

Sao Paulo, 27 November 2008

**Request for Review for “SANTECH – Saneamento & Tecnologia Ambiental Ltda. – SANTEC
Resíduos landfill gas emission reduction Project Activity” (1908)**

Notification (e-mail message) received on 20 November 2008

From requests 1, 2 and 3, item additional information:

“The DOE is requested to provide details regarding how it has been confirmed that the emission factor calculation complies with the requirements of the approved methodology and applicable tools. In doing so the methodological choices made and the correctness of these choices should be described. The DOE may wish to take note of the guidance provided by the Executive Board on this matter (EB43, para 64 (a)).”

Project participants initial comments to the request for review

Although the request for review is addressed to the DOE, the Project Participants believe that the below provided information is helpful to address the raised issue.

1. The project activity documentation was first submitted to the approval by the Brazilian DNA on January 23rd, 2007 using ACM0001 version 4 (valid from 28 Jul 2006 to 21 Dec 2006, requests for registration could be submitted until 05 Mar 2008) and ACM0002 version 6 (valid from 19 May 2006 to 13 Dec 2007, requests for registration could be submitted until 13 Aug 2008). On 13 April 2007 the Brazilian DNA issued its first opinion containing requests for corrections. After carrying out the requested corrections the new version of the PDD had to be resubmitted to the DOE for validation but at the time version 4 of ACM0001 was not applicable anymore. Due to the change of applicable methodology version PPs re-started the validation process publishing the new version of the PDD in the UNFCCC’s website for a new Global Public Stakeholder Process from 1 September 2007 to 30 September 2007 using ACM0001 version 6 (valid from 6 Jul 2007 to 1 Nov 2007, requests for registration could be submitted until 1 Jul 2008) and ACM0002 version 6 (valid from 19 May 2006 to 13 Dec 2007, requests for registration could be submitted until 13 Aug 2008). After additional rounds of information exchange during the first semester of 2008 the PPs submitted the final version of the PDD and Validation Report to the Brazilian DNA on 18 June 2008. The project activity received the Letter of Approval on 23 June 2008.
2. The project was submitted for registration on 1 July 2008 when both methodologies (ACM0001 version 6 and ACM0002 version 6) were still valid.
3. ACM0002 version 6 does not mention the use of any applicable tool for the emission factor calculation.
4. The Brazilian DNA released Resolution 8¹ containing the following decisions:

¹ Source: <http://www.mct.gov.br/index.php/content/view/72993.html> (accessed on 26 November 2008).

Art. 1 - Adopt the single system comprised of the union of National Interconnected System (NIS) subsystems as a definition of the “Project Electric System” for any Clean Development Mechanism (CDM) project activity connected to the NIS, supplying or using electricity from the grid, and applying the ACM0002 and AMS-I.D. methodologies and/or the “Tool to calculate the emission factor for an electricity system” approved by the CDM Executive Board.

Sole paragraph - This definition, when applicable, shall be extended to any other methodologies dealing with project activities connected to the grid that come to be approved by the CDM Executive Board, unless expressed otherwise in a deliberation by this Commission.

Art. 2 - Regularly publish emission factors in t CO₂/MWh, calculated for the single system and made available by month, day and hour on the Interministerial Commission on Global Climate Change’s web site.

Art. 3 - This resolution takes effect on the date of its publication.

5. The resolution is dated 26 May 2008 but it took effect only on 19 July 2008, the day of its publication in the “Diário Oficial da União”² and one day after the submission of the project activity’s final documents to the Brazilian DNA. Before that the subdivision of the Brazilian Interconnected System in 2 subsystems (South-Southeast-Midwest and North-Northeast, as used in the project activity emission factor calculation and in over than 50 registered CDM projects up to then) was accepted by the Brazilian DNA and the grid emission factors published by the Brazilian DNA were not mandatory.
6. The emission factor used in the project activity was prepared with public available information and complies with the requirements of the applicable approved methodology - ACM0002 version 6 - and validated by TÜV-SÜD.
7. It is important to stress that the project activity is not using grid emission factors made available by the Brazilian DNA, therefore, it is the PPs understanding that the guidance provided by “EB43, para 64(a)” is not applicable.

Confident that the above initial comments help to adequately address the raised issue we remain available at any time for additional clarifications.

Best regards,

For the Project Participants



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² Official Gazette of the Federal Executive, available at <http://www.in.gov.br/>.