

 <p style="text-align: center;">CDM: Proposed New Methodology Meth Panel recommendation to the Executive Board (version 07.1) <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:	04 - 08 September 2006
Related F-CDM-NM document ID number (electronically available to EB members)	F-CDM-NM0108-rev: Biodiesel production and switching fossil fuels from petro-diesel to biodiesel in transport sector - 30 TPD Biodiesel CDM Project in Andhra Pradesh, India
Related F-CDM-NMex document ID number(s) (electronically available to EB members)	F-CDM-NMex0108: Mawandia / Gruetter
Related F-CDM-NMpu document ID number(s) (electronically available to EB members)	F-CDM-NMpu0108-rev: None received
<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 CDM-NM and its application in sections A to C 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>	
<p>Title of proposed new methodology:</p> <p>Production of biodiesel from perennial non-edible oil crops for use as fuel</p>	
<p>History of submission (to be communicated by UNFCCC Secretariat):</p> <p>First submission (Round 10; 19 April 2005); Clarifications received in response to preliminary recommendations at Meth 16; Final recommendation at Meth 17; Second submission (Round 14; 11 January 2006); Clarifications received in response to preliminary recommendations at Meth 21</p> <p>Final recommendations at Meth 22</p>	
<p>A. Final recommendation by the Meth Panel</p>	
<p>a. To approve this proposed methodology with minor changes. Minor changes required:</p>	
<p>b. To reconsider this proposed methodology, subject to required changes. 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

Reasons for non-approval:

The methodology took much of the previous recommendations into account such as monitoring applicability conditions and treatment of exports, and has made a conscious effort to improve. As a result, it is generally very well developed, rigorous and transparent. Nevertheless, it lacks clarity in the following points:

- **Definitions:** The terms of “waste land”, “marginal land” or “severely degraded land” need to be specified, so as to ensure that shifting of activities prior to project are deemed as minimal. In particular, it should be made clear not to include land where crops and other plants for commercial purpose are planted prior to use for the project activity, and ensure consistency with Afforestation / Reforestation Working Group.
- **Surplus availability of seeds from pre-existing plants.** The applicability conditions require that for existing oil seed sources, the oil seeds must be available in surplus. This is appropriate but the situation may change during the crediting period. The surplus availability of the seeds should therefore be monitored and emission reductions should be reduced respectively if this condition is not relevant any more (for the quantity of oil seeds collected from pre-existing not managed plants).
- **Baseline scenario selection:** According to the previous suggestions by the Meth Panel, the methodology has been improved to include several test questions to rank the possible baseline candidates. The relationship between the answers to the test questions, the ranking of options, and the outcome of scenarios and its implication with respect to baseline emission need to be clearer. The applicability of the methodology in relation to the outcome of test questions also needs to be clear.
- **Leakage:** Description of leakage lists positive and negative leakages to be considered. While positive leakage (i.e. leading to additional emission reductions) includes all sources due to consideration on upstream emissions, some of the reasons cited for not taking into account negative leakage (i.e. leading to emissions increases) need to be justified according to the definition of the land. Furthermore, potential sources of emissions such as tractors need to be either taken into account or be provided a reason not to.
- **Transport:** It is not clear why it can be assumed that 50% of the trucks return with full load (most plantation sites are in rural areas and not necessarily along major transport routes for other goods). Secondly, the freight emission factor is at the very low range of values provided in the literature (the German Energy and Environmental Research Institute (IFEU) cites a figure of 0.072 to 0.130kg-CO₂/t-km whereas a figure of 0.048 is used in the new methodology). Particularly for developing countries, this value appears optimistic. Thirdly, the assumption on the oil content of the crop may not reflect the possible range, in particular since the methodology may not only be applicable to Jatropha but also to different plants which have different oil content.
- **Fertilizer applications:** Derivation of the default value for discounting baseline emissions by 12% to take upstream emissions from fertilizer use into account is transparent derived and clearly illustrated. The methodology states that “typical maximum N inputs” are used to derive a conservative default emission factor. This is appropriate. However, apparently, the default emission factors seems to be derived from a “best estimate” calculation, which assumes rather average or lower than average values than the higher end of key parameters. For example, regarding the amount of fertilizer applied, the example calculation suggests that this may vary between 0 and 300 kg N per ha and a “best estimate” value of 60 kg N per ha has been used based on a recommended quantity in a particular country and for a particular plant type. It should be explained and justified whether the derivation from “best estimates” is conservative and to which extent the fertilizer application rate can be regarded as conservative for eligible oil plantations. Effect of leaching is not included, but its reasons are not being stated (e.g. irrigation does not take place).

