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CDM Executive Board

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Response to the Review of project "Body Coal and Clamp Kiln Fuel Switch at Allbrick, South Africa" (Ref. no. 6461)

Dear Honourable Members of the CDM Executive Board,

Please find attached the response of TÜV NORD to the review of the above mentioned project No. 6461.

The PP has authorized us to submit their review response in the attached consolidated document. The content of this response remains in the sole responsibility of the PP.

In so far as actions from the PP were to be taken the TÜV NORD response has taken those actions into account.

If you have any questions do not hesitate to contact us.

Yours sincerely,

Rainer Winter
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Review Issue # 1

Original text
of the issue
raised:

The DOE shall substantiate on how the proposed project activity is applicable to the applied methodology, AMS III Z version 03 given that, it does not provide any provision to include such cases where the project activity utilizes charcoal produced from renewable biomass as fuel.

Furthermore, the DOE shall explain how it has validated the methane emissions occurring within the project boundary due to charcoal production will not contribute more than 1% of the overall expected average annual emissions reductions in accordance with para 77 of VVM version 1.2. Please refer to para 71 and 77 of VVM version 1.2

PP's Response

According to § 4 of EB 23, Annex 18 (Definition of Renewable Biomass), biomass is renewable if it is sourced from biomass residues that do not result in the decrease in carbon pools. In this project activity, charcoal is produced using wood waste from local sawmills which would be left dumped to undergo natural anaerobic decomposition. Hence, the charcoal produced from this waste is deemed renewable and hence applicable to the project activity and § 1 of the approved and applied methodology. The use of the stockpiled wood waste avoids methane emissions generated during the anaerobic decomposition of the biomass; therefore the overall effect of the methane emissions due to the production of charcoal is not significant.

In line with § 65-67 of the VVM v1.2, the project activity has applied the correct methodology and version as well as correct formulae for emission reduction calculations. AMS III. Z, version 03 is valid till 2013-01-25 (VVM v1.2 § 68). In Paragraph 13 of the methodology, project emissions consist of emissions associated with the use of fossil fuels or electricity consumption or both. The Project activity has accounted for possible emissions from fossil fuel use as well as electricity from motors as required by both tools. Therefore, it is the DOE's opinion that the project conforms to requirements.

DOE's Response

Par 71 of the VVM v1.2 states as follows:-

A selected approved methodology applies to the project activity if the applicability conditions of the methodology are met and the project activity is not expected to result in emissions other than those allowed by the methodology. The DOE shall determine whether the choice of methodology is justified and the project participants have shown that the project activity meets each of the applicability conditions of the approved methodology or any tool or other methodology component referred to therein. This shall be done by validating the documentation referred to in the PDD and by verifying that its content is correctly quoted and interpreted in the PDD. If the DOE, based on local and sectoral knowledge, is aware that comparable information is available from sources other than that used in the PDD, then the DOE shall cross check the PDD against the other sources to confirm that the project activity meets the applicability conditions of the methodology

Further, par 77 of VVM v1.2 states: -

The validation report shall contain information regarding greenhouse gas emissions occurring within the proposed CDM project activity boundary as a result of the implementation of the proposed CDM project activity which are expected to contribute more than 1% of the overall expected average annual emissions reductions, which are not addressed by the applied methodology

DOE's Opinion

The proposed project activity is applicable to the applied methodology AMS.III. Z version 03 as the charcoal utilized in processed directly from waste sawdust defined as renewable biomass (EB 23, Annex 18). This raw material in the charcoal production does not result in reduction of carbon stocks. This conforms to the applicability requirements of the methodology.

In the absence of the proposed CDM project activity, the biomass from surrounding plantations will lie in piles to undergo natural anaerobic decomposition process or burned out in the open, thereby emitting harmful methane emissions. The DOE determined that since the PP does not consider methane avoided in calculating the baseline emission (BE), the same should not be accounted for as project emissions (PE). Hence, in line with § 77 of the VVM v1.2, we are convinced that any emissions as a result of charcoal productions will not be more than 1%.

The DOE therefore does not consider it necessary to revise the already submitted project documents