

 <p align="center">CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03) <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	Subhendu Biswas Institution: First Climate (India) Pvt. Ltd.
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input type="checkbox"/> PP <input checked="" type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Clarification on leakage estimation for projects using biomass briquettes based on renewable biomass
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input type="checkbox"/> Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) <input type="checkbox"/> Proposal for a new SSC methodology (Fill in fields 4. and 5. below)
Approved SSC methodologies ² to which your submission relates to, if applicable.	AMC-I.C, AMS-I.D, AMS-I.F and General guidance on leakage in biomass project activities
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Subhendu.biswas@firstclimate.com Ph: +9133-4022-3456
Information for completing the form Describe the questions related to the SSC Methodologies, Modalities and Procedures below. If the questions are related to a project under development or implementation, you may describe the context in which they arose.	
Query on an approved SSC methodology or SSC procedures	
1. If you have questions relating to the application of an approved small-scale methodology (AMS) please specify and provide reference to the exact technology/measure below. If you have questions related to procedures for SSC project activities please clarify below:	

¹ Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

² The list of all approved small-scale methodologies (AMS) can be found at <http://cdm.unfccc.int> and go to CDM: small scale CDM methodologies.

>>As per paragraph no. 11 of the SSC methodology AMS-I.C., version 18, project activities using biomass briquette are allowed to use the methodology under the following conditions: *“If solid biomass fuel (e.g. briquette) is used, it shall be demonstrated that it has been produced using solely renewable biomass and all project or leakage emissions associated with its production shall be taken into account in emissions reduction calculation”*. Further, as per clarification titled “Consideration of biomass briquettes as one biomass type (F-CDM-SSCwg ver 01 SSC_438)”, biomass briquettes are to be considered as single biomass type.

Further, as per paragraph 14 of the “General Guidelines to SSC CDM methodologies, Version no. 15” and paragraph 49 (b) of the SSC methodology AMS IC version 18 for PoA , small-scale project / biomass project activities should estimate leakage emission for biomass project activities as per the “General guidance on leakage in biomass project activities” (latest version).

In general, biomass briquettes are made from biomass residues or wastes available in the region and/or from biomass from energy plantations (dedicated or non-dedicated to the project activity) or existing forests. As per paragraph 17 of the “General guidance on leakage in biomass project activities” competing uses for biomass are not relevant, where the biomass is generated as part of the project activity (new forests or cultivations). Our understanding is that as per the guidance, leakage due to competing use from the use of biomass briquettes manufactured from biomass generated from plantations may be ruled out.

As per paragraph 18 of the “General guidance on leakage in biomass project activities”; for biomass project activities based on biomass residues, competing use of biomass is a possible leakage emission source and has to be considered, unless it is demonstrated ex-ante at the beginning of each crediting period by the project proponent that the biomass type being used is in surplus. Guidance on surplus availability demonstration is available in the same guidance. Biomass briquettes are generally made from several types of biomass residues based on the desired properties of the produced biomass briquettes. Generally, project proponents buy biomass briquettes from briquette manufacturer/supplier who would not manufacture any surplus briquette unless there is a market demand for the same. It is further requested to note that demonstration of surplus availability of all types of biomass residues being used in the manufacture of briquettes would be a tedious process and would be contrary to the intention of the small-scale methodology. The surplus availability of the constituents which comprise major portion of the briquettes (around 80% of the biomass briquette by weight) might be demonstrated as the rest would be marginal and required for conformance with final product quality i.e. w.r.t. NCV and moisture.

Furthermore there are instances wherein biomass briquettes are produced from biomass sourced from plantations (dedicated or non-dedicated) along with biomass residue. There is no guidance on determination of leakage in such scenario in line with “General guidance on leakage in biomass project activities”. Leakage determination in such scenario may be restricted to the portion which corresponds to the use of biomass residue only (for the major constituents only, as discussed above).

Accordingly, clarification is requested on:

- a. Whether our interpretation on non requirement of estimation of leakage due to competing use of biomass for briquettes manufactured from biomass from plantations is correct,
- b. Treatment of leakage for biomass briquettes comprising of several biomass residues and whether the same can be restricted to major constituents only, and
- c. The treatment of leakage for biomass briquettes comprising of biomass from plantations as well as several biomass residues

Request for revision of an approved SSC methodology

2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:	
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3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.	
<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats <input type="checkbox"/> PDD in PDF format (optional) <input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the request for revision of the SSC methodology) 	
Proposal for a new SSC methodology	
4. If you are proposing a new small scale methodology, please provide justifications below:	
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5. For submitting a new small scale methodology a filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" is required.	
<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats³ <input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <input type="checkbox"/> Relevant annexes to the PDD are provided <input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the new SSC methodology) 	
Date you are delivering the contribution:	11/01/2011
Information to be completed by the secretariat	
SSC-Submission number	

³ The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).