FINAL
JI DETERMINATION REPORT

GPN S.A.

GPN GRAND QUEVILLY N7 N_2O ABATEMENT PROJECT

Report No: : 8000373115 – 09/264

Date: 2010-04-28

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Project Type: ☒ JI Track 1 (Projet Domestique) ☐ JI Track 2	Organisational unit: TÜV NORD JI/CDM Certification Program
Client: GPN S.A.	Client ref.: Patrick Le Calvé
Summary:	☒ positive determination opinion ☐ negative determination opinion

GPN S.A. has commissioned the TÜV NORD JI/CDM Certification Program (CP) as a Third Party to determinate the project: "GPN Grand Quevilly N7 N_2O abatement" with regard to the relevant requirements of the host country France and of the UNFCCC for JI project activities, as well as criteria for consistent project operations, monitoring and reporting. UNFCCC criteria refer to the Kyoto Protocol Article 6 criteria and the Guidelines for the implementation of Article 6 of the Kyoto Protocol as agreed in the Marrakech Accords.

The project applies to the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants", approved and published by the MEEDDAT in July 2009.

The review of the project design documentation and additional documents related to baseline and monitoring methodology have provided TÜV NORD JI/CDM CP with sufficient evidence to determinate the fulfilment of the stated criteria.

In detail the conclusions can be summarised as follows:

- The project is in line with all relevant host country criteria (France) and all relevant UNFCCC requirements for JI.
- The project additionality is sufficiently justified in the PDD, the monitoring plan is transparent and adequate.
- The calculation of the project emission reductions is carried out in a transparent and conservative manner, so that the calculated emission reductions of 265,459 tCO_2e are most likely to be achieved within the crediting period.

The conclusions of this report show, that the project, as it was described in the project documentation, is in line with all criteria applicable for the determination PDD.

Report No.: 8000373115 – 09/264	Subject Group: Climate Protection	
Report title: GPN Grand Quevilly N7 N_2O abatement project.		
Work carried out by: Mr. Rainer Winter Mr. Ulrich Walter Mr. Stefan Magenheim Mr. Khalid Doukkali		
Technical review by: Mr. Eric Krupp	Final approval by Mr. Eric Krupp	
Date of this revision: 2010-04-28	Rev. No.: 1	Number of pages: 87

Indexing terms

Projet Domestique
JI – Track 1
Determination PDD

Abbreviations

AMS	Automated Monitoring System
BAT	Best available technology
BAU	Business as usual
CA	Corrective Action
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CH_4	Methane
CL	Clarification Request
CO_2	Carbon dioxide
CO_{2e}	Carbon dioxide equivalent
CP	Certification Program
DFP	Designated Focal Point
DRIRE	Directions Régionales de l'Industrie de la Recherche et de l'Environnement
DVM	Determination and Verification Manual /Draft)
EB	CDM Executive Board
EIA	Environmental Impact Assessment
ERU	Emission Reduction Unit
EU ETS	European Union Emissions Trading Scheme
FAR	Forward Action Request
GHG	Greenhouse gas(es)
IPCC	Intergovernmental Panel on Climate Change
JI	Joint Implementation
JISC	Joint Implementation Supervisory Committee
MEEDDAT	Ministère de l'Ecologie, de l'Energie, du Développement durable et de la Mer, France
N_2O	Nitrous Oxide
NCV	Net Calorific Value of Fuel
PDD	Project Design Document
QC/QA	Quality control/Quality assurance
UNFCCC	United Nations Framework Convention on Climate Change
VVM	Validation and Verification Manual

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1 OBJECTIVE / SCOPE

GPN S.A. has commissioned the TÜV NORD JI/CDM Certification Program (CP) to carry out a determination of the project:

" GPN Grand Quevilly N7 N_2O abatement"

with regard to the relevant requirements for JI project activities.

The purpose of a determination is to have an independent third party assess of the project design. In particular, the project's baseline, the monitoring plan (MP), and the project's compliance with relevant host country and UNFCCC criteria are determinated in order to confirm that the project design as documented is sound and reasonable and meets the stated requirements and identified criteria. Determination is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of emission reduction units (ERUs).

UNFCCC criteria refer to the Kyoto Protocol Article 6 criteria and the Guidelines for the implementation of Article 6 of the Kyoto Protocol as agreed in the Marrakech Accords with regard to Track 1 JI project activities.

2 GHG PROJECT DESCRIPTION

2.1 Project Characteristics

Essential data of the project is presented in the following Table 2-1.

