CDM: Proposed new methodology expert form (version 03)

(To be used by methodology experts providing desk review for a proposed new methodology)

Name of expert responsible for completing and submitting this form	Dian Phylipsen
Related F-CDM-NM document ID number	NM0074

Note to those completing this form, as applicable: Please provide recommendations on the proposed new baseline and monitoring methodologies based on an assessment of annexes 3 and 4 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.

A. Evaluation of the proposed new methodologies by desk reviewers:

I. Evaluation of the porposed new baseline methodology:

Title of new baseline methodology:>>Baseline methodology for technological improvements in industry

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

>>According to the documentation, the methodology is applicable to project activities where technological improvements in industrial or manufacturing processes lead to the reduction in the level of GHG emissions per unit of industrial output. Categories mentioned for applicability are Manufacturing industries, Chemical Industries, Construction, Transport, Mining/mineral production, Metal Production, Agriculture.

If the proposed project activity leads to GHG emission reductions due to less electricity consumption from a grid, the methodology states that this will have to be calculated according to a suitable methodology.

The methodology is so general, it is difficult to check this applicability, but the categories of Construction, Transport, Mining/minerral production and Agriculture are unlikely candidates for this methodology (as confirmed by the title).

No limitation on applicability regarding regions.

ii. Strengths and weaknesses of the methodology:

>>strengths: simple, widely applicable. The documentation also mentiones good availability of data, realistic simulation of investment decisions as strengths.

Weaknesses: Too general, leaving too many issues undefined or open to judgement of project developer and DOE.

iii. Any changes needed to improve the methodology:

a. Minor changes:>>

b. Major changes: >>make less general, so that issues as system boundray, leakage, etc can be sufficiently defined.

II. Evaluation of the proposed new monitoring methodology:

Title of new monitoring methodology: >>Monitoring Emission Reductions from technological improvements in industry'

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

>>applicable to project activities where technological improvements in industrial or manufacturing processes lead to the reduction in the level of GHG emissions per unit of industrial

output. An example mentioned is cement factories that introduce a new technology that reduces the amount of clinker needed to produce cement, thus reducing associated GHG emissions. The methodology states that if the proposed project activity leads to GHG emission reductions due to less electricity consumption from a grid, this will have to be monitored according to a suitable methodology.

ii. Strengths and weaknesses of the methodology:

>>Strengths: Simple and widely applicable, therefore cost reduction. The documentation aslo mentioons good data availability, routinely gathered by project developers, realistic simulation of investment decisions.

Weakness: too generic, leaves too much to judgment of project developer and DOE.

iii. Any changes needed to improve the methodology:

a. Minor changes:>>clarify how leakage is dealth with, dinguishing the effects of emission reductions of the project and the effects of leakage.

b. Major changes: >>make less general, so that issues as system boundray, leakage, etc can be sufficiently defined.

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 technological improvements in industry

(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 divided in two phases: determination of baseline scenario and project additionality, and ERs calculations.

The baseline scenario and additionality are determined in a step-wise process to determine the financial barriers associated with the development of the project, and following the "Draft consolidated tools for demonstration of additionality".

b) State the approach selected:

>>The documentation states that approach 48(b) "Emissions from a technology that represents an economically attractive course of action, taking into account barriers to investment" is chosen. However, from the description in the text as well as the application to the cement example (and the cement PDD) it is the question whether this is correct, and whether us it not approach 48(a) "Existing actual or historical emissions, as applicable;" that is being used, with the barrier investments are taken into account in showing that the project is additional to the baseline of a continuation of the current situation.

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:

>>The documentation states that approach 48(b) is the most appropriate as "this type of activity in which project activities are usually prevented to occur due to financial reasons. After considering the national and sectoral policies in the definition of plausible scenarios, investor decisions are usually affected by their assessment of risks and investment returns. As risks related to new activities are difficult to measure, only qualitative assessments can be done. The investment return, on the other hand, is an easier option to simulate investor decisions in a quantitative assessment, resulting in a more precise evaluation of future scenarios"

However, considering that the incorrect approach may be chosen this may need to be revised.

(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 scenario and additionality are determined in the step-wise process described in the "Draft consolidated tools for demonstration of additionality" released on the Eleventh Meeting of the CDM Meth Panel. The methodology should use the option 2 related to investment analysis.

