



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>	30 January–02 February 2012, SSC WG 35
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Revision of AMS-III.F to include open biomass burning in the baseline
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-III.F “Avoidance of methane emissions through composting”
<i>Name of the authors of the query:</i>	Adrian Mueller Institution: Research Institute of Organic Agriculture FiBL, Switzerland in cooperation with South Pole Carbon Asset Management Ltd. adrian.mueller@fibl.org

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 Stakeholder:

The stakeholder proposes a revision of AMS.III-F by including biomass burning in the baseline.

Currently, the baseline covers anaerobic decay of biomass (biomass waste, manure, wastewater) only. In many regions in non-Annex I countries, open burning of biomass waste (agricultural waste, crop residues, etc.) is common practice and the corresponding methane and nitrous oxide emissions contribute considerably to global agricultural greenhouse gas emissions. Avoiding this biomass burning has thus a considerable mitigation potential.

In addition, avoiding biomass burning would contribute to local and regional sustainability by reducing local and regional air pollution, mainly from particulate matter (smoke) from the burning sites. By producing compost, the biomass formerly burnt is instead converted to a valuable nutrient source, which can be used as a fertilizer.

We also suggest that the presence of an organic certificate for the project can serve to fulfil the monitoring requirements for the establishment of absence of open burning in the project activity. We emphasize that the organic standards that are eligible for this certification and which are listed in the “IFOAM family of Standards” (http://www.ifoam.org/about_ifoam/standards/family_of_standards/FamilyFrame_web.pdf) all are equivalent to or stricter than the single international reference “Common Objectives and Requirements of Organic Standards COROS” (<http://www.goma-organic.org/tools/coros/>), agreed upon by the IFOAM membership and also endorsed by FAO and UNCTAD under the GOMA (Global Organic Market Access) project. In particular, this list covers all governmental organic standards and regulations. Specifically, these governmental standards and regulations all have legal status, meaning that violating them leads to legal prosecution and consequences. Controlling for compliance to these standards is only allowed to special governmental bodies or companies that are accredited by governments for this. Such controlling is also executed according to legally binding rules.

To also cover the project activity of mulching of material that would have been burnt in the baseline, we

also submitted a new Small Scale Methodology based on open burning in the baseline with mulching as the project activity (“Avoidance of methane and nitrous oxide emissions through mulching”).

Specifically, key changes for adding biomass burning, resp. its avoidance to the methodology are made

- in the description of the technology (§§ 1b, 2, 9, 10, 11b)
- in the boundary (§ 16b)
- in the baseline (§§ 17b, 18) and
- in the monitoring description (§ 31 – Table III.F.1).

Independently, we also suggest some small changes in formulations, which do not change contents but correct some largely minor formal errors (§ 21 iii) equation (6), the suggested correction accounts for the conversion of kg CO₂ from the emission factor per km to t CO₂ in the project emissions) 26, 29, 31 (row 1)) or add a reference of interest in the context of blending material (§ 11) and nitrous oxide emissions (§ 1, footnote 1).

Recommendation by the SSC WG:

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

Please refer to paragraph 27 of the meeting report of the SSC WG 35

<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 not recommend the proposed revision, because:

1 The proposed revision seems to cover savanna and grassland, while the current version of AMS-III.F is only intended for waste that would have otherwise been left to decay anaerobically in a solid waste disposal site (SWDS), or in an animal waste management system (AWMS), or in a wastewater treatment system (WWTS).

2 The uncertainty associated with the baseline emissions determination is high.

- The proposed approach is using default emission factors of open burning from the 2006 IPCC Guidelines.¹ The 2006 IPCC Guidelines also provide default emission factors for composting process (table 4.1, chapter 4, Volume 5, 2006 IPCC Guidelines) that is not included in the proposed approach. The SSC WG is unable to see the justification to apply IPCC default value only for baseline emissions and not for the composting process. In fact consistent application of 2006 IPCC Guidelines may lead to negative emission reductions under many circumstances;
- Robust procedures are missing to ensure that the quantity of the waste used for composting (Q_y provided in equation (3)) is corresponding with the quantity of agricultural residuals that would have been open-burned. Although, the author of the submission, at a later stage, clarified that IPCC default value (quantity of biomass of type b openly burnt, per ha (t dry matter ha⁻¹)) can be used for improvement, the SSC WG is not convinced about the representativeness of this default value to the specific underlying project scenario.

The SSC WG also took note of other minor changes/improvement highlighted by the author of the submission (see the last paragraph of the summary of the query), and agreed to recommend the changes in a future revision of AMS-III.F.

¹ 2006 IPCC Guidelines for National Greenhouse Gas Inventories

Signed by the Chair, Ms. Fatou Gaye

Date: 02/02/2012

Signed by the Vice-Chair, Mr. Peer Stiansen

Date: 02/02/2012

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