Table 2-1: Project Characteristics

Item	Data		
Project title	"GPN Grand Quevilly N7 N_2O Abatement Project "		
Project size	☒ Large Scale ☐ Small Scale		
Project Scope *(according to UNFCCC sectoral scope numbers for JI)*	☐	1	Energy Industries (renewable- /non-renewable sources)
	☐	2	Energy distribution
	☐	3	Energy demand
	☐	4	Manufacturing industries
	☒	5	Chemical industry
	☐	6	Construction
	☐	7	Transport
	☐	8	Mining/Mineral production
	☐	9	Metal production
	☐	10	Fugitive emissions from fuels (solid, oil and gas)
	☐	11	Fugitive emissions from production and consumption of halocarbons and hexafluoride

Item	Data		
	☐	12	Solvents use
	☐	13	Waste handling and disposal
	☐	14	Afforestation and Reforestation
	☐	15	Agriculture
Applied Methodology	*Project specific methodology (Projet Domestique Methodology)*		
Track	*1*		
Crediting period	2009-12-01 – 2012-12-31		
Start of crediting period[1]	2009-12-01		

2.2 Involved Parties and Project Participants

The following parties to the Kyoto Protocol and project participants are involved in this project activity (Table 2-2).

Table 2-2: Project Parties and project participants

Characteristic	Party	Project Participant
Host party	France	GPN S.A.
Other involved party/ies	Germany	N.serve Environmental Services GmbH

2.3 Project Location

The details of the project location are given in table 2-3:

Table 2-3: Project Location

No.	Project Location
Host Country	France
Region	North West (Haute Normandie), Département: Seine-Maritime, Commune : Le Grand Quevilly (near Rouen)
Project location address	30, rue de l'lindustrielle - BP 204 76121 Grand Quevilly Cadex
Plant coordinates	Stack : Latitude: 49°24'58.67"N Longitude : 1° 1'28.92"E Ammoniac Boiler: Latitude: 49°24'59.60"N Longitude: 1° 1'29.84"E

[1] As per the published PDD (version 2)

2.4 Technical Project Description

The project involves the installation of a secondary N_2O reduction catalyst of the nitric acid production plant of GPN N7. The emission reductions are a result of the catalytic decomposition of nitrous oxide. Nitrous oxide which is formed as by-product of the nitric acid production will be removed by the catalyst installed below the ammonia oxidation gauze pack in the ammonia burner. The nitrous oxide would otherwise be emitted through the gas stack into the atmosphere.

The key parameters of the project are given in table 2-4:

Table 2-4: Technical data of the project *)

Parameter	Unit	Value
Ammonia Oxidation Reactor		
Manufacturer	-	GPN S.A.
Diameter	mm	4920
Start of commercial production	-	January 1989
Operating conditions as per specifications (trip point values)		
- Temperature (min/max):	℃	800/925
- Pressure (min/max):	MPa	There is no trip point for pressure
- Ammonia to Air ratio (max)	Vol.-%	13,4
Ammonia Oxidation Catalyst		
Manufacturer	-	Heraeus
Composition:	-	Pt/Rd/Pd
Absorber		
Design capacity per day (100%)	t/d	1050
Design capacity per day (legal)	t/d	1200
Annual operation (design)	days	350
Secondary Catalyst		
Start of operation	-	June 2008
Manufacturer	-	YARA
Type	-	58 Y 1
Design efficiency N_2O reduction	%	83
N_2O Analyzer (stack), current		
Manufacturer	-	FT Fine Tech
Type	-	PCM 1000/TSO 20
Measurement Principle	-	NDIR
N_2O Analyzer (stack), future		
Manufacturer	-	FT Fine Tech
Type	-	ANAFIN 5000 ORBITAL AIT
Measurement Principle	-	FTIR
Stack volume flow rate measurement		
Manufacturer	-	Sick Maihak GmbH
Type	-	FLOWSIC 100
Measurement Principle	-	Ultrasonic

3 METHODOLOGY AND DETERMINATION PDD SEQUENCE

3.1 Determination PDD Steps

The determination of the project consisted of the following steps:

- Contract review
- Appointment of team members and technical reviewers
- Publication of the project design document (PDD)
- A desk review of the PDD[/PDD/] submitted by the client and additional supporting documents
- Determination planning,
- On-Site assessment,
- Background investigation and follow-up interviews with personnel of the project developer and its contractors,
- Draft determination reporting
- Resolution of corrective actions (if any)
- Final determination reporting
- Technical review
- Final approval of the determination.

The sequence of the determination is given in the table 3.1 below:

Table 3.1: Determination PDD sequence

Topic	Time
Assignment of determination	2009-07-03
Submission of PDD for global stakeholder commenting process	2009-08-03
On-site visit	2009-07-27 to 2009-07-31
Draft reporting finalised	2009-08-28
Final reporting finalised	2010-04-28
Technical review on final reporting finalised	2010-04-28

3.2 Contract review

To assure that

- the project falls within the scopes for which accreditation is held,
- the necessary competences to carry out the verification can be provided,
- Impartiality issues are clear and in line with the JI accreditation requirements

a contract review was carried out before the contract was signed.

