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Att: CDM Executive Board

Your ref.:
 CDM Ref 0861

Our ref.:
 ETEL/KCHA

Date:
 04 April 2007

Response to request for review “ACEL Blended cement project at Sankrail grinding unit” (0861)

Dear Members of the CDM Executive Board,

We refer to the requests for review raised by three Board members concerning DNV’s request for registration of the “ACEL Blended cement project at Sankrail grinding unit” (0861)

and would like to provide the following initial response to the issues raised by the requests for review.

Comment 1:

The documentation containing comprehensive information on market and educational barriers and planned efforts should be made available to the EB members. So far only on the basis of statement that such documentation was provided to the DOE and that the information is publicly available it cannot be confirmed that §43/§44 of the CDM modalities and procedures are met.

It also cannot be confirmed that claims for retroactive credits would be justifiable unless clarity is provided. The evidence that the incentive from the CDM was seriously considered in the decision to proceed with the project activity should be also provided.

DNV Response:

We reiterate, that during the validation DNV assessed that the project meets the eligibility criteria for claiming retro-active credits. The following documents, which were assessed during the validation, are attached with this response (**Attachment – I**):

- i. E-mails from Zenith Corporate Services Limited to Mr. U. R. Raju dated 10 July 2003 discussing prospects of CDM projects.
- ii. A PIN (Project Information Note) for the project dated November 2003 which explicitly addresses the CDM prospect of the Sankrail grinding unit project activity.

For assessing the project additionality through barriers related to market perception and education among the consumers the following documents were verified during the validation:

- i. For establishing the lower acceptability of high fly ash blended cement due to its colour, settling time, lower strength etc., samples of customer complaints concerning these issues from the project period, which involves PPC with high fly ash blending have been assessed during the validation (**Attachment – II**). These complaints also demonstrate the lack of knowledge regarding the correct technique of using PPC. During interactions with the masons; some of the masons also complained of impurity in the cement which was mistakenly attributed to the floating carbon particles during mortar preparation.
- ii. The training and marketing activities carried out to increase the education level and thus acceptability of high fly ash blended cement were assessed from the training conducted for technical services, masons and consumers (**Attachment – III**)
- iii. The planned activities pertaining to a forward action plan to facilitate the use and acceptability of high fly ash blended cement. (**Attachment - IV**)

In our opinion, the above documentation provides sufficient input to confirm that §43/§44 of the CDM modalities and procedures are met.

Comment 2:

For baseline emission calculation the PDD shows in Section B the calculated values for data like BE calcin, BE fossil_fuel etc. However, only the results but not the input variables to arrive at the results are documented in the PDD. It is unclear what the input values are.

DNV Response:

During the validation DNV assessed all the calculations thoroughly. The detailed baseline emission calculation spreadsheets as assessed during the validation are attached to this response. (**Attachment – V**).

Comment 3:

Editorial corrections to PDD and/or Validation Report

- See CL3 at page A-28: 12 cement plants in the region minus 4 plants not considered in the region equals 8 plants. It is unclear why only 7 plants are mentioned in the ‘summary of project participants’ response and not 8. In the final conclusion it should read: “The exclusion of the 4 plants is acceptable since the data for these four (not five as mentioned in the text) plants are unreliable.

DNV Response:

The 7 plants indicated in the ‘Summary of Project Participants’ Response’ refer to the 7 plants other than the project activity. Since the region selection criteria as per ACM0005 stipulates that the selected region should ‘include at least 5 other plants with the required published data’, the project proponent has identified these other 7 plants beside the project activity plant during the establishment of the region. This has been explicitly mentioned in the revised PDD (**Attachment – VI**). However, for establishing the benchmark clinker %, all of the 8 plants for which reliable data is publicly available have been assessed.

DNV acknowledges the typographical error in the conclusion and expresses sincere gratitude to the Executive Board for pointing this out. The corrected validation report is attached with this response. (**Attachment – VII**).

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully
for DNV CERTIFICATION AS



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