



**CDM project activity/programme of activities registration request review form (CDM-REGR-FORM)  
(Version 03.0)**

**Section 1. General Information**

|   |   |
|---|---|
| <b>Designated national authority/Executive Board member submitting this form (Name in print)</b>                                      |   |
| <b>Title and UNFCCC reference number of the proposed project activity or programme of activities (PoA) submitted for registration</b> | 5460 Compost from Municipal Solid Waste in Peshawar, Pakistan |

**Section 2. Basis for review request**

*Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures (the annex to decision 3/CMP.1), which validation requirements may require review. Please tick the appropriate boxes in the list of requirements below. For requesting a review of a proposed afforestation or reforestation project activity or PoA, please refer to paragraphs 12 and 15 of the CDM modalities and procedures for afforestation and reforestation project activities (the annex to decision 5/CMP.1), and tick the equivalent boxes below mutatis mutandis.*

*The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*

- ☐ The participation requirements as set out in paragraph 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 of 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 3: Comments supporting review request**

*Please elaborate the reason for requesting a review on the requirements you indicated in section 2 above.*

1) The DOE shall provide information on how it has assessed the barrier analysis. In particular, the DOE shall provide more information on how it has validated:

- the absence of a market value for compost in Pakistan.
- the non-quantifiable nature of barriers listed in the analysis, mainly, competition of subsidized chemical fertiliser and lack of infrastructure.
- the availability of trained labour barrier.
- the relevancy of tipping fees in the context of this proposed project (Validation Report, p. 21), as tipping fees are charged by entities collecting or receiving waste (e.g. landfills) instead of composting facilities.
- the prevailing practice barrier, as well as the common practice analysis, including the first of its kind claim and its relevant temporary, geographical and technological scope. Please refer to VVM v 1.2 paragraph 118 (a) and (b), EB 50 Annex 13.

2) The DOE shall describe the steps taken to assess the identification of the baseline scenario of the project activity. In particular, the DOE/PP should provide more information regarding the assessment of credible alternatives for power generation in the absence of the project activity (e.g. landfill and/or composting with electricity generation), considering that the Pakistan government "promotes the production of biogas" (Validation Report, p. 132), which in turn could be used to generate electricity. Please refer to VVM v1.2 paragraph 87, AM0025 v12 step 1..

Date received at UNFCCC secretariat

27 Jun 12