 <p style="text-align: center;"><b>CDM: Proposed New Methodology</b>  <b>Meth Panel recommendation to the Executive Board</b>  <b>(version 03)</b>  <i>(To be used by the Meth Panel to make a recommendation to the Board regarding a proposed new methodology)</i></p>	
Date of Meth Panel meeting:	26 - 28 January 2005
Related F-CDM-NM document ID number (electronically available to EB members)	F-CDM-NM0074: "Optimisation of Clinker use and energy conservation through technical improvement in the Ramla Cement Plant in Israel"
Related F-CDM-NMex document ID number(s) (electronically available to EB members)	F-CDM-NMex0074: Phylipsen / Schneider
Related F-CDM-NMpu document ID number(s) (electronically available to EB members)	F-CDM-NMpu0074: No comments received
<p><i>Note to those completing this form, as applicable: Please provide recommendations on the proposed new baseline and monitoring methodologies based on an assessment of annexes 3 and 4 and of their application in sections A to E of the draft CDM PDD, desk reviews and public input. Please ensure that the form is entirely filled and that arguments and expert judgements are substantiated.</i></p>	
<b>A. Final recommendations by the Meth Panel</b>	
<b>I. Recommendation on the proposed new baseline methodology:</b> <i>(checkmark the choice made)</i>	
Title of proposed new baseline methodology:>> Baseline methodology for technological improvements in industry	
<p>a. To approve this proposed methodology with minor changes</p> <p><input type="checkbox"/></p> <p>i. Conditions under which this proposed methodology is applicable to other potential CDM project activities (e.g. project type, region, data availability):</p> <p>&gt;&gt;</p> <p>ii. Minor changes:</p> <p>&gt;&gt;</p>	
<p>b. To reconsider this proposed methodology, subject to required changes</p> <p><input type="checkbox"/></p> <p>i. Conditions under which the proposed methodology is applicable to other potential projects (e.g. project type, region, data availability):</p> <p>&gt;&gt;</p> <p>ii. Required changes:</p> <p>&gt;&gt;</p> <p><i>(Project participants shall make required changes to the proposed new methodology and send it back to the Meth Panel. The proposed new methodology will be reconsidered by the Meth Panel if changes required are made by the project participants. The Executive Board will only consider this proposed new methodology after the revised proposed methodology has been reconsidered by the Meth Panel.)</i></p>	

## c. Not to approve the proposed methodology



## i. Reasons for non-approval:

>> The scope of the methodology is too broad -- any technology improvement in industry that reduces emissions per unit of output (which is suggested to include agriculture, chemicals, mining, and other sectors) -- to be evaluated effectively. Too many issues (system boundary, leakage, key assumptions, data sources, gases included, etc.) are either loosely or not at all defined by the methodology itself, leaving the DOE in a position of methodology evaluation and review rather than verification. For example:

- It is unclear whether this methodology is intended for existing facilities, for new ones, and/or for life extension of existing facilities. The implications of each might be quite different, especially with respect to project boundary. For instance, the methodology does not deal with the case where the project might increase production thereby displacing production at facilities beyond the project site or even the country in question.
- There may be issues specific to each industrial process that need to be addressed in the methodology itself. For instance, a steam system improvement project raises a host of technical issues as noted in AM0017; a natural gas cogeneration project (which might reduce the net emissions per unit of output of the industrial facility served) requires consideration of issues specific to heat and electricity supply; and so on. Therefore a one-methodology-fits-all approach is unlikely to be effective unless it is considerably more thorough than the present proposal.
- The accompanying draft CDM-PDD itself makes the latter point clear where it notes in the quantification formula for project emissions that "...the proposed project activity also leads to emissions due to electricity consumption in the cement manufacturing process....[for which] a suitable methodology will have to be identified and adopted. (p.23).

These are only illustrations. In general, the methodology often simply describes what a baseline methodology should comprise. The actual substantial methodological input from the proposed baseline methodology is limited. In practice, project developers would need to develop their own sub-methodology for each project under this methodology. The methodology developers are suggested to consult the set of approved methodologies to get a better sense of the level of specificity required to develop a complete methodology.

