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Att: CDM Executive Board

Your ref.:
 CDM Ref 0268

Our ref.:
 MLEH/ETEL

Date:
 15 August 2007

Response to request for review Lages Methane Avoidance Project (0268)

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by three Board members concerning DNV's request for issuance of CERs for project activity 0268 entitled "Lages Methane Avoidance Project", and we would like to provide the following response to the issues raised by the requests for review.

Comment 1:

"The DOE confirmed that "In 2007, after a huge crisis, the quantity of wood processed by Sofia decreased significantly. In this situation, the two major suppliers became Battistella and Multiform, the latest considered as part of the spot market." Further information should be supplied to explain how the DOE verified the high load factor of the facility while the production of waste wood from Battistella and Sofia why has been significantly decreased."

DNV Response:

Although the production of waste wood from Battistella and Sophia has decreased, there had been an increase in the consumption of wood waste from the spot market, resulting in an increase in the total quantity of wood processed. The table below presents the average monthly wood waste consumption (tonnes/month):

	Battistella	Sofia	Spot Market	Total
November - December 2004	6567.2	3740.4	3769.4	14077.0
2005	5474.0	2916.6	3366.3	11756.9
January - May 2006	5560.9	1398.4	6895.9	13855.2
June - December 2006	5280.5	796.0	13918.7	19995.1
January - May 2007	4411.3	146.9	16648.4	21206.6

During the last monitoring period the company entered into agreement with a lot of new wood waste suppliers. This resulted in an increase of the average round trip distance to biomass supply sites, increasing significantly the leakage emissions from off-site transportation, as presented in the table below:

	Number of wood waste suppliers	Average round trip distance to biomass supply sites (km)	Leakage emissions from off-site transportation (ktCO ₂ e/month)
November - December 2004	14	10.2	0.012
2005	28	5.6	0.005
January - May 2006	31	12.3	0.014
June - December 2006	39	20.5	0.034
January - May 2007	60	21.8	0.036

DNV was able to assess a sample of biomass receipts for biomass bought by Lages Bioenergética Ltda from Battistella, Sofia and third suppliers on the spot market from June 2006 to May 2007. The sample included some new suppliers.

Comment 2:

“There is inconsistency regarding the date of the verification. The duration of verification in the section 2 of the verification report stated that the date of preparations, on-site verification and reporting was done in 2006 while the section 2.2 of the report stated that the date is 26-27 June 2007.”

DNV Response:

We acknowledge there was a typing error in the verification report. The correct dates are:

Preparations: 22 June 2007

On-site verification: 26 – 27 June 2007

Reporting: From 02 to 06 July 2007

We sincerely hope that the Board accepts our above explanations.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS



Einar Telnes
Director
International Climate Change Service



Michael Lehmann
Technical Director