3.3 Appointment of team members and technical reviewers

On the basis of a competence analysis and individual availabilities a determination team, consistent of one team leader and 3 additional team members, were appointed. Furthermore also the personnel for the technical review and the final approval were determined.

The list of involved personnel, the tasks assigned and the qualification status are summarized in the table 3-2 below.

Table 3-2: Involved Personnel

	Name	Company	Function [1)]	Qualification Status [2)]	Sectoral competence	Technical competence	Host country Competence	Controlling competence
☒ Mr. ☐ Ms.	R. Winter	TÜV NORD CERT, Germany	TL	SA	☒	☒	☐	☒
☒ Mr. ☐ Ms.	U. Walter	TÜV NORD CERT, Germany	TM	TE	☐	☒	☐	☐
☒ Mr. ☐ Ms.	S. Magenheim	TÜV NORD SYSTEMS, Germany	TM	TE	☐	☒	☐	☐
☒ Mr. ☐ Ms.	K. Doukkali	TÜV NORD CERT, Germany	TM	TE	☐	☒	☒	☐
☒ Mr. ☐ Ms.	E. Krupp	TÜV NORD CERT, Germany	TR, FA	SA	☒	☒	☐	☒

[1)] TL : Team Leader; TM : Team Member, TR: Technical review; FA: Final approval

[2)] GHG Auditor Status: A : Assessor; E : Expert; SA: Senior Assessor; T : Trainee; TE Technical Expert

3.4 Consideration of Public Stakeholder Comments

The draft PDD, as received from the project participants, has been made publicly available on TÜV NORD Website www.global-warming.de during a 30 days period from 2009-08-03 to 2009-09-03.

In case comments were received, they are taken into account during the determination process. The comments and the discussion of the same are documented in annex 5 of this report.

3.5 Determination PDD Protocol

In order to ensure consideration of all relevant assessment criteria, a determination protocol is used. The protocol shows, in a transparent manner, criteria and requirements, means of determination and the results from pre-determination the identified criteria. The determination protocol reflects the generic JI – Track 1 requirements projects have to meet as well as project specific issues as applicable. The determination protocol serves the following purposes:

- It organises, details and clarifies the requirements that a JI project is expected to meet;
- It ensures a transparent determination PDD process where the independent entity will document how a particular requirement has been validated and the result of the determination.

The determination protocol as described in Figure 1.

Determination Protocol Table A-1: Requirement checklist				
Checklist Item	***Determination PDD Team Comment***	***Reference***	***Draft Conclusion***	***Final Conclusion***
The checklist items in Table A-1 are linked to the various requirements the project should meet. The checklist is organised in various sections. Each section is then further sub-divided as per the requirements of the topic and the individual project activity.	*The section is used to elaborate and discuss the checklist item in detail. It includes the assessment of the determination team and how the assessment was carried out.*	*Gives reference to the information source on which the assessment is based on*	*Assessment based on evidence provided if the criterion is fulfilled (OK), or a CAR, CL or FAR (see below) is raised. The assessment refers to the draft determination stage.*	*In case a corrective action or a clarification the final assessment at the final determination stage is given.*

Figure 1: Determination protocol tables

The completed determination protocol is enclosed in Annex 1 to this report.

3.6 Review of Documents

The published PDD (version 2) and supporting background documents related to the project design and baseline were reviewed.

Furthermore, the determination team used additional documentation by third parties like host party legislation, technical reports referring to the project design or to the basic conditions and technical data.

3.7 Follow-up Interviews

The determination team has carried out interviews in order to assess the information included in the project documentation and to gain additional information regarding the compliance of the project with the relevant criteria applicable for JI (Projet Domestique).

During determination the determination team has performed interviews to confirm the provided information and to resolve issues identified in the document review. The main topics of the interviews are summarized in table 3-3.

Table 3-3: Interviewed persons and interview topics

Interviewed Persons / Entities	Interview topics
Project proponent representatives (GPN) Project consultant (N.serve) Maintenance staff of AMS (SPIE)	- Chronological description of the project activity with documents of key steps of the implementation. - Implementation status - Technical details of the project realization, project feasibility, designing, operational life time, monitoring of the project - Host Government Approval - Approval procedures and status - Monitoring and measurement equipment and system. - Financial aspects - Crediting period - Project activity starting date - ERU allocation / ownership - Baseline assumptions - Additionality - Monitoring - Roles & responsibilities of the project participants w.r.t. project management, monitoring and reporting - National Legislation - Editorial issues of the PDD

A comprehensive list of all interviewed persons is part of section 7 'References'.

3.8 Project comparison

The determination team has compared the proposed JI project activity with similar projects or technology that have similar or comparable characteristics and with similar projects in the host country in order to achieve additional information esp. regarding:

- Project technology
- Additionality issues
- Reasons for reviews, requests for reviews and rejections within the JI registration process.

