

 <p style="text-align: center;">CDM: Proposed New Methodology Meth Panel recommendation to the Executive Board (version 03) <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-NM0069: "30 TPD Biodiesel Project in Andhra Pradesh, India"
Related F-CDM-NMex document ID number(s) (electronically available to EB members)	F-CDM-NMex0069: Mawandia / Sari
Related F-CDM-NMpu document ID number(s) (electronically available to EB members)	F-CDM-NMpu0069: Graichen
<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>	
A. Final recommendations by the Meth Panel	
I. Recommendation on the proposed new baseline methodology: (checkmark the choice made)	
Title of proposed new baseline methodology:>>Biodiesel production and switching fossil fuels from petro-diesel to biodiesel	
<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>>></p> <p>ii. Minor changes:</p> <p>>></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>ii. Required changes:</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 proposed methodology assumes that all biodiesel produced is consumed, and that all biodiesel consumed displaces petro-diesel. However, the consumption and use(s) of biodiesel is not monitored. These omissions should be corrected in any resubmitted version of the methodology, taking into account that biodiesel can be used for several purposes (including non-energy uses).
- The currently proposed project boundary includes i.e. the bio diesel production site and the transportation of biodiesel and feedstocks to this site. The boundary should be extended to cover the use of biodiesel (to avoid double-counting risks, see section B.I.5 (b) below).
- The currently proposed project boundary excludes several sources, which may significantly affect the level of expected emission reductions (both positively and negatively). In particular, the proposed boundary does not include emissions associated with the preparation and harvesting of the raw materials needed to produce biodiesel, or the emissions associated with any land clearing. These emission sources are directly associated with the project activity, could be significant in some cases, and should be accounted for unless this source is demonstrated to be insignificant for the individual project activity using this methodology. Excluding these emissions would mean that the proposed methodology could significantly over-estimate its expected emission reductions. (Another important potential source of emissions could be in the process of oil extraction- this is not included in the methodology).
- The baseline scenarios should be widened to include the possibility of a fuel switch to natural gas or other fuel source. (This may require generalization of the formulae for ER calculations.)
- The methodology assumes that using biodiesel will not have any impact on the efficiency of the engine. This assumption should be justified for each proposed project activity using the methodology. The proposed methodology indicates that a grid emission factor, if available, can be used to calculate project emissions. However, the methodology should specify how this emission factor is calculated (or alternatively use the other method proposed to calculate the GHG-equivalent emissions of electricity consumption).

(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: >> Biodiesel production and switching fossil fuels from petro-diesel to biodiesel

a. To approve this proposed methodology with minor changes



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

>>

ii. Minor changes:

>>

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.):

>>

ii. Required changes:

(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



i. Reasons for non-approval:

>>

- The methodology assumes that the boiler used in biodiesel production is fuelled by biodiesel only and it is therefore not necessary to consider any fossil fuel emissions. This is not necessarily the case, fossil fuel use of the production plant (and their associated emission factors) should be monitored, e.g. through measurement or delivery documents by suppliers.
- There are also other data gaps, corresponding to those outlined for the baseline methodology above (e.g. lack of data on biodiesel consumption and use, plantation-related emissions).
- The methodology assumes that the quantity of biodiesel produced = that consumed = amount of petrodiesel replaced. This is a problematic assumption as there may be on-site use of biodiesel, or leaks, theft, wastage. Thus, the quantity of biodiesel consumed should be justified, e.g. via monitoring sales of biodiesel.
- Biodiesel production is monitored as part of the baseline parameters but this should be part of the project activity parameter (could be relevant in case some projects use a baseline methodology from one and a monitoring methodology from another case).
- Also, the fuel for transportation of biodiesel is reported to be measured but should be estimated specially if the transportation is contracted out.

(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*): >> Biodiesel production and switching fossil fuels from petro-diesel to biodiesel

(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:

>> The three-step methodology is developed for fuel-switch activities that partially or fully substitute biodiesel for “petro-diesel” in the transport sector.

