

Araucaria, 29/10/08

Dear Members of the CDM Executive Board,

Please be so kind as to find below our responses to the issues raised in the following request for review, received on September 19th 2008 from the Secretariat of the Executive Board:

Request for review for: “Fosfertil Piaçaguera NAP 2 Nitrous Oxide Abatement Project” (1784)

AA) Request for review:

1. The PP/DOE are requested to clarify if the review of permitted operating conditions and baseline emission factor for the project activity is part of the validation or not. In doing so, the DOE shall explicitly mention the parameters that are ex-ante and the parameters that have to be verified ex-post by the verifying DOE.

The Project Proponent wishes to point out that the full documentation used in the permitted operating conditions determination was presented to DNV during the validation process. Therefore, DNV validated the values presented in the PDD.

The baseline campaign finished after the validation process, therefore the completed baseline campaign will be verified during the first verification process.

2. The PP/DOE are requested to clarify why all the parameters required by the AM0034 (version 02) are not included in the monitoring plan of the PDD. In doing so PP/DOE are required to explicitly document all the monitoring requirements such as monitoring frequency, description of monitoring methods and procedures.

According to the methodology, the following parameters are determined once, before the start of the baseline campaign: normal operating temperature range, normal operating pressure range, maximum ammonia flow rate, maximum ammonia to air flow rate, normal campaign length, normal gauze supplier, and normal gauze composition. Once these parameters are determined, they remain constant throughout the entire life of the project, in view of which they were included in section B.6.2 instead of B.7.1 of the PDD.

The parameters total N₂O emissions during the baseline campaign (BE_{BC}), total N₂O for project campaign (PE_n), emission factor used to calculate emission reductions (EF_p) are calculated parameters, described in the PDD, but were not included in section B.7.1 by mistake.

The updated version of the PDD includes these parameters in the monitoring plan with the following descriptions;

- Total N₂O emissions during the baseline campaign (BE_{BC}): N₂O baseline emission will be calculated based on measurements of stack gas flow rate, N₂O concentration, and the operating hours. All parameters will be measured during a complete campaign before project implementation to properly characterize N₂O baseline emissions. No QA/QC procedure is needed.
- Total N₂O for project campaign (PE_n): N₂O project emission will be calculated based on measurements of; stack gas flow rate, N₂O concentration, and the operating hours. All parameters will be measured during a project campaign to properly characterize N₂O project emissions. No QA/QC procedure is needed.
- Emission factor used to calculate emission reductions (EF_p): Emission factor used to calculate the emission from the particular campaign. Calculated using campaign emission factors, EF_p will be determined as the higher of EF_{mn,a} and EF_n. Calculated after end of each project campaign. No QA/QC procedure is needed.

3. PP/DOE are requested to confirm that the crediting period will not start before the date of registration or the completion of the baseline campaign, whichever is later.

As the completion of the baseline campaign already happened, the Project Proponent confirms that the crediting period will not start before project registration.

BB) Identification of a contact person:

We inform that the contact person for the review process is:
María Inés Hidalgo, ihidalgo@mgminter.com; +54-11-52191230

Best Regards,

A handwritten signature in black ink, appearing to read 'Ricardo' followed by a stylized flourish.

Ricardo Prado Santos, ricardosantos@fosfertil.com.br, +55 41 36411907