

 CDM project activity registration review form <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>	
Designated national authority/Executive Board member submitting this form	
Title of the proposed CDM project activity submitted for registration	Nubarashen Landfill Gas Capture and Power Generation Project in Yerevan
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.	
<input type="checkbox"/> <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i> <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 checked="" type="checkbox"/> XX 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 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"/> XX 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 checked="" type="checkbox"/> XX 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. <input type="checkbox"/> <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i> <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. 	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	

Rationale of Request for review:

a. Format of the PDD

It is stated clearly in “CLEAN DEVELOPMENT MECHANISM PROJECT DESIGN DOCUMENT FORM (CDM PDD) Version 02 - in effect as of: 1 July 2004)” that “This template shall not be altered. It shall be completed without modifying/adding headings or logo, format or font.” However, the developers of this PDD have added two levels of sub-headings in section B.2 (e.g. B.2.1. Concerning how the consolidated baseline methodology in LFG project activities is applied to the project; B.2.2.0. Step 0: Preliminary screening based on the starting date of the project activity).

b. Inconsistency within the PDD

In section A.3 of the PDD, three project participants are listed, while in the Annex 1, five are listed.

c. Environmental impact assessment

In Section F.2 of the PDD, it is stated that “At the same time, Ministry of Nature Protection of Armenia has the same opinion, and says ‘There is no need to implement environmental impact assessment at the stage of PDD.’” This means that in the future, it is possible that an environmental impact assessment will be necessarily made. Under this condition, without knowing the conclusion of the EIA, it seems that it is not appropriate for the selected DOE to validate the project. Further, relevant certificate should be provided at least.

d. Correction application of the selected methodology

In the PDD, the project boundary does not include the landfill. However, according to the selected methodology, “The project boundary is the site of the project activity where the gas is captured and destroyed/used.” Therefore, the landfill should be included in the project boundary. The current project boundary only cover the pipeline gas, not cover the landfill. And more serious issue could be: the project may not be a small scale project if the project boundary cover the landfill, and if so, then the baseline and monitoring methodology that this project is applied to can not be applied any more, and hence, the PDD of this project activity should be revised and resubmitted. For this point, further analysis or response, either from the DOE or project participants, or from an independent expert, would surely be required.

e. Correct quotation of the selected methodology

In sections B.1.1 and D.2, the PDD has incorrectly quoted the selected PDD, i.e. the contents in the double quotation marks in these sections are not that contained in the approved methodology.

2. Minor issue:

In section B.2 of the PDD, no explanation has been provided for the parameters contained in the formulae used. In the sub-sections of part E, main conclusions, which are currently absent from the main text, should be provided.

Conclusion: This project could be registered under the condition that the above-mentioned problems have been appropriated addressed. However, it should be further noted that in the approval letter of the Armenian DNA, it is stated that “3. This letter shall only be valid in case the Project Design Document submitted to the Executive Board of the Clean Development Mechanism for registration corresponds to the information available on the above mentioned web-pages”. This means that if the PDD is revised, the project participants need to get a new approval letter from the Armenian Government.