

 <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>	
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Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Clarification about the applicability of methodology AMS.III.AO. "Methane recovery through controlled anaerobic digestion"
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.	III.AO. Methane recovery through controlled anaerobic digestion
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	marcelo.iezzi@ar.pwc.com Phone: (54-11) 4850 – 6816
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.

The Arrows Project activity consists in the avoidance of methane production from decay of biomass through a Municipal Solid Waste treatment system. This project activity will be developed in Buenos Aires, Argentina. The project activity will avoid the methane emissions that would have been generated in a landfill where the waste would have been disposed. In the absence of Arrow project, 650 tons/day of Buenos Aires MSW would be disposed in a landfill. The waste treatment system will generate biogas, through an anaerobic digestion, that will be used to generate electricity that will be introduced to the National Grid displacing other generation sources.

In Buenos Aires, Argentina, the current practice of MSW is disposal in landfills. The organization in charge of landfills management is CEAMSE (Coordinación Ecológica Área Metropolitana Sociedad del Estado). Almost all CEAMSE landfills have systems to capture and flare the biogas registered as CDM projects or in process of registration.

In Argentina there is no regulation requiring capture part or all of biogas generated in landfills, so this would have been vented to the atmosphere, in the absence of the CDM. All the landfills that have capture of biogas have been implemented as CDM projects, in fact, all CEAMSE capture projects have been developed as CDM project.

The project proponent seeks clarification regarding the how to calculate baseline emissions using the methodology *AMS.III.AO "Methane recovery through controlled anaerobic digestion"*. The problem is not related with the applicability conditions (as it will be demonstrated in the PDD that it is common practice in the region to dispose off the waste in solid waste disposal site) but with the description of the parameter $BE_{SWDS,y}$, specifically when it is said: "The tool may be used with the factor $f=0.0$ assuming that no biogas is captured, flared or used" The clarification is required since the landfills where the MSW would have been disposed, have biogas capture and flare, but implemented as CDM project activities.

As specified in the methodology, projects participants should calculate the methane emission of the solid waste disposal site ($BECH_{4,SWDS,y}$) using the "Tool to determine methane emissions avoided from dumping waste at a solid waste disposal site". Project participants would like to know if it is correct to use the tool with the factor " $f=0.0$ ", assuming that no methane is captured and flared in the baseline.

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:

>> Not applicable

3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.

The following documents have been attached to this form:

- ☐ Draft methodology with changes highlighted in Word and PDF formats
- ☐ PDD in PDF format (optional)
- ☐ 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:

>>Not applicable

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.

The following documents have been attached to this form:

- ☐ Completely filled in form “CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)” in Word and PDF formats³
- ☐ A draft PDD (with sections A to C completed):
 - ☐ Relevant annexes to the PDD are provided
 - ☐ 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:

14 December 2010

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>).