



**CDM project activity registration review form (F-CDM-RR)**  
**(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)**

<b>Designated national authority/Executive Board member submitting this form</b>	
<b>Title of the proposed CDM project activity submitted for registration</b>	Nobrecel fuel switch in black liquor boiler Project; Project activity I224

**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.**

- ☐ *The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*
- ☐ 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.
- ☐ *The following are requirements derived from paragraph 40 of the CDM modalities and procedures:*
- ☐ 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	25/09/2007
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Reason for request:

1. Further demonstration of the additionality of the project activity is required.
2. Further clarification is required on how the start date of the project activity has been validated.
3. In the context of the above start date, the appropriateness of the benchmark should be justified.



4. As per paragraph 12.b of the “Indicative simplified baseline and monitoring methodologies for selected small-scale CDM project activity categories” v.10, data variables such as quantity of fuel inputs should be measured continuously and data elements such as emission factors, calorific value should be measured or calculated at least once in year.
5. Given that the capacity of the project activity with the claimed boiler efficiency falls under 45 MW<sub>thermal</sub>, the project participants have applied the approved small scale methodology AMS.I.C Version 9. The methodology requires calculation of EG<sub>historical</sub>, which is the average of historical thermal energy delivered by the existing facility, spanning all data from the most recent available year (or month, week or other time period) to the time at which the facility was constructed, retrofitted or modified in a manner that significantly affected output (i.e., by 5% or more). A minimum of 3 years (excluding abnormal years) of historical production data is required. The project participants have chosen the three years 1999 to 2001, which are not the most recent three years. The PDD (Last paragraph of Section A.4.2 on page 5) mentions that “All these three phases will be implemented by the end of 2006”. Hence it will be appropriate to use the years 2004 to 2006 being the most recent three years for calculating EG<sub>historical</sub>. With these base years the three years historic average steam production from black liquor is 247,618 MWh (as against 184,211 MWh). The additional steam production qualifying for emission reduction will be 75,382 MWh resulting in baseline emissions of 19,801 tCO<sub>2</sub>e/annum and emission reductions of 16,674 tCO<sub>2</sub>e. Further clarification is required and adjustment is required.