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Att: CDM Executive Board

Your ref.:  
CDM Ref 0003

Our ref.:  
SUHA/MLEH

Date:  
28 September 2006

### **Response to request for review**

#### **Request of issuance of CERs for the “HFC Decomposition Project in Ulsan” (CDM Registration Reference No 0003).**

Dear Members of the CDM Executive Board,

We refer to the four requests for review on DNV’s request for issuance of CERs from the “HFC Decomposition Project in Ulsan” (CDM Registration Reference No 0003) and would like to provide the following initial response to the issues raised in the requests for review:

*The Revised Monitoring Report does not include results of the monitoring of the following parameter, required by the methodology and by the PDD Monitoring Plan: AM001v02 p.9 ID7: “The quantity of HCFC 22 produced in the plant generating the HFC 23 waste”.*

The revised monitoring report does not include results of the monitoring of the quantity of HCFC 22 produced because this data is confidential. This data is not used to determine additionality, to describe the baseline methodology and its application, and to support an environmental impact assessment and can thus be considered confidential. In their parallel response to this requests for review, the project participants disclose the amount. For future cases, DNV proposes to submit two version of the monitoring report: One marked up version where the quantity of HCFC 22 is made illegible so that this can be made publicly available, and a second version containing all information which shall be treated as strictly confidential by all handling this documentation (Board members, RIT member and the secretariat).

*As the substitution for this parameter, the DOE verifies in Revised Monitoring Report p.11:*

*“The coefficient w in monitored period was less than 2.90% (cut off ratio defined in PDD).” The DOE does not explain what is exact value of “w” and how it was calculated (It is indicated that the HCFC22 production rate is confidential data which is not consistent with the CDM MP)*

As stated in DNV verification / certification report, DNV has assessed the reported “w” and confirmed that ratio never exceeded the 3.0% limit set by the monitoring methodology or the 2.9% threshold applied by the site for this factor. DNV did not explain what the exact value of “w” is because this would allow for the calculation of the quantity of HCFC 22 produced which is confidential. In their parallel answer to this request for review, the project participants disclose the value of “w”. For future cases, DNV proposes to submit two versions of the monitoring report as described above.

*The DOE does not address the requirement of the methodology that the HCFC22 production rate used for the CERs calculation shall be capped by the historical HCFC production rate (2000/2002)*

The project is registered based on version 02 of AM0001 and this version does not require to cap the HCFC 22 production rate by the historical rate.

We sincerely hope that the Board members find our elaboration on the issues raised in the requests for review satisfactory. In case any further clarifications are needed, please do not hesitate to contact us.

Yours faithfully  
for DET NORSKE VERITAS CERTIFICATION LTD



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