3.9 Resolution of Clarification and Corrective Action Requests

3.9.1 Definition

A **Corrective Action Request (CAR)** will be established where:

- mistakes have been made in assumptions, application of the methodology or the project documentation which will have a direct influence the project results,
- the requirements deemed relevant for determination of the project with certain characteristics have not been met or
- there is a risk that the project would not be registered by the UNFCCC or that emission reductions would not be able to be verified and certified.

A **Clarification Request (CL)** will be issued where information is insufficient, unclear or not transparent enough to establish whether a requirement is met.

A **Forward Action Request (FAR)** will be issued when certain issues related to project implementation should be reviewed during the first determination ERU.

3.9.2 Draft Determination PDD

After reviewing all relevant documents and taken all other relevant information into account, the determination team issues all findings in the course of a draft determination report and hands this report over to the project proponent in order to respond on the issues raised and to revise the project documentation accordingly.

3.9.3 Final Determination PDD

The final determination starts after issuance of the proposed corrective action (CA) of the CARs CLs and FARs by the project proponent. The project proponent has to reply on those and the requests are "closed out" by the determination team in case the response is assessed as sufficient. In case of raised FARs, in which action from the project personnel is requested, the project proponent has to respond on this, identifying the necessary actions to ensure that the topics raised in this finding are likely to be resolved at the latest during the first verification. The determination team has to assess whether the proposed action is adequate or not.

In case the findings from CARs and CLs cannot be resolved by the project proponent or the proposed action related to the FARs raised cannot be assessed as adequate, no positive determination opinion can be issued by the determination team.

The CAR(s) / CL(s) / FAR(s) are documented in chapter 4.

3.10 Technical review

Before submission of the final determination report a technical review of the whole determination procedure is carried out. The technical reviewer is a competent GHG auditor being appointed for the scope this project falls under. The technical reviewer is not considered to be part of the verification team and thus not involved in the decision making process up to the technical review.

As a result of the technical review process the determination opinion and the topic specific assessments as prepared by the determination team leader may be confirmed or revised. Furthermore reporting improvements might be achieved.

3.11 Final approval

After successful technical review of the final report an overall (esp. procedural) assessment of the complete determination will be carried out by a senior assessor located in the accredited premises of TÜV NORD.

Only after this step the request for registration can be started (in case of a positive determination opinion).

4 DETERMINATION FINDINGS

In the following table the findings from the desk review of the published PDD, visits, interviews and supporting documents are summarised**:**

Table 4-1: Summary of CARs, CLs and FARs issued

Determination topic [1)]	No. of CAR	No. of CL	No. of FAR
General description of project activity (A) - Project boundaries - Participation requirements - Technology to be employed - Contribution to sustainable development	3	3	-
Project baseline (B) - Baseline Methodology - Baseline scenario determination - Additionality determination - Calculation of GHG emission reductions Project emissions Baseline emissions - Leakage	2	2	1
Duration of the Project / Crediting Period (C)	1	-	-
Monitoring Methodology (D) - Monitoring of Project emissions Baseline emissions Leakage Sustainable development indicators / environmental impacts Project management planning	1	2	1
Estimation of greenhouse gas emission reductions (E)	1	1	-
Environmental impacts (F)	-	-	-
Stakeholder Comments (G)	-	-	-
SUM	**8**	**8**	**2**

[1)] The letters in brackets refer to the determination protocol

The following tables include all raised CARs, CLs and FARs. For an in depth evaluation of all determination items it should be referred to the determination protocols (see Annex 1).

The findings of determination process are summarized in the tables below.

Finding:	**A1**		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	No letters of approval have been provided so far.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*The LoA can only be obtained once a preliminary determination report is available. The French DFP requires a preliminary determination report to be submitted for processing the LoA issuance request.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	The LoA of the host country France /LOA/ was issued by the Ministère de l'Écologie, de l'Énergie, du Développement durable et de la Mer (French Ministry of Ecology and Sustainable Development)/mist/ on 2010-04-16 and provided to the determination team on 2010-04-28. • The issuing authority is listed un the UNFCCC JI website as Designated Focal Point. • The LoA states GPN S.A. and N.serve Environmental services GmbH as project participants as given in the PDD. • The project title is clearly referenced in French: "Projet de réduction des émissions de N_2O de la production d'acide nitrique sur le site GPN N7".		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☐ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	**A2**		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The HNO_3-capacity of the N7-plant needs to be corrected. Furthermore, the value of the annual emissions without the installation of the abatement technology needs revision.		

Finding:	A2
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*An amendment has been made to the PDD now reflecting the nominal capacity of the plant being 1050 tHNO_3 (100% conc.) per day (Section A.2, page 1); annual emissions without the installation of the abatement technology has been revised.*
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The relevant figures in the PDD have been revised.
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	A3		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	On page 44/45 the first column should be translated to English.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*Has been amended in the PDD.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The relevant table has been revised.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	A4		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The coordinates of the plant location are missing in the PDD.		