B. General information on the submitted proposed new methodology
<p>(1) One sentence describing the purpose of the methodology.</p> <p>This methodology is designed for project activities involving construction and operation of a plant for production of biodiesel from non-edible, perennial oil crops.</p>
<p>(2) Summary description of the methodology.</p> <p><i>Short statements on how the proposed methodology: chooses the baseline scenario, demonstrates additionality, calculates baseline emissions, calculates project emissions, calculates leakage, calculates and monitors emission reductions.</i></p> <p>The baseline assumes that emissions occur from vehicles and stationary installations which would have combusted petrodiesel substituted by biodiesel, taking into account difference in efficiency between fuels based on their relative calorific value. Project emissions include emissions from biodiesel processing, as well as upstream emission sources such as nitrogen application and transport of ingredients. The land where plantation takes place is classified as “waste land”, “marginal land” or “severely degraded land”, not giving rise to emissions related to loss of carbon pools.</p> <p>Issue of double counting is avoided by identifying consumers (and taking into account biodiesel sales to unidentified consumers) as well as subtracting the proportion exported.</p>
<p>(3) Relationship with approved or pending baseline and monitoring methodologies (if applicable).</p> <p><i>a) Does the proposed new methodology include part of an already-approved methodology or a methodology pending approval (see recent EB reports)? If so, please briefly note the relevant methodology reference numbers (AMXXXX or ACMXXXX), titles, and parts included.</i></p> <p>No, though elements of ACM0002 or AMS I.D. are used for estimating GHG emissions from electricity consumption are incorporated.</p> <p><i>b) In particular, is the proposed new methodology largely an amendment or extension of an approved methodology? (i.e. the methodology largely consists of expanding an approved methodology to cover additional project contexts, applicability conditions, etc., and is thus largely comprised of text from an existing approved methodology) If so, indicate whether the amendments or extensions are appropriate, and explain why.</i></p> <p>No.</p> <p><i>c) Indicate whether, and explain how, any other approved methodology (not noted in response to the previous question) could currently, or with minor modifications, be used to calculate emission reductions from the project activity associated with the proposed new methodology. If so, please indicate the reference number and the parts of the methodology that would need modification.</i></p> <p>No.</p> <p><i>d) Please briefly note any significant differences or inconsistencies (baseline emission calculations, leakage methods, and boundary definitions, etc.) between the proposed new methodology and already-approved methodology of similar scope.</i></p> <p>None.</p> <p><i>e) To avoid potential repetition, feel free to provide one comprehensive answer here that covers questions a through d.</i></p> <p>Emission reduction is calculated as the difference between baseline and project emissions, subtracting further leakage and adjustment by removing the fraction of ineligible crops and biodiesel exported abroad.</p>
C. Details of the evaluation of the proposed new methodology by the Meth Panel:
(1) Applicability conditions

a) State the applicability conditions as provided in the CDM-NM (copy the applicability conditions listed in Section 1, sub-heading 3 of the submitted CDM-NM)

This methodology is applicable to project activities which meet the following conditions:

