

Comment 1

03-04-07 7:36pm

Name: Rajaram Velayudhan **City: Trivandrum****Organisation: Individual** **Country: India**

Dear Sir,

It is not very clear how come by adopting a small scale methodology the project could be written in a regular scale PDD document and it is suprising to know how could this has been hosted for international stake holder consultation.

It is also not very clearly stated how the capcity expansion will have same baseline as existing.

In my opinion almost all the plants in the state of UP has methane recovery technology but generation of power may not be a common practice.

The project also is not with in the threshold limits of the SSC under AMS III H.The total emission would be more than 60KT.

The investment analysis looks really stunning for the reason that the IRR has increased from -14.18% to 10.73%.I really could not imagine what is the cost per unit of CER are considered to gnerate a positive IRR and there is no justification for the same too.

The common practice lacks substantaion of data in terms of number of the projects implemented in UP.In my understanding more than 40% of the distilleries in the state where the project is implemented has methane recovery system,It is really illogical that a PP installing an GHG reducing activty late is availing CDM revenues and the people who has taken proactive step are not getting any assistance.This scenario gives a wide misinterpretation to the system of CDM.

The project clearly lacks in establishing the additionality of the project.

Rajaram velayudhan

Comment 2

04-04-07 7:17am

Name: rajaram velayudhan **City: trivandrum****Organisation: Individual** **Country: india**

Dear Sir,

By applying a small scale methodology how could a regular scale PDD template could be used is not very clear and it is far the more surprising that how could this been uploaded for international stake holder consultation. I believe the project has to be re uploaded for public comments.

The project is expected to increase the production capacity from 55 KLPD to 100 KLPD,however the AMS III H is applicable only to the existing waste water streams and it is not very clear how could even now the baseline condition remains the same for the expansion project. As almost all the Greenfield project or expansion projects are developed with methane recovery system in the state where the project is being implemented.

In my experience more than 40% of the distilleries in the state have already implemented methane recovery system without CDM revenues. It would be highly illogical that if some one is late in adopting a technology is eligible for claiming credits and proactive front runners are denied off.

The common practice analysis should be substantiated with suitable evidence. The arguments put in the PDD are vague and not substantiate.

It is also hard to imagine a project hooking up from an IRR of -14% to +10.73% due to CDM revenues.

The project is exceeding the threshold limits of the AMS III H of 60 KT/annum.

Comment 3 04-04-07 10:15am

Name: Gaelle	City: camberley
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Organisation: sgs	Country: uk
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TEST

Comment 4 04-04-07 10:30am

Name: Gareth Moss	City: London
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Organisation: Ellion	Country: London
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This is a test.

Comment 5 04-04-07 11:23am

Name: Rajaram Velayudhan	City: Trivandrum
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Organisation: Individual	Country: India
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