Furthermore, the procedures for defining the baseline scenario, and specific baseline assumptions are insufficient. First of all, the "tool to assess and determine additionality" is designed to determine whether the project is part of the baseline scenario. It is not however necessarily a sufficient tool in many circumstances to determine what the baseline scenario is. As shown in the accompanying draft CDM-PDD, there is little discussion for instance of what fuels are used at the cement plant, whether expansion is likely and so forth. (See EB-17 report, item 16. "The use of this tool to assess and determine additionality does not replace the need for the baseline methodology to provide for a stepwise approach justifying the selection and determination of the most plausible baseline scenario alternatives. Project participants proposing new baseline methodologies shall ensure consistency between the determination of additionality of a project activity and the determination of a baseline scenario.")

As noted below the methodology could lead to the accounting of emission reductions from differences in production levels.

The methodology does not establish how differences in the quality of output between baseline and project scenario would be accounted for.

Hopefully the items above and below can be addressed through a more complete new methodology.

*(A new proposal should be submitted in accordance with the procedures for submission and consideration of proposed new methodologies of the Executive Board.)*

**II. Recommendation on the proposed new monitoring methodology: (checkmark the choice made)**

Title of proposed new monitoring methodology: &gt;&gt;

a. To approve this proposed methodology with minor changes

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i. Conditions under which methodology is applicable to other potential projects (e.g. project type, region, data availability):

&gt;&gt;

ii. Minor changes:

&gt;&gt;

b. To reconsider this proposed methodology, subjected to required changes

☐

i. Conditions under which the proposed methodology is applicable to other potential projects (e.g. project type, region, data availability.):

&gt;&gt;

ii. Required changes:

&gt;&gt;

*(Project participants shall make required changes in the proposed new methodology and send it back to the Meth Panel. The proposed new methodology will be reconsidered by the Meth Panel if changes required are correctly made by the project participants. The Executive Board will only consider this proposed new methodology after required changes proposed have been made and the revised proposed methodology has been reconsidered by the Meth Panel.)*

c. Not to approve the proposed methodology

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i. Reasons for non-approval:

>> This methodology is not approved for the reasons described above for the CDM-NMB. Basically, it is too vague and broad to be applicable to the range of project types proposed, and thus the methodology cannot specify or justify the choice of data to monitor sufficiently to enable effective evaluation.

*(A new proposal should be submitted in accordance with the procedures for submission and consideration of proposed new methodologies of the Executive Board.)*

**B. Details of the evaluation of the proposed new methodology by the Meth Panel:**

**I. Proposed new baseline methodology (specify title here):** >>Monitoring Emission Reductions from technological improvements in industry'

**(1) Short description of the methodology, including an assessment of which approach from paragraph 48 of the CDM modalities and procedures was used:**

a) Describe the methodology:

>> Project participants are directed to use the additionality tool to assess additionality and to define the appropriate baseline scenario, using the investment analysis (part 2) and not the barrier analysis (part 3). Baseline and project emissions are calculated by multiplying a baseline / project emission factor per unit of output with the production quantity of the corresponding commodity. In addition, emissions from fuel use in the baseline and project scenario are calculated separately by multiplying the amount of fuel used with the corresponding GHG emission factor. Activity data (production of the commodity) must be the

same in the baseline and project case, however, it is not specified how this is to be derived, i.e. whether the project activity is assumed equal to the baseline (e.g. using only project output) or vice versa (e.g. using historical output or other means to project baseline output). (Text on p.8-9 are confusing in this respect) Leakage is supposed to be calculated by subtracting the amount of input material and energy used in the baseline scenario from the amount of input material and energy used in the project case, multiplied with the corresponding emission factor of the input material.

*b) State the approach selected:*

>> The selected approach is as per paragraph 48 (b) of the CDM modalities and procedures: "Emissions from a technology that represents an economically attractive course of action, taking into account barriers to investment".

