



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 the data requirements for the measurement campaign for greenfield projects 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) “Methane recovery in wastewater treatment”
Name of the authors of the query:	Kyoko Tochikawa Institution: Carbon Partners Asiatica kyoko.tochikawa@cp-asiatica.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:

Reference is made to paragraph 18(b)(i) of AMS-III.H, which stipulates the method for determining the baseline conditions prior to the project implementation for Greenfield projects. The said paragraph is reproduced below for ease of reference.

18. In case one year of historical data is not available: ...

(b) In the case of Greenfield projects, one of the following procedures shall be used to determine the baseline emissions:

(i) Value obtained from a measurement campaign in a comparable existing wastewater treatment plant i.e., having similar environmental and technological circumstances for example treating similar flow and same type of wastewater (domestic, industrial, etc.), located in the same host country and region. Average values from the measurement campaign shall be used and the result shall be multiplied by 0.89 to account for the uncertainty range (30% to 50%) associated with this approach;

Clarification is requested as to whether, instead of data obtained from a measurement campaign in a comparable plant, historical data from that same comparable plant can be used. In accordance with the latter half of the paragraph, this will then be multiplied by 0.89 to account for the associated uncertainty.

It is clear in the overall context of the methodology AMS-III.H that historical data is considered superior to data obtained from a measurement campaign and the natural assumption would be that this extends to paragraph 18(b)(i). However, this query is submitted for absolute clarity, as the interpretation of this paragraph will greatly affect the availability/sources of data in practice.

Taking this opportunity, clarification is furthermore requested on what type of historical data would be acceptable, if indeed historical data may be used. For example, where a comparable plant with “similar environmental and technological circumstances” is identified (and assuming that the DOE confirms it is comparable), is it correct to believe either of the following is acceptable?

- (1) Historical data that is made available upon specific request from the greenfield (CDM) project owner to the owner of the comparable plant. The DOE may independently confirm by written or verbal correspondence with the owner of the comparable plant that the historical data was obtained in a manner consistent with industry-/nationally-/internationally-recognized practice for COD measurement (this seems clearly in line with paragraph 18(b)(i); or
- (2) Historical data that is contained in a registered PDD.

Recommendation by the SSC WG:

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

Please refer to paragraph 22 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

- For Brownfield projects (existing facilities), the measurement campaign shall be undertaken as per paragraph 18 (a) in AMS-III.H, version 14. External data obtained from other wastewater treatment plants or registered PDDs are not allowed;
- For Greenfield projects,
 - (a) External data obtained from comparable existing plant (at least one year historical data) can be used in lieu of the at least 10-day measurement campaign, provided that:
 - (i) The comparable existing plant complies with paragraph 18 (b)(i) in AMS-III.H, version 14, i.e. having similar environmental and technological circumstances for example treating similar flow and same type of wastewater (domestic, industrial, etc.), located in the same host country and region;
 - (ii) The external data used are still subject to the uncertainty correction, i.e. the result shall be multiplied by 0.89.
 - (b) Data from a registered PDD can be used, only if:
 - (i) The baseline plant complies with the same conditions in paragraph 18 (b)(i) in AMS-III.H; and
 - (ii) All the required information (historical parameter values based on at least one year data) to establish the baseline emissions can be obtained from the PDD;
 - (iii) The external data used are still subject to the uncertainty correction, i.e. the result shall be multiplied by 0.89.

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

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