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CDM Executive Board

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Request for review

Dear Sirs,

Please find below the response to the request for review formulated for the CDM project with the registration number 336. In case you have any further inquiries please let us know as we kindly assist you.

Yours sincerely,

Werner Betzenbichler
Carbon Management Service

Michael Rumberg

Response to the CDM Executive Board

Issue 1:

The validation report describes different amount of sites and farms that PDD – it mentions on page 7 and 12 “28 farmers and 31 sites”. Table A2 of PDD details 25 farms/sites and 31 contact names. Table E1 of PDD details emissions from 33 projects. Also there is not enough explanation of how 29 digesters are related to the much larger quantity of lagoons that appears in table B1 of PDD.

Response by TÜV SÜD:

There are 31 sites (column 1), 28 farmers (column 3 “contact”, without Mr. Almeida since he is just the contact of the association of COOASGO) and actually 25 farms (column 2 “Address”). This is because some farms have the same address, but it is separated to two owners who have contracts with AgCert (see Fazenda São Tomaz Cachoeirinha. On the other hand it can be the case that one person owns two or more farms (see Mr. Paulo Franz). That is why the number of sites, farm addresses and contacts can vary. The validation report is correct according to the farmers (column 3 “contact”, without Mr. Almeida since he is just the contact of the association of COOASGO) and sites (column 1).

By maintaining an own data base on all addresses from all sites identified by the various projects of the project participants TÜV SÜD takes care that there is no double counting and all sites can be identified during the verification process.

The reason of 33 sites in the table of section E is due to the fact that the two Fazenda Paraíso Sitio 1 & 2 (Carvalho) of Luis Claudio Magalhães de Carvalho and Fazenda Paraíso Sitio 1 & 2 of Mr. José Parassu de Carvalho Neto from section A are separated in section E in Sitio 1 and Sitio 2 of Luis Claudio Magalhães de Carvalho in respective in Sitio 1 and Sitio 2 Mr. José Parassu de Carvalho Neto.

Issue 2:

How is it planned to provide one digester to cover more than one lagoon in two separate AWPSs (such as Fazenda Rio Doce Talhado (Orestes Vanz) and Fazenda Rio Doce Talhado e Talhado (Direu Vanz)? Or 2 separate digesters for 13 separate lagoons (such as Fazenda Sao Tomaz Cachoeirinha)?

Response by TÜV SÜD:

As described correctly in the PDD, farmers operate several lagoons for manure storage. The lagoons are usually operated in serial which means that the manure flows from one to the second to the third and so on. In project case only the first lagoon will be replaced by a digester system. One digester system consists of two covered cells or modules. In those modules the manure will be treated and stored. After the digester the treated manure flows into the second lagoon and into the others until the water will be used for irrigation. That means the other lagoon system will be kept as storage for the treated manure. In very big farms with a lot of manure indicated by the amount of existing old lagoons like in Fazenda Sao Tomaz Cachoeirinha

one digester system (including two modules) is not sufficient to ensure the minimum retention time; hence AgCert constructs a second digester system to safeguarding the treatment of all manure as it is the purpose of the project.

Issue 2:

Although the monitoring plan can be found in section D of the PDD, Attachment 1 – Monitoring Plan, as specified in Annex 4 of the PDD is missing.

Response by TÜV SÜD:

It has to be recognized that the project was submitted for host country approval already in autumn 2005 long time before there has been any guidance by the EB on the extent of monitoring plans in annex 4. The existing annex 4 refers to an “operation and maintenance plan” which has been assessed during the validation process and which provides more details than section D, which has already been deemed to be sufficient by the reviewer.