

 <p><b>CDM project activity registration review form (F-CDM-RR)</b>  <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>	
<b>Designated national authority/Executive Board member submitting this form</b>	
<b>Title of the proposed CDM project activity submitted for registration</b>	Terrestre Ambiental Landfill Gás Project; Project activity 1133
<p><b>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.</b></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"> <li><input type="checkbox"/> The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied;</li> <li><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;</li> <li><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;</li> <li><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;</li> <li><input checked="" type="checkbox"/> The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board;</li> <li><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;</li> <li><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.</li> </ul> <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"> <li><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;</li> <li><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;</li> <li><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;</li> <li><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;</li> <li><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;</li> <li><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.</li> </ul> <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>	
<b>Section below to be filled in by UNFCCC secretariat</b>	
Date received at UNFCCC secretariat	13/11/2007

Reasons for request:

1. Version 3 of the Tool for the demonstration and assessment of additionality should be applied.
2. The PDD states that "One reason for the small quantity of landfill power generation is the lack of technical expertise in the country. As there was so far just little research on this subject in Brazil, the companies that decide to use this kind of technology, will preferably buy the equipments from companies based in US or EU, and train the work labor to operate the system". The DOE shall further clarify how they have verified and then validated the accuracy of this statement against other large scale project activities in Brazil that precisely use the technical expertise that is lacking according to the argument in the paragraph.

3. In order to provide evidence of the additionality of the project activity, the PDD states that “In addition, there is a lack of funding in Brazil. CNI says that “...the bank loans are expensive; the payments are in short terms and not enough to supply the market. The capital market is not very developed, restricting the shares sells and others bonds directly to investors. And external financing, in the last years, has been oscillating in payment terms and costs, also being an unstable resource”. Furthermore, to get the loans, companies underwent through lot of bureaucracy, and the whole process could last months”. However this supporting evidence is a statement by the Confederação Nacional da Indústria dated 2003. Further evidence is requested.
4. To apply the simple cost analysis the PDD merely states that “As already mentioned before, there is a high investment cost related to biogas collection in Brazil. If a project implements only the biogas collection and flaring system, a rough cost estimate is around USD 1,000,000.00 (or about € 775,000.00) for a similar project” and adds a table with equipment costs. Further evidence and substantiation is required.
5. The evidence provided in the common practice analysis is dated in 2000. Updated information is required.
6. As per the tool to determine project emissions from flaring gases containing methane, the type of flare and the approach to determine its efficiency should be documented and validated.
7. The DOE should confirm how the appropriateness of the 20% adjustment factor being applied in this project activity has been validated.