



**CDM: Response form for Request for revision of approved methodologies
(version 01.1)**

<i>Date of Meth Panel meeting:</i>	9 - 13 July 2007
<i>Title and number of Request for revision</i>	Replacement of Coal with EFB (Empty Fruit Bunches) and other available biomass like palm shell etc. in power boilers at Riau Andalan Pulp and Paper (RAPP) / AM_REV_0052
<u>Summary of the query:</u> Please use the space below to summarize the request for revision on the related approved methodologies.	
An amendment to the approved methodology AM0036 "Fuel switch from fossil fuels to biomass residues in boilers for heat generation" Version 01.1 is proposed. The envisaged project activity is a fuel switch activity from fossil fuel to biomass residues, which is very similar to the project activities to which AM0036 is applicable.	

Recommendation by the Meth Panel:

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

Not to approve the request for revision.

The project foresees the increase in the share of biomass used in existing boilers. With the project, a new type of biomass (Empty Fruit Bunches, EFB, from third party palm oil mills) should be used in the boilers in addition to the biomass residues available onsite. No modification of the existing boilers is necessary.

The request proposes to introduce a new “scenario 5” that builds on the following applicability condition: “The use of biomass residues or increasing the use of biomass residues beyond historical levels is technically not possible at the project site **without a significant capital investment in [...] new dedicated biomass supply chain established for the purpose of the project** (e.g. collecting and cleaning contaminated new sources of biomass residues that could otherwise not be used for energy purposes)” (AM0036; p.3).

However, the project foresees only the establishment of a “biomass supply chain which lead to the preparation of transportation system and agreement with the Palm Oil Mills to ensure the supply of EFB and biomass residues at RAPP. The supply chain will include identification of EFB supply in the area, transportation system of EFB from off-site to on-site project activity, installation of on-site transportation system, and pre-treatment of EFB” (PDD, p.2).

In other words, the project proponents buys the biomass residues from the market and does not invest significantly in equipment to collect and process the biofuel residues. The methodology is clearly not applicable to situations where biomass is purchased from the market. Therefore, the methodology and the proposed scenario 5 are not applicable to the underlying project.

The project proponents may resubmit the request based on an underlying project for which it can be shown that the methodology and the new scenario 5 proposed in this request for revision are applicable.

(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.

N.A.

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

Other issues:

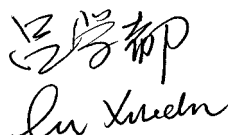
“Case C” is covered by Case B, and historic data is needed. In order to claim that the use of biomass residues has been increased over historic levels, the project proponents have to provide some evidence on the level of historic biomass use. In many cases, biomass is traded on markets and can be sold and bought. Therefore, the fact that additional biomass is bought is not sufficient to assume that more biomass is used, because domestically produced biomass residues may also be transferred to other plants or sold, or the biomass bought may be more convenient to use than the domestically produced biomass residues. With this, the biomass bought from the market may simply substitute for domestic biomass. Relevant is the amount of biomass residues actually used in boilers before and after the start of the project activity.



Signature of Meth Panel Chair

Date: 17/07/2007

(Akihiro Kuroki)



Signature of Meth Panel Vice-Chair

Date: 17/07/2007

(Xuedu Lu)

Information to be completed by the secretariat

F-CDM-AM	AM_REV_0052
Name of the authors of the query:	TUEV-SUED
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