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

>>Baseline emissions are determined by adding process emission and energy-related emissions as follows:

Eb = (QPb * EFb) + (QFb * EFFb)

Eb: Emissions in the baseline scenario (tonnes CO2e)

QPb: Amount of product produced in the baseline scenario (tonnes or unit).

EFb: Emissions Factor of the baseline scenario (tonnes CO2e/tonnes or unit).

QFb: Amount of fuel used in baseline scenario (volume or energy unit).

EFFb: IPCC emission factor for fuel used in baseline scenario (tCO2/ volume or energy unit).

Emissions after implementation of new equipment or technology are calculated by:

Ep = (QPp * EFp) + (QFp * EFFp)

Where:

Ep: Emissions in project scenario (tonnes CO2e)

QPp: Amount of produced product in project scenario, by definition the same as in the baseline.

EFp: Emissions Factor in the project scenario (tonnes CO2e/tonnes or unit).

QFp: Amount of fuel used in project scenario (volume or energy unit).

EFFp: IPCC emission factor for fuel used in project scenario (tCO2/ volume or energy unit).

Emission Reductions are determined by:

ER = Eb – Ep – L

Where:

ER: Emission Reduction (tonnes CO2e)

Eb: Emissions in the baseline scenario (tonnes CO2e)

Ep: Emissions in the project scenario (tonnes CO2e)

L : Leakage (tonnes CO2e)

Leakage = (Dp – Db) * EF

Where:

Dp: Demand of input material used in the project scenario (tonnes, units / year)

Db: Demand of input material used in the baseline scenario (tonnes, units / year)

EF: Emission factor of input material (CO2e/tonne, unit)

QPp is used for calculations of both project and baseline emissions. The Emissions Factor in the project scenario (EFp) will, in most cases be lower than in the baseline, due to the technological innovations introduced in the production process.

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?

>>The document only refers to section D.1 ("see Section D.1 for additionality definition."), which in turn

refers to the "Draft consolidated tools for demonstration of additionality" released on the Eleventh Meeting of the CDM Meth Panel (option 2 related to investment analysis).

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

>>yes, although information on comparable investments may be difficult to obtain. Heavy burden on DOE.

(3) Assessment of the description of the proposed methodology and its applicability

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

>>No, too general

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 Annex 3):

>>unclear whether in case of the cement project, the formulaes relate to tonnes of clinker or tonnes of cement

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.

>>It can, but it is difficult to judge whether it will in all cases, because of the general nature of the approach

Please explain:

>>

(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, the methodology is applicable to all projects in which technological improvemens int manufacturing industry processes leads to the reduction of GHGs within the system boundaries. Note that the general nature of the methodology lead to much room for interpretation for project developers and DOEs. The elaboration of certain issues in the methodology (e.g. system boundaries) may lead to incorrect application to some specific project types.

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

>>Table 2 in the documentation shows the spatial level of data necessary to apply the methodology. This seems appropriate, except for items # 11 Input material or energy emission factor, which is stated to be "Related to the technology, not location". There will be projects where the composition (and therefore emission factor) of input material (and certainly energy) emission factor are determined by location as well as technology.

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:

>>The documentation only states "The project should aim at using the most recent data sources available at the time of construction of the baseline." This is in itself an apropriate, albeit it (again) rather general statement.

(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

>>see below. Gases are not identified, but the methodology refers to the broader category of GHGs, rather than CO2.

ii) Physical delineation

>>The documentation gives the general statement "For investment projects applying the proposed methodology the physical site(s) of the business-as-usual activities and of the proposed project activity typically define the boundary.

GHG emissions that occur from the same source and in the same amounts in baseline and project scenarios are usually not significant for the purpose of calculating emission reductions and can therefore be excluded from the monitoring boundaries.

The analysis leading to the definition of the monitoring boundaries should comprise all elements related to the production process, in the baseline and project scenarios. Direct emissions related to the production process (e.g., raw material transformation such as clinker and cement production activities, electricity consumption, fossil fuel consumption, etc.) are typically included in the project boundaries. In the case that the technological improvement results in reduced electricity consumption from electricity grid, the boundaries will be extended to reflect the boundaries considered in the relevant methodology used to calculate the CEF of the grid.