- Step 1: assesses the additionality of the proposed project activity by using the EB-approved additionality tool. (No details on how to do this are given in the proposed methodology). (The draft CDM-PDD has some discussion on this in B3, though this is not sufficient).
- Step 2: calculates the baseline emissions as existing emissions caused by combustion of petro-diesel.
- Step 3: calculates the emissions occurring within the project boundary, and those associated with leakage. (However, as outlined below, the proposed project boundary is not appropriate).

The methodology has been developed to apply across different types and performances of vehicles and uses one single emissions factor.

b) State the approach selected:

>> Approach is per paragraph 48 (a) of the CDM modalities and procedures: “Existing actual of historical emissions, as applicable”.

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:

>> This is an appropriate approach as the project is a fuel-switch project and the baseline scenario assumed is the continuation of existing activities.

(2) Basis for determining the baseline scenario:

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

>> The methodology allows for two potential baseline scenarios, i.e. substituting petro-diesel with biodiesel or continuing existing practices. The methodology also indicates that national and sectoral policies need to be taken into account when determining which of the baseline scenarios is most appropriate.

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

>> The underlying rationale is to assess what the petro-diesel vehicle owners would do in the absence of the proposed project. The stated assumption underpinning the rationale is that the baseline scenario in the absence of the project activity would be the continuation of the existing practice of using petro-diesel.

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?

>> The methodology indicates that the EB-approved additionality tool should be used to assess additionality.

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

>> Using the additionality tool to assess additionality is appropriate and adequate.

However, limiting the potential baseline scenarios to two is not appropriate: extending the possibilities to a switch to biodiesel from e.g. CNG, LPG or LNG should be included. (As outlined in the proposed methodology, if a fuel switch from a fuel other than petro-diesel is identified as the baseline scenario, the proposed methodology cannot be applied or would have to be generalised).

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

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

>> Yes, the proposed methodology is clear and well written.

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 CDM-NMB):

>> With changes as requested, the methodology should be appropriate to the proposed project activity.

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.

>> Yes, the methodology could result in an appropriate baseline scenario. However, the methodology currently excludes some plausible baseline scenarios, as outlined above. This should be changed.

Please explain:

>> As outlined above, the methodology does not allow for CNG, LPG or LNG as a potential baseline scenario.

(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):

>> Yes, the proposed methodology contains several generic formulae that could be applied to other potential project activities (after suggested changes have been applied).

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

>> Different spatial scopes of data are used in different parts of the methodology:

- IPCC default emission factors are used, e.g. CH₄ emissions from methanol production.
- Country-specific data or IPCC default data for developed countries (if no country-specific data are available) are proposed to calculate the C-content of petro-diesel.
- Project-specific production of biodiesel (multiplied by its CO₂ emission factor) is used to determine the baseline emissions. The methodology does not indicate what the source of the CO₂ emission factor is, or whether it is project-specific or a default value.
- Grid-specific or default emission factors for coal-fired plants (source not specified) are used to calculate project emissions.

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:

>> Since the C content of fuels is not expected to change over time, it is appropriate to use IPCC defaults and (regularly-monitored) project-specific production data.

(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

>> Emissions of:

- CO₂ (or CO₂, CH₄ and N₂O, depending on available data sources) from baseline diesel combustion;
- CO₂ emissions from transporting biodiesel to biodiesel plant;
- CH₄ emissions from methanol consumed in biodiesel manufacture;
- CO₂ emissions from electricity consumed in biodiesel manufacture.

ii) Physical delineation

>>

- The bio diesel production plant site
- Transportation of the bio diesel and the feedstock
- Combustion sources or vehicles that substitute petro-diesel with bio diesel

b) Indicate whether this project boundary is appropriate:

>> All gases and sources as currently included in the project boundary are appropriate. However, an extension to other sources is needed as the current boundary excludes several sources, which may significantly affect the level of expected emission reductions (both positively and negatively).

In particular, the boundary does not include the use of the biodiesel. Excluding this from the boundary could lead to potential double counting of emission reductions by different projects claiming emission reductions from producing and using the biodiesel. PPs should restructure the

project boundary or indicate how to avoid such double-counting.