Finding:	A4
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*Coordinates have been added in section A.4.1.4.*
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The coordinates are included in the corresponding section of the PDD
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	A5		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The dates of the relevant Arrete Prefectoral have to be changed to 2009-07-16. As two years after this date the revised benchmark has to be applied, the emission reduction calculation has to be revised accordingly.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*All references have been changed to July 2011 (instead of June 2011); the emission prospects have been revised accordingly.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. All relevant figures, tables and the corresponding Excel-sheet are revised.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	A6		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The information regarding the name of the organisation given in Annex 1 is not in line with A.3. The name given in A.3. is GPN S.A., in Annex 1 is GPN N7 Nitric acid plant (France)		

Finding:	A6
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*A revised PDD was send per email on 2009-09-16.*
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The name of the Organisation in Annex 1 is mentioned according the information given in Chapter A.3.
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	B1		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The discussion of the alternatives c) and d) is missing in chapter B.4.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*A discussion of these scenarios has been included in section B.4 (Step 1).*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The discussion of the scenarios c) and d) are now included in the PDD. Both scenarios were discussed sufficiently.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	B2		
Classification	☒ CAR	☐ CL	☐ FAR

Finding:	B2
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	Table 3 in section B.3 needs to be completed.
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*The mentioned table has been completed.*
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	*OK.* *The table has been completed according to the methodology*
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	B3		
Classification	☐ CAR	☐ CL	☒ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	For the time after 16th July 2011, it has to be clarified in the PDD how it can be assured that no ERUs will be issued for emission levels which do not go beyond the business as usual scenario, which is defined by the Arrete prefectoral 2009-07-16 (2,47 kg N_2O/t HNO_3) over a period of 12 months.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*This issue has now been addressed in the section 'Data processing in case of malfunction of the abatement system' in section B.6.1.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. It was clarified in the PDD, that in the case where a regulatory limit was set by local authorities, this limit replaces the benchmark emission factor determined by the French DFP. Furthermore it must be proven during the verification to the satisfaction of the responsible AIE that no ERUs will be claimed for emission levels that exceed the new regulatory limit, which in this case is 2.47kgN_2O/tHNO_3 from 2009-07 on, It must therefore be proven at each verification that the plant's average emission levels for the past year did not exceed this regulatory limit.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	B4		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The Investment Cost Sheet is still pending		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*The Investment Cost Sheet was sent per e-mail on 2009-08-07.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. A clear, viewable and unprotected investment cost sheet and a rough summary of associated costs with copies of relevant order, invoices were provided to TUEV NORD on 2010-01-20.: • Investment Excel sheet: "GPN N7 100120 • AMS associated costs N7 summary The main types of costs are: • The main types of costs are: • •Costs for catalyst/leasing or investment • Cost for the loss of noble metals in the catalyst lifetime • Monitoring equipment (Finetech) which is in compliance with the monitoring standards listed in the methodology • Installation and connection • Sampling points, calibration gases, pressure regulators, access platform • Engineering • QAL2 audit (2010) • QAL 3 (maintenance, calibrations etc) (ongoing) • Annual Surveillance Test (2011, 2012) • Determination (once) • First Verification • Subsequent Verifications (x 5)) The results of the assessment of the financial sheets are following: • The numbers mentioned in the cost sheets are proved by evidences provided on the on-site visit or during the determination process. • Since the contract between Heraeus and GPN includes a guaranteed performance (85% guaranteed /83% real) over the full crediting period, a technical lifetime assessment of the project/the installation should not be undertaken. • Taxation (VAT) is excluded from the calculation. • The input values are referenced and proved with contracts, invoices or technical offers. • Between 2009 and 2012, the project costs are summarised to 1,082,483 EUR, the revenues in the same period from the		

Finding:	B4
	ERUs issued are 2,389,134. • The tax savings caused by less N_2O-emission are 248,094 EUR between 2009 and 2012. It could be shown, that it is not possible to compensate the costs of the project activity (1,082,483 EUR) only with profits from the a.m. N_2O-tax savings. The figures included in the Data Cost Sheet are assessed as appropriate, conservative and realistic, the calculation is comprehensible. On a basis of an ERU price of 9 € a return of invest is given at 2010. Since no benchmark is predefined (according to the methodology), a further assessment of the IRR is not required. The Annex 3 of the Determination Report includes a detailed assessment of financial parameters.
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	B5		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The date of the installation of the N_2O abatement catalyst is not evidenced.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	The PP provided a Consignment Note regarding 7.499 m³ Catalyst 58-Y1/CNN7/ (date: 2008-06-03) and a corresponding Delivery Note/DNN7/ (date: 2008-06-10).		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The documents show clearly the date of purchasing of the catalyst at the beginning of June 2008.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	C1		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	Apart from the procedural aspects, section C.1. should also reflect the technical aspects of the project implementation.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*Some clarifying sentences have been added to section C.1.1.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The technical aspects of the project implementation is now described properly in section C.1.1..		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	D1		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	Regarding the AMS it should be made clear in the PDD whether the EN 14181 will be followed completely or if other eligible standards, like AFNOR XP X43-305, which are in line with the methodological requirements will be applied for this project activity.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*Additional information has been added to section B.7.2, chapters 1 & 3 therein.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The PP declares, that the AMS will meet all requirements of the methodology, defined in Chap. 7.: Monitoring Plan. The methodology states, that the latest applicable European or national standards and norms (for example, EN14181, AFNOR XP X43-305, or any other monitoring standard considered acceptable in accordance with the requirements for assessing plant emissions in order to calculate payable N_2O tax, as applicable) shall be used for selecting and operating the monitoring system. It must be checked at each verification that the selection and operating conditions of the AMS is in line with the chosen monitoring standard.		