*c) Indicate (in summary form) why the approach selected is the most appropriate. Please provide your expert judgement on the appropriateness of the selected approach to the project category:*

>> The authors state that the chosen approach is appropriate because "project activities are usually prevented to occur due to financial reasons" and "investor decisions are usually affected by their assessment of risks and investment returns". This seems appropriate for the assessment of additionality. However, if historical emissions intensities are used for the baseline (again not clearly specified, but implied), this would correspond to the approach in paragraph 48 (a) of the CDM modalities and procedures.

## **(2) Basis for determining the baseline scenario:**

*a) State whether the documentation explains how the baseline scenario is to be chosen and identified:*

>> It states that the additionality tool shall be used, however, as noted in the reasons for non-approval above, this is insufficient for determination of the baseline scenario. In addition, three criteria are added for the development of the baseline methodology: availability of information, reduction of transaction costs, and realistic simulation of investment decisions. However, it remains rather unclear how these supplementary criteria are linked with the additionality tool. For example, under "availability of information" it is stated that "the methodology permits the determination of a baseline scenario where financial information is only available for the proposed project." This is in contradiction to the additionality tool, where all plausible scenarios should be assessed in the investment analysis.

*b) State the basic underlying rationale for algorithms/formulae used (e.g. marginal vs. average basis) (see also section 4 below):*

>>

- The emissions intensity of a production or manufacturing process is reduced due to the implementation of a new technology. GHG emission intensities in the baseline and project case may be collected from different sources, including IPCC data.
- The underlying production level should be the same in the baseline and project scenario. However, the definition of the production level is not totally clear.
- Differences in fuel consumption are taken into account, but not related to the output quantity of the commodity. Potential differences in output *quality* are not discussed.
- GHG emissions intensity of all input materials and energy streams are accounted as leakage emissions.

No further rationale is provided for the algorithms/formulae used in the context of an application to different sectors or activities.

*c) State whether the documentation explains how, through the use of the methodology, it can be demonstrated that a project activity is additional and therefore not the baseline scenario. If so, what are the tools provided by the project participants?*

>> Yes, through use of the additionality tool.

d) State whether the basis for determining the baseline scenario and for assessing additionality is appropriate and adequate:

>> Yes for additionality, but no for the baseline scenario, as described above.

### **(3) Assessment of the description of the proposed methodology and its applicability**

a) State whether the methodology has been described in an adequate manner:

>> No, it has not. It is too general as noted above.

b) State whether the proposed methodology is appropriate for the referred proposed project activity and the referred project context (described in Sections A-E of the draft CDM-PDD and submitted along with Annex 3):

>> The methodology could, in a modified manner, in principle be applicable to the proposed project activity. However, the guidance provided is not sufficient to apply the methodology to the proposed project activity. In the methodology, as examples, some information is given on how to apply the methodology to the proposed project activity. Still, no systematic guidance for the cement sector is given and a discussion of all relevant aspects is missing, e.g. regarding the different products of cement and different process implications, relevant emission factors, etc.

c) State whether the application of the methodology could result in a baseline scenario that reasonably represents the anthropogenic emissions by sources of greenhouse gases that would occur in the absence of the proposed project activity.

>> It could conceivably, for some project types, but it lacks sufficient rigour for most.

Please explain:

>>

- As explained in the introductory note, the main reason is that the methodology is far too general. As project developers would practically need to develop their own guidance (or methodology), it cannot be assured that emissions are reasonably estimated.
- Changing patterns in fuel consumption due to the project activity are not accounted appropriately and may lead to the accounting of emission reductions from differences in the production level.
- The methodology does not establish that the output should be of the same quality in the baseline and project scenario. A change in product quality may lead to reductions at the project plant, but to increases in other production plants, if market demand for different products does not change.

