



**CDM project activity/programme of activities registration request review form (CDM-REGR-FORM)
(Version 03.0)**

Section 1. General Information

Designated national authority/Executive Board member submitting this form (Name in print)	
Title and UNFCCC reference number of the proposed project activity or programme of activities (PoA) submitted for registration	8752 Methane Recovery and Use of the Biogas in the Dak To Tapioca Starch Making Plant of APFCO, Vietnam

Section 2. Basis for review request

Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures (the annex to decision 3/CMP.1), which validation requirements may require review. Please tick the appropriate boxes in the list of requirements below. For requesting a review of a proposed afforestation or reforestation project activity or PoA, please refer to paragraphs 12 and 15 of the CDM modalities and procedures for afforestation and reforestation project activities (the annex to decision 5/CMP.1), and tick the equivalent boxes below mutatis mutandis.

The following are requirements derived from paragraph 37 of the CDM modalities and procedures:

- ☐ The participation requirements as set out in paragraph 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 of 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 3: Comments supporting review request

Please elaborate the reason for requesting a review on the requirements you indicated in section 2 above.

1) The applied methodology, AMS. III-H version 16, paragraph 27 (b) requires that "an ex ante measurement campaign shall be implemented to determine the required parameters (COD removal efficiency, specific energy consumption and specific sludge production). The measurement campaign shall be implemented in the baseline wastewater systems for at least 10 days. The measurements should be undertaken during a period that is representative for the typical operation conditions of the systems and ambient conditions of the site (temperature, etc)."

However, the PDD page 23 states that "the 10-days COD-measurement campaign the inflow and the outflow COD content of the covered lagoon was measured."

The DOE is requested to clarify why the 10 days measurement campaign was not undertaken in the baseline wastewater systems, and how it has assessed the ex ante measurement campaign to be in line with the applied methodology. Please refer to AMS. III-H version 16, paragraph 27 (b).

2) The PDD, page 25 states that "there might be fugitive methane emissions due to inefficiency capturing system. These emissions will happen before the metering system and are therefore not integrated into the ex-ante estimations. The emission reduction will be calculated ex-post on the total captured and destroyed biogas. All these gas flow-meters are installed before the biogas is used in the boiler or in the flare."

However, the applied methodology, AMS.III-H, version 16, paragraph 33 states that ex post emission reductions shall be based on the lowest value of the following, as per paragraph 32: (i) The amount of biogas recovered and fuelled or flared (MDy) during the crediting period, that is monitored ex post; (ii) Ex post calculated baseline, project and leakage emissions based on actual monitored data for the project activity (BE_{expost} - PE_{expost} - LE_{expost}).

The DOE is requested to clarify how it has validated that not accounting for methane fugitive emissions due to inefficiencies in capture systems (PE_{fugitive,y}) is in line with the applied methodology. Please refer to AMS. III-H version 16, paragraphs 29, 30, 33., VVM version 02.1, paragraph 67 (c).

Date received at UNFCCC secretariat

17 May 13