

Comment 1

19-07-06 5:55pm

Name: preet kaur**City: new delhi****Organisation: individual****Country: india**

Since A.4.3 of the pdd states that “in absence of the project activity SIL would have continued treating its waste stream in the existing anaerobic lagoons”, the DOE should get an explicit undertaking from SIL that it is not undertaking this project for any statutory compliance whatsoever. This is important because in paper industry disposal of wastewater is a major problem and the norms to be followed have been tightened by the Government agencies over a period of time. The DOE should ensure that this project has not been undertaken to fulfill commitment made by SIL, as a part of a package to be implemented in phases, to government or judicial bodies.

Comments on the barriers to the project activity given under B.3 of the pdd

Satia Paper Mill in Muktsar District of Punjab has been using this process since 1997. An excerpt from the website of Ministry of Environment and Forest, Government of India

(<http://www.envfor.nic.in/divisions/ic/wssd/doc3/chapter16/css/Chapter16.htm>) is reproduced below:

“Managing Methane

Satia Paper Mills, Muktsar, Punjab was generating large amounts of organic waste, including methane, as a result of its manufacturing process. They were also using 20 tonnes of rice husk per day in their boilers, leading to substantial emission of greenhouse gases. The conventional effluent treatment system was not able to meet the norms set by the Pollution Control Board and the mill was becoming economically unviable. In 1997 the mill switched to a technology which provided a solution to both its effluent treatment and energy requirement problems. As part of the UNDP- supported 'Development Of High Rate Biomethanation Processes as means of Reducing Green House Gases Emission' project being implemented by the Ministry of Non-conventional Energy Sources, an Upflow Anaerobic Sludge Blanket Bioreactor was installed at the mill. The reactor uses the organic waste from the mill to produce biogas. The biogas is used in the boilers, resulting in net saving of operating cost of the mill. The use of rice husk is also avoided which further reduces its emission levels. The new technology has meant 45 per cent reduction in Chemical Oxygen Demand and around 80-85 per cent Biological Oxygen Demand reduction. This technology can be used in a variety of production processes where organic waste levels are high, including leather factories and tanneries, dairies, confectioneries, food processing units and breweries. Started in 1994, the US \$5.5 million MNES project is serving not only to control emissions of methane, a greenhouse gas, but also its utilization as a clean fuel. The project aims to provide technical assistance and institutional preparation for formulating a national strategy for biogas generation and utilisation, in introducing, demonstrating and standardizing a wide variety of technologies, and in bringing about an awareness amongst policy makers, waste generators, and others.”

This paper mill is about 100 Km away from SIL plant and in the same state of Punjab using this technology for almost a decade without availing any CDM benefits. Thus besides addressing the affluent treatment problem, this project has been undertaken to reduce the rice husk being consumed by SIL in its boiler as the price of rice husk has increased very rapidly in the last few years in the state of Punjab and the success of this project is not dependent on its getting the CDM benefits.

The technological and resource barrier do not exist based on the above facts.

Regarding the barrier due to prevailing practice, the pdd has used a lot of qualifying words, to discriminate this project from those presently operational:

1. "The project activity is the first of its kind in India wherein waste water from wheat straw wash would be treated in a UASB digester and gas liberated would be recovered and burnt"
2. "No paper unit in the state has commissioned high rate UASB digester so far"

In case of Satia Paper Mill the digester is called bioreactor and it just does not process only wheat straw wash but other waste water as well.

Also, the pdd itself states that this technology was introduced in India in late eighties and although it may not have widespread use but still a lot of units are using this without availing CDM benefits.

Thus this project is not at all additional but business as usual.