### **(4) Assessment of algorithms/formulae and type of data needed:**

a) State whether the description of the methodology includes algorithms and generic formulae that can be applied to other potential project activities (if not, the proposed new methodology will be considered as a project-specific methodology):

>> The methodology might indeed be applicable to many projects in which simple technological improvements at existing facilities which possess no other plausible baseline scenarios other than indefinite continuation of BAU conditions, and very narrow system boundaries, and little likelihood of potential leakage. But otherwise the GHGs within the system boundaries. Note that the general nature of the methodology lead to much room for interpretation for project developers and DOEs. The elaboration of certain issues in the methodology (e.g. system boundaries) may lead to incorrect application to some specific project types.

b) Explain the spatial scope of data used to determine the baseline and whether the scope is appropriate:

>> Table 2 in the documentation shows the spatial level of data necessary to apply the methodology.

- Items 7 and 8 (product emission factor in the baseline and project scenario, respectively): these items should refer to the plant-specific circumstances and thus have a local spatial scope, wherever possible. If project specific data is not available, national or international data may be taken. This is dependent on the sector and the project activity. A general technology-specific, location-independent spatial

scope as proposed by the authors is not adequate and may result in rather wrong estimates of actual emission reductions.

- Item 11 Input material or energy emission factor, which is stated to be "Related to the technology, not location". There will be projects where the composition (and therefore emission factor) of input material (and certainly energy) emission factor are determined by location as well as technology. Item 1 (list of plausible scenarios): depending on the type of sector or project activity, the spatial level may be local (as given in table 2), but also national or even international, depending on the project type the methodology would be applied to.

*c) Explain the vintage of data used (in relation to the duration of the project crediting period) and whether the vintage of data is appropriate, indicating the period covered by the data:*

>> The authors state that "the project should aim at using the most recent data sources available at the time of construction of the baseline". No further information is given. Therefore, the adequacy of the vintage of data used cannot be judged

#### **(5) Definition of the project boundary related to the baseline methodology:**

*a) State how the project boundary is defined in terms of:*

*i) Gases and sources*

>> Not defined. It implicitly appears that all greenhouse gases should be considered. It is unclear whether GHG emissions associated with raw materials and energy flows to the plant are included in the project boundary. According to the description in section D.5 and equations 2 and 3 these sources should be included, however, they are also included in the calculation of leakage effects in section D.6 (equation 4).

*ii) Physical delineation*

>> The documentation provides the general statement "For investment projects applying the proposed methodology the physical site(s) of the business-as-usual activities and of the proposed project activity typically define the boundary.

*b) Indicate whether this project boundary is appropriate:*

>> The disbenefit of a very general methodology is that it implies potentially excessive efforts to for each project developer to consider all gases or sources or to make independent determinations as to their significance. Overall, the general approach to the system boundary is too general to give a final judgment. For instance, there can be technological improvements that result in different flows of materials or fuels (e.g. from pipelines to truck transport) that do have a significant effect on project emissions that should be taken into account.

#### **(6) Key assumptions/parameters (including emission factors and activity levels) and data sources:**

*a) List the implicit and explicit key assumptions. Identify those, if any, which are problematic and explain:*

>> The documentation lists the following explicit assumptions:

1. Determination of baseline scenario and additionality assumes:

- Information on acceptable IRRs or discount rates for comparable investments with a similar risk profile in the relevant sector and country from various business statistics, expert judgment.
- Conservative calculation, to be checked by DOE.
- The level of production activity will be the same in the project and baseline scenarios. The installation of a new technology to reduce GHG emissions will not change the level of production activity, thus, the production are the same in both scenarios.
- The production efficiency may be different for the baseline and project scenarios. It will just be considered that if the project scenario is more efficient than the baseline, it will need a smaller number



of units, or less raw material to produce the same amount of product as in the baseline. This will be incorporated in the investment analysis, considering the price of installations, as well as maintenance and operation costs in each scenario.

2. Calculation of emissions of the baseline scenario and project activity assumes:

- The emissions will be calculated considering the same production in both scenarios. If production efficiency and level increase in the project scenario, this new production level will be used for the baseline scenario.
- Emission factor, conversion factors or default data used for this analysis needs to be gathered from scientific publications, specialized institutions and consultants, the IPCC, or any other recognized sources, or from validated/documented data gathered by the project company. Full references must be given for the sources of data used. These will need to be checked by the DOE.
- The input demand can vary between the project and business as usual (BAU) scenarios. If this variation is significant, measurable, and reasonably attributable to the project activity and that results in an increase in the emissions it must be included as project emissions (if it is inside the boundary and under the control of the project proponent) or leakage (if it is outside the boundary and is not under the control of the project proponent).

