

 CDM project activity issuance 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 (Name in print)	
Title of the proposed CDM project activity for which issuance is requested	Project for GHG emission reduction by thermal oxidation of HFC 23 in Gujarat, India (0001)
DOE that requested for issuance and date of request	SGS 25/05/07
Please indicate, in accordance with paragraphs 65 of the CDM modalities and procedures, for which reason(s) you request review. (Place a cross (X) in front of the reason)	
<input type="checkbox"/> <i>Fraud</i> <input type="checkbox"/> <i>Malfeasance</i> <input checked="" type="checkbox"/> <i>Incompetence</i>	

1. The Monitoring Report does not include readings of the monitored parameters

The "TENTH MONITORING REPORT" dated 17/05/2007 (called farther MRv1) and the Confidential monitoring workbook.xls file (called farther XLS file) do not include readings of the monitored parameters and the daily totals.

2. The monitoring is not according to the approved methodology

The methodology applied AM001v02 p.9 requires monitoring of the following parameters that cannot be found in the MRv1+XLS:

- ID7 - Q_HCFCy - "The quantity of HCFC 22 produced in the plant generating the HFC 23 waste".
This parameter was replaced in the XLS file by "Cumulative HCFC22 Production during the year - based on actual plant figures".
- ID8 - HFC23_sold – "HFC 23 sold by the facility generating the HFC 23 waste"

This parameter was not monitored.

However, this parameter was checked by the DOE, as described in Verification Report APRIL 01 – MAY 05 2007 REVISION NO. 01 dated 2007-05-24 (called farther VR1) Section 3.1.4 item 9.

3. The Monitoring Report Appendix-1 is missing

MRv1 Section 2.1.3: "The data being collected in order to monitor the GHG reduction is given in the table in Appendix-1 to this Monitoring Report."

"Appendix-1" is mentioned in the MRv1 more seven times.

However I cannot find this "Appendix-1".

4. The amount of CERs requested is much higher than the estimation

The amount of CERs requested is 69% higher than the approved estimation of the emissions reduction.

- 4.1 The DOE should verify the HFC22 production each month of the verification period and should explain reason for the 69% increase of CERs required.
- 4.2 The DOE should verify that daily HFC22 production does not exceed the maximum daily production capacity (60,000 kg/d).
- 4.3 The DOE should verify that the HFC23 destructed quantity does not exceed the maximum daily HFC22 production capacity multiplied by the waste generation rate (w=2.63%).

More detailed/accessible information could clarify the decision to issue

The presentation of data/findings should be improved

1. **The MRv1 monitored parameters are not numbered.**
2. **The monitored parameters names and ID numbers should follow the applied methodology.**
3. **The VR1 Section 3.1 and Table 2 (p.22-23) include ID numbers. It is not clear to which ID numbers they correspond, as the PDD monitoring plan and the MRv1 do not have ID numbers.**

The impacts on other monitoring periods should be clarified

1. **I suggested to add to the Monitoring Plan:**

1.1 **Verification of HFC23 destruction that will include:**

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