Emissions from construction of the project and from transportation of raw material to the plant (assumed to be the same in both scenarios) are typically excluded."

b) Indicate whether this project boundary is appropriate:

>>The general approach to the system boundary is appropriate, but is too general to give a final judgement. For instance, there can be technological improvements that result in different flows of materials or fuels (e.g. from pipelines to truck transport) that do have a significant effect on project emissions that should be taken into account.

(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:

>>The documentation lists the following explicit assumptions:

1) Determination of baseline scenario and additionality assumes:

- Information on acceptable IRRs or discount rates for comparable investments with a similar risk rofile in the relevant sector and country from various business statistics, expert judgment.

- Conservative calculation, to be checked by DOE.

- The level of production activity will be the same in the project and baseline scenarios. The installation of a new technology to reduce GHG emissions will not change the level of production activity, thus, the production are the same in both scenarios.

- The production efficiency may be different for the baseline and project scenarios. It will just be considered that if the project scenario is more efficient than the baseline, it will need a smaller number of units, or less raw material to produce the same amount of product as in the baseline. This will be incorporated in the investment analysis, considering the price of installations, as well as maintenance and operation costs in each scenario.

2) Calculation of emissions of the baseline scenario and project activity assumes:

- The emissions will be calculated considering the same production in both scenarios. If production efficiency and level increase in the project scenario, this new production level will be used for the baseline

scenario.

- Emission factor, conversion factors or default data used for this analysis needs to be gathered from scientific publications, specialized institutions and consultants, the IPCC, or any other recognized sources, or from validated/documented data gathered by the project company. Full references must be given for the sources of data used. These will need to be checked by the DOE.

- The input demand can vary between the project and BAU scenarios. If this variation is significant, measurable, and reasonably attributable to the project activity and that results in an increase in the emissions it must be included as project emissions (if it is inside the boundary and under the control of the project proponent) or leakage (if it is outside the boundary and is not under the control of the project proponent.

The following remarks can be made regarding the above assumptions:

-It is questionable whether information on "acceptable IRRs or discount rates for comparable investments with a similar risk profile in the relevant sector and country" would be publicly available. And what if there are no comparable investments in the relevant sector and country (e.g. as is the case in the PDD-project in the cement industry)?

- What constitutes a 'conservative calculation'?

- There are hardly any measures that are solely taken to reduce GHGs (unless is CO2 capture and storage or destruction of F-gases). Especially in the case of reducing energy- or process related CO2 emissions, measures are usually mainly taken to increase energy efficiency, production, product quality, etc. There will be many cases where the introduction of technologies that reduce GHG emissions will also effect production levels!

- the link between production efficiency and leakage is very unclear. The same for input material demand and leakage (see also Section 8 below)

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

>>see comments above.

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

>>see comments above

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

>>The documentation states "This is a generic methodology applicable to a wide range of activities. The exact type and source of data needed will vary from project to project". A table is provided based on a case study (the PDD cement project) that specifies the type of data that will be required for the calculation of emissions for projects using this methodology. In all cases these are project proponent data, except for product emission factors, input material emission factors (both from scientific publications, specialized institutions and consultants, the IPCC, or any other recognized sources, or from validated/documented data gathered by the project company - to be checked by DOE) and GWP (IPCCC).

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

>>For this particular case, yes, although the statement "To be checked by DOE." should be included for all data listed. The question is the verifiability of (especially the financial data) by the DOE (see also remark under a) on availability of data for comparable investments).

f) State possible data gaps:

>>see under a)

(7) Assessment of uncertainties:

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

i) The basis for determining the baseline scenario:

>>The documentation states that the application of the methodology described in the “Draft

consolidated tools for demonstration of additionality" can lead to an erroneous baseline scenario if:

- Set of plausible alternatives is incomplete. A careful analysis of possible and plausible alternatives and confirmation by a DOE of the validity of the analysis and the conclusions drawn from it is imperative in order to mitigate risks and to ensure credibility of the result.

- The financial analysis is not conservative. The DOE must carefully control and check all assumptions used in order to ensure a conservative result.

ii) Algorithms/formulae:

>>not provided

iii) Key assumptions:

>>not provided

iv) Data:

>>not provided

b) State whether the uncertainties presented are reasonable:

>>Too general to judge

(8) Leakage:

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

>>The documentation states that "Leakage is calculated as the difference in the consumption of input materials or energy used for the production lines of the project and baseline scenarios, multiplied by the emission factors associated with these materials, energy or fossil fuels. .[. .] The Emissions Factor to be used will depend on the factors that are identified as causing leakage, and will need to be referenced to internationally accepted data sources or from previously validated CDM projects. The appropriateness of the emissions factor used will need to be checked by the DOE."