*b) State whether the key assumptions are arrived at in a transparent manner:*

>> Yes.

*c) Give your expert judgement on whether the assumptions/parameters are adequate:*

>> No.

1. The statement that project activity will not change production levels is not a valid prima facie assumption. Many projects are undertaken for reasons in addition to reducing GHGs. Especially in the case of reducing energy- or process related CO<sub>2</sub> emissions, measures are usually mainly taken to increase production efficiency, reduce energy costs, improve product quality, etc. There will be many cases where the introduction of technologies that reduce GHG emissions will also affect production levels.
2. What constitutes a “conservative calculation” should be defined.
3. Choice of emission factors and conversion factors.
4. Principle of “equivalent of service”. The methodology does not address appropriately the principle that the service provided as part of the project activity shall be the same in the baseline scenario. For instance, in the case of the proposed cement plant, the project and the baseline scenario could only be compared if in both scenarios same quality of cement is produced. In the case of a heat production plant an equivalence of service would mean that in both the baseline and project the same thermodynamic parameters (pressure, temperature) are provided. However, the cement example on page 9 indicates, that the methodology would allow to produce a product with different specifications (e.g. a different quality). However, in that case, emission reductions are only attributable to the project activity, if it can be shown that the consumers of cement will switch in the long-term to different cement types due to the proposed project activity. Otherwise – if the demand for different types of cement remains the same – the emission reductions in the project plant would be offset by emission increases in other cement plants that increase their production to satisfy the market demand of the cement type produced prior to project implementation.

*d) Indicate which data sources are used and how the data are obtained (e.g. official statistics, expert judgement):*

>> According to the methodology, emission factors and conversion factors may be chosen from many different sources, but without indicating any priority. The priority choice for emission factors and conversion factors should be indicated, (e.g. the first choice for emission factors and conversion factors should, in accordance with IPCC GPG, be data from the actual plant or respective fuel suppliers.)

*e) Give your expert judgement on whether the data used are adequate, consistent, accurate and reliable:*

>> Insufficient specification to judge.

<p>f) <i>State possible data gaps:</i></p> <p>&gt;&gt; Because of the overly broad scope of this methodology, they are potentially quite numerous but impossible to list.</p>
<p><b>(7) Assessment of uncertainties:</b></p> <p>a) <i>State whether the methodology includes an assessment of uncertainties regarding:</i></p> <p>i) <i>The basis for determining the baseline scenario:</i></p> <p>&gt;&gt; Yes. The documentation states that the application of the methodology described in the “Draft consolidated tools for demonstration of additionality” can lead to an erroneous baseline scenario if: “the set of plausible alternatives is incomplete... [Or if] the financial analysis is not conservative. The DOE must carefully control and check all assumptions used in order to ensure a conservative result.”</p> <p>ii) <i>Algorithms/formulae:</i></p> <p>&gt;&gt; Not provided.</p> <p>iii) <i>Key assumptions:</i></p> <p>&gt;&gt; Not provided.</p> <p>iv) <i>Data:</i></p> <p>&gt;&gt; Not provided.</p> <p>b) <i>State whether the uncertainties presented are reasonable</i></p> <p>&gt;&gt; Not adequately provided – too vague to judge.</p>
<p><b>(8) Leakage:</b></p> <p>a) <i>State how the baseline methodology addresses any potential leakage due to the project activity:</i></p> <p>&gt;&gt; The documentation states that "Leakage is calculated as the difference in the consumption of input materials or energy used for the production lines of the project and baseline scenarios, multiplied by the emission factors associated with these materials, energy or fossil fuels. The Emissions Factor to be used will depend on the factors that are identified as causing leakage, and will need to be referenced to internationally accepted data sources or from previously validated CDM projects. The appropriateness of the emissions factor used will need to be checked by the DOE."</p> <p>b) <i>Indicate whether the treatment for leakage is appropriate and adequate:</i></p> <p>&gt;&gt; The treatment of leakage does not seem to make sense, as there apparently is an overlap between emission reductions of the project compared to the baseline and the effects of leakage.</p>
<p><b>(9) Transparency and “conservativeness”:</b></p> <p>a) <i>Indicate whether the baseline methodology was developed in a transparent way:</i></p> <p>&gt;&gt; The methodology lacks transparency in that it leaves key methodology decisions to project participants and DOEs.</p> <p>b) <i>State whether the baseline methodology is conservative:</i></p> <p>&gt;&gt; Because of this, conservativeness is impossible to judge.</p>
<p><b>(10) Potential strengths and weaknesses of the proposed baseline methodology (please explain):</b></p> <p>&gt;&gt; Strengths include clear writing and succinctness. The paramount weakness is vagueness and incompleteness per the above comments.</p>
<p><b>(11) Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account (please explain):</b></p> <p>&gt;&gt; The documentation states: "The results of this comparative analysis between plausible scenarios should</p>



