

Comment 1

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The PDD has miserably failed in establishing the additionality of the project.

There exist no evidence or anectodal reference provided on common practice barrier. The data represented are misleading and most of the if not all distilleries are using bagasse/biomass for their steam generation.

Differnce between stand alone and non-stand alone project criteria needs to be explained further and how does the opration varies between two to conclude that the project is additional not a BAU.

Regards

Rajaram velayudhan