

 <p style="text-align: center;">CDM: Proposed new methodology expert form (version 04) <i>(To be used by methodology experts providing desk review for a proposed new methodology)</i></p>	
Name of expert responsible for completing and submitting this form	Jürg M. Grütter
Related F-CDM-NM document ID number	NM0108
<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-NMB and CDM-NMM 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. Evaluation of the proposed new methodologies by desk reviewers:	
I. Evaluation of the proposed new baseline methodology:	
<p>Title of new baseline methodology:>>Baseline methodology for Biodiesel production and switching fossil fuels from petro-diesel to biodiesel in transport sector</p>	
<p>i. Conditions under which this methodology is applicable to other potential projects (e.g. project type, region, data availability):</p> <p>>></p> <ol style="list-style-type: none"> 1. The methodology is only applicable to projects in which the identified baseline is petro-diesel. 2. The bio-diesel fuel must be used at least partially in the host country. This must be monitored. 3. Bio-diesel consumers or distributors do not claim credits for the same bio-diesel. 4. Applicable for all types of bio-diesel and all regions. 5. No enforced regulations concerning usage of bio-diesel exist in the country 6. The project proponent owns the production facility for bio-diesel production 	
<p>ii. Strengths and weaknesses of the methodology:</p> <p>>></p> <p>Strengths:</p> <p>Simple and straightforward for baseline and leakage emission determinations</p> <p>Weaknesses:</p> <ol style="list-style-type: none"> 1. Various parameters are non-transparent and non-conservative (efficiency factor, fuel usage oilseed production) 2. Non-inclusion of various sources of project emissions in oilseed production (existing plantations, fuel usage over whole production scope) 2. Non-inclusion of important non-CO2 emission sources in project emissions (basically N2O in oilseed production) 3. Potential claiming of land-use change emission reductions 4. Control of non-claiming of CERs through consumers of bio-diesel is not sufficiently taken into account. 	
<p>iii. Any changes needed to improve the methodology:</p> <ol style="list-style-type: none"> a. Minor changes:>> b. Major changes:>> <p>Following major changes are required:</p> <ol style="list-style-type: none"> 1. Change approach to select baseline from 48a to 48b as this is the most appropriate to select a 	

conservative as well as realistic baseline and to avoid overstating emission reductions. The methodology can determine that it is only applicable for the substitution of petro-diesel. This is a condition of application. However the methodology must identify through using approach 48 a, b or c if this is in reality the baseline for the specific project and if this condition of the methodology is thus fulfilled. The methodology itself cannot determine the approach based on achieving a desired result (petro-diesel). The methodology must result in the identification of a realistic baseline. Latter is valid also independent of using approach 48a or 48b. If the approach 48a,b or c shows that petro-diesel is the appropriate project baseline then the proposed methodology can be used.

2. The additionality tool as proposed by the EB is included but no application of this tool to this project type is given. The methodology given for assessing additionality is thus not appropriate.
3. Efficiency factor to calculate substitution of petro-diesel through bio-diesel needs to be specified. It is recommended to base this efficiency factor on relative energy contents of fuels to increase transparency and to have a conservative approach.
4. Include emissions from existing plantations and not only new plantations. Exclude only emissions from waste-oils with a clear definition of waste-oils.
5. Include all fuel emissions from oil-seed plantations including land preparation, production, and harvesting.
6. Include N₂O emissions from the production of oil seeds as these can be very significant sources of GHG emissions. For rapeseed or soybean production European studies e.g. indicate that GHG emission reductions compared to diesel might be only 40-50% (see e.g. IEA Bio-Fuels for Transport, 2004 or CO₂ Studie, FVV, 2004). Using life-cycle approaches even negative results have been presented (bio-diesel having more GHG well-to-tank emissions than petro-diesel). This depends very much on the production method used. All relevant aspects must thus be included in a methodology which is not specific for certain types of oilseeds but generic.
7. If clearance-sequestration > 0 then include it in project emissions if clearance-sequestration < 0 then use the value of 0. Otherwise the project would claim in fact land-use change credits which would be another category of CDM projects. Also this would allow for a conservative approach.
8. It must be assured better that CERs from bio-diesel consumption will not be claimed by bio-diesel users or distributors. This is potentially very problematic as companies changing to bio-diesel might well claim that they are taken the risk and additional costs of using bio-fuels. A condition of approval should include a certification by the DNA that it is willing and able to ensure that no other credit for GHG emission reductions is issued to other projects using the same fuel. The DOE should verify this condition, and it should be included in the monitoring plan.