be evaluated in the context of sector trends, and incorporating the effects of any legislation and government policies that may affect this trend. This can be done by analyzing the policies (subsidies, laws, economic trends), as well as the behavior of companies involved in the same production sector in the region where the project will be implemented (For more detail see step 1 in section D.1).” Again, indisputable, but very general.

**(12) Applicability of the proposed methodology across project types and regions (please indicate):**

>> According to the documentation, the methodology is applicable to project activities where technological improvements in industrial or manufacturing processes lead to the reduction in the level of GHG emissions per unit of industrial output. Categories mentioned for applicability are Manufacturing industries, Chemical Industries, Construction, Transport, Mining/mineral production, Metal Production, Agriculture. This is clearly too broad.

**(13) Any other comments:**

a) State whether any other source of information (i.e. other than documentation on this proposed methodology available on the UNFCCC CDM web site) has been used by you in evaluating this methodology. If so, please provide specific references:

>> None.

b) Indicate any further comments:

>> No further comments.

**II. Proposed new monitoring methodology (specify title here): >> Monitoring Emission Reductions from technological improvements in industry'**

*In respect of the proposed new monitoring methodology, evaluate each section of annex 4 to the draft CDM PDD. Please provide your comments section by section:*

**(1) Brief description of new methodology:**

*Describe new methodology:*

>> The proposed monitoring methodology is even more general and vague as the baseline methodology. The authors indicate that “the precise list of data to be collected depends on the peculiarities of the project type”. They do not provide a list of data that needs to be collected. There is only, as an example, a set of data to be collected for projects in the cement industry. However, no guidance is given on how to apply these very general monitoring instructions to specific sectors and project activities. In summary, an actual monitoring methodology with data sets has not been provided by the authors.

It remains unclear, why monitoring is proposed to include “parameters to define the baseline scenario as the most plausible scenario in the absence of project activities and to prove additionality”, as this is undertaken as part of the validation and not the certification. This may refer to the proposal of an additionality test at the beginning of each crediting period.

**(2) Key assumptions/parameters:**

a) List the implicit and explicit key assumptions. Identify those, if any, which are problematic and explain:

>> The documentation lists the following assumptions explicitly as being used in the monitoring methodology:

1. The project developer will need to identify the emission factors and technical parameters to be used for the monitoring methodology (e.g. fuel emission factors, efficiency of GHG destruction equipment, etc.), but these will need to be from internationally recognized sources;
2. The methodology can only be applied in cases where such recognized emission factors do exist
3. The methodology can only be used if there is a simple, transparent and accurate way to measure the proxy indicator. This is usually the case, as the proxies tend to be industrial products that are generally

very well monitored;

4. The Global Warming Potential values for GHGs will need to be those approved by the IPCC.
5. All the other variables included in the baseline definition, additionality test or emission reduction calculation not included in this monitoring plan are expected to be constant for the project duration.
6. The need of inclusion of one or more variable based on sector or national policies and circumstances will be evaluated by the local DOE.