Finding:	D1
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	D2		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The monitoring plan should include the monitoring of the regulatory framework.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*An addition was made to section B.7.1 by means of parameter P.12*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The Parameter: "Emissions cap for N_2O from nitric acid production set by government/local regulation" was added to the Table 11: Data and parameters measured during the project activity.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	D3		
Classification	☐ CAR	☐ CL	☒ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The verifier has to check the appropriateness of the AMS (with regard to e.g. location of the sampling point, QAL1, QAL 2, uncertainty assessment).		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*The project proponents will address these requirements before the first verification*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The clarification of both FAR D3 (AMS) and CL D1 (monitoring standard) need to be checked during the first verification. The PP has to present evidences regarding the eligibility of the monitoring standard and the appropriateness of the AMS.		

Finding:	D3
Conclusion *Tick the appropriate checkbox*	☒ To be checked during the first periodic verification ☐ Appropriate action was taken ☐ Project documentation was corrected correspondingly ☐ Additional action should be taken ☐ The project complies with the requirements

Finding:	D4		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The upper trip point value of OT_{range} in Table 5 has to be corrected.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*Upper trip point value has been corrected in table 5 in section B.6.2.*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The PDD is revised accordingly.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

Finding:	E1		
Classification	☐ CAR	☒ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The concept of instrument correction factors needs further explanation in the PDD esp. with regard to the calibration curve.		

Finding:	E1
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*This issue has now been discussed via telephone between the N.serve monitoring expert Martin Stilkenbaeumer and the TUEV NORD monitoring expert Stefan Magenheim. The discussion was resolved to the satisfaction of Mr Magenheim and a basic summary has been provided by our monitoring expert below. Most of this information is already included in the PDD, but please inform us if anything more specific is needed.* *As part of the quality assurance concept for the AMS in this project a 3rd party calibration test is performed initially and repeated every 3 years. This calibration test will be performed as described in the European norm EN 14181 as QAL2. QAL2 is a procedure for the determination of the calibration function and its variability. The QAL2 tests are performed on suitable AMS that have been correctly installed and commissioned on-site. QAL 2 tests are to be performed at least every 3 years according to EN 14181 but also after major changes to the plant or changes or repairs to the AMS, which will influence the results obtained significantly.* *A calibration function is established from the results of a number of parallel measurements performed with a Standard Reference Method (SRM). The variability of the measured values obtained with the AMS is then evaluated against the required uncertainty. According to EN14181, both the QAL 2 procedures and the SRM need to be conducted by an independent "testing house" or laboratory which has to be accredited to EN ISO/IEC 17025.* *A series of QAL2 specific reference measurements using a the SRM method as per EN 14181 will be carried out at the plant by an accredited testing house to ensure the AMS' suitability, establish the calibration curve and test the variability of the measurements. The results of these SRM are available to the AIE as part of the verification process. The AMS calibration function as well as the total uncertainty of the AMS will be determined. The results will be applied in the project.* *The resulting calibration function or correction factor will be applied to the resulting hourly average values for N2O concentration and for Stack gas flow prior to the final calculation of emission reductions.*
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. It was confirmed, that the correction factors (derived from the calibration curve of the QAL2 audit for all components of the AMS), will be applied to both VSG (tail gas volume flow rate) and NCSG (mean concentration of N_2O in tail gas) data.

Finding:	E1
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements

Finding:	E2		
Classification	☒ CAR	☐ CL	☐ FAR
Description of finding *Describe the finding in unambiguous style; address the context (e.g. section)*	The 90 % issuance factor has to be applied in the formula for ERU-calculation.		
Corrective Action #1 *This section shall be filled by the PP. It shall address the corrective action taken in details.*	*The 90% issuance factor has now been taken into account in the formula for ERU calculation in section B.6.1.* *Table 9 in section B.6.4 and table 2 in Annex 4 have also been adjusted accordingly*		
DOE Assessment #1 *The assessment shall encompass all open issues in annex A-1. In case of non-closure, additional corrective action and DOE assessments (#2, #3, etc.) shall be added.*	OK. The issurance factor was applied to the calculation of ERUs in the formula on page 26 of the PDD.		
Conclusion *Tick the appropriate checkbox*	☐ To be checked during the first periodic verification ☒ Appropriate action was taken ☒ Project documentation was corrected correspondingly ☐ Additional action should be taken ☒ The project complies with the requirements		

5 DETERMINATION ASSESSMENT SUMMARY

The following paragraphs include the summary of the final determination assessments after all CARs and CRs are closed out. For details of the assessments pl. refer to the discussion of the validation findings in chapter 4 and the validation protocol (Annex 1).

