

 <p>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	Al-Shaheen Oil Field Gas Recovery and Utilization Project (Project 0763)
<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 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 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 checked="" 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 checked="" 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	07/02/2007

Reasons for Requesting a Review

1. The DOE has not been completely transparent in the way it handled and reported in the validation report the differences in the PDD published for public comments (Version 1 of 25 August 2006) and the PDD submitted/uploaded for registration (Version 2 of 9 October 2006).

- Significant differences in the estimated emission reductions in both versions of the PDD. Over the 7 years crediting period, estimated emission reductions were 10,204,674 tonnes of CO₂e in Version 1 and 17,497,540 tonnes of CO₂e in Version 2.
- Differences in project participants and their listed representatives
 - In Version 1 both Maersk Oil Qatar and Qatar Petroleum are both listed as project participants, but in the revised PDD (Version 2) Qatar Petroleum is listed as the only project participant.
 - In Page 4, Section A.3 (Project Participants) – Version 1 states "*The Project Developer is Maersk Oil Qatar and Qatar Petroleum is a main partner*" while Version 2 states "*The Project Developer for the Al-Shaheen Project is Qatar Petroleum and Maersk Oil Qatar is a main partner*".
 - Page 16, Paragraph 2 of Version 1 shows the level of involvement and investment by both Maersk Oil and Qatar Petroleum. However, last paragraph on Page 20 of Version 2 ascribes the same level of investment to only Qatar Petroleum without any reference to Maersk Oil.

In view of the statement by DNV in the second paragraph of Section 2.3 (Page 5) of the Validation Report, it is difficult to understand what concerns were raised by DNV that led Qatar Petroleum and EcoSecurities to decide to revise the list of project participants. Also, it is difficult to see how DNV can consider the above inconsistencies between Page 16 of Version 1 and Page 20 of Version 2 justifiable explanations to any concerns it might have raised during validation.

Furthermore, in view of the above changes introduced in Version 2 of the PDD, the Doe should have provided some justification why it did not consider it necessary that the revised PDD should have been re-published for public comments.

2. Participation requirements may not appear to have been completely met if Maersk Oil is a *bona fide* Project Participant.
 - The significant role and responsibilities of Maersk Oil in ensuring a successful execution and implementation of the project activity remain the same in both versions of the PDD and yet no evidence is provided to show voluntary withdrawal of Maersk Oil as a project participant. Both versions of the PDD indicated under the purpose of the project activity (A.2, Page 2) that Maersk Oil is responsible for operating the project and list Maersk Oil as the "Project Developer"
 - There are several emphases in the PDD on technology transfer. First paragraph under Section A.4.3 of both versions of the PDD, for example, emphasize strong partnership between Qatar Petroleum and Maersk Oil, as well as the use of Maersk Oil 's state of the art technology.

If Maersk Oil is a *bona fide* project participant, as listed in Version 1 of the PDD published for public comment, then a letter of authorization, in respect of Maersk Oil, is required from the DNA of the Party involved. The DOE does not appear to have been completely transparent in its assessment of this participation requirement.

Furthermore, DNV was not completely transparent in its reflection of CAR1 (Table 3, Page A.20 of the Validation Report). If CAR1 correctly reflects that DNA approval status is missing in respect of both project participants (Maersk Oil & Qatar Petroleum) listed in Version1 of the PDD being validated at the time, the DNA LoA only in respect of Qatar Petroleum should not be accepted as adequate resolution of CAR1.