

Comment 1

18-10-07 1:28pm

Name: kajal goswami**City: Kolkata****Organisation: eco sustainability services****Country: India**

The project documentation is poor and the additionality is high questionable. Following issues needs to be addressed by the PP and validator during project validation.

1. The project involves switch from mercury cell to membrane technology. Use of mercury cell technology for soda manufacturing is an obsolete technology. The technology would not have continued for the next 21 years (end of crediting period).
2. discussion on sustainable development indicators has nothing to do with the projects impact but generic discussion on companys' contribution to these indicators.
3. the technology section is an one liner with no description of technology and no documentation of specifications as required by AMS II D.
4. the project is in operation since 1963. the plant has already been operating for last 44 years and the lifetime of the membrane cell technology is given as 30 years. So by the same logic the mercury cell plant has already outlived its lifetime and is already overdue to be changed. Residual lifetime to be presented with 3rd party assessment of the same.
5. it needs to be clearly demonstrated with documentation that Allahabad bank would not have provided project finance to the plant in absence of CDM. it is CDM that drove the bank to provide finance for the project.
6. technology penetration is shown to be 70% which is not true. It is around 82%. It needs to be clearly demonstrated why the plant needs CDM funds to do this technology changed when 82% of other plants do not need this funds. If all other plants can do the technology change why is it that PP needs CDM funds to go ahead with the project.
7. consent to operate of the plant needs to be presented with the special conditions in the consent. It needs to be assessed through stakeholder consultation with the pollution control board personnel that this change in plant is not to fulfill legal requirements as switch to membrane technology is a CREP guideline.
8. organizations communication to Pollution control board on timeline to fulfill CREP guideline related to switch to membrane cell needs to be provided. This is to assess as to when the organization was legally bound to change over irrespective of CDM.
9. the project generates chlorine which was not there in the baseline. It needs to be clarified if there are project emissions associated with the chlorine handling and disposal system and are the project emissions metered.