

CDM project activity registration review form (F-CDM-RR) (By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)

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| Designated national authority/Executive Board member submitting this form | |
| Title of the proposed CDM project activity submitted for registration | India-FaL-G Brick and Blocks Project No.1 (0707) |
| 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. | |
| ☐ The following are requirements derived from paragraph 37 of the CDM modalities and procedures: | |
| ☐ The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied; | |
| ☐ 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; | |
| ☐ 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; | |
| ☐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; | |
| The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board; | |
| ☐ 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; | |
| 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. | |
| ☐ The following are requirements derived from paragraph 40 of the CDM modalities and procedures: | |
| ☐ 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; | |
| ☐ 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; | |
| ☐ 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; | |
| 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; | |
| ☐ 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; | |
| ☐ 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. | |
| ☐ There are only minor issues which should be addressed by the DOE / project participants prior to the registration of the project. | |
| Section below to be filled in by UNFCCC secretariat | |
| Date received at UNECCC secretariat | 30/11/2006 |

Reasons for Request:

- 1. This project activity refers to AMS II D which is a methodology for energy efficiency. This project does not include an energy efficiency measure. What is done here is the switch from one brick manufacturing process to a less energy intensive one. This seems to go beyond what was assumed in the context of AMS II D. Therefore the detailed methodology that is provided should be assessed by the SSC working group before being accepted by the EB.
- 2. Neither the PDD nor the validation report provide references proving that CDM was an important factor when the investment decision was taken. Since the project will request retroactive credits, strong evidences that CDM was considered from project inception are necessary. Moreover, it is stated that "the PDD for the project was prepared and offered for validation after 31st December 2005", and the Validation Report says that "It was verified that the

project proponent was in the process of having a discussion with the Small Scale working group of UNFCCC regarding a new methodology for the project and was recommended to use the AMS II D methodology.". However, the COP/MOP decision regarding retroactive credits states that these can be requested by "project activities that started in the period between 1 January 2000 and 18 November 2004 and have not yet requested registration but have either submitted a new methodology or have requested validation by a designated operational entity by 31 December 2005 (...)". Therefore, the project does not comply with the requirements for prompt start project activities.

3. The product produced in this project (FaL-G bricks) utilizes cement/lime and other industrial products that caused GHG emission during their production process. These emissions should be included in the project emissions.