

Comment 1

17-07-06 12:58pm

Name: Armaan	City: Jaipur
Organisation: Individual	Country: India

1. The argument does not suitably justify that this project is not business-as-usual.
2. It has been mentioned that there are numerous other similar projects under CDM. Hence, how is this project unique?
3. The additionality is debatable. The barriers mentioned seem to be generic and can be used for any biomass project.
4. The investment barriers mentioned in the PDD are not sufficient to prove the additionality. Also, it should be clarified whether CDM had been considered at the outset of the project activity.
5. It has been argued that the IRR is substantially higher with CDM. No, figures and calculations have been shown.
6. The stakeholder analysis need to be more detailed.

Comment 2

08-08-06 10:28am

Name: MANOJ KUMAR	City: NEW DELHI
Organisation: INDIVIDUAL	Country: INDIA

The project proponent is a Company listed on the Bombay Stock Exchange, India and its Annual Financial Report is a publicly available document. The last report for the year ending 31st December 2005 is available on the following link
<http://sebidifar.nic.in/documents/YASHPAPERS/ar122005.pdf>

Pages 31 to 33 of this Annual Report discuss the advantages and returns from installing the biomass based turbine, which are totally at variance with what is stated under the Investment Barrier of the pdd.

On page 47 of the Annual Report, under the heading “Annexure to the Directors Report” the data of Electricity Generated by biomass, Electricity generated by DG Sets, Electricity purchased from Grid, Biomass (Rice Husk and Baggase Pith) Consumption, Diesel Consumption and Coal consumption is given. It is very clear that the project proponent has not used any Coal or purchased any electricity from the grid for the last 2 years and mainly biomass husk has been used as fuel for both power generation as well as steam generation for use in the paper mill.

Since mainly biomass is being used as fuel for both power & steam generation in the pre project scenario also, when no CDM benefits were available, it is BUSINESS AS USUAL and there is no additionality in this proposed project.

In fact, the DOE should get all the previous years Annual Reports available with the project proponent to establish the year since when they have mainly been using biomass as fuel with no consumption of coal or grid power. As per my knowledge they have been doing it for at least the LAST SIX YEARS and it would be grossly inappropriate to give CDM benefits just because a high pressure boiler is being used by this project as there would be no reduction in GHG emission when compared to the baseline scenario operating before the implementation of this project.