



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>	19–22 October 2010, SSC WG 28
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Revision of AMS-II.J to abolish the requirement for unique project marking of CFLs
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-II.J “Demand-side activities for efficient lighting technologies”
<i>Name of the authors of the query:</i>	Auroskanda Vepari Institution: EDF Trading Limited auroskanda.vepari@edftrading.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:

Overall issue

Paragraph 5 of AMS-II.J. Version 04 requires marking of “unique” project identification on compact fluorescent lamps (CFLs) utilized under the project activity. The requirement for unique marking imposes inefficiency and difficulties in procuring CFLs for the project activity due to two principal reasons: (i) A precise number of households that participate in the replacement of its lighting devices under the project activity is not known ex ante. Hence the number of required CFLs is also not known precisely requiring Project Proponents to procure and manufacture inefficiently by ordering more than the number of CFLs eventually distributed/installed. A unique, project specific identification renders any excess CFLs unsuitable for any other purpose. (ii) Procurement/manufacture of CFLs for such project activities may precede the registration of a project making unique project identification that can be marked on the CFL (e.g. CDM Project number) unavailable at the time of procurement/manufacture.

Context

- The original intent of the requirement of marking on CFLs in paragraph 5 of AMS-II.J. is primarily to distinguish during subsequent ex post surveys a project device (i.e. CFL supplied under the replacement project) and a spontaneous market purchase of a CFL (see paragraph 17.(c) of the methodology); and secondarily to also discourage secondary market behaviour.
- The primary and secondary intent of the requirement would be equally addressed if the project devices are marked suitably, but not necessarily for unique project identification.
- For example, project devices may be marked “CDM Project Device” and “Not for Sale/Resale”. Such markings, while not carrying unique project identification, will achieve the same effect.
- Unused project devices with such non unique identification can be used by other similar CDM project activities. Project proponents may procure expected quantities, and utilise any surplus inventory in other CDM project, relieving inefficiencies in procurement.

- Further, marking (ink based) is not always technically or logistically feasible (e.g. when a project proponent needs to procure off the shelf products or quantities, rather than custom products made which requires minimum volumes). Hence, we also suggest that the project proponents may alternately suitably label project devices (e.g. using distinctive non removable stickers, holograms, etc.), as this would have the same effect.

Proposed revision

Paragraph 5: “CFLs utilized under the project activity shall, in addition to the standard lamp specifications, be marked and/or labelled ~~for clear unique identification for the project~~ suitably to enable identification of project devices during surveys required as per paragraph 17.”

Recommendation by the SSC WG:

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

Please refer to paragraph 4 of the meeting report of the SSC WG 28
<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 noted that the marking of CFLs could be a problem in circumstances where all of the lamps procured cannot be distributed. However, the SSC WG is of the opinion that the reasons for the unique marking of lamps, in addition to those indicated in the submission, include the ability to identify the lamps that are distributed only through the specific CDM project activity under consideration, particularly if multiple CFL projects are underway. Thus, the SSC WG is of the opinion that the marking of CFLs should be done to ensure “traceability to a project” of CFLs which shall avoid confusion in the *ex post* surveys conducted to confirm that the lamps are still installed and operating.

There may be more than one alternative to ensure “traceable” marking of CFLs with a project. The most straightforward option would be a permanent marking of CDM project number and name on each of the CFLs along with other specifications. Alternatively, when multiple projects are implemented marking may be undertaken using special codes or in phases, for example each CFL is permanently marked 'for CDM project, not for sale/resale' followed by project specific marking/labeling to allow unambiguous identification of CFLs with a specific project during surveys required as per paragraph 17. Such optional approaches to markings require justifying to the validating DOE that the project specific marking is fool proof, i.e. it is not possible to mark/label CFLs during the surveys and count them as operating and it is not possible to remove the project specific marking and thus disqualify CFLs from being counted as operating.

Signed by the Chair, Mr. Peer Stiansen

Date: 22/10/2010

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 22/10/2010

Information to be completed by the secretariat

SSC-Submission number	SSC_467
Date when the form was received at UNFCCC secretariat	22 October 2010
Date of transmission to the EB	22 October 2010
Date of posting in the UNFCCC CDM web site	22 October 2010