1. Biodiesel plant:
 - a) The project activity involves construction and operation of a biodiesel plant for (trans-) esterification¹ of biogenic oils and fats, using methanol as the alcohol feedstock.
 - b) The biodiesel plant includes an expeller² for extraction of oils from seeds, and / or it processes oils expelled elsewhere.
 - c) Storage and treatment of feedstocks and products of the plant do not result in any methane emissions. In particular, seed cake produced at the plant is either treated aerobically (e.g. returned to field directly, or after composting), or the methane resulting from anaerobic treatment is completely captured and combusted (e.g. in a biodigester for energy generation).
2. Consumers:
 - a) The biodiesel is supplied to identified consumers, and / or to identified retailers for on-sale to unidentified consumers.
 - b) The baseline fuel is petrodiesel. Volumes of biodiesel not meeting this condition are discounted in the calculation of emission reductions.
 - c) For biodiesel supplied to unidentified consumers via retailers, the following conditions apply:
 - The biodiesel is supplied as a blend with petrodiesel, and the blending proportion is low enough to ensure that the price and technical performance characteristics of the blend do not differ significantly from those of pure petrodiesel. The default value for the maximum allowable blending proportion for this purpose is 10% by volume (B10).
 - Blending is done by the producer or a third party who is contractually bound to the producer (e.g., the retailer), to ensure that blending proportions can be verified.
 - d) For biodiesel supplied to identified consumers, the following conditions apply:
 - The biodiesel is consumed as transport fuel or for stationary combustion;
 - The biodiesel is consumed either pure (B100) or as a blend with petrodiesel (e.g. B5, B10, B20, etc.);
 - If the biodiesel is consumed pure or in blends higher than B10, petrodiesel is established as the baseline fuel through scenario analysis.
 - e) Export of the biodiesel to other countries is prevented, or accounted for:
 - The identified consumers operate in the host country, and are contractually obliged to consume the biodiesel in the host country;
 - Retailers are contractually obliged to sell the biodiesel blend in the host country;
 - Any biodiesel volumes exported abroad by the producer are clearly identified and discounted in the calculation of emission reductions.
3. Feedstocks:
 - a) The plant processes mainly oils and seeds from non-edible, perennial crops³ such as *Pongamia pinnata* and *Jatropha curcas*.
 - b) The geographical origin and original suppliers of the processed crops are identified.
 - c) The oil seeds are either picked from pre-existing oil trees (whether naturally occurring or from man-made plantations), or produced in dedicated plantations that are induced by the project activity.
 - d) If picked from pre-existing trees, the oil seeds are available in surplus, preventing displacement of existing uses.
 - e) Dedicated plantations are restricted to waste land, severely degraded land, and marginal land along railroads, field boundaries, etc.
 - f) Nitrogen (N) inputs into plantations of each processed oil crop can either be monitored, or

¹ Esterification denotes the formation of an ester compound from a carbonic acid and an alcohol. Transesterification denotes the exchange of one alcohol in an ester against another (for example glycerol against methanol). In this methodology, “esterification” is used to denote both esterification and transesterification for simplicity.

² Expeller denotes the installation used to extract the oil from the seeds.

³ The term “crop” is used in this methodology for both annual and perennial plants.

there is sufficient information available to determine in a conservative way whether the average total amount of nitrogen (N) input into the plantations of all oil crops is likely to exceed 120 kg N per metric tonne of oil produced in the region where the biodiesel plant procures its feedstock.

- g) Any crops processed by the project activity which do not meet the above conditions are discounted in the calculation of emission reductions. For example, annual and edible crops, such as sunflower and soybean, as well as waste oils and fats from industrial processes may be processed, but will not generate CERs.
- h) Volumes of biodiesel produced with alcohols other than methanol (for example, ethanol) are discounted in the calculation of emission reductions.

4. CER Ownership:

- a) Project participants claim CERs only for the direct CO₂ emissions from fossil fuels displaced by the biodiesel. They do not claim CERs for the following: (i) Biodiesel consumed for non-energy purposes; (ii) Reductions in life-cycle emissions associated with the production of the displaced fossil fuels; and (ii) Utilization of the by-products of biodiesel production, such as glycerol and de-oiled seed cake.
- b) Project participants have contractually arranged with their identified biodiesel consumers and retailers that the latter will not claim CERs for the displaced fossil fuels.
- c) This methodology does not prejudice the ability of project participants or other parties to claim removals by sinks associated with plantations of perennial oil seed crops, using an approved methodology for afforestation/reforestation. Likewise, it does not prejudice the ability of biogenic methanol producers to claim CERs for the carbon incorporated in the biodiesel, using a separate, approved methodology (carbon from biogenic methanol is treated as fossil by this methodology).

b) Explain whether the proposed applicability conditions are appropriate and adequate. If not, explain the changes required:

The applicability conditions have been improved, and monitoring conditions are imposed.

