

 <p style="text-align: center;">CDM project activity registration review form (F-CDM-RR) <i>(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)</i></p>	
Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	Destruction of HFC-23 at Refrigerant (HCFC-22) Manufacturing Facility of Chemplast Ltd. (0499)
<p>Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review, including any supporting documentation.</p> <p><input type="checkbox"/> <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied; <input type="checkbox"/> Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity (DOE) on how due account was taken of any comments has been received; <input type="checkbox"/> Project participants have submitted to the DOE documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party; <input checked="" type="checkbox"/> The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity, in accordance with paragraphs 43 to 52 of the CDM modalities and procedures; <input checked="" type="checkbox"/> The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board; <input type="checkbox"/> Provisions for monitoring, verification and reporting are in accordance with decision 17/CP.7, the CDM modalities and procedures and relevant decisions of the COP/MOP; <input type="checkbox"/> The project activity conforms to all other requirements for CDM project activities in decision 17/CP.7, the CDM modalities and procedures and relevant decisions by the COP/MOP and the Executive Board. <p><input type="checkbox"/> <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> The DOE shall, prior to the submission of the validation report to the Executive Board, have received from the project participants written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development; <input type="checkbox"/> In accordance with provisions on confidentiality contained in paragraph 27 (h) of the CDM modalities and procedures, the DOE shall make publicly available the project design document; <input type="checkbox"/> The DOE shall receive, within 30 days, comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available; <input type="checkbox"/> After the deadline for receipt of comments, the DOE shall make a determination as to whether, on the basis of the information provided and taking into account the comments received, the project activity should be validated; <input type="checkbox"/> The DOE shall inform project participants of its determination on the validation of the project activity. Notification to the project participants will include confirmation of validation and the date of submission of the validation report to the Executive Board; <input type="checkbox"/> The DOE shall submit to the Executive Board, if it determines the proposed project activity to be valid, a request for registration in the form of a validation report including the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received. <p><input type="checkbox"/> There are only minor issues which should be addressed by the DOE / project participants prior to the registration of the project.</p>	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	26/09/2006

Reasons for Request:

1. A comment received by CarbonWatch raises serious questions regarding the additionality of the project activity: "(...) What this suggests/ point to is the possibility of the baseline scenario being the discontinuation of production of HCFC22 (and thus the emissions of HFC23), the proposed HFC23 incineration results in a scenario which is no different from the BAU. On the contrary as the incineration does not reduce 100% of the HFC23 emission, it in fact increases GHG emissions." Considering that in the response to the above comment the DOE states that "(...) As per the Montreal Protocol, India and refrigerant manufacturer's like CSL are committed to phase out of CFC productions. (...)", and the DOE states in section 3.2 of the Validation Report that "Though in business from 1989, since June 2004, CSL has outsourced the production of refrigerant gases as part of CSL's revamping strategy. Production of

HCFC is now expected to be revived along with the implementation of the project activity in 2007", this should be further clarified.

2. Differently from what is defined in AM0001/ver.03, the amount of natural gas (Q_NGy) used by destruction process is not monitored. It is not explained in PDD whether the destruction process doesn't use natural gas. Methodology says "if a different fuel, such as liquid petroleum gas (LPG), is used for the incineration process, the variables Q_NGy and E_NGy are replaced with variables for the quantity of fuel used and emission coefficient for that fuel. Please clarify.

3. Only final figures are presented for baseline, project and leakage. Initial activity data (such as electricity consumed kwh, data for calculation of leakage, etc) for emission calculations are not provided.

4. The PDD states in Section C that the starting date of the project activity is "15/10/2005 (PDD development started). Incineration plant is expected to start operation by March 2007". However, the starting date of the crediting period is stated as 01/10/2006. The crediting period cannot start before plant operation. Please correct it.