



UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D-53153 Bonn
Germany

DET NORSKE VERITAS
DNV CERTIFICATION AS
Veritasveien 1
1322 Høvik
Norway
Tel: +47 - 6757 9900
Fax: +47 6757 9911
<http://www.dnv.com>

Att: CDM Executive Board

Your ref.:
CDM Ref 1104

Our ref.:
MLEH/ETEL

Date:
26 July 2007

Response to request for clarifications

Review of “Ancon-EcoMethane Landfill Gas Project” (1104)

Dear CDM Executive Board Members,

We refer to the request for clarifications with regard to the request for review related to DNV’s request for registration of the “Ancon-EcoMethane Landfill Gas Project” (1104) and would like to provide the following clarifications.

Comment no. 1:

It should be more clearly indicated how the statement that local regulations regarding LFG capture and flaring are not enforced has been validated. [The list of alternatives does not include the possibility of a low pressure cogeneration system designed to meet the captive needs of the sugar plant].

PP/DNV’s Response

This matter was validated through interviews with two representatives of DIGESA (Dirección General de Salud Ambiental) belonging to the Ministry of the Environment into the Department of Environmental Health. The meeting was held on November 07th, 2006.

During the interview, both persons, José Tello Molina and Vilma Morales, clearly confirmed that local regulations such as Law 27314 (general law for solid waste management), as well as Decree No 057-04-PCM were not in force. Law 27314 is perceived by DIGESA personnel as a guideline for waste handling, and does not provide any detailed guidelines regarding LFG handling. Hence, due to the fact that no details for LFG capture and handling are mentioned in this document it is considered not in force.

The bracketed last part of the comments regarding alternatives regarding sugar plant seems to have been misplaced for this project and is not considered as the project 1104 is a landfill gas project and no sugar plant is involved.

Comment no. 2:

Further information is required to substantiate how the proposed 5% adjustment factor is in accordance with the approved methodology.

PP/DNV's Response

According to the applied Approved Methodology it is stated that:

“In cases where regulatory or contractual requirements do not specify $MD_{reg,y}$ an “Adjustment Factor” (AF) shall be used and justified, taking into account the project context.

The following examples provide guidance on how to estimate AF:

- *In cases where a specific system for collection and destruction of methane is mandated by regulatory or contractual requirements, the ratio of the destruction efficiency of that system to the destruction efficiency of the system used in the project activity shall be used.*
- *In cases where a specific percentage of the “generated” amount of methane to be collected and destroyed is specified in the contract or mandated by regulations, this percentage divided by an assumed efficiency for the collection and destruction system used in the project activity shall be used.*

Thus, given the methodology requirements the Project Developer is not obliged to apply any AF to this proposed project activity as neither regulatory nor contractual requirements do exist. By applying a 5% AF for this particular project activity, the Landfill Operator's practice of lighting some of the passive gas wells randomly and reflecting the project circumstances is taken into account. So for reasons of conservativeness, and in order to take into account that a small amount of LFG was actually flared in the baseline scenario; the Project Developer chose a 5% AF. In this context it must also be said that the passive gas venting system, which consists of old oil drums, does not capture the generated LFG in an effective way, hence a 5% AF can be considered conservative.

In addition and as required by the methodology in section “Data to be collected or used to monitor emissions from the project activity”, under variable 13, “Regulatory requirements relating to landfill gas projects”, the project meets the requirement to monitor National legislation and mandatory regulations annually and will use this to identify any changes to the adjustment factor (AF) or directly to $MD_{reg,y}$ at renewal of the credit period (see PDD section B.7.1)

We sincerely hope that the Board accepts our aforementioned explanations.

Yours faithfully

for DET NORSKE VERITAS CERTIFICATION AS



Einar Telnes
Director
International Climate Change Services



Michael Lehmann
Technical Director