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|  <p align="center">CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03) <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p> | |
| Name: | Susanne Häfeli-Hestvik Institution: Tricorona |
| Affiliation ¹ : | <input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder |
| Title/Subject (max. 200 characters): | Simplify and broaden the water purification part of AMS-I.E. |
| Purpose of the submission: | <input type="checkbox"/> Query on an approved SSC methodology or small scale procedures ² (Fill in field 1. below) <input checked="" type="checkbox"/> Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) <input type="checkbox"/> Proposal for a new SSC methodology (Fill in fields 4. and 5. below) |
| Approved SSC methodologies ² to which your submission relates to, if applicable. | AMS.I.E. |
| Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission). | Susanne@tricorona.se |
| Information for completing the form Describe the questions related to the SSC Methodologies, Modalities and Procedures below. If the questions are related to a project under development or implementation, you may describe the context in which they arose. | |
| <p align="center">Query on an approved SSC methodology or SSC procedures</p> 1. If you have questions relating to the application of an approved small-scale methodology (AMS) please specify and provide reference to the exact technology/measure below. If you have questions related to procedures for SSC project activities please clarify below: >> | |
| <p align="center">Request for revision of an approved SSC methodology</p> 2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below: The methodology's water purification part is currently leading to too high transaction costs and as a consequence a CER price well above 20 EUR per ton of CO ₂ meaning effectively that there might be a few registered in the new future but no issued credits. This can be remedied; requirements can be simplified and broadened to take into account the importance of access to affordable clean water for a country/region's development. 1- We propose to change the methodology so as - to account for all water purified (to delete the cap), and | |

¹ Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

² The list of all approved small-scale methodologies (AMS) can be found at <http://cdm.unfccc.int> and go to CDM: small scale CDM methodologies.

- to delete the need for a baseline survey.

We understand these changes imply accepting raising water/energy demand and thus emissions and we feel the arguments are compelling: Raising energy demand is already accepted for renewable energy projects: no one asks project participants in AMS-I.D or ACM0002 to cap the electricity produced or to prove that an equivalent amount of electricity produced by the project has been taken off the electricity grid from fossil-fuelled power plants. Further, AMS-I.E. has that concept already acknowledged, in that approach b) (not applicable for water purification technologies though) allows to measure the heat produced by the project equipment and thereby assumes that heat would have been produced by kerosene or something else GHG intensive if only people had had access to it. Water borne diseases constitute up to 80 % of all illnesses and do not spread only through drinking the water, but can also enter the body when bathing/washing oneself or one's children, through the usage of unclean utensils such as plates and cutlery and through eating unclean, raw vegetables. For instance, the East Africa Water Safety site says "Water used for bathing should first be boiled, filtered or treated in order to remove parasites" (http://www.ehow.com/about_6704847_east-africa-water-safety.html). Directors of Health Promotion and Education (DHPE) says that, to avoid parasites entering the body through the skin, "Heat bath water for 5 minutes at 150F" (<http://www.dhpe.org/infect/schisto.html>). It is thus clear that from a health perspective, it is imperative that "drinking water" refers to the quality of water required for drinking, cleaning utensils, bathing and washing, rather than just drinking. Increasing demand for clean water should also comprise health and well-being-related demands outside normal domestic use such as water use in health care facilities, food production, economic activity or amenity use.

It is in our view only a theoretical threat at most that business would emerge to purify water simply to get the CERs and then let the water go bad, or that we would see CERs issued for the purification of water that could not be treated by means of boiling it anyway (e.g. arsenic pollution) and we hope that we can agree to cross that bridge only when and if at all we ever get there. Further, the methodology has already a cap (the 15 MW installed capacity) and an applicability restriction (only applicable in regions with decreasing biomass resources).

2- On the non-renewability: It is difficult to get surveys from 1989 (21 years ago!), we would therefore propose the methodology to be changed to "... using survey methods or based on relevant third party confirmation/data/statistics such as from governments, research institutes and similar" instead.

3- Leakage is also an issue because it adds so much uncertainty down the road which discourages private investment upfront. It is nearly impossible to find out whether these other non-project households now use the non-renewable firewood a project saved and even if they did, it should not matter for the CERs because the issue is the same as for renewable energy projects where one also does not have to confirm whether the equivalent amount of coal really has been saved for example. For business, what works best is as much as possible security upfront, before money is invested. The methodology's performance shows this very clearly: Only 3 projects have been registered since the methodology's adoption in early 2008, 3 years ago. None of them has even started yet verification, quite simply because the way the methodology currently is written it is just simply too few CERs for too much uncertainty too long down the road.

Notes to the calculators:

Cost calculator: The purpose is to showcase that the big costs come from the CDM handling and the logistics. Note: For getting CERs issued from 5000 households, we expect having to distribute equipment to at least 7000 households. The big question is how many CERs can be generated per household per year. Our point is that everything below 2 tCO₂ forecast per household/year is unattractive for any investor and keeping in mind the current experience with issuance success.

CER calculator: The way the methodology is currently written, any technology would get maximum 0.51 tCO₂ per household/year in the Western regions of Kenya as an example (see C5, compare to the minimum 2 tCO₂/household/year needed to make the project financially viable). In line with our proposal, the rows 17 and 24 would change:

- take away the cap, and
- take away the fraction of baseline households boiling water.

3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.

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| <p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input checked="" type="checkbox"/> Draft methodology with changes highlighted in Word and PDF formats <input type="checkbox"/> PDD in PDF format (optional) <input type="checkbox"/> <input checked="" type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the request for revision of the SSC methodology) <ul style="list-style-type: none"> - Excel file showing the calculations regarding financial viability - Excel file showing the methodology equations | |
| Proposal for a new SSC methodology | |
| 4. If you are proposing a new small scale methodology, please provide justifications below: | |
| >> | |
| 5. For submitting a new small scale methodology a filled in form “CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)” is required. | |
| <p>The following documents have been attached to this form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Completely filled in form “CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)” in Word and PDF formats³ <input type="checkbox"/> A draft PDD (with sections A to C completed): <ul style="list-style-type: none"> <input type="radio"/> Relevant annexes to the PDD are provided <input type="checkbox"/> Additional information (please specify if you are providing any information note, published paper or a report in support of the new SSC methodology) | |
| Date you are delivering the contribution: | 2010-12-10 |
| Information to be completed by the secretariat | |
| SSC-Submission number | |

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