II. Evaluation of the proposed new monitoring methodology:

Title of new monitoring methodology: >> Monitoring methodology for Biodiesel production and switching fossil fuels from petro-diesel to biodiesel in transport sector

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

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1. The methodology is only applicable to projects in which the identified baseline is petro-diesel.
2. The bio-diesel fuel must be used at least partially in the host country. This must be monitored.
3. Bio-diesel consumers or distributors do not claim credits for the same bio-diesel.
4. Applicable for all types of bio-diesel and all regions.
5. No enforced regulations concerning usage of bio-diesel exist in the country
6. The project proponent owns the production facility for bio-diesel production

- ii. Strengths and weaknesses of the methodology:

>> Strengths:

Simple and straightforward.

Weaknesses:

1. Related to baseline methodology
2. No monitoring of potential double-counting through claims on emission reductions from users of bio-diesel.

iii. Any changes needed to improve the methodology:

- a. Minor changes:>>
- b. Major changes:>>

Changes required are related to changes recommended in the baseline methodology. Additionally the monitoring methodology must ensure that CERs from bio-diesel consumption will not be claimed by bio-diesel users or distributors. This is not included in the current monitoring methodology. This is potentially very problematic as companies changing to bio-diesel might well claim that they are taken the risk and additional costs of using bio-fuels. A condition of approval should include a certification by the DNA that it is willing and able to ensure that no other credit for GHG emission reductions is issued to other projects using the same fuel. The DOE should verify this condition, and it should be included in the monitoring plan.

B. Details of the evaluation of the proposed new methodology by the desk reviewer:

I. Proposed new baseline methodology (*specify title here*): >> Baseline methodology for Biodiesel production and switching fossil fuels from petro-diesel to biodiesel in transport sector

(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 methodology is developed for fuel switch from petro-diesel to biodiesel. Baseline emissions are the burning of petro-diesel based on an emission factor per liter of fuel used. Project emissions are emissions caused when refining bio-diesel, emissions to transport the biodiesel, land-clearing minus sequestration emissions and fuel used to produce the biodiesel. The methodology thus also claims potentially sequestration reductions if sequestration emissions are lower than land-clearance emissions. Other GHG emissions caused by the production of biodiesel especially due to use of fertilizers (N₂O) are not included. Leakage from the increased usage of methanol is included. The methodology assumes (implicit or explicit) that it can be used independent of vehicle type using petro-diesel/biodiesel, of the biodiesel mixture (1-100%) and of the biodiesel type (e.g. biodiesel produced from waste-oils is treated equal to biodiesel from rapeseed). The methodology also allows mixtures of above i.e. does not control these variables.

b) State the approach selected:

>>48a existing actual emissions is taken as approach

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:

>> Non appropriate. The methodology states that this approach is the most adequate as the baseline is the further usage of petro-diesel. This is clearly a wrong approach. The methodology can state that its application is restricted to projects where the baseline is petro-diesel. The approach 48 a,b or c must however determine for specific projects first if this is actually the baseline or not. The approach must thus be open and not conditioned to a specific result. The approach shall determine which baseline is the most appropriate. If another baseline than petro-diesel surges then the methodology cannot be applied. Explicitly the methodology says that the approach 48b could also be used but that in this case the result would be potentially a different baseline. Clearly this indicates that the approach 48b would be far more appropriate as this approach would result in the most probable baseline (BAU without project) and not in a pre-determined baseline which is the most convenient for the project. The methodology through using approach 48a thus potentially excludes realistic baselines with less emissions thus overstating emission reductions and not allowing to determine in an adequate manner what is a conservative baseline.

For this type of project it is strongly suggested to use approach 48b. the financial analysis can always be complemented by including barriers such as identified in 48a monetizing them or including their impact in

a sensitivity analysis. There are however no practical reasons why the approach 48a cannot be used and the argument posed by the methodology itself, that using approach 48b would show that other alternatives might be a more realistic baseline is a strong argument itself to use 48b as an approach.

The arguments given to not use approach 48c are not valid from a methodological viewpoint. While in certain cases biodiesel might not be standard in other cases it might be. However approach 48b is considered as more appropriate as even with a significant market share new biodiesel production plants might not be viable from a financial perspective.

(2) Basis for determining the baseline scenario:

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

>>The baseline is pre-determined and not chosen.