*b) State whether the key assumptions are arrived at in a transparent manner:*

>> Cannot be judged.

*c) Give your expert judgement on whether the assumptions/parameters are adequate:*

>> Too vague, cannot be judged.

### **(3) Data sources and data quality:**

*a) Indicate which data sources are used and how the data are obtained (e.g. official statistics, expert judgement):*

>> The documentation states "The precise list of data to be collected depends on the peculiarities of the project type. In essence, the quantity of GHG destroyed is estimated through the use of a proxy indicator that allows the calculation of the GHG emissions associated with the production process in the baseline and project scenarios. The most important factors to be monitored are the proxy indicator (i.e., the quantity of product produced) and the emissions factor of the indicator. As there is no expected variation in the other data involved in the emissions calculations, there is no need for monitoring these parameters. The table provided only shows examples based on the case study of a project that reduces CO<sub>2</sub> emissions due to improve clinker and cement production process (the draft CDM-PDD project).

The data to be monitored do not include the underlying data required to determine emission factors (e.g. the amount of clinker used in cement).

NB: the emission factor per tonne of clinker may be obtained from literature, but not the emission factor per tonne of cement. The % of clinker in cement varies widely over different regions, countries, project developers and over time. As alternative materials are being used as a cheaper alternative, the remaining share of clinker in cement is influenced by the availability of those alternative materials and their prices. In addition, the amounts of alternative materials that can be used depend on the required product specifications. I.E. there is no way this parameter can be obtained from literature, as suggested in Table B.2.1.

*b) Give your expert judgement on whether the data used are adequate, consistent, accurate and reliable:*

>> Cannot be judged in most cases, because of general nature of methodology. See however, remark on emission factors taken from literature, made above.

*c) State possible data gaps:*

>> As above, too vague to judge.


### **(4) Assessment of the description of the proposed methodology and its applicability:**

*a) State whether the proposed methodology has been described in an adequate manner:*

>> No, too general. Furthermore, the tables mention a number of parameters to be measured continuously, that cannot be measured on a continuous basis or cannot be measured at all, but should be calculated or estimated (emission factor).

*b) State whether the proposed methodology is appropriate for the referred proposed project activity and the referred project context (described in Sections A-E of the draft CDM-PDD and submitted along with annex 4):*

>> No, since the methodology is too general.

<p>c) State whether this proposed monitoring methodology is compatible with the proposed baseline methodology described in annex 3 of the draft CDM-PDD:</p> <p>&gt;&gt; Yes, it is compatible.</p>	
<p><b>(5) Leakage</b> (please elaborate, if appropriate):</p> <p>&gt;&gt; See above under baseline methodology.</p>	
<p><b>(6) Quality assurance and control procedures</b> (please explain):</p> <p>&gt;&gt; Again, too vague.</p>	
<p><b>(7) Potential strengths and weaknesses of the proposed monitoring methodology</b> (please explain):</p> <p>&gt;&gt; Same as for the baseline methodology above.</p>	
<p><b>(8) Applicability of the proposed methodology across project types and regions</b> (please indicate):</p> <p>&gt;&gt; Same as for the baseline methodology above.</p>	
<p><b>(9) Any other comments:</b></p> <p>a) State whether any other source of information (i.e. other than documentation on this proposed methodology available on the UNFCCC CDM web site) has been used by you in evaluating this methodology. If so, please provide specific references:</p> <p>&gt;&gt; None.</p> <p>b) Indicate any further comments:</p> <p>&gt;&gt; No further comments.</p>	
<div style="text-align: center;">  </div> <p>Signature of Meth Panel Chair .....  Date: 9/02/2005 (Jean-Jacques Becker)</p> <p>Signature of Meth Panel Vice-Chair .....  Date: 9/02/2005 (José Miguez)</p>	
<b>Information to be completed by the secretariat</b>	
F-CDM-NMmp doc id number	F-CDM-NMmp - NM0074
Date when the form was received at UNFCCC secretariat	9 February 2005
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