Also, the currently proposed boundary does not include emissions associated with the preparation and harvesting of the raw materials needed to produce biodiesel, or the emissions associated with any land clearing. These emission sources are directly associated with the project activity, could be significant in some cases (see public comment and reference from Jakob Graichen), and should be accounted for unless this source is demonstrated to be insignificant for the individual project activity using this methodology. Excluding these emissions would mean that the proposed methodology could significantly over-estimate its expected emission reductions.

The potential impact of using biodiesel (compared to petro-diesel) on engine efficiency will also need to be taken into account – or it will need to be demonstrated that a change in engine efficiency is not relevant/significant.

(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:

>> Explicit assumptions:

- Quantity of biodiesel produced = quantity of biodiesel consumed. This is a problematic assumption as there may be on-site use of biodiesel, or leaks, theft, wastage. Thus, the quantity of biodiesel consumed should be justified, e.g. via monitoring sales of biodiesel.
- Using a grid-specific or coal-based emission factor to estimate project-related electricity emissions is appropriate if a grid emission factor is not available. (OK to use a coal-based emission factor, as likely to be conservative. However, if a different “grid electricity emission factor” is to be used the methodology should specify how it should be calculated].
- Fuel switch to a non-biodiesel fuel is not a plausible baseline scenario. This should be changed as outlined above.

Implicit assumptions (need to be made explicit to be transparent):

- Quantity of biodiesel consumed = quantity of petro-diesel displaced in non-Annex I countries. This is a problematic assumption, as biodiesel can be used for both energy and non-energy purposes, and can be exported. (If biodiesel is used to displace petro-diesel in Annex I countries, it should not generate CERs).
- No demand-based transport project (e.g. fuel switching in road vehicles) will also claim credit for using the same biodiesel as produced by the project. (This potential for double-counting all emission reductions by the proposed project is problematic. Any methodology resubmission should indicate how a proposed project activity could be structured, and what needs to be monitored, in order to reduce the likelihood of such double counting.).
- Increased project-related emissions associated with the production and harvesting of raw materials are either insignificant, or are offset by increased project-related sequestration of the associated plantations. This assumption has not been justified. In the absence of appropriate justification, production, harvesting and land-clearing emissions should all be included in the project boundary.
- The efficiency of engines will not change if biodiesel and/or petro-diesel are used. This should be justified.

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

>> See above.

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

> > See above.

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

>> International or national data are used for emission factor calculations. Project-specific activity data are used. (No data is used to calculate emissions from production and harvesting raw materials. This data gap should be filled).

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

>> Activity data monitored at the project level should be adequate, consistent, accurate and reliable. However, it is not clear how much variation is likely in carbon oxidation factor for different uses of the biodiesel. It is also not clear that potentially excluding emissions of CH₄ and N₂O is appropriate, as the data given indicate that these could account for up to 6% of GWP emissions from engines.

f) *State possible data gaps:*

>>

- Information on the amount of biofuel consumption and use(s).
- Information on emissions from production and harvesting raw materials, and from associated land clearing.
- Information on emission factors from different class/type/operation of vehicles and a comparison to the emission factor used to calculate emission reductions from project.
- Emissions of CH₄ and N₂O from fuel combustion in engines (if a country-specific C-factor chosen).

(7) Assessment of uncertainties:

a) *State whether the methodology includes an assessment of uncertainties regarding:*

i) *The basis for determining the baseline scenario:*

>> Yes.

ii) *Algorithms/formulae:*

>> Yes.

iii) *Key assumptions:*

>> The methodology indicates that there is “an uncertainty in respect of the carbon content of petrodiesel and oxidation factor”, but estimates that these are low for C-content emission factors. The methodology also suggests using a conservative value based on “developed country emission factors”. No qualitative or quantitative assessment of uncertainties in oxidation factor is made.

iv) *Data:*

>> See c above.

b) *State whether the uncertainties presented are reasonable:*

>> It is difficult to assess this given the data gaps (on variations in emission factor from vehicles of different mode, emission control, operating characteristics etc.).

