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*RE: Comments to Project 0017 :  
Methane Emissions Avoidance in Stavropol Gas Distribution Network*

### **Comments on the JI project proposal**

#### **“Methane Emission Avoidance in Stavropol Gas Distribution Network”**

In view of the Russian organisation of the World Wide Fund for Nature (WWF Russia), the given project has a key importance for nature protection and GHG emission reduction in the Russian Federation as well as for purposes of the sustainable development.

WWF Russia would like to highlight just social effect of the project relevant to sustainable development. Natural gas leakage on low pressure distribution network is very painful deal for local population. Avoidance will have very positive reply of local residential sector and public. Public opinion on the Kyoto protocol will be principally better after the project. WWF hopes that the project will mobilize local public to more careful and sustainable use of gas, i.e. more sustainable lifestyle. It will also facilitate to fuel switch from coal to gas, because people will be sure that gas is used properly and gas managers do avoid leakages.

Expert of WWF Russia was attracted to previous similar project in Kaliningrad Oblast. He can confirm that the proposed architecture of the project is effective and completely robust in Russian conditions. The project proposes low-cost options of avoidance of methane losses. It is low-cost, but not BAU option.

The activity is an additional indeed. Additionality is “produced” not only Gore-Tex materials, which are 20-times more expensive than very outdate Russian materials. Additionality is also caused by Russian financial and crediting practice in municipal sector, where local gas managers can not get reasonable credit to save gas because gas has not a value to be accounted in crediting without JI.

An another confirmation of WWF Russia expert directly involved in similar project about 3 years ago is that measurements are certainly required. Leakage varies from place to place and even from point to point. Therefore without direct measurement it is impossible to estimate the baseline and real effect of the project.

Considering high value for local population and goals of the sustainable development, WWF Russia is ready to recommend the project as much as possible, including official statements toward Russian officials and international society.

Best regards

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