



**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)*

<b>Date of SSC WG meeting:</b>	11–14 January 2011, SSC WG 29
<b>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</b>	Clarification on the applicability of AMS-III.AN to early-start CDM projects
<b>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</b>	AMS-III.AN “Fossil fuel switch in existing manufacturing industries”
<b>Name of the authors of the query:</b>	Vladislav Arnaudov Institution: Mitsubishi UFJ Morgan Stanley Securities Co., Ltd. <a href="mailto:arnaoudov-vladislav@sc.mufg.jp">arnaoudov-vladislav@sc.mufg.jp</a>

**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:

Paragraph 10 of AMS-III.AN. “Fossil fuel switching in existing manufacturing industries” ver. 1 states that “...The baseline fuel consumption ( $FC_{FF,BL,i}$ ), product output ( $P_{BL,i}$ ) and/or input material ( $I_{BL,i}$ ) as relevant shall be available for the immediate three years prior to the start date of validation for the purpose of baseline emissions calculation. For element processes with less than three years operational history all historical data shall be available (a minimum of one year data would be required).”

The current wording of the paragraph does not allow early start projects to apply the methodology, especially in case they have already started construction prior to the start of validation, as “the immediate three year data prior to the start of validation” will not be available.

Therefore, we would like to seek guidance from the SSC WG as of how AMS-III.AN. ver. 1 can be applied to early start CDM projects.

**Recommendation by the SSC WG:**

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

Please refer to paragraph 30 of the meeting report of the SSC WG 29  
[http://cdm.unfccc.int/Panels/ssc\\_wg](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.

Based on the submission, the SSC WG agreed to recommend a revision of paragraph 10 of AMS-III.AN as below to indicate that instead of immediate three years data prior to the validation date of the project the three years data prior to the start date of the project would be required:

“paragraph 10: The baseline emissions are the historic fossil fuel consumption related emissions associated with the element processes, affected by the project activity that would continue to occur in the absence of the project activity.

The baseline fuel consumption ( $FC_{FF,BL,i}$ ), product output ( $P_{BL,i}$ ) and/or input ( $I_{BL,i}$ ) material (as relevant shall be available for the immediate three years prior to the start date of the project for the purpose of baseline emissions calculation. For element processes with less than three years operational data all historical data shall be available (a minimum of one year data would be required).”

The proposed revision of AMS-III.AN is contained in annex 7 of the SSC WG 29 report.

Signed by the Chair, Mr. Peer Stiansen

Date: 14/01/2011

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 14/01/2011

**Information to be completed by the secretariat**

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