

 <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>	21 - 25 June 2010
<i>Title and number of Request for revision</i>	Clarification with regards to the applicability of the methodology to greenfield plants AM_REV_0191
<p>Summary of the query:</p> <p>Please use the space below to summarize the request for revision on the related approved methodologies.</p> <p>ACM0015 is the “Consolidated baseline and monitoring methodology for project activities using 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 only applicable to existing facilities. The request for revision seeks to expand the applicability of the methodology to greenfield facilities.</p>	
<p>Recommendation by the Meth Panel:</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>	
<p>Answer to authors of the request for revision by the Meth Panel :</p> <p>Please use the space below to provide an answer to the authors of the above query</p> <p>The Meth Panel recommends <u>not to approve</u> the request for revision for the following reasons:</p> <ul style="list-style-type: none"> In case of Greenfield facilities, the access to accurate data from other cement plants in the region of the proposed project activity is crucial for the determination of benchmark parameters and corresponding baseline emissions. For that reason, the panel believes that the required data should be obtained in a systematic manner directly from the cement and clinker manufacturers in the region of the proposed project activity. This is to ensure that the data is monitored in accordance with the monitoring procedures defined in the methodology, and that the DOE validating/verifying the project activity have access to the raw data used to calculate emissions. In principle, the data should not be obtained from third parties, especially because data available from different sources of information may have been collected using different monitoring procedures and following definitions which are different from those used in the methodology. This is also to ensure that the DOE validating/verifying the project activity have access to the raw data used to calculate emissions; Default values, design values and industry standards should not be used as a proxy to actual operations performance data monitored directly in the cement and clinker manufacturers in the region of the proposed project activity, unless those default values, design values and industry standards are proved to be conservative. It is not clear whether that is the case in the proposed revision to the methodology. If default values, design values, industry standards are used they 	

should be explicitly presented, the basis for their determination explained, and the conservativeness of their use assessed;

- The proposed request for revision lacks the procedures (equations) that explain how the data obtained from the diverse sources mentioned in the proposed revision will be used to calculate the baseline emissions parameters. Because data obtained from different cement and clinker manufacturers in the region will be used, some kind of averaging needs to be made in order to calculate the emissions benchmarks. The proposed revision however does not explain how such averaging should be conducted. For instance, it is common practice in other methodologies that benchmarks are calculated as the average performance of the top 20% performers in the region of the project activity.

The Meth Panel has been working on the development of appropriate procedures to expand the application of the approved methodology ACM0015 to greenfield plants. However, the use of conservative default parameters and/or appropriate benchmarks has proven to be difficult due to complications in accessing data from competitors that can be adequately validated and verified by third parties. Alternative approaches, such as that of the proposed new methodology NM0302, seem to be more robust than the proposals considered so far. The panel will continue working on the case in order to come to a conclusion as soon as possible.

Signed by the Chair, Mr. Lex de Jonge

Date: 25/06/2010

Signed by the Vice-Chair, Mr. Philip Gwage

Date: 25/06/2010

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0191
Name of the authors of the query:	DNV
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