The terms of “waste land”, “marginal land” or “severely degraded land” need to be specified, so as to ensure that shifting of activities prior to project are deemed as minimal. In particular, it should be made clear not to include land where crops and other plants for commercial purpose are planted prior to use for the project activity, and ensure consistency with what is being decided at the Afforestation / Reforestation Working Group

(2) Determining the baseline scenario and demonstrating additionality:

a) Explain the methodological basis for determining the baseline scenario, and whether the basis is appropriate and adequate.

As per previous recommendation, the baseline scenario options include four producer scenarios and five consumer scenarios. Scenarios which are not plausible technically, economically or legally feasible are eliminated using a set of prescribed test questions. Then, the scenarios are ranked according to their overall feasibility to determine the most likely scenario.

. If not, outline required changes:

b) Explain 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.

The relationship between the answers to the test questions, the ranking of options, and the outcome of scenarios and its implication with respect to baseline emission need to be clearer. The applicability of the methodology in relation to the outcome of test questions also needs to be clear.

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 in the methodology to undertake the assessment of additionality?

The methodology uses the "Tool for demonstration and assessment of additionality" to establish the

additionality of the project activity in relation to the baseline.

d) Explain whether the basis for assessing additionality is appropriate and adequate. If not, outline required changes:

Determination of additionality is appropriate. However, the “test questions” leading to determination of the baseline scenario (and therefore additionality of the project activity) need to be improved.

(3) Methodological basis for calculating baseline emissions and emission reductions

a) Explain how the methodology calculates baseline emissions and whether the basis for calculating baseline emissions is appropriate and adequate. If not, outline required changes:

Baseline emissions are calculated based on the assumption that the biodiesel serves to displace the amount of petrodiesel with the same amount of energy. Thus, the baseline emission is a product of the amount of biodiesel, carbon content of the baseline petrodiesel, the rate of net calorific value of biodiesel in relation to the baseline fuel. From the previous submission, the following changes are made.

- Biodiesel is differentiated among crops from which they are derived. Therefore, consistency between applicability conditions (which limits eligible biodiesel to those produced from non-edible crops) and baseline calculation is ensured.
- By limiting the baseline fuel to petrodiesel, it has eliminated the calculation process of efficiency based on specific fuel efficiency.

The following improvement can be conceived.

- It is not clear why it can be assumed that 50% of the trucks return with full load, (most plantation sites are in rural areas and not necessarily along major transport routes for other goods). Secondly, the freight emission factor is at the very lower of the range of values provided in the literature (the German Energy and Environmental Research Institute (IFEU) cites a figure of 0.072 to 0.130kg-CO₂ /t-km whereas a figure of 0.048 is used in the new methodology). Particularly for developing countries, this value appears optimistic. Thirdly, the assumption on the oil content of the crop may not reflect the possible range, in particular since the methodology may not only be applicable to *Jatropha* but also to different plants which have different oil content.

b) Explain how the methodology calculates project emissions and whether the basis for calculating project emissions is appropriate and adequate. If not, outline required changes:

Project activity emissions include the following three components

- Emissions from combustion of fuels in the biodiesel plant (consumption by the expeller; and other sources)
- Emissions from electricity consumption in the biodiesel plant (consumption by the expeller; and other sources). ACM0002 or AMI-D is used, depending on the amount of electricity consumption.
- Emissions from combustion of alcohol (methanol) used for esterification of biodiesel.
- The calculation is generally appropriate. The revised methodology assumes that methanol is principally derived from natural gas and treats emissions from methanol as such (even when some of the methanol may be biomass-derived). This is in accordance with the previous recommendation, which improves conservativeness and simplicity.

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(4) Definition of the project boundary:

a) *State how the project boundary is defined in terms of:*

i) *Gases and sources*

The project activity emission includes CO₂ emitted from the fuel and electricity consumed from biodiesel production process. CH₄ and N₂O emissions are omitted as being negligible.

ii) *Physical delineation*

The spatial extent include the following:

- a) The biodiesel production plant, comprising the esterification unit, plus expeller unit (if applicable), plus other installations on the site (e.g. storage, refining, blending, etc.);
- b) Upstream expeller plants supplying oil to the biodiesel production plant (if any);
- c) Vehicles and stationary combustion installations where the biodiesel is consumed.

b) *Indicate whether this project boundary is appropriate. If not, outline required changes:*

Generally appropriate, though whether the “identified customers” can be included in the boundary is debatable.

