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UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE

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Item 11(a) of the provisional agenda
Methodological issues under the Kyoto Protocol
Carbon dioxide capture and storage in geological formations as clean development mechanism project activities

Views on the eligibility of carbon dioxide capture and storage project activities involving transport of carbon dioxide from one country to another or which involve geological storage sites that are located in more than one country; and on the establishment of a global reserve of certified emission reduction units for carbon dioxide capture and storage project activities

Submissions from Parties and admitted observer organizations

Addendum

1. In addition to the three submissions contained in document FCCC/SBSTA/2012/MISC.8, one further submission has been received.

2. In accordance with the procedure for miscellaneous documents, this submission is attached and reproduced* in the language in which it was received and without formal editing.

* This submission has been electronically imported in order to make it available on electric systems, including the World Wide Web. The secretariat has made every effort to ensure the correct reproduction of the text as submitted.

Submission from India

Indian Submission on CCS

In the COP17 meeting held in Durban, Parties and admitted observer organizations were invited to submit their views on the eligibility of CCS project activities which involve (a) transport of CO2 from one country to another and the storage sites that are located in more than one country and (b) establishment of Global Reserve of certified emission reduction units.

2. India's submission on the above are as follows:

3. As regards eligibility of CCS project activities which involves transport of CO2 from one country to another and the storage sites that are located in more than one country further clarity is needed on the related technology, legality and safety etc.

3.1 Due to non-availability of Global Maps for CO2 storage sites including their storage potential, detailed guidelines/procedures for a site to qualify as a CO2 storage needs to be addressed with scientific basis.

3.2 In cross border CCS projects it may lead to a situation in which a country may suffer from adverse impact of CO2 seepage/leakage etc. which has been created and transported by another country. Therefore, inter-country legal/liability issues need to be harmonized.

3.3 During cross-border transportation and storage the liability arising out of the CCS project shall be shared by multiple countries. However, the liabilities among counties over the entire CCS cycle i.e. operating phase/closer phase/ post closure phase needs attention to fix the responsibility among the countries.

3.4 Also, the responsibility of identification of source of seepage for the storage site located in more than one country need to be ensured.

3.5 In addition, it is suggested that for the consideration of CDM benefits in CCS project, the carbon cost (penalty) of the entire CCS chain, including capture, pumping in pipelines as well as pumping in the storage should be known before hand.

4. As regards establishment of Global Reserve of Certified Emission Reduction (CER) units, it is felt that the establishment of global reserve of CER units may reduce the liability of the project operator. Accordingly, a provision to forward a proportion (5%) of the CERs issued to reserve account of CDM registry, established for the CCS project activity has already been mentioned at para no 21 (b) of the document FCC/KP/CMP/2011/L.4.

4.1 It is suggested that additional 2% of CERs generated for each CCS project should be transferred to global reserve of CERs and it should be used in case of catastrophic release of CO2 from CCS project installation. The amount of CERs to be transferred from the global reserve for a particular CCS project shall be limited to maximum 10 times of its contribution to the global reserve.

4.2 Considering the fact that the CCS projects implemented in the non annex-1 countries may face additional difficulties due to low safety regulations, monitoring and technical capabilities, it is proposed to use a portion of the Global reserve of CERs to help the non-annex countries in developing their technical capabilities.