it is required to:

The amount of waste combusted, gasified or mechanically/thermally treated by the project activity in each year (Qy) shall be measured and recorded, as well as its composition through representative sampling, to provide information for estimating the baseline emissions. The quantity of auxiliary fuel used (Q_{fuel}) and the non-biomass carbon content of the waste or RDF/SB combusted (Q_{nonbiomass}) shall be measured, the latter by sampling. The total quantity of combustion and gasification residues and residues from mechanical/thermal treatment (Q_{y,ash}) and the average truck capacity (CTy) shall be measured. The electricity consumption and/or generation shall be measured. The distance for transporting the waste in the baseline and the project scenario and the distance for transporting the produced RDF/SB (km/truck) shall also be recorded.

It needs to be clarified how a RDF producer planning to sell the product in open market with varied quantity to different customers (some of them may be users, others may be traders) can do effective monitoring as described above.

Does this mean that methodology is not applicable for RDF producers from municipality solid waste who plan to sell off the product in open market? Following mentions in the methodology indicate that the producer of RDF is eligible to use this methodology:

- Paragraph 2 (c) Mechanical/thermal treatment **to produce refuse-derived fuel (RDF)** or stabilized biomass(SB)1.
- Paragraph 3 The produced RDF/SB shall be used for combustion either on site or **off-site**.
- Paragraph 16 : project boundary do not include combustion site of RDF
- Paragraph 17 (b) IV: Transportation of RDF/SB to the sites of the end users (**if some of the sites are unknown** a conservative approach assuming transport emissions for a specific distance, for example a default of 250 km, shall be used).
- Paragraph 26 : In case of RDF/SB production, project proponents shall demonstrate that the produced RDF/SB is not subject to anaerobic conditions before its combustion end-use resulting in methane emissions. **If the produced RDF/SB is not used in captive facilities but sold to consumers outside the project boundary as a fuel,** a default 5% of the baseline emissions shall be deducted as leakage to account for these potential methane emissions, unless project proponents can prove otherwise

The above references of methodology gives a confidence that our PP can utilize the methodology. Kindly clarify the queries presented in query number 1&2

Recommendation by the SSC WG:

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

Please refer to paragraph 28 of the meeting report of the SSC WG 21 (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 would like to clarify that the condition proposed by the project proponent satisfies the requirements stipulated in the methodology AMS-III.E, version 15.1, paragraph 12 and the project proponent is encouraged to provide a guideline on the handling and storage of RDF while selling it to its customers.

Regarding the situation where the final products will be sold in the open market, the SSC WG is proposing a revision to the methodology to take this into account.



Signature of SSC WG Chair

(Hugh Sealy)

Date: 19/06/2009



Signature of SSC WG Vice-Chair

(Peer Stiansen)

Date: 19/06/2009

Information to be completed by the secretariat

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