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

>>The treatment of leakage does not seem to make sense, as there apparently is an overlap between emission reductions of the project compared to the baseline and the effects of leakage.

(9) Transparency and "conservativeness":

a) Indicate whether the baseline methodology was developed in a transparent way:

>>The documentation states "The proposed baseline methodology is transparent and conservative because:
- It uses the conventional understanding of why a proposed course of action is not economically attractive.
- It can be applied in a transparent manner as it relies on conventional financial analysis that can be checked by an auditor to ensure completeness, correctness, plausibility and conservative assumptions - It can be applied in a conservative manner provided the conditions for its use are followed."

The general nature of the methodology limits the transperancy, as the methodologies is only described in very general terms, and specifics are not provided as they are project-dependent.

b) State whether the baseline methodology is conservative:

>>Cannot be judged from this general description. No specific provisions for being conservative have been made in the methodology, so whether or not it leads to a conservative baseline will depend on each specific case.

(10) Potential strengths and weaknesses of the proposed baseline methodology *(please explain)***:**

>>strengths: simple, widely applicable. The documentation also mentiones good availability of data, realistic simulation of investment decisions as strengths.

Weaknesses: Too general, leaving too many issues undefined or open to judgement of project developer and DOE.

(11) Other considerations, such as a description of how national and/or sectoral policies

and circumstances have been taken into account *(please explain)*:

>>The documentation states: "The results of this comparative analysis between plausible scenarios should be evaluated in the context of sector trends, and incorporating the effects of any legislation and government policies that may affect this trend. This can be done by analyzing the policies (subsidies, laws, economic trends), as well as the behavior of companies involved in the same production sector in the region where the project will be implemented (For more detail see step 1 in section D.1)."

Again, correct, but very general.

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

>>According to the documentation, the methodology is applicable to project activities where technological improvements in industrial or manufacturing processes lead to the reduction in the level of GHG emissions per unit of industrial output. Categories mentioned for applicability are Manufacturing industries, Chemical Industries, Construction, Transport, Mining/mineral production, Metal Production, Agriculture.

If the proposed project activity leads to GHG emission reductions due to less electricity consumption from a grid, the methodology states that this will have to be calculated according to a suitable methodology.

The methodology is so general, it is difficult to check this applicability, but the categories of Construction, Transport, Mining/minerral production and Agriculture are unlikely candidates for this methodology (as confirmed by the title).

No limitation on applicability regarding regions.

(13) 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:

>>no

b) Indicate any further comments:

>>A wide applicability of methodologies is, in general, recommendable. However, in this case I feel this methodology has gone too far, making it very difficult to say anything more than "appropriateness depends on the specific project the methodology is applied to." In my view this methodology leaves too much room the project developer and the DOE, without giving the DOE much guidance on how to make a final judgement.

II. Proposed new monitoring methodology *(specify title here):* >>Monitoring Emission Reductions from technological improvements in industry'

In respect of the proposed new monitoring methodology, evaluate each section of annex 4 to the draft CDM PDD. Please provide your comments section by section:

(1) Brief description of new methodology:

Describe new methodology:

>>This methodology allows the monitoring and calculation of ERs from company activities that currently emit greenhouse gases (GHG) and are considering the adoption of new equipment or technology that would lead to the reduction in GHGs per unit of industrial or manufacturing output. Financial reasons or other barriers related to technology improvement have traditionally prevented the use of such equipment or technology.

The monitoring of emissions of this type of activity is based on the monitoring of a proxy indicator that is correlated with the GHG generation (e.g. if there is an emission factor for a certain product, monitor just the amount of product produced).

The methodology focuses on the monitoring of parameters used to:

- Define the baseline scenario as the most plausible scenario in the absence of project activities;
- Prove project additionality;
- Calculate emissions reductions achieved during project activities; and

- Estimate the amount of leakage to be deducted from the emissions reductions calculated for the project activity.

However, the documentation also states that "The precise list of data to be collected depends on the peculiarities of the project type.'And only an examplary table is provided of the parameters to be monitored in a specific case study (the PDD project).

