

 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>	
Name:	Dr. Dhanya M. Nambiar Institution: Centre for Environment Education and Development Pvt. Ltd., India.
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 on scope and applicability of Methodology AMS. III. Z
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.	AMS. III. Z - Fuel switch, process improvement and energy efficiency in brick manufacture, version 03.
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Dr. Dhanya M. Nambiar: cdm@ceedindia.com project@ceedindia.com +91 9869002781 / 022 65752268
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:	
>> This submission seeks to clarify the following issues which we have come across while applying the Methodology AMS III Z for one of our project.	
Background : The project under reference is setting up of a new brick manufacturing facility by using Autoclave Aerated Concrete (AAC) technology. AAC blocks serve as an alternative building material to the traditional burnt clay bricks and serve the same purpose as of clay bricks used for construction. Production process of AAC Blocks does not involve sintering	

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.

(firing) as required in the clay brick manufacturing, but involves autoclaving. The steam required for this purpose is produced from use of biomass based boiler thus the production process of AAC blocks completely eliminate burning of coal as required in the clay brick production, ultimately contributing to the reduction of greenhouse gas emissions.

AAC blocks are manufactured from Fly ash (68%), Cement (22%), Lime (8%), Gypsum (2%) and a small amount of Aluminium paste at the weight ratio given in bracket. The production process involves the use of aerated concrete which is made by introducing air or other gas to a slurry of flyash, lime, cement and gypsum so that when the mixture is set hard after autoclaving, a uniform cellular structure is obtained.

AAC masonry has many advantages than the traditional bricks due to its strength and structural stability, durability, fire resistance, insulation and sound absorption etc. Although superior in quality, the commercial production of AAC blocks is quite costly and elaborate in practice, hence it could not make enough headway in the Indian market. On the contrary, Fal G technology which is extensively used in India is simple in principle and is more cost effective as far as the selling price of the brick is concerned.

While referring to all the earlier submission to SSC Working Group regarding clarifications on AMS. III. Z (SSC_433, SSC_412, SSC_385, SSC_347, SSC_322, SSC_298, and SSC_297) it came to our notice that CDM EB has recommended AMS. III. Z to use for Fal G technology.

However for the application AMS. III. Z for AAC technology, we seek your further clarification on following issues:

Clarification No. 1

Para 1 footnote 1 of Methodology AMS III Z version 03, defines brick as ***“Brick in the context of this methodology includes solid bricks and blocks as well as hollow blocks used in building construction.”*** Also Para 1 (b) states that ***“Examples include pressed mud blocks (soil blocks) with cement or lime stabilisation and other ‘unburned’ bricks that attain strength owing to fly ash, lime/cement and gypsum chemistry.”***

Usually AAC masonry building units are made in sizes and shapes that fit different construction needs. Masonry building units include blocks, corner, double corner, partition blocks, and concrete floor as well as panels with steel reinforcement. These serve the purpose of load bearing and non load bearing function.

Clarification is required whether all such masonry building units as mentioned in the above paragraph can be considered as “brick” as per the definition in AMS III Z version 03

Clarification No. 2

As per paragraph 6 of the methodology, the abundance of the raw material needs to be demonstrated by using two step processes. Clarification is required on the Approach 1 and 2 given under the step 2.

- *Approach 1: Demonstrate that the raw materials to be utilized, in the region of the project activity, are not fully utilized. For this purpose, demonstrate that the quantity of*

material is at least 25% greater than the demand for such materials or the availability of alternative materials for at least one year prior to the project implementation.

Clarification is required as to how such a trend can be demonstrated? To our understanding, such a demonstration means:

{(quantum of production of the material in the region – the exports from the region + imports into the region) } is greater than 25% of the consumption in the region.

That is, such surplus over the year is accumulated in the inventory. Such an event is highly unlikely in a production/consumption situation, where information on inventory, production, sales etc is online available to a decision maker on a daily basis.

- *Approach 2: Demonstrate that suppliers of raw materials to be utilized, in the region of the project activity, are not able to sell all of the subject raw materials. For this purpose, project participants shall demonstrate that a representative sample of suppliers of the raw materials to be utilized, in the region, had a surplus of material (e.g., at the end of the period during which the raw material is sold), which they could not sell and which is not utilized.*

Clarification is required as to how to demonstrate such an annual trend? To our understanding, the suppliers will adjust their production/imports/exports in the region to the sale on timely basis. Hence, unsold/unutilised material stored in the inventory or disposal of produced material is an unlikely situation.

Clarification No. 3

Under Para 12, methodology insist to include the leakage as below:

“In the case of project activities involving change in production process or a change in type or quantity of raw and/or additive materials as compared to the baseline, the incremental emissions associated with the production/consumption and transport of those raw and/or additive materials consumed as compared to baseline, shall be calculated as leakage”.

However clarity is required on whether this leakage should include the emission due to production of all raw materials such as cement, lime, gypsum, fly ash and aluminium paste.

Does the word “***production/consumption***” given in the above Para means both ***production*** and ***consumption*** or is it either of ***production*** or ***consumption***. For example, in the case of cement the possible leakage emissions are:

Emissions due to production of cement + Emissions due to consumption of cement
OR

Emissions due to consumption of cement only.

Which one will apply?

Does the above Para give provision to exclude the emission due to flyash production and consumption, since it is a waste material?

Clarification No. 4

The clarification is also required as to whether it is necessary to include the emission associated with the production of raw material under leakage, in spite of demonstrating that the availability of raw material is 25 % greater than the demand as per Para 6 of the

methodology.	
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:	
>> NA	
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:	
>>	
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) 	
<i>Date you are delivering the contribution:</i>	
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>).