

 <p align="center"><b>CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03)</b>  <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	Institution: <a href="#">The Egypt Ministry of Finance</a>
Affiliation <sup>1</sup> :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Request for further clarification on applicability of AMS III.C v.11
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures <sup>2</sup> (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 <sup>2</sup> to which your submission relates to, if applicable.	AMS III.C Version 11
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	<a href="#">Deputy Minister Nabil Rashdan</a> +20-22686-1200 nyehia@mof.org  <a href="#">Mr. Mohamed Youssef</a> +20-22686-1200 / 1300 maziz@mof.org  <a href="#">Ms. Marwa Hussein</a> +20-22686-1200 / 1300 marwahussein@mof.gov.eg
<b>Information for completing the form</b>	
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.	
<b>Query on an approved SSC methodology or SSC procedures</b>	
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:	
<p>We are writing in reference to recent clarification SSC_414, which states: "the SSC WG agreed to reiterate the previously provided clarifications in response to SSC_364 and SSC_125 that AMS-III.C covers project activities involving the replacement of high GHG emitting vehicles with new electric or hybrid vehicles."</p> <p>This clarification was followed by a recommendation, presented in paragraph 7 of the report for the 26<sup>th</sup> meeting</p>	

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

<sup>2</sup> 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.

of the SSC-WG, which states “taking into account the responses to request for clarifications already approved by the CDM Executive Board (the Board) (e.g. SSC\_376<sup>3</sup> and SSC\_364), the SSC WG agreed to recommend a revision to AMS-III.C...to clarify that the methodology is only applicable to technology/measures involving electric and hybrid vehicles.”

We have two concerns with this decision and request additional clarification, as follows:

- **There are inconsistencies and errors in the use of precedent to support the clarification:**
  - SSC\_125, referred to in the SSC WG decision, states that "*The SSC WG agreed to clarify that AMS III.C deals with project situations involving the replacement of complete vehicles and not components thereof, e.g. project activities involving the replacement of fossil fuel vehicles with new electric/hybrid vehicles.*" (November 2007)
  - SSC\_364, referred to in the SSC WG decision, states that "*The SSC WG agreed to clarify and reiterate in precedence with SSC\_125, AMS-III.C deals with project situations involving the replacement of complete vehicles and not components thereof, e.g., project activities involving the replacement of fossil fuel vehicles with new electric/hybrid vehicles. Therefore, fuel switching within the existing vehicles is not applicable to use the methodology AMS-III.C.*" (February 2010)
  - SSC\_376, referred to in the SSC WG decision, refers to methodology AMS.III.H, which is entirely unrelated to AMS.III.C.

Since no previous clarification indicates that applicability of the methodology is restricted to "electric or hybrid vehicles", thereby excluding other low GHG emissions vehicles, the SSC WG clarification is incorrect -- the new clarification does **not** reiterate previous clarifications and is, thus, a brand new statement without precedent.

- **The clarification itself is not a clarification but constitutes a revision of the existing methodology:**
    - From version 1 through version 11 of AMS.III.C, the applicability conditions of the methodology have referred to “low GHG emissions vehicles,” with no indication that its applicability should be restricted to a specific technology. In fact, all requirements of the methodology, as written, can be met by any vehicle that emits fewer greenhouse gases per km travelled. No additional components or amendments are necessary to cover non-electric or non-hybrid vehicles.
    - As a case-in-point, the Egypt Vehicle Scrapping and Recycling Program PoA, which does not include the use of electric or hybrid vehicles, completed its global stakeholder consultation in December 2009 and is now nearing completion of validation. Throughout this period, AMS.III.C has been successfully employed, because the program is in full compliance with the methodology *as it is written*. Similarly, there are other CDM programs utilizing AMS.III.C under validation that do not include sole use of electric vehicles, yet, have been able to proceed.
- Please not that the Ministry of Finance of Egypt has been directing National resources**

<sup>3</sup> We believe that SSC\_376 actually refers to SSC\_375 which is in response to a request for clarification of methodology AMS III.S, not AMS III.C

<sup>4</sup> As per EB34, Annex7, paragraph 14, “*The revision of an approved SSC methodology or tool referred to in a SSC methodology shall not affect (i) registered CDM project activities during their crediting period; and (ii) project activities that have been published for public comments for validation using the previously approved methodology or tool, so long as the project activity is submitted for registration within 8 months of the date when the revision became effective.*”

towards completing the registration of the project based on the UNFCCC requirements and if suddenly the projects stops, then a great waste will be realized. Again, we request the grace period option to be applied on our case.

- So, by restricting the types of technologies that may be used under version 11 of the methodology, SSC\_414 constitutes a revision of the methodology, not a clarification.
- **Given these two concerns, we would like to present the following request for additional clarification:**
  - Projects and programs that utilize AMS.III.C and are currently under validation may submit for registration under version 11 of AMS.III.C until 12 April 2011 as per EB34, Annex 7, Paragraph 14.<sup>4</sup> To complete validation of these programs, we require confirmation that version 11 of the methodology may be applied *as it has been written* (i.e., not limiting the applicable technologies to only electric or hybrid vehicles) until the end of this grace period.
  - Therefore, please provide clarification that projects and programs using AMS.III.C that have already completed the global stakeholder consultation and are under validation may continue to submit for registration under the grace period, as version 11 is written, not as it has been revised through SSC\_414.

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#### 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:

&gt;&gt;

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:

&gt;&gt;

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 formats<sup>5</sup>
- ☐ 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:*

[August 22, 2010](#)

**Information to be completed by the secretariat**

SSC-Submission number

<sup>5</sup> The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).