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

>>For baseline emissions the formulae are based on the carbon contents of petro-diesel. Only bio-diesel consumed in the host country is included. CH₄ and N₂O emissions may be neglected according to the methodology. Neglecting latter is considered as OK as they are relatively small and neglecting CH₄ and N₂O in the baseline leads to a more conservative estimate of baseline emissions. After determining the emission factor per ton of fuel the total baseline emissions correspond to t bio-diesel produced multiplied by the emission factor of petro-diesel multiplied by the efficiency factor. The determination of this critical factor is not further detailed (e.g. based on 100% usage of bio-diesel or partial substitution rates). The formula implies that the efficiency change factor needs to be calculated using a 100% blend or re-calculating the efficiency change with blends (e.g. if motor efficiency changes 5% with a 20% blend then the efficiency factor would need to be 0.75 (1-0.05/0.2) as a 1t of bio-diesel only substitute in reality 0.75t of petro-diesel). The PDD clearly shows that this explanation is required. The PDD mentions that a 20% mixture will be used where only minimal changes will occur to fuel efficiency. That might be correct, but a minimal change of e.g. 2% using a 20% mixture means that bio-diesel in total (to 100%) only substitutes petro-diesel at a rate of 90%, which is again relevant....

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?

>>Methodology distinguishes three possible baselines (continuation, usage of biodiesel without CDM and CNG/LPG/LNG). It does not include other possible alternatives such as diesel-ethanol blends (or pure ethanol). The methodology states that national policies shall be assessed but does not explain detailed how. The criteria included is that biodiesel would be the baseline if mandatory or cheaper than petrodiesel. If CNG/LPG/LNG is considered as more attractive then latter is the baseline. The term "attractive" is not further specified (attractive in technical, environmental, financial terms?). The additionality tool of the EB is proposed as methodology. No specifications are made e.g. criterias when step 2 and when step 3 shall be used or specific aspects relevant for this type of project when assessing additionality or typical barriers etc.

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

>>While using the additionality tool of the EB is appropriate the methodology should offer some specification of this tool for this project. The application of the tool in the PDD is not appropriate as alternatives are not considered from a financial point of view (e.g. CNG, LPG) and the baseline is pre-determined in the methodology towards petro-diesel. This can be a condition for this methodology but the methodology must have an open approach to determining what for a specific project is in reality the appropriate baseline first.

(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 with exception of the determination of the baseline which is implicitly pre-determined by the methodology as being petro-diesel.

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):

>>The methodology itself has serious deficiencies. An adapted methodology could however be used for the referred proposed project.

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.

>>No as the methodology pre-determines an approach leading to the baseline of petro-diesel which is an applicability condition of the methodology.

Please explain:

>>see above. Main problems are:

1. The baseline is pre-determined by selecting an approach which excludes other potentially viable alternatives.
2. The additionality tool is not specified for this project type
3. The efficiency factor is not defined sufficiently leading to an overstating of baseline emissions.
4. Project emissions exclude important components

(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, for biodiesel in general substituting petro-diesel. The problem is in fact that this is potentially to generic as biodiesel can be produced from a variety of sources. This is not taken into account in an appropriate manner by the methodology.

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

>>The scope used is bio-diesel production plant, transport of bio-diesel and feed-stocks, usage of bio-diesel in vehicles plus preparation of harvesting in new plantations. The scope is OK up to limitations in the agricultural production of products used to produce bio-diesel. The scope here is limited to new plantations thus excluding emissions from already existing plantations and to fossil fuel usage plus land clearance thus omitting other GHG emissions potentially produced during oilseed production and harvesting. The scope in the context of production of bio-diesel inputs is thus considered as non-appropriate.

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:

>>vintage is basically when biodiesel is produced. This is ok

(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

>>Sources are identified in the methodology. The methodology states that only oil bearing seeds from new plantations are included. All other bio-diesel sources are excluded. D5 does not state gases to be included. In the formula used for baseline emissions these are CO₂, N₂O and CH₄ can, must however not be included. Project emissions are based on CO₂ only. Leakage emissions are based on CH₄.

ii) Physical delineation

>>The physical delineation is: production plant, input production from new plantations, usage of bio-diesel in vehicles, transport of bio-diesel plus input elements to production plant.

b) Indicate whether this project boundary is appropriate:

>>Sources: Differentiating new oil-seed sources from all other input sources is problematic. To have methanol outside and included as leakage is OK. Also OK would be to exclude waste-oils as they are waste-products. A clear definition of waste-product would however be required. All other sources should be included (production of oil bearing seeds from existing plantations e.g.)

Physical: see comments on scope of data.