(5) State whether the proposed methodology is appropriate for the referred proposed project activity and the referred project context (described in Sections A - C of the draft CDM-PDD and submitted along with CDM-NM). *If not, explain why:*

It is appropriate.

(6) Key assumptions:

a) *List the implicit and explicit key assumptions and rationale for the methodology:*

Explicit assumptions:

- That biodiesel from which CERs are claimed will be carbon neutral.
- Effect of double counting is adequately taken into account.

Implicit assumptions

- That plantation does not lead to any displacement of activities which leads to GHG emission and will not lead to loss of carbon pool.
- The surplus condition of oil-bearing seeds will persist during the crediting period.

b) *Give your expert judgement on whether the assumptions are adequate. Identify those, if any, which are problematic and outline required changes:*

- The first assumption is adequate since the methodology excludes annual and edible crops, and that plantation of relevant crops only occurs on severely degraded, waste or marginal lands. Whether the crops are "edible" or the lands are "degraded", "waste", or "marginal" may need expert judgment from the DOEs.
- The second assumption is generally adequate since the project participants will arrange contractually with identified biodiesel consumers that they will not claim CERs for their displaced fossil fuels. The methodology should take into account the treatment of double counting, currently under consideration by the Board.
- The third assumption can be problematic, since the terms of “waste land”, “marginal land” or “severely degraded land” need to be specified, so as to ensure that shifting of activities prior to project are deemed as minimal. In particular, it should be made clear not to include land where crops and other plants for commercial purpose are planted prior to use for the project activity, and ensure consistency with AR WG.
- The fourth assumption may be problematic and such condition should be periodically monitored.

(7) Data and parameters NOT monitored (i.e. data that is determined only once and remains fixed throughout the crediting period)

a) Indicate for all key data and parameters which data sources or default values are used and how the data or the measurements are obtained (e.g. official statistics, expert judgement):

Carbon content of petrodiesel;

Net calorific value of petrodiesel;

Standard N input for each of the oil crop.

b) Explain the vintage of data recommended (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. If not, outline required changes:

Since the values are not likely to change over time, they are appropriate.

c) Give your expert judgement on whether the data and the measurement procedures (if any) used are adequate, consistent, accurate and reliable. Identify those, if any, which are problematic and outline required changes:

Measurement is not provided, but method for obtaining default data such as statistics are provided.

d) State possible data gaps:

None perceived.

(8) Key data and parameters monitored (i.e. data that is determined throughout the crediting period)

a) Indicate for all key data and parameters which data sources (e.g. official statistics, expert judgement) or measurement procedures are used:

- Fuel and energy consumed by the expeller (both on-site and off-site)
- Oil expelled, produced and purchased
- Consumption of methanol
- Biodiesel supplied to customer
- Net calorific value of biodiesel
- Parameters related to procurement of oil (N fertilizers applied, transport distance, specific yield)

b) Give your expert judgement on whether the data sources and measurement procedures (if any) used are adequate, consistent, accurate and reliable. If not, outline required changes:

Generally appropriate.

c) Give your expert judgement on whether the monitoring frequency for the data and parameters is appropriate. If not, outline required changes:

Generally appropriate. The applicability conditions require that for existing oil seed sources, the oil seeds must be available in surplus. This is appropriate but may change during the crediting period. The surplus availability of the seeds should therefore be monitored and emission reductions should be reduced respectively if this condition is not relevant any more (for the quantity of oil seeds collected from pre-existing not managed plants).

d) Give your expert judgement on whether the QA/QC procedures are appropriate. If not, outline required changes:

Parameters with respect to estimation of project activity emissions include no specific QA/QC procedures due to its small impact on CER volume. They may not need an elaborate scheme, but since such procedures are an integral part of overall QA / QC activity of biodiesel plant, it is desirable that QA /QC procedure is stated.

Net calorific value of biodiesel is measured with laboratory certified according to national standards. It is desirable to enable that compatibility of such standards to international standards are ensured.

e) State possible data gaps:

See above.

(9) Assessment of uncertainties:

Provide an assessment of uncertainties given (e.g. in determining baseline scenario, data sources, key assumptions)

No provision to take into account uncertainties.