5.1 General Description of the Project Activity

5.1.1 Participation

LOA

The DFP of France issued a LoA after submission of the Draft Determination Report.

Project Participants

The project participants are listed in section A.3 of the PDD and this information is consistent with the contact details provided in annex 1 of the PDD.

No entities other than those approved or authorised to be project participants are listed or indicated in these sections of the PDD.

For an in depth evaluation of these topics, please refer to section A.1 of the table A-1 of annex 1.

5.1.2 Contribution to Sustainable Development

The contribution of the project activity to sustainable development of the host country has been confirmed by referencing the project activity in a specific "Méthode pour les Projets Domestiques " /mist/,/B-1/ for JI Track 1 projects, which refers directly to the applied secondary N_2O abatement technology.

For an in depth evaluation of these topics, please refer to section A.2 and B.2 of the PDD.

5.1.3 PDD Editorial Aspects

The PDD is in line with the structure and guidance specified in the decree set from March 2nd 2007 issued by the "Ministère de l'écologie et du développement durable" /B-5/.

For an in depth evaluation of these topics, please refer to section A.3 of the table A-1 of the annex 1.

5.1.4 Technology to be employed

The description of the project as contained in the PDD is complete and accurate and it provides the reader with a clear understanding of the nature of the project activity.

The technology and know-how used in the project activity is assessed to be environmentally safe and sound.

For an in depth evaluation of these topics, please refer to section A.4 of the table A-1 of the annex 1 and chapter 2 of this validation report.

5.1.5 Type of Project

The project qualifies as a Large Scale JI Track 1 Project, scope 5: "Chemical Industry". The host country France fulfils the requirements for Track 1 participation.

5.2 Project Baseline, Additionality and Monitoring Plan

5.2.1 Application of the Methodology

The project applies to a valid version of a French methodology for Projets Domestiques "Catalytic reduction of N_2O at nitric acid plants"/B-2/, published by the Ministère de l'Écologie, de l'Énergie, du Développement durable et de la Mer (French Ministry of Ecology and Sustainable Development)/mist/.

The project activity meets all applicability conditions of the applied methodology. Beyond this, the proposed project activity meets all the other possible requirements or stipulations mentioned in all sections of the selected methodology.

Furthermore the project activity is not expected to result in significant emissions, related both to project and leakage, other than those listed in the methodology.

Summarised it is assessed that the project applies a valid version of an approved methodology and the methodology is applicable to the project.

For an in depth evaluation of these topics, please refer to section B.1 of the table A-1 of the annex 1.

5.2.2 Project Boundary

The PDD correctly describes the project boundary including the physical delineation of the project activity (all parts of the Nitric Acid Plant N7) and the description of the emission sources and GHGs that are included in the project boundary for the purpose of calculating project and baseline emissions for this project activity.

No emission sources which are impacted by the project activity but not addressed by the approved methodology have been identified during validation.

For an in depth evaluation of these topics, please refer to section B.2 of the table A-1 of the annex 1.

5.2.3 Baseline Identification

The PDD provides a transparent and verifiable description of the identified most plausible baseline scenario, including a description of the technology that would be employed and/or the activities that would take place in the absence of the proposed project activity.

The procedure to identify the most plausible reference scenario derived from the methodology (para 3 of the methodology) has been applied correctly and is transparently and sufficiently documented in the PDD.

The identification of possible alternatives of the project activity was carried out appropriately. Furthermore the PP has shown that all relevant policies and circumstances have been identified and correctly considered in the PDD in accordance with the guidance by the DFP.

Summarised it can be assessed that the identified baseline scenario reasonably represents what would occur in the absence of the proposed project activity and the approved methodology used is applicable to the identified baseline scenario.

For an in depth evaluation of these topics, please refer to the section B.3 of the Annex 1 as well as table A-2 of the Annex 2.

5.2.4 Calculation of GHG Emission Reductions

The PDD applies steps and equations to calculate project emissions, baseline emissions, leakage and emission reductions as per the requirements of the methodology.

For the calculation of the GHG emission reductions, the correct equations have been used reflecting the methodological choices. Furthermore all equations are applied correctly.

