



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:	15–18 June 2010, SSC WG 26
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Clarification on historical data for determining baseline COD removal efficiency under AMS-III.H
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-III.H (Version 14, EB 53) “Methane recovery in wastewater treatment”
Name of the authors of the query:	Gan Tee Jin Institution: Gan Teng Siew Realty Sdn Bhd teejin@gtsr.com.my

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:

I am seeking clarification on para 17 of the methodology, which states “In determining baseline emissions using equation 1, historical records of at least one year prior to the project implementation shall be used. This shall include for example COD removal efficiency of the wastewater treatment systems, ...etc.”

This project (ref. 3125, titled “Biogas Recovery at Ulu Kanchong Palm Oil Mill”) was first validated under version 10 of the methodology, submitted for first completeness check in Nov 2009, and subsequently rejected by EB because it was not re-submitted by the extended validity period of AMS III-H version 10, 27 February 2010.

Under the version 10 validation, we undertook a measurement campaign in the baseline wastewater system for 10 days in November 2008 to determine the baseline COD removal efficiency of the wastewater treatment system. We did not have at least one year of historical records because the business-as-usual operation is only required to monitor conditions of the treated wastewater at the final discharge of the treatment system. Subsequently, upon learning about the 0.89 uncertainty factor that must be applied to the 10-day measurement data as per para 18, we (the project participant) continued taking records of the baseline wastewater system from May 2009 to December 2009, in the hope that this set of data, stretching over 13 months (from Nov 2008 to December 2009) may be used as the updated baseline in the second and third crediting periods.

Now that the project activity must be re-validated under AMS III-H version 14, we want to know whether the data stretching over 13 months (from November 2008 to Dec 2009) may be considered as “historical records of at least one year” for purposes of para 17. I am not seeking a comprehensive assessment of the data (which is probably beyond the scope of the SSC WG), but would like only the following clarified:

Does the absence of data for five months (from December 2008 to April 2009) automatically disqualify the 13-month data as “historical records of at least one year” for the purpose of para 17, thus compelling us to use the 10-day measurement campaign for estimating baseline emission?

We note that the General Guideline For Sampling And Survey For Small-Scale CDM Project Activities (EB50an30) states in para 3 “The purpose of sampling is to obtain (a) *unbiased* and (b) *reliable estimates*

of the mean value of parameters” and in para 8 “Where there is no specific guidance in the applicable methodology, project proponents shall use 90/10 confidence/precision as the criteria for reliability of sampling efforts.” Therefore, we aim to convince the DOE and EB that (a) the 5-month absence of data has not introduced biasness to the data¹; and (b) the data provide a reliable mean COD removal efficiency of the baseline wastewater treatment system.

¹ The project activity is located in Malaysia (at latitude of 2°35' 10"N, tropical climate), where the ambient temperatures are uniform throughout the year with little seasonal variation. As anaerobic digestion activity is influenced by temperature, we believe COD removal efficiency of the baseline wastewater system is unchanged during the period Dec 2008 to April 2009, when baseline measurements had not been taken.

Recommendation by the SSC WG:

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

Please refer to paragraph 23 of the meeting report of the SSC WG 26
<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 agreed to clarify that the data from a measurement campaign shall be used in order to be in compliance with the methodology in which only two options for determining the baseline data, including the COD removal efficiency, are provided, i.e. in cases where one entire year of historical data is not available, a measurement campaign must be undertaken which is to be adjusted by a factor of 0.89 to account for uncertainties.

Signed by the Chair, Mr. Peer Stiansen

Date: 18/06/2010

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 18/06/2010

Information to be completed by the secretariat

SSC-Submission number	SSC_427
Date when the form was received at UNFCCC secretariat	18 June 2010
Date of transmission to the EB	18 June 2010
Date of posting in the UNFCCC CDM web site	18 June 2010