(10) Leakage:

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

Leakage includes the following

- a) Transport of oil seeds (or oil) to the biodiesel plant.
- b) Emissions associated with the production of alcohols used for esterification;
- c) Leakage of N₂O emissions associated with enhanced nitrogen- (N) cycles and application of N-fertilizers in oil crop plantations;
- d) Deforestation and land clearing as a result of new oil crop plantations;
- e) Displacement of existing uses of oil crops, which may result in enhanced demand for fossil fuels, or enhanced deforestation elsewhere;
- f) Export of biodiesel to Annex 1 countries, which can lead to double-counting.
- g) Reduction in precombustion emissions associated with the displaced production of fossil fuels;
- h) Sequestration of carbon in oil crop plantations (removals by sinks).

Where items g) and h) are considered positive (i.e. resulting in emission reduction), and items a) b) c) and g) are accounted for, on the grounds that items d) e) and f) are prevented by applicability conditions and item h) cannot be accounted for. In particular, estimation of N₂O emission involves two options: a default approach where such emission is taken to be 15% of baseline emissions, and a project-specific approach.

b) Indicate whether the treatment for leakage is appropriate and adequate. If not, outline required changes:

Description of leakage lists positive and negative leakages to be considered. While positive leakage (i.e. leading to additional emission reductions) includes all sources due to consideration on upstream emissions, some of the reasons cited for not taking into account negative leakage (i.e. leading to emissions increases) need to be justified according to the definition of the land. Furthermore, potential sources of emissions such as tractors need to be either taken into account or be provided a reason not to.

Derivation of the default value for discounting baseline emissions by 12% to take upstream emissions from fertilizer use into account is transparent derived and clearly illustrated. The methodology states that "typical maximum N inputs" are used to derive a conservative default emission factor. This is appropriate. However, apparently, the default emission factors seems to be derived from a "best estimate" calculation, which assumes rather average or lower than average values than the higher end of key parameters. For example, regarding the amount of fertilizer applied, the example calculation suggests that this may vary between 0 and 300 kg N per ha and a "best estimate" value of 60 kg N per ha has been used based on a recommended quantity in a particular country and for a particular plant type. It should be explained and justified whether the derivation from "best estimates" is conservative and to which extent the fertilizer application rate can be regarded as conservative for eligible oil plantations. Effect of leaching is not included, but its reasons are not being stated (e.g. irrigation does not take place).

<p>(11) Transparency, “conservativeness” and consistency</p> <p><i>a) Explain whether the methodology has been described in an adequate and transparent manner. If not, outline required changes:</i></p> <p>The methodology is generally transparent. Provisions to ensure that the extensive applicability conditions are met, need to be included.</p> <p><i>b) Explain whether the methodology is conservative, and if so, how:</i></p> <p>The methodology does not seem to lead to significant overestimation.</p> <p><i>c) Explain whether the methodology is internally consistent, and if not, highlight which sections are inconsistent:</i></p>
<p>(12) If relevant, state whether the proposed changes required for the methodology implementation on 2nd and 3rd crediting periods are appropriate.</p> <p>The applicability conditions, baseline scenario and additionality will be re-validated.</p>
<p>(13) State the baseline approach selected, indicate whether this is appropriate, and why.</p> <p>The approach "existing actual or historical emissions, as appropriate" is selected. However, the baseline selection process seems to represent more "emissions from a technology that represents an economically attractive course of action".</p>
<p>(14) Any other comments:</p> <p><i>a) State which other source(s) of information (i.e. other than documentation on this proposed methodology available on the UNFCCC CDM web site) have been used by you in evaluating this methodology. Please provide specific references:</i></p> <p>None.</p> <p><i>b) Indicate any further comments:</i></p> <p>The methodology should take into account the treatment of double counting, currently under consideration by the Board.</p>



Signature of Meth Panel Chair
 Date: 13/09/2006 (Rajesh Kumar Sethi)



Signature of Meth Panel Vice-Chair
 Date: 13/09/2006 (Jean-Jacques Becker)

Information to be completed by the secretariat

F-CDM-NMmp doc id number	F-CDM-NM0108-rev
Date when the form was received at UNFCCC secretariat	13 September 2006
Date of transmission to the EB	13 September 2006
Date of posting in the UNFCCC CDM web site	13 September 2006