

August 28, 2007

CDM Executive Board
Bonn, Germany

Subject: Request for review: 'Project 1164 AWMS Methane Recovery Project BR06-S-29, Sao Paulo, Brazil'

Dear EB Members:

In response to the subject 'request for review' of project 1164 the Project Participants provide the following clarifications:

1. **Further details and clarification are needed regarding the formula used for calculation of VS, and it should be more clearly stated that the project participant will comply with the requirements of paragraph 6 of the approved methodology to use the lower of the two options.**

VS is determined by weight adjustment based on country weights using IPCC 2006 defaults for VS excretion. Specifically on page 20 of the PDD, equation E2 gives further clarification of VS calculation.

Regarding requirements of paragraph 6 of the approved Section E.1.2.5 of the PDD clearly states, 'The ex-ante baseline emissions calculated in section E.1.2.4 of this PDD will be compared to the actual monitored amount of methane captured and combusted by the project activity. The lesser of these values will be used as the project emission reductions of the crediting period.'

2. **The reasons for estimated high growth rates in animal numbers on certain farms should be more clearly explained.**

Where higher growth rates apply, the site description in section A.4.1.4 explains these estimations if growth is considered. Specific descriptions are found on the pages 6-7 for the PDD under review: The DOE validated growth rates with each producer during the on-site audit that plans on increasing production.

3. **Further clarification is required regarding the method to be employed for calculation of the animal population.**

AgCert uses historical data for animal population as indicated in Table E1. This information is collected from the producers prior to baseline determination. These numbers are the same inventory numbers used to run their business and are subject to financial audits. This data is then averaged for use in the baseline calculations as indicated in tables E3 and equation B2.

4. **As effluent will be stored in secondary and tertiary lagoons information should be provided on how emissions from these sources will be accounted for, further information regarding how sludge will be monitored in accordance with paragraph 5 (v).**

The methane emissions from subsequent lagoons (secondary, tertiary, etc.) are accounted for in the project activity by the use of a Methane Conversion Factor of 10% for project activity. This value accounts for fugitive methane emissions from the lagoons within the project boundary.

Section A.4.2, Table D1, and Annex 3, Monitoring ID#1 provide information regarding monitoring of the sludge. Sludge is disposed of by applying to soil or some other aerobic process which is documented.

- 5. It should be more clearly stated which parameters are being fixed ex-ante and which parameters will be monitored during the crediting period. For all parameters the methods of monitoring or estimation should be clearly described.**

All variables in Table E5 are being fixed ex-ante.

Annex 3 summarizes what is being monitored during the crediting period and describes the step for each monitoring ID.

- 6. Further evidence is required regarding how the issue of potential debundling between this and similar projects, both registered and requesting registration, has been validated**

All project sites have been plotted on a mapping program and compared to other project locations to ensure debundling is not an issue. The DOE was provided this information.

Should you require any additional information regarding this request please feel free to contact me at any time.

Sincerely,



Leo S. Perkowski
Vice President, Regulatory Affairs