

 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	BK Energia Itacoatiara Project, Brazil (0168)
DOE that requested for issuance and date of request	Det Norske Veritas Certification Ltd. (DNV)
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>	
Please indicate reasons for the request for review and attach any supporting documentation to this request form. (if space is not sufficient please attach further reasons)	
Reasons for request: 1) Since the claim for CERs from methane avoidance component based on very controversial assumption in that there is no market available for fuel wood and hence entire fuel wood coming out of the sawmill would be left for decaying. The DOE is expected to independently verify this assumption. Without such verification, the claim for CERs from methane avoidance may not be valid. 2) According to the monitoring plan (please see monitoring data items D.3-2 and D.3-3 in Page 21 in the PDD), the project should have been used fuel wood from the existing stockpiles. But instead of doing so, the project used fresh biomass and is still claiming for CERs through methane avoidance. The monitoring report shows (Page 13, Monitoring Report) that fresh wood logs supplied by PWA (9,667 metric tons) are also used in the power plant. The fresh wood logs are not bi-products of the sawmill operations, these are rather collected from the forest during logging. Logging can not be considered as component of sawmill operation as it occurs beyond the project boundary (or outside sawmill compound). The DOE is expected to ask clarifications to the project participant on this issue, but has not done so.	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	22/03/2007