(8) Leakage:

a) *State how the baseline methodology addresses any potential leakage due to the project activity:*

>> Some leakage effects of the project activity are considered, i.e. an increase in methanol production (and corresponding methane emissions) associated with increased biodiesel production.

b) *Indicate whether the treatment for leakage is appropriate and adequate:*

>> The treatment of methane emissions from increased methanol use/production is appropriate. However, as outlined above, the treatment of leakage (or the project boundary) should be expanded to include emissions associated with land clearing and planting/harvesting of raw materials and with oil extraction from the seeds.

(9) Transparency and “conservativeness”:

a) Indicate whether the baseline methodology was developed in a transparent way:

>> Yes, the methodology is transparent.

b) State whether the baseline methodology is conservative:

>> The proposed methodology includes some conservative elements. These include:

- Use of developed country emission factors (if country-specific values not available)
- Use of a coal-based emission factor to calculate the GHG emissions from electricity consumption (if a grid-value is not available).

However, there is not enough information is provided to assess whether or not the baseline methodology is conservative (e.g. data gaps on:

- The relative C emission factors from vehicles of different mode, emission control, operating characteristics etc.
- The relative magnitude of increased emissions from land clearing and planting/harvesting and increased sequestration from greater number of plantations).

(10) Potential strengths and weaknesses of the proposed baseline methodology (please explain):

>>

Strength:

- The methodology is simple and easy to implement.

Weaknesses (outlined in more detail above):

- Lack of suitable monitoring to validate the assumption that the quantity of bio diesel produced is equal the petro-diesel substituted.
- Absence of suitable provisions to monitor increase (if any) in the consumption of petro diesel, on account of blending bio-diesel.
- Suitable procedure to monitor fuel usage within the project premises.
- Lack of suitable provisions to account for plantation related GHG emissions.
- Too limited options for choices of baseline scenario.
- Assumption that using biodiesel will have no impact on engine efficiency.
- Other issues as highlighted above.

(11) Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account (please explain):

>> The methodology takes national and/or sectoral policies into account in its assessment of potential baseline scenarios. (However, it is unlikely that national circumstances and policies will describe that biodiesel production and use is the only alternative to biodiesel use.)

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

>>The applicability of this methodology is not limited to certain regions. The proposed methodology indicates that it should be limited to use of biodiesel in transport (as opposed to stationary engines).

(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:

>> More complete references should be provided e.g. page 30 of the draft CDM-PDD-Annex 3.

b) Indicate any further comments:

>> The proposed new methodology indicates that the methodology is applicable to project activities that “...partially or fully substitute petro-diesel with biodiesel in mobile combustion for road and rail transport”. However, the associated draft CDM-PDD indicates that the proposed project promotes mitigation of GHG emissions by substituting the petro-diesel in transportation vehicles “and to a small extent in stationary applications”. In the application of this methodology to the proposed project activity, it should be clarified by the PP whether or not the expected emission reductions are just transport-based or whether they also include emission reductions from displacing diesel in stationary applications. (If it can be established that biodiesel is a perfect substitute for petro diesel then the methodology can be further simplified).

II. Proposed new monitoring methodology (*specify title here*): >>Monitoring methodology for emissions from biodiesel production and switching fossil fuels from petro-diesel to biodiesel.

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 monitoring methodology requires the monitoring of the following data to ascertain the GHG emissions reduction on account of the project activity:

- Emission factor for each of the applicable greenhouse gases (i.e. CO₂ only or CO₂, CH₄ and N₂O - depending on data availability)
- Quantity of biodiesel produced (should be included in project activity parameters to be monitored)
- Electricity consumed by the bio diesel plant during its operation
- Quantity of petro diesel consumed for off-site transport - raw material, by products + biodiesel (Also include possible usage of petro diesel in the plant)
- Amount of methanol used in the manufacture of biodiesel.

The monitoring methodology indicates that:

Emissions from electricity from electricity = electricity consumed * grid emissions factor.

In order to be made consistent with the proposed baseline methodology, a choice of either a grid emissions factor (if it is indicated how this is calculated) or a coal-based power plant emissions factor should be used.

