

12th September, 2008.

The Executive Board of the Clean Development Mechanism
c/o Clean Development Mechanism Secretariat
United Nations Framework Convention on Climate Change
Bonn, Germany

by email and fax

Submitted through

Det Norske Veritas (DNV) Certification AS
International Climate Change Services

Dear Sirs

We have been informed, vide email dated 10th September, 2008, that the request for issuance in respect of the CDM Project Activity "Project for GHG emission reduction by thermal oxidation of HFC23 in Gujarat, India" (Ref. no. 0001) is under consideration for review, because three requests for review have been received from Members of the CDM Executive Board.

In this connection, we append herewith a submission titled "Response to the Requests for Review", which provides clarifications to address the reasons for the request for review. We understand that Det Norske Veritas (DNV) Certification AS, International Climate Change Services, the Designated Operational Entity (DOE) that has undertaken the verification in respect of this Project Activity, shall also be furnishing a separate submission.

We request that these submissions be considered by the CDM Executive Board during its deliberations at the EB Meeting when the consideration of a review relating to the request for issuance is to be taken up. I would also like to take the opportunity to be present at the Meeting of the CDM Executive Board, as an Observer, to be able to provide any further clarifications the CDM Executive Board may require, if any, during its consideration.

We trust that these submissions shall clarify all the points raised in the Requests for Review.

While the consideration for review in respect of this issuance is scheduled at the 43rd Meeting of the CDM Executive Board, in view of the above clarifications provided, which will confirm that the issue arose due to a minor and inadvertent error, **and has no impact on the number of CERs requested for issuance**, we would appreciate if these submissions can be considered at the 42nd Meeting of the CDM Executive Board, to enable us to meet some contractual commitments at our end.

Thanking you in anticipation

With best regards
For Gujarat Fluorochemicals Limited

Deepak Asher

Deepak Asher
Director & Group Head (Corporate Finance)

RESPONSE TO THE REQUESTS FOR REVIEW

Comment 1

The quantity of HFC23 destroyed in the monitoring period n of year y QHFC23,d,n,y was reported as 343.860 MT in the spreadsheet but 343.726 MT (as total from February – July 2008) in the Appendix 7 of the monitoring report. Further, this total value is not the sum of the monthly values presented in the table. Clarification is required.

Clarification 1

Inadvertently, the spreadsheet that was uploaded with the Verification Report was an earlier version, which contained certain minor errors. However, the Monitoring Report contained the correct values for all the parameters, based on the correct version of the spreadsheet. Further, the correct version of the spreadsheet was also made available to the DOE for verification, and the Verification Report too contained the correct values for all the parameters. Hence the number of CERs verified and certified for issuance was correctly reported.

This error in uploading the wrong version of the spreadsheet is sincerely regretted. The correct version of the spreadsheet is appended with this submission.

Comment 2

The verification report mentions that the weekly zero check and six-monthly recalibration of the HFC23 meters were done, however, it does not mention when the last time the full calibration was conducted.

Clarification 2

In terms of the Monitoring Methodology, read with the guidance provided by the CDM Executive Board (para 22 of EB24 Meeting Report), the calibration of the flow meter used for the measurement of the HFC23 gas flow is to be conducted every six months and a zero check is to be done on a weekly basis. The Monitoring Report confirms that these requirements were complied with, and the Verification report confirms that this was checked by the DOE. However, the date when the last calibration was done, was not mentioned, since it was believed that this was not required.

However, as desired by the EB, the dates for the full re-calibration for the two HFC23 meters are given as under:

| Particulars | Calibration Certificate Number | Date of calibration | Date of certificate |
|-------------|--------------------------------|------------------------------|------------------------------|
| Meter No 1 | CAH 1703 0803 048 | 14 th March, 2008 | 17 th March, 2008 |
| Meter No 2 | CAH 1778 0803 054 | 27 th March, 2008 | 1 st April, 2008 |

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