



CDM project activity registration review form (F-CDM-RR)
(By submitting this form, a Party involved (through the designated national authority) or an Executive Board member may request that a review is undertaken)

Designated national authority / member submitting this form	
Title of the proposed CDM project activity submitted for registration	«Switching fossil fuels in an industrial facility by Indorama Cement Limited» (0737)

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.

- The following are requirements derived from paragraph 37 of the CDM modalities and procedures:*
- The participation requirements as set out in paragraphs 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 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 below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	14/12/2006

Reasons for Request:

- 1.** In justification of additionality PPs make focus on technological barriers. The technology is indigenous and is being broadly implemented by producers in many objects in India. PPs state that they still have problems with the technology and among them is the quality of BFG which is out of their control. The project started in 2000, but the starting date of fixed crediting period is 01.09.2006. Therefore it is difficult to assess whether the CDM has been seriously taken into consideration while approving the project and relevantly no evidence is provided on this.

- 2.** In the calculation of the emissions reductions the PP uses formula based on the calorific values of the two types of fuels – LDO (which is displaced) and BFG (which is supplied from the steel plant and combusted in the cement plant). However, neither emissions factor, no content and characteristics of BFG are provided in the PDD, and no project emissions are estimated. Methodology AMS III.B. version 09 states “ Project activity direct emissions consist of those emissions related with the use of fossil fuel after the fuel switch”, but emissions reductions that are estimated by PPs are equal to the baseline emissions.

- 3.** The methodology also says that “The emission baseline is the current emissions of the facility expressed as emissions per unit of output (e.g., kg CO₂/kWh)”. Output unit emission is not considered at all by the PPs.

- 4.** The methodology states that “The project boundary is the physical, geographical site where the fuel combustion affected by the fuel-switching measure occurs.” The steel factory, from which the BFG is supplied thus avoiding BFG emissions there, should be involved in the project boundary as far as its fuel combustion could be affected by fuel switching measures. In description of project boundary from PDD it is said that “the project boundary includes the production facility, hot air generator (HAG), auxiliary equipment & machinery, piping and allied systems”. In the allied systems could be implied the steel factory but nothing is monitored there (except of bills for BFG) and it is several times stated that the steel factory is out of PPs control and even the quality of BFG totally depends from steel factory owners.

- 5.** According to the methodology “Monitoring shall involve: (a) Monitoring of the fuel use and output for an appropriate period (e.g., a few years, but records of fuel use may be used) prior to the fuel switch being implemented”. Still, monitoring plan from the PDD doesn't consider at all the fuel use (LDO) and the output for an appropriate period prior to the fuel switch being implemented as it is requested by the methodology. It doesn't consider the fuel use and the output after the fuel switch has been implemented.