
Overshooting SSC Working Group Activity outside scope

<i>CDM reform category:</i>	<ol style="list-style-type: none">1. Need for reforms of the CDM Governing Institutions2. Need for procedural improvements and provision of adequate resources
<i>CDM reform sub- category:</i>	<ol style="list-style-type: none">1.a Professionalise the CDM governing body(-ies)2.b Agree and implement clear timelines for each regulatory process
<i>Project:</i>	“Reduction of Heavy Fuel Oil usage through the installation of a Gas Engine at Maple Leaf Cement Factory Limited, Iskanderabad, Daud Khel, Mianwali, Pakistan”

- The DOE in Mai 2008 questioned the applicability of AMS III.B to the project including a switch from a multiple fuel baseline to a multiple fuel project scenario.
- On 14/10/2008 the SSC WG issued negative answer on the request for clarification on the applicability of AMS III B to the project case (SSC_223, which was handed in on 20/08/2008 and suggested a request for revision.
- On 12/12/2008 PP requested the revision of AMS III.B (SSC_250).
- On 24/2/2009 the SSC WG at its 19th meeting issued a revised version, answering to different requests. However, the version was of bad quality. The subsequent EB46 meeting sent it back to the SSC WG with the request to de-consolidate the methodology for different scenarios (greenfield, multiple fuel, grid use).
- On 29/4/2009 (SSC20 the SSC WG) drafted in response to the EB’s request two new methodologies, AMS III AE and AF, both not addressing the initial request of SSC_250 anymore. Also EB47 could not approve the two versions and sent them back to the SSC for improvement.
- On 12/6/2009 First Climate provided new substantive input to the 21st SSC WG meeting, drafting another solution to the revision requested initially. This input has been considered in SSC 21 for its work on a new version. SSC22 saw the release of the revised version.
- On 13/10/2009 EB50 finally approves the revision as AMS III AE, valid from 16.10.2009 onwards

Impact:

- Due to the huge delay in the process of revising a comparably simple SSC methodology, the project is constantly losing CERs and chances for registration are shrinking since the project is already commissioned since February 2007.
 - Minimum 12 month delay in issuance
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Improvement recommendation:

- Ensure the working group to stay within the scope of the requests and work them expeditiously.
- Development of new methodologies by the SSC WG only through EB's mandate.
- Speed up discussion process of methodology revisions and involve all concerned consultants actively.
- Make sure that only documents of highest quality are submitted from SSC WG's side to the EB
- Keep SSC methodologies as simple as possible

The project involves major investment (purchase of a new multiple fuel engine). The multiple fuel usage in the project situation is caused by a country-wide gas curtailment period taking place in entire Pakistan during winter times.

This project had a late validation due to several delays in the PDD process caused by the non awareness of CDM in Pakistan. Due to the huge delays in methodology revision and approval, the project now faces delay in issuance and increased risk of rejection by the EB since commissioning has already taken place long time ago.

The PP appreciated the possibility of interaction with the SSC WG that ultimately led to a useful methodology.
