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)	
Designated national authority/Executive Board member submitting this form	
	1598 Emission reductions through partial substitution of fossil fuel with alternative fuels in the 2 cement plants of PT Holcim Indonesia Tbk
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;	
shall make publicly available the project design document;	d in paragraph 27 (h) of the CDM modalities and procedures, the DOE
☐ The DOE shall receive, within 30 days, comments on the accredited non-governmental organizations and make them p	validation requirements from Parties, stakeholders and UNFCCC 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.	

1. The DOE should further explain and give a positive validation opinion on the key assumptions in the sensitivity analysis, in particular the coal and biomass price forecasts.

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2. Taking into consideration that Holcim is an international operating company with broad experience on proces optimization, the DOE should confirm the prevailing practice barrier, i.e., whether the project activity is the first-of-its kind for Holcim, and that the technological barriers associated with the partial substitution of coal with biomass would have prevented the implementation of the project activity without CDM.

Section below to be filled in by UNFCCC secretariat

Date received at UNFCCC secretariat

## UNFCCC/CCNUCC



**CDM - Executive Board** 



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3. Given the international experience of Holcim in optimization of cement production, the DOE should confirm that the CER revenues were necessary to proceed with the project activity given the delay in its submission for validation and provide a detailed timeline of actions taken towards CDM registration and if possible, a third-party evidence of prior consideration of the CDM.