

Comment 1

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Name: Ken Newcombe	City: Bristol
Organisation: Individual	Country: Great Britain

Does the PA provide long term employment benefits to the local community?

Emission Reduction calculations need to be clear;
PDD not mentioning the date of stakeholder consultation process implies the same was not done;
Monitoring plan does not provide information on QA/QC procedures and lacks clarity in responsibility of monitoring personnel;
Does the project activity contribute the ER targets of M/s. Delphi Automotive systems or any other Annex 1 party;

Additionality arguments are really weak:
VAM technology is proven and prevalent in the Host Country;
PP already having VAMs would be exposed to maintenance problems and have operated the VAMs without CDM revenues.
Maintenance issues cannot be argued as a significant barrier;
Equipment supplier/s are interested parties and hence appreciation is not a valid argument;
Other promoters having VAM's in the same region/sector have sustained without CDM revenues and Delphi TVS being one the major automotive component manufacturers in the host country (having implemented VAM's earlier) need not depend on CDM revenues for the sustainability of the PA;
DOE needs to carefully evaluate the Additionality arguments in all aspects and provide an independent/transparent opinion on whether the project contributes to real, measurable and long term benefits;