

 <p>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></p>	
Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	Quezon City Controlled Disposal Facility Biogas Emission Reduction Project; Project activity 1258
<p>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.</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"> <input type="checkbox"/> The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied; <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; <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; <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; <input checked="" type="checkbox"/> The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board; <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; <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. <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"> <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; <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; <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; <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; <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; <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. <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>	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	15/11/2007

Reasons for request:

1. Further substantiation is required regarding the choice of a 10 year assessment period for the investment analysis.
2. Further explanation should be provided regarding why tax is assumed to be paid in years when there is no net income from the project activity, and the DOE should confirm by what process the input values used in the investment analysis have been validated.
3. in page 3 of the PDD, the PP states that "The 22-hectare disposal facility was the disposal site for Metro Manila's municipal solid waste (MSW) from 1973 until July 2000 when it was prematurely closed due to a tragic trashslide" and that "...due to lack of alternative disposal sites, it was reopened in November 2000 pursuant to an Executive Order



signed by President Joseph Estrada instructing the conversion of this open dump to a controlled dump and making it an exclusive dumpsite of Quezon City”. Further clarification is requested of which areas (cells) of the dumping site were affected by the slide, and to which degree they have become inoperative for methane and leachate collection, which parts of the dumping site will be operated by the project with the specification of cells, location in relation to the slide site, etc..

4. Further information and clarification is required on which is the exact technical description of a “controlled dumpsite” in relation to a sanitary landfill, in the framework of the Philippine regulations, and whether the operation of the project activity requires the installation of a biogas collection network, which might not have been in place at the time of utilization of the site as a dumping site. This operation could lead to the emission of methane to the atmosphere, the degree of which should be discounted as emissions from the project activity, and that could eventually be greater than the intended emissions reductions.
5. Due to the operational conditions described above, the project activity might not be applying a proper method for the estimation of baseline emissions. On the first place, the FOD model developed by the US-EPA applies to sanitary landfill conditions which were designed and implemented from the start with its biogas collection system in place, and these conditions might well vary if the site was a dumping site in the first place and a “controlled dumping site”, afterwards. No technical explanation is given about the meaning of a “controlled dumping site” in Philippines and what does this mean regarding a biogas collection system. No adjustment factor has also been specified by the PP to take this into account. The FOD models used by the IPCC refer generally to properly constructed sanitary landfills, with a system for compaction and storing in cells of solid waste, and a separation between domestic and commercial waste, on one hand, and hazardous waste, on the other.
6. In page 10 of the PDD, it is stated that “According to this law [Republic Act No. 9003 note of reviewer], only in sanitary landfills with waste in place amounting to more than 500,000 tons should a gas control system be installed”. Further clarification is required if this means that a “gas control” system was already installed at the Baragay Payatas site, and the nature of this system (bamboo or PVC pipes).
7. Further information and description of the project activity, including the appropriate technical descriptions about the operational condition of the project activity which must be included in the PDD, more specifically about conditions for biogas collection in new and old areas (cells?) of the dumpsite, including:
 - i. preliminary lining of the terrain
 - ii. nature and layout of the tubing and piping
 - iii. compaction procedures and degree
 - iv. drainage of leachate and gas, etc
8. The PP states in page 14 of the PDD that “the dumpsites cause serious public health, environmental and social impacts. They have inadequate fencing, signage and security provisions. Unrestricted access is prevalent. The presence of 4,000 waste pickers at the dumpsites is dangerous. They are poorly protected and at severe public health risk”. It is not clear to which degree is the project activity affected by these conditions and whether the monitoring plan is adequate for these specific conditions.
9. The DOE shall further clarify how they assessed and validated the applicability of the applied methodology to this specific project activity.