(2) Key assumptions/parameters:

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

>>

- Quantity of biodiesel produced = quantity of biodiesel consumed = amount of petro-diesel replaced. This is a problematic assumption as there may be on-site use of biodiesel, or leaks, theft, wastage; or biodiesel could be used for non-energy uses. Thus, the quantity of biodiesel consumed should be justified, e.g. via monitoring sales of biodiesel.
- No monitoring of emissions from production/harvesting or land clearing for production of raw materials is necessary. This is problematic (see discussions in baseline section above).
- The biodiesel production plant does not use fossil fuels. This should be monitored (and any fossil fuel use included in the project boundary).

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

>> The first assumption was arrived at in a transparent manner. However, the latter three were not.

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

<p>>> Some changes are needed – see above (and baseline section) for suggestions.</p>
<p>(3) Data sources and data quality:</p> <p><i>a) Indicate which data sources are used and how the data are obtained (e.g. official statistics, expert judgement):</i></p> <p>>>Project operation records are used to monitor 3 of the 5 items to be monitored, and “official” statistics or IPCC defaults are used for the remainder.</p> <p><i>b) Give your expert judgement on whether the data used are adequate, consistent, accurate and reliable:</i></p> <p>>>The monitoring methodology proposed should result in consistent and accurate estimates of the items to be monitored. However, monitoring of further items is also needed (plantation-related emissions, range of oxidation factors, fossil fuel usage etc.). The respective emission factors of those fossil fuels have to be collected as well, using national factors of IPCC default values.</p> <p><i>c) State possible data gaps:</i></p> <p>>>See b) above.</p>
<p>(4) Assessment of the description of the proposed methodology and its applicability:</p> <p><i>a) State whether the proposed methodology has been described in an adequate manner:</i></p> <p>>>Yes, it has been described in an adequate manner.</p> <p><i>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):</i></p> <p>>>Yes, subject to proposed changes.</p> <p><i>c) State whether this proposed monitoring methodology is compatible with the proposed baseline methodology described in annex 3 of the draft CDM-PDD:</i></p> <p>>>Yes, subject to proposed changes.</p>
<p>(5) Leakage (please elaborate, if appropriate):</p> <p>>>The estimation of leakage is limited to increased CH₄ emissions from methanol used in the production of biodiesel. While this is appropriate, it is not sufficient (as outlined in the baseline section above).</p>
<p>(6) Quality assurance and control procedures (please explain):</p> <p>>>QA/QC procedures (focusing on the type of equipment used for monitoring or cross-checking of records) are planned for most items except the CO₂ emission factor for diesel and the emission factor for electricity.</p>
<p>(7) Potential strengths and weaknesses of the proposed monitoring methodology (please explain):</p> <p>>></p> <p><u>Strength:</u></p> <ul style="list-style-type: none"> • It is simple and easy to implement <p><u>Weaknesses:</u></p> <ul style="list-style-type: none"> • There are considerable gaps in the methodology (e.g. as relating to monitoring biodiesel consumption and uses, estimating plantation-related emissions, any fossil fuel emissions of the biodiesel plant, range of oxidation factors etc.). There are also some problematic assumptions: notably that biodiesel production = prodiesel consumption.
<p>(8) Applicability of the proposed methodology across project types and regions (please indicate):</p> <p>>> After addressing the issues raised elsewhere in this document, the monitoring methodology should be</p>

applicable to all similar projects, regardless of the regional location. The key criteria being that the project should involve a voluntary fuel switch from petro-diesel to bio-diesel.

(9) 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.

Signature of Meth Panel Chair

Date: 9/02/2005

(Jean-Jacques Becker)

Signature of Meth Panel Vice-Chair

Date: 9/02/2005

(José Miguez)

Information to be completed by the secretariat

F-CDM-NMmp doc id number	F-CDM-NMmp - NM0069
Date when the form was received at UNFCCC secretariat	9 February 2005
Date of transmission to the EB	9 February 2005
Date of posting in the UNFCCC CDM web site	9 February 2005