

 CDM project activity registration review form (F-CDM-RR) <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	
Title of the proposed CDM project activity submitted for registration	1609 Anshan Iron and Steel Group Corporation (Anshan) Blast Furnace Gas Combined Cycle Power Plant Project
<p>Please indicate, in accordance with paragraphs 37 and 40 of the CDM modalities and procedures, which validation requirement(s) may require review. A list of requirements is provided below. Please provide reasons in support of the request for review, including any supporting documentation.</p> <p><input type="checkbox"/> <i>The following are requirements derived from paragraph 37 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> The participation requirements as set out in paragraphs 28 to 30 of the CDM modalities and procedures are satisfied; <input type="checkbox"/> 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; <input type="checkbox"/> 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; <input checked="" type="checkbox"/> 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; <input checked="" type="checkbox"/> The baseline and monitoring methodologies comply with requirements pertaining to methodologies previously approved by the Executive Board; <input type="checkbox"/> 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; <input type="checkbox"/> 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. <p><input type="checkbox"/> <i>The following are requirements derived from paragraph 40 of the CDM modalities and procedures:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> 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; <input type="checkbox"/> 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; <input type="checkbox"/> 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; <input type="checkbox"/> 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; <input type="checkbox"/> 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; <input type="checkbox"/> 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 the project design document, the written approval of the host Party and an explanation of how it has taken due account of comments received. <p><input type="checkbox"/> There are only minor issues which should be addressed by the DOE / project participants prior to the registration of the project.</p>	
Section below to be filled in by UNFCCC secretariat	
Date received at UNFCCC secretariat	27.05.2008

1. The PP/DOE should clarify the inclusion of the fuel costs in the investment analysis as the waste gas would have been flared in the absence of the project activity.

2. The DOE shall confirm how it has validated the input values used in the investment analysis, taking note of the guidance provided in EB 38 paragraph 54.



3. The methodology requires that “among the alternatives that do not face any prohibitive barriers, the most economically attractive alternative should be considered as the baseline scenario”. Clarification should be provided why no such comparison has been conducted in the determination of the baseline.
4. The DOE should clarify how it has validated that the examples mentioned under Sub-step 4b (the Common Practice Analysis on page 18 PDD) meet the requirements of EB38 paragraph 60.
5. The DOE should clarify how it has validated the obstacles for AISG to obtain loan from bank for new built-projects, especially for this proposed project (page 15 PDD).
6. Taking into account that MHI independently established its Blast Furnace Gas (BFG) Turbine Combine Cycle (GTCC) power generation technology in the 1980s, including development of BFG dedicated combustors, and has since then delivered numerous systems to iron and steel manufacturers at home and abroad, enjoying a near 70% share of the world's BFG gas turbine market (Japan Corporate News, 27 May 2008), the DOE should clarify how it has validated the claimed technological barriers and why the size of this project (300 MW) makes it fundamentally different from any other earlier implemented combined cycle plants using enriched Blast Furnace Gas.
7. The DOE should clarify why costs for maintenance are presented as a financial barrier (page 15 and 16 PDD), while such costs are already incorporated in the investment analysis.
8. Further clarification is needed on a) the selection of the project boundary, as well as on b) the exclusion of other users of BFG in both the baseline assessment (page 8 PDD) and in step 1a of the additionality assessment (page 10 PDD), taking into consideration that – as occurs at other iron and steel plants in the world - BFG could also be used as fuel by several other production units of an integrated iron and steel plant (e.g. coke ovens, rolling mills etc) and taking into account the fate and remaining life time of the existing captive power generation units of 345 MW.