(2) Key assumptions/parameters:

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

>>The documentation lists the following assumptions explixitly as being used in the monitoring methodology:

- The project developer will need to identify the emission factors and technical parameters to be used for the monitoring methodology (e.g. fuel emission factors, efficiency of GHG destruction equipment, etc.), but these will need to be from internationally recognized sources;

- The methodology can only be applied in cases where such recognized emission factors do exist

- The methodology can only be used if there is a simple, transparent and accurate way to measure the proxy indicator. This is usually the case, as the proxies tend to be industrial products that are generally very well monitored;

- The Global Warming Potential values for GHGs will need to be those approved by the IPCC.

- All the other variables included in the baseline definition, additionality test or emission reduction calculation not included in this monitoring plan are expected to be constant for the project duration.

- The need of inclusion of one or more variable based on sector or national policies and circumstances will be evaluated by the local DOE.

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

>>cannot be judged, because of general nature of the methodology. Item 5 is potentially very important, and can be quite different for different project cases, but is left to DOE in specific project.

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

>>Again, correct but too genera to be of much value

(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):

>>The documentation states "The precise list of data to be collected depends on the peculiarities of the project type. In essence, the quantity of GHG destroyed is estimated through the use of a proxy indicator that allows the calculation of the GHG emissions associated with the production process in the baseline and project scenarios. The most important factors to be monitored are the proxy indicator (i.e., the quantity of product produced) and the emissions factor of the indicator. As there is no expected variation in the other data involved in the emissions calculations, there is no need for monitoring these parameters.

The table provided only shows examples based on the case study of a project that reduces CO2 emissions due toimproved clinker and cement production process (the PDD project).

The data to be monitored do not include the underlying data required to determine emission factors (e.g. the amount of clinker used in cement).

NB: the emission factor per tonne of clinker may be obtained from literature, but not the emission factor per tonne of cement. The % of clinker in cement varies widely over different regions, countries, project developers and over time. As alternative materials are being used as a cheaper alternative, the remaining share of clinker in cement is influenced by the availability of those alternative matierials and their prices. In addition, the amount of alternative materials that can be used depend on the required product specifications. I.E. there is no way this parameter can be obtained from literature, as suggested in Table B.2.1.

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

reliable:

>>Cannot be judged in most cases, because of general nature of methodology. See however, remark on emission factors taken from literature, made above.

c) S*tate possible data gaps:*

>> Data underlying emission factors are not monitored, nor data that may be used by the DOE for cross-checking.

(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:

>>No, too general. Tables mention a number of parameters to be measured continuously, that cannot be measured on a continuous basis or cannot be measued at all, but should be calculated or estimated (emission factor).

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 annex 4):

>>yes, though tables mention a number of parameters to be measured continuously, that cannot be measured on a continuous basis for cement production (input demand as it concerns solids) or cannot be measued at all, but should be calculated or estimated (emission factor). See also remarks on missing data or inappropriate data sources made under (3) a).

c) State whether this proposed monitoring methodology is compatible with the proposed baseline methodology described in annex 3 of the draft CDM-PDD:

>>yes, both are equally (too) general.

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

>>see B.I.8 (leakage under baseline methodology)

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

>>too general to judge

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

>>Strengths: Simple and widely applicable, therefore cost reduction. The documentation aslo mentioons good data availability, routinely gathered by project developers, realistic simulation of investment decisions.

Weakness: too generic, leaves too much to judgment of project developer and DOE.

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

>>applicable to project activities where technological improvements in industrial or manufacturing processes lead to the reduction in the level of GHG emissions per unit of industrial output. An example mentioned is cement factories that introduce a new technology that reduces the amount of clinker needed to produce cement, thus reducing associated GHG emissions. The methodology states that if the proposed project activity leads to GHG emission reductions due to less electricity consumption from a grid, this will have to be monitored according to a suitable methodology.

No limitation regarding applicability to different regions.

(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:

>>no

b) Indicate any further comments:

>>in certain places an emission factor of CH4/t clinker is given (e.g. Table B.2.1). This is incorrect. This should be CO2/t clinker. Underlying data for determining EFs are not included in monitoring data. Part of the data in the tables is incorrect (measured versus estimated, sources of data).
Signature of desk reviewer …….. Date: / /

Information to be completed by the secretariat	
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