Comment 1

22-06-07 10:36am

Name: Hiral Mehta	**City: Ahmedabad**
Organisation: Paryavaran Mitra	**Country: India**

1. Whether state government department has issued any NOC to this project?
2. What is percentage wise content of Municipal Solid Waste received by Hanjer Biotech for processing? Whether Municipal Corporation will treat the waste in any manner before transportation?
3. What is frequency of road transportation carrying MSW from collection point to site? Whether transportation emission has been considered?
4. RDF pelletes will be sold to near by industries as alternative fuel. What is content of emission of these pelletes?
5. Are there any financial benefits for surrounding villages due to proposed CDM project of Hanjer Biotech as a part of Corporate Social Responsibility? Whether company has proposed any community welfare projects in benefits of surrounding community?

Comment 2

25-06-07 10:58am

Name: Amar Mody	**City: Mumbai**
Organisation: Independent	**Country: India**

Comments on RDF Project in Rajkot

1. First and foremost, the composition of waste has not been mentioned. This data would be surely available or a feasibility study for RDF technology would have been incomplete without a survey/research into percentage composition various individual waste streams. Weight-wise distribution of various MSW components also needs to be well researched to indicate the CV of the RDF post treatment.
2. What specific chemical is used to accelerate biological decomposition? Such information would be valuable for students as well as general public.
3. The statement on pg. 7 of the PDD quotes “calorific value of this product is less than coal and therefore can be a good substitute for coal which is used as fuel.” This statement contradicts itself in its current form. Please elaborate.
4. Project technology diagram is an exact replica of earlier registered project – PDD of JAL in Chandigarh!

5. “Unwanted materials including inert rejected during processing are either recycled in the plant or properly taken out as segregated items for their utilization as raw materials to other recycling industries. In short, integrated inert management is an important feature of the plant.”
Does this mean it is a zero-discharge plant? How is it possible to recycle paper shreds, plastic wrappers and polythene bags, bottle caps which are not of grades I to VI and suitable for recycling? What about the inert debris, sand dust, stones, floor sweepings, ash? In the present form the PDD suggests that absolutely nothing is taken to the landfills, which would mean that all of the above might be dumped in the surrounding areas. PDD mentions about a dump yard. Is it a designated dump yard or yet another open landfill?
6. Baseline and Emission reduction calculations need to be

rechecked. Calculations in the second table where in a constant value of 27,500 TCO2e over the crediting period are not plausible since calculations for methane avoidance are based on FOD model and therefore are non-linear.
7. Furthermore, it is not clear whether the boilers or kilns, which are meant to receive RDF, belong to HBEPL or not. There is also no mention of the type of industry to which the RDF will be supplied and the baseline fuel for such industry types. It may be that the normal practice for such industry is use of Natural gas, which can be less incumbent upon the environment than the combustion of RDF.
8. Financial barriers are not described at all and are left to the readers' imagination. IRR figures seem to be random numbers. There is also no mention of the MNES and other such nodal agencies encouraging investments into such technologies through Public private partnerships and the subsidies that these projects can acquire.
9. "There is no mechanical facility provided other than screening machine which cannot separate wet and dry waste for segregation of MSW. Because of the very high cost of facilities for the sorting, separation and recycling of waste, it is uneconomical for the project participants."
This argument placed under technological barrier is out of context and meaningless. Earlier, in the PDD, the text preceding the diagram describes the various sorting processes that have been incorporated to produce a uniform and high CV MSW stream. What was that about then? If any of the necessary technological inputs are deemed "uneconomical", they need to be specified under financial barriers and appropriate replacements for such inputs should be in place. Else, the entire credibility of the project in terms of it resulting into net social, environmental and technological benefits is highly questionable.
Furthermore, the discussion mentions the Indian municipalities' inability to comply with MSW 2000 rules on various grounds. These are not the barriers related to the project. Again the arguments are out of context and weak.
10. The whole additionally argument collapses because of the fact that there is no mention of the alternatives available to the project. There are other forms of MSW treatment, which are environmentally far more positive such as vermi-composting, which require far lesser technological input and avoid GHG emissions at the same time. Biological forms of treatment are cheaper and better researched for Indian MSW. Finally, for a common man, it would seem that the option of constructing sanitary landfills, with methane recovery and combustion, should be given a greater preference rather than such short term fixes. Although, RDF may still be justifiable, but needs strong justifications and as such should be benchmarked against other forms of MSW treatments.

Overall, the PDD lacks many of the most basic details and is less than half complete. Some sections of the PDD have been quoted verbatim from similar a successful CDM project, which makes me doubt the entire integrity of the rationale behind such a project.

Comments submitted by Amar Mody (Independent).