

 <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>	
Name:	Auroskanda Vepari Institution: EDF Trading
Affiliation ¹ :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Suggested revisions to requirement for project marking of CFLs
Purpose of the submission:	<input type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input checked="" 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.	This request stems from inefficiency and difficulties in procurement of CFLs imposed by the requirement for unique project marking under AMS-II.J.
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	auroskanda.vepari@edftrading.com +44 20 7061 4217
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:	
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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:	

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.

>> **Overall issue**

Paragraph 5 of AMS-II.J. Version 04 requires marking of “unique” project identification on compact fluorescent lamps (CFLs) utilized under the project activity. The requirement for unique marking imposes inefficiency and difficulties in procuring CFLs for the project activity due to two principal reasons: (i) A precise number of households that participate in the replacement of its lighting devices under the project activity is not known ex ante. Hence the number of required CFLs is also not known precisely requiring Project Proponents to procure and manufacture inefficiently by ordering more than the number of CFLs eventually distributed/installed. A unique, project specific identification renders any excess CFLs unsuitable for any other purpose. (ii) Procurement/manufacture of CFLs for such project activities may precede the registration of a project making unique project identification that can be marked on the CFL (e.g. CDM Project number) unavailable at the time of procurement/manufacture.

Context

- The original intent of the requirement of marking on CFLs in paragraph 5 of AMS-II.J. is primarily to distinguish during subsequent ex post surveys a project device (i.e. CFL supplied under the replacement project) and a spontaneous market purchase of a CFL (see paragraph 17.(c) of the methodology); and secondarily to also discourage secondary market behaviour.
- The primary and secondary intent of the requirement would be equally addressed if the project devices are marked suitably, but not necessarily for unique project identification.
- For example, project devices may be marked “CDM Project Device” and “Not for Sale/Resale”. Such markings, while not carrying unique project identification, will achieve the same effect.
- Unused project devices with such non unique identification can be used by other similar CDM project activities. Project proponents may procure expected quantities, and utilise any surplus inventory in other CDM project, relieving inefficiencies in procurement.
- Further, marking (ink based) is not always technically or logistically feasible (e.g. when a project proponent needs to procure off the shelf products or quantities, rather than custom products made which requires minimum volumes). Hence, we also suggest that the project proponents may alternately suitably label project devices (e.g. using distinctive non removable stickers, holograms, etc.), as this would have the same effect.

Proposed revision

- *Paragraph 5:* “CFLs utilized under the project activity shall, in addition to the standard lamp specifications, be marked and/or labelled for clear unique identification for the project suitably to enable identification of project devices during surveys required as per paragraph 17.”

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:

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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:

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>).