



PARTY/JISC REVIEW FORM

(version 03)

(by submitting this form, a Party involved in a JI activity (through DFP) or a JISC member requests a review)

Party involved (DFP) / JISC member submitting the form:

Reference number and title of the proposed JI activity:

0137: Joint Implementation project aimed at N2O emissions reduction by installation of secondary catalyst inside ammonia oxidation reactors at 3 nitric acid production plants NA2, NA3 and NA4 of Azomures SA company, situated at Târgu Mures, Romania

AIE that performed the verification

BVC

Type of JI activity: large-scale small-scale LULUCF PoA/JPA

Background

1. The requirements of Article 6 of the Kyoto Protocol, the JI guidelines and relevant CMP and JISC requirements regarding verifications (paragraph 37 of the JI guidelines) have to be met and appropriately addressed by the AIE.
2. Project participants shall submit to an AIE a report in accordance with the monitoring plan on reductions in anthropogenic emissions by sources or enhancements of anthropogenic removals by sinks that have already occurred, as provided for in paragraph 36 of the JI guidelines. The report shall be made publicly available.
3. The AIE shall perform a verification of the reductions in anthropogenic emissions by sources or enhancements of anthropogenic removals by sinks reported by project participants, provided that they were monitored and calculated in accordance with paragraph 33 of the JI guidelines (paragraph 37 of the JI guidelines).
4. The AIE shall make its verification publicly available through the secretariat, together with an explanation of its reasons, in accordance with paragraph 38 of the JI guidelines.
5. Where applicable, the AIE shall take into consideration paragraphs 41–55 of the procedures for programmes of activities under the verification procedure under the JISC (JI PoA procedures, version 1).
6. The AIE shall observe the standard for applying the concept of materiality in verifications (version 1).

Request for review

Please respond to the questions presented below by marking the appropriate check box:

Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	➤ Has the AIE verified appropriately the reductions in anthropogenic emissions by sources or enhancements of anthropogenic removals by sinks reported by project participants in accordance with appendix B of the JI guidelines, and the fact that they were monitored and calculated in accordance with paragraph 33 of the JI guidelines?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	➤ Has the AIE made its verification under paragraph 37 of the JI guidelines publicly available through the secretariat together with an explanation of its reasons (including the sampling plan for JI PoA, if applicable)?
<input type="checkbox"/>	<input type="checkbox"/>	➤ Has the coordinating entity of the JI PoA included only JPA(s) that appear to meet all the eligibility requirements defined in the JI PoA DD? (<i>applicable to JI PoA only</i>)

Please describe in detail the reasons for requesting the review, including the specific JI requirements (e.g. guidelines, guidance, decisions, rules, etc.) that you consider not fulfilled, and attach supporting documentation, if appropriate.

- The 3rd MR covers the period from 05/04/2011 to 13/07/2012 and relates only to the production line NA 4, which is one of the three lines covered by the project. While the previous MRs for this project seem to imply that the monitoring periods for each of the lines have been separated, such a separation has not been mentioned explicitly in the PDD, nor does it seem to have been determined in the determination report. According to the JISC's "CLARIFICATION REGARDING OVERLAPPING MONITORING PERIODS UNDER THE VERIFICATION PROCEDURE UNDER THE JOINT IMPLEMENTATION SUPERVISORY COMMITTEE",

(para 5) the monitoring plan shall explicitly provide for overlapping monitoring periods of clearly defined project components, justify its need and state how the conditions mentioned in paragraph 4 above are met;

(para 6) the accredited independent entity (AIE) shall assess whether the requirements listed in paragraphs 4 and 5 above are fulfilled as part of the determination in accordance with paragraph 33 of the JI guidelines;

These conditions seem to not have been met. The separation was not made explicit in the PDD, it was not determined in the determination report, nor addressed in the verification report.

- Emission factor for line NA4 is estimated in PDD as 6.11 kgN₂O/tHNO₃. PDD p41 "Final baseline emission factor calculation will be subject to verification during first periodic verification".

The current MR indicates that: "Baseline emission factor established for the line 4 is 9.14 kgN₂O/tHNO₃." That is 50% above the PDD estimation. The current VR only mentions that "Baseline emission factors and project emission factors for emission reduction calculations for Lines NA2, NA3, NA4 has been established on the line-specific basis. The calculation of emission reductions is based on conservative assumptions and the most plausible scenarios in a transparent manner. In particular conservative approach has been used in the statistical evaluation, which is applied to the complete data series of N₂O concentration as well as to the data series for gas volume flow on every production line on AZOMURES plant. Detailed calculations are correct and described transparently in the Monitoring Report and Calculation models". Therefore it is not mentioned in the VR, what are the reasons for such a difference between the PDD estimation and the value applied in the MR.

- According to PDD p7 the nameplate capacity of production line NA4 is 247,500 tHNO₃/y, 330 days/y, resulting in 223,767 tHNO₃/y maximum production possible. 247,500 tHNO₃/y nameplate capacity of line NA4 equals to 28.3 tHNO₃/hr. According to MR, the project NAP was 325,170 tHNO₃ in 466 days, equivalent to 254,693 tHNO₃/y, 14% above the maximum production possible. VR on page 8 indicates the nameplate capacity of production line NA4 as 750 t HNO₃/day, which results in 31.25 tHNO₃/hr, 11% above the PDD nameplate capacity. XL attached to MR details the project NAP with 1 hour resolution. The project NAP exceeds the 31.25 tHNO₃/hr limit in many hours, reaching maximum of 49.2 tHNO₃/hr, 57% above the VR nameplate capacity and 74% above the PDD nameplate capacity of the production line. MR p21 indicates the project NAP of 698 tHNO₃/day comparing to 435 tHNO₃/day in baseline, 60% more than in baseline campaign. It is not clarified how it was possible to exceed the project Nitric Acid Production by 60% above the baseline campaign, and up to 57% above the nameplate capacity of the production line.
- VR on its page 7 of the second monitoring period (previous verification) includes the following FAR: "FAR1: Please define the back-up procedures for the Emission Reduction Model in documented or electronic form in such a way that copies can have developer of the model and representatives of AZOMURES plant." The current VR on its page 7 includes the following observation "There are no remaining issues and FARs from previous verifications." As the previous MR included FAR, this AIE observation is not correct. The current MR and VR do not include expression "back-up procedure". Thus the FAR from the previous verification have not been addressed by the AIE.