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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 on the CDM project with the registration number 1328. In case you have any further inquiries please let us know as we kindly assist you.

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Carbon Management Service

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Issues:

1. The start date of the project activity should be as per the CDM glossary of terms.
2. If the main demonstration of additionality is the low returns, then this should be demonstrated by means of a transparent and validated investment analysis.
3. Further clarification is required on how the DOE has validated the prior and serious consideration of the CDM; considering the project activity started construction three years prior to start of validation. This information should also be included in Section B.5 of the PDD.
4. Further details regarding the common practice should be provided in accordance with the requirements of step 4 of the additionality tool, i.e. similar project activities should be described and the differences between each of these activities and the project should be clearly indicated.

Response:

The criticized transparency in PDD and validation report is related to the fact that the project was already submitted for registration early Sept. 2007 and was remaining in the completeness check for months (until March) by several reasons. Meanwhile we (TÜV SÜD) would not consider the validation being complete any longer due to altered guidance by the EB. Hence we would appreciate if possibilities for corrections could be given. Additionally the project participants submitted an incomplete response (also forwarded with this letter) to this request referring to missing documents (reference annexes) that could not yet be validated due to the time constraints in this procedure. Nonetheless we are convinced that by appropriate proofs there is still the possibility considering the activity being valid. The PDD should undergo the following revisions for dealing with the issue indicated above:

1. An update of the indicated starting date
2. An adjustment of the additionality discussion either by using step 2 or by demonstrating that missing available investment resources have been the main barrier at time of investment decision.
3. By a transparent discussion of the time gap between project decision and PDD development (this discussion was made so far only orally).
4. Further elaboration on the common practice test as already given by the PPs response, clearly discussing the mentioned similar activities

In case such an updated PDD could be provided in the course of this review process we would be enabled to validate the belonging proofs accordingly.