

 <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>	
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Affiliation <sup>1</sup> :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input type="checkbox"/> PP <input checked="" type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Submission on AMS-III.AK. Biodiesel production and use for transport applications
Purpose of the submission:	<input type="checkbox"/> Query on an approved SSC methodology or small scale procedures <sup>2</sup> (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 <sup>2</sup> to which your submission relates to, if applicable.	AMS-III.AK. Biodiesel production and use for transport applications, Version 01, EB55
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	Daniel Martino E-Mail: <a href="mailto:daniel.martino@carbosur.com.uy">daniel.martino@carbosur.com.uy</a> Phone: 0598 2915 3514
<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: >>	
<b>Request for revision of an approved SSC methodology</b>	
2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:	

<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.

## Background

This request for revision of the approved small scale methodology III.AK follows our previous submissions of proposed new small scale methodologies for biodiesel projects SSC-NM051 and SSC-NM057, and the suggestion made by the Small Scale Working Group in its 27<sup>th</sup> meeting (paragraph 33) for considering the possible application of III.AK to the underlying project activity.

The underlying project activity uses oilseeds originating in crops which are grown sustainably and not intended for producing biofuels, in a country where there is no deforestation nor other changes in land use causing significant decreases in carbon stocks, and where most of the oilseeds produced are exported. The main revenue from processing a fraction of the oilseeds that would otherwise be exported to international markets derives from the production of protein meal to be used as supplementary feed for cattle, with biodiesel being a by-product. The biodiesel is to be used by captive fleets, and the blending proportion with mineral diesel is expected to be variable, frequently higher than 20 per cent.

The current version of AMS-III.AK restricts the use of oilseeds to those originating in dedicated plantations, and therefore cannot be applied to the underlying project activity. In addition, it limits the applicability to biodiesel blends of B20 or lower, and while it enables using waste as feedstock, it does not include the possibility of including project activities in which biodiesel is a by-product.

## Summary of the request

The proposed revision intends to broaden the applicability to project activities that:

1. produce biodiesel for transportation from specific oilseeds from non-dedicated plantations;
2. produce biodiesel as a by-product of the production of oilseed meal; and
3. use the biodiesel in blends higher than 20 per cent.

## Proposed changes to the methodology

Paragraph 2 is proposed to be amended for enabling the use of higher biodiesel blends if it can be demonstrated that the net calorific value of the biodiesel is not inferior to that of the mineral diesel it displaces,

Paragraph 7 has been added to make the methodology applicable to non-dedicated cropland complying with several conditions that would ensure that the project activity does not cause an increase in the area of oilseed crops outside project boundaries and that it does not cause a shift of the pre-project activities. Other conditions provide further insurance that the project would not cause losses in carbon stocks: it would have to be shown that deforestation is not significant in the host country, and that all the cropland areas from which oilseeds are harvested, have been under agricultural use since before the project start date.

Paragraph 8 expands the applicability of the methodology to project activities for which biodiesel is a by-product and, therefore, does not have a direct influence on the use and management of land.

Other sections of the methodology (e.g., boundaries, data collection, assessment of land eligibility and monitoring parameters) were adjusted to accommodate the proposed changes in applicability conditions.

The methodology text has been amended by introducing two applicability conditions (7 and 8) that address project activities for biodiesel production from crops cultivated on non-dedicated plantations and for activities that produce biodiesel as a by-product.

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"> <li><input type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats</li> <li><input type="checkbox"/> PDD in PDF format (optional)</li> <li><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)</li> </ul>	
<b>Proposal for a new SSC methodology</b>	
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.	
<p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Completely filled in form "CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)" in Word and PDF formats<sup>3</sup></li> <li><input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <li><input type="radio"/> Relevant annexes to the PDD are provided</li> <li><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)</li> </ul> </li> </ul>	
Date you are delivering the contribution:	22 <sup>th</sup> October 2010
<b>Information to be completed by the secretariat</b>	
SSC-Submission number	

<sup>3</sup> The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).