

 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>	
Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	Amurang Biomass Cogeneration Project; Project activity 1141
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.	
☐ <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i> ☐ 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. ☐ <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i> ☐ 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 UNFCCC secretariat	09/10/2007

Reason for request:

1. The PP shall further demonstrate the additionality of the project activity.
2. As the baseline plant was not operational prior to the project activity, further clarification is required on how the baseline has been validated with reference to paragraph 6 of the applied methodology, including clarification that the diesel generators would continue to operate in the absence of the project activity.
3. In addition, as the plant was not operating at the time the project activity began, no fossil fuel was being consumed and therefore the project activity would not bring about any real emissions reductions. Furthermore, no information is provided as to when the existing facility ceased operations and what the plans were to start it up again. The only

additional information given is that the previous owners of the plant had financial difficulties. There is no indication that the new owner, Cargill, ever planned to operate the plant using diesel.

4. Further, a barrier is claimed related to the risk associated with the long term supply of biomass since there is “no guarantee of a long term supply”. Page 9 of the PDD claims that there is a continued risk of shortage of the supply of biomass residues due to uncontrollable circumstances such as natural disasters or pests. However, it is also claimed that there is a surplus of supply of biomass so that potential leakage from competing uses of biomass can be neglected. In the validation report (page 12) the DOE states that: the analysis of the quantity of available biomass in the region (e.g. 50 km radius) has shown that there is a surplus of at least 50,000 tonne/year of biomass from the two regions where the copra will be sought, that is at least 25% larger than the quantity of biomass that is utilized including the project activity. Further clarification is required on these inconsistencies, including the statement that when there is a scarcity of supply the diesel generator will be used as a back-up.
5. Since the thermal capacity of the boiler is less than the 45 MW thermal threshold for cogeneration systems, the application of small-scale methodology I.C is appropriate. Under this methodology the baseline is the fuel consumption of the technologies that would have been used in the absence of the project activity times an emission coefficient for the fossil fuel displaced. The project activity determines baseline emissions assuming that diesel fuel was used in the absence of the project activity, and under this assumption the methodology is applied correctly, using default emission coefficients for diesel, and both for heat and for electricity (according to AMS I.D). However, if the facility has not been operating in recent years, and no fossil fuel was being used in the absence of the project activity, then no fossil fuel is in fact being displaced, and the baseline is actually zero emissions.
6. Information should be provided regarding when the facility ceased to operate and for what reasons, as well as if there were plans to restart operations using fossil fuel.
7. The DOE shall further clarify under what rationale and how they have validated the fact that the plant is not being operational.