Gases: Should be made explicit in D5. The restriction on CO₂ in project emissions is questioned. N₂O emissions in the case of agricultural production of inputs can be 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:

1. CERs from bio-diesel consumption will not be claimed by bio-diesel users or distributors. This is potentially very problematic as companies changing to bio-diesel might well claim that they are taken the risk and additional costs of using bio-fuels. A condition of approval should include a certification by the DNA that it is willing and able to ensure that no other credit for GHG emission reductions is issued to other projects using the same fuel. The DOE should verify this condition, and it should be included in the monitoring plan.

2. Harvesting of oil-seeds involves no fuel usage. This is a problematic assumption. Raps-seed harvesting is e.g. also in many developing countries done by machines. It is thus recommended to change this part.

3. Bio-diesel is consumed to 100% in the host country. The full amount is consumed. This condition is monitored. OK

Implicit:

1. Petro-diesel remains the baseline fuel for the project life-time. Needs to be assessed appropriately looking at national policies.

2. No other GHG emissions occur in the plantation process. Not appropriate as potentially highly relevant N₂O emissions occur.

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

>>The explicit ones yes except 2. Implicit ones of course no

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):

>>For petro-diesel emissions IPCC. For efficiency factor unclear public source. For project emissions

basically proprietary information and official conversion factors.

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

>>OK with exception of data gaps and the efficiency factor which should be based on the differential energy content.

f) State possible data gaps:

>>1. The efficiency factor used to assess substitution of petro-diesel through biodiesel must be detailed. The efficiency change must be based either on using 100% biodiesel or using a specified blend and determining the efficiency factor based on the blend (efficiency change/percentage blend). In general vehicles using 100% biodiesel will be adapted to biodiesel usage. Their efficiency loss will thus be lower than using blends. Using such data would thus understate baseline emissions and be non-conservative. If the methodology does not indicate if blends or pure biodiesel will be used it must indicate clearly how the efficiency factor will be determined. A transparent and conservative approach would be to determine latter based on the relative energy content. Average biodiesel has a lower energy content, leading to a higher fuel requirement of about 15% on a weight basis. The efficiency factor would in this case be 0.85. Neglecting this lower energy content as done in the PDD (based on the unclear and non-specified formula of the methodology) leads to overstating emission reductions by 15% which is significant.

2. Inclusion of fuel usage in existing plantations from which oilseeds are used.

3. Inclusion of all fossil fuel used in the whole production process of all oilseeds incl. harvesting.

4. Inclusion of N20 emissions resulting from the production of oilseeds (usage of fertilizers basically)

(7) Assessment of uncertainties:

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

i) The basis for determining the baseline scenario:

>>The uncertainty identified refers to the emission factors. This is however no big issue. The real uncertainty is regarding the efficiency level. Here the baseline scenario lacks an assessment of uncertainty.

ii) Algorithms/formulae:

>>no

iii) Key assumptions:

>>no

iv) Data:

>>no

b) State whether the uncertainties presented are reasonable:

>>no; following uncertainties should be assessed:

- efficiency factor petro-diesel to bio-diesel
- emissions from land-clearance, sequestration and fuel usage for oilseed production
- data used to quantify emissions from transport of bio-diesel (however this will not be a major issue; a short discussion would however be helpful)

(8) Leakage:

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

>>leakage due to increased demand of methanol is included

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

>>OK, if the above mentioned additional project emissions are included

(9) Transparency and "conservativeness":

<p>a) <i>Indicate whether the baseline methodology was developed in a transparent way:</i></p> <p>>>The selection of the baseline is not transparent. The procedure thereafter to determine baseline emissions is transparent with exception of the efficiency indicator for transforming quantity of bio-diesel in diesel. The procedure to determine project emissions are transparent with exception of the emissions arising from oil-seed production. In this part it is unclear what is included and what not and the criteria for inclusion/exclusion are not clear. The determination of leakage is transparent.</p> <p>b) <i>State whether the baseline methodology is conservative:</i></p> <p>>>No.</p> <p>1. The efficiency indicator as presented is not conservative as misinterpretations are probable for bio-diesel mixtures. This would overstate emission reductions. This actually happens in the PDD presented.</p> <p>2. Project emissions are understated as oilseed production emissions are only included partially omitting potentially highly relevant N₂O emissions. Also the project potentially will claim land-use change emissions not attributable to this project type.</p>
<p>(10) Potential strengths and weaknesses of the proposed baseline methodology (please explain):</p> <p>>>Strengths:</p> <p>Simple and straightforward for baseline and leakage emission determinations</p> <p>Weaknesses:</p> <p>1. Various parameters are non-transparent and non-conservative (efficiency factor, fuel usage oilseed production)</p> <p>2. Non-inclusion of various sources of project emissions in oilseed production (existing plantations, fuel usage over whole production scope)</p> <p>2. Non-inclusion of important non-CO₂ emission sources in project emissions (basically N₂O in oilseed production)</p> <p>3. Potential claiming of land-use change emission reductions</p> <p>4. Control of non-claiming of CERs through consumers of bio-diesel is not sufficiently taken into account.</p>
<p>(11) Other considerations, such as a description of how national and/or sectoral policies and circumstances have been taken into account (please explain):</p> <p>>>In determining the baseline partially without being very explicit. In the PDD this is taken better into account.</p>
<p>(12) Applicability of the proposed methodology across project types and regions (please indicate):</p> <p>>>Potentially applicable to all countries, regions and types of bio-diesel.</p>
<p>(13) Any other comments:</p> <p>a) <i>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:</i></p> <p>>></p> <p>b) <i>Indicate any further comments:</i></p> <p>>></p>
<p>II. Proposed new monitoring methodology (specify title here): >> Monitoring methodology for Biodiesel production and switching fossil fuels from petro-diesel to biodiesel in transport sector</p> <p><i>In respect of the proposed new monitoring methodology, evaluate each section of CDM-NMM to the draft CDM-PDD. Please provide your comments section by section:</i></p>

