



Mr. Rajesh Kumar Sethi  
Chair, CDM Executive Board  
UNFCCC Secretariat  
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July 25<sup>th</sup>, 2008

**Re. Request for review for request for issuance of “RIMA Fuel Switch in Bocaiúva” (UNFCCC Ref. no. 0889).**

Dear Mr. Sethi,

SGS has been informed that the request for issuance of the CDM project activity “RIMA Fuel Switch in Bocaiúva” (UNFCCC Ref. no. 0889) is under consideration for review because three requests for review have been received from members of the Board.

The requests for review are based on the reasons outlined below. SGS would like to provide an initial response to the issues raised by the request for review:

Request for review 1:

*The charcoal fines used in the project activity was a renewable biomass.*

SGS' Response:

Yes, the charcoal fines used is a renewable biomass. The project activity consists in switching fossil fuel oil to renewable biomass (charcoal fines).

The charcoal fines used is in accordance with registered PDD version 02, 18<sup>th</sup> August 2006 and methodology AMS IC version 08.

Rima operates two plants in the region that produces ferroalloys and metallic silicon. The plants have reduction furnaces that use charcoal as reducing agent. Part of the charcoal consumed in these plants is produced in Rima's sustainable managed forests.

Rima also has eucalyptus and pines plantations where charcoal is produced. The charcoal passes through sieves in order to separate the fines from material with the proper size for the production of metallic silicon and ferroalloys. The fuel switch project is using the fines, left over from sieving.

Request for review 2:

*The requirement of monitoring plan for daily recording of the quantity of charcoal fine consumed in the kiln and the output of the dolomite kiln was met.*

SGS' Response:

The requirement of monitoring plan for daily recording was met. In fact the recording is more frequent than required, charcoal fine consumed in the kiln and the output of the dolomite kiln is recorded hourly and than consolidated daily as required. The monitoring report presents on section B.3 the correct monitoring frequency and the summary of monthly data on section D.2.

During verification assessment was verified the daily data records.

Request for review 3:

*The project emissions associated with drying of charcoal fines have not been taken into account while calculating emission reductions.*

SGS' Response:

During verification assessment the fact that the project activity is operational in the same condition as established in the registered PDD was verified. There is no project emissions associated with drying of charcoal fines.

The project emissions in the registered PDD are zero.

The second phase explained in the PDD and monitoring report started on November 2006 and comprises a drying charcoal fines using hot air from the kiln. The energy used to dry the charcoal fines comes from the same kiln where charcoal fines are used as fuel. There is no additional source of fuel or electricity to be considered in this project activity as project emissions.

With the explanation provided above, we hope that all concerns of the EB have been addressed. We do however apologize if this was not sufficiently clear from the verification report.

Fabian Goncalves (+55 11 5504-8887) will be the contact person for the review process and is available to address questions from the Board during the consideration of the review in case the Executive Board wishes.

Yours sincerely,



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**Annexes to the response:**

- SGS Verification and Certification Report 24/07/08.