(1) Brief description of new methodology:

Describe new methodology:

>>Baseline emissions are monitored basically by using pre-determined emission factors plus the bio-diesel production volume. Project emissions are based on the production of bio-diesel, partially emissions caused by the production of oil-seeds, and transport emissions caused to and from the bio-diesel plant. Most data is proprietary. For leakage methanol consumption is recorded. Additionally the project monitors sales volumes of bio-diesel.

(2) Key assumptions/parameters:

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

Implicit

CERs from bio-diesel consumption will not be claimed by bio-diesel users or distributors. No monitoring of this assumption is made.

No other assumptions specific for the monitoring part are made (the same assumptions apply in general as for the baseline methodology)

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

>>The implicit one no.

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

>>See baseline methodology. The implicit assumption that no other parties claim CERs from bio-diesel consumption is problematic.

(3) Data sources and data quality:

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

>>Proprietary for core data such as bio-diesel produced and consumed, electricity and fuel used in plant, land area for oil-seeds, identification of vegetation. Some data can be proprietary or official sources (e.g. efficiency rate of vehicles using bio-diesel). Other sources are official. However especially for the question of land clearance and sequestration the source and validity of this data is questionable. It is unclear how the methodology will determine which type of vegetation was cleared, who records this and how this is monitored. It is also unclear how the methodology will determine what plantations are new and what are existing ones.

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

>>Efficiency indicator is non-adequate and needs to be specified (best as default value). Rest of data as presented is OK with the gaps already mentioned. Reliability is OK.

c) State possible data gaps:

>> The gaps were already highlighted in the baseline. Gaps are therefore basically:

- Lack of monitoring of emissions data on production of oil-seeds in existing plantations
- lack of monitoring emissions data from all fossil fuel used in producing oil-seeds
- lack of monitoring data on N₂O emissions in oil-seed plantations

Additionally following elements lack:

- monitoring of vegetation ex-ante including records
- monitoring of vegetation type ex-post incl. records
- Monitoring that CERs from bio-diesel consumption will not be claimed by bio-diesel users or distributors is not assured. This is not included in the current monitoring methodology. This is potentially very

problematic as companies changing to bio-diesel might well claim that they are taken the risk and additional costs of using bio-fuels. A condition of approval should include a certification by the DNA that it is willing and able to ensure that no other credit for GHG emission reductions is issued to other projects using the same fuel. The DOE should verify this condition, and it should be included in the monitoring plan.

(4) Assessment of the description of the proposed methodology and its applicability:

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

>>yes

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-NMM):

>>yes, with the restrictions mentioned in the baseline

c) State whether this proposed monitoring methodology is compatible with the proposed baseline methodology described in CDM-NMB of the draft CDM-PDD:

>>yes

(5) Leakage (please elaborate, if appropriate):

>>OK

(6) Quality assurance and control procedures (please explain):

>>OK and in line with data. Fuel usage of oil-seed suppliers will however be difficult to monitor exactly in practice

(7) Potential strengths and weaknesses of the proposed monitoring methodology (please explain):

>> Strengths:

Simple and straightforward.

Weaknesses:

1. Related to baseline methodology

2. No monitoring of potential double-counting through claims on emission reductions from users of bio-diesel.

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

>> Potentially applicable to all countries, regions and types of 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:

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b) Indicate any further comments:

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Signature of desk reviewer

Date: 22 / 05 / 2005

Information to be completed by the secretariat

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