Baseline Emissions:

The baseline methodology takes into account

- a decree of the MEEDAT, setting the benchmark Emission Factors (EF_{BM}) for the calculation of the reduction of N_2O-Emission in future years

2009	2010	2011	2012	
2.5	2.5	2.5	1.85	kg N_2O/t HNO_3 (100%)

and

- a plant specific regulatory limit of 2.47 kg N_2O/t HNO_3 (100%) from July 2011 onwards.

The baseline emission factor considers both limit values and is determinated as follows:

These values/years are:
Year: 2009 2010 to 2011-06 to 2011-12 to 2012-12
Value: 2.5 2.5 2.5 2.47 1.85 [kg N_2O/t HNO3 (100%)]

Project Emissions:

Taking into account an 83 % efficiency of the secondary N_2O abatement catalyst and an Emission Factor of 7,78 kg N_2O/tHNO_3 (N_2O concentration in the stack from the beginning of 2008 until the installation of secondary catalyst in June 2008), the resulting Project Emission Factor was calculated to 1,32 kg N_2O/tHNO_3.

For an in depth evaluation of these topics, please refer to sections B5-B6 of the table A-1 of the annex 1.

5.2.5 Additionality Determination

Prior consideration of JI

The plant operator carried out a trial campaign between June 2008 and September 2009 to assess the technical effects of the installation of a secondary N2O abatement catalyst. After successful completion of this campaign, GPN decided to undertake a Track 1 JI project activity. September 2009 is therefore fixed as the starting date of the project. After successful completion of this campaign, GPN decided to undertake a Track 1 JI project activity.

Hence, the determination team can confirm that the project complies with the requirements regarding prior consideration of JI.

Application of Methodology / Methodological Tools

The discussion of additionality in the PDD was justified and conducted according to the step-by-step- approach of the Projet Domestique Methodology[/B-1, B-2/]. A financial

barrier assessment, according to the Arrêté du 2 mars 2007 of the «Ministère de l'écologie et du développement durable» was included in the consideration.

Alternatives

The PDD contains a complete list of all realistic alternatives to the project scenario. The list contains inter alia the project activity not undertaken as a JI project activity and the continuation of the status quo.

Investment Analysis
The PP provided an investment-sheet with all relevant types of costs occurred in the project activity/INVN7/. The basis of this cost assessment is a comparison of costs incurred in absence of the project (to fulfil the legal requirements) against the costs of the project activity.

The main types of costs are:

- Costs for catalyst/leasing or investment
- Cost for the loss of noble metals in the catalyst lifetime
- Monitoring equipment (Finetech) which is in compliance with the monitoring standards listed in the methodology
- Installation and connection
- Sampling points, calibration gases, pressure regulators, access platform
- Engineering
- QAL2 audit (2010)
- QAL 3 (maintenance, calibrations etc) (ongoing)
- Annual Surveillance Test (2011, 2012)
- Determination (once)
- First Verification
- Subsequent Verifications (x 5)

The validation team has conducted a thorough assessment of the parameters and assumptions used in this calculation. The conclusion is, that all relevant financial

indicators and parameters are determined accurately. This was checked by means of cross-checking the evidences provided by the PP as well as acquired through background investigation (public regulation, local tax laws, etc.); besides, expertise in relevant accounting practices has been consulted.

It can be confirmed, that none of the N_2O destruction technology options are expected to generate any significant financial or economic benefits other than JI related income. Therefore, the "Business As Usual" scenario, the installation of just enough secondary N_2O abatement catalyst to comply with the applicable N_2O regulation, is considered not to face any significant investment barriers.

Barrier Analysis

The PP has justified the additionality on the basis of

a) Investment barriers

b) Technological barriers

c) Other barriers

Though all barriers are justified to a certain extent, none of the barriers was assessed by the validation team to be a decisive barrier which would have prevented the project from realization.

For an in depth evaluation of these topics, please refer to sections B4 of the table A-1 of the annex 1.

Summary

The procedure to justify the additionality of the project activity derived from the methodology or required methodological tools has been applied correctly and is transparently documented in the PDD.

The validation team is convinced that the CDM was seriously considered during the Management Decision for the project.

Considering all statements above, the validation team arrived at the conclusion that the project activity is **additional** because the project is not financially viable without JI revenues, whereas none of the other presented barriers could be considered as a decisive barrier for the project implementation.

5.2.6 Monitoring Methodology

The data measurement, storage, assessment and processing was discussed with the plant operator GPN and N.serve, who will process the monitoring data and it can be confirmed, that the monitoring plan is in line with the methodology Projet Domestique Methodology: Catalytic reduction of N_2O at nitric acid plants/B-2/.

For an in depth evaluation of these topics, please refer to section B6 of the table A-1 of the annex 1.

5.2.7 Monitoring Plan

The monitoring plan covers all monitoring parameters as stipulated in the applied monitoring procedure of the methodology. The monitoring plan can be implemented and the validation team arrived at the conclusion that all monitoring arrangements are feasible within the project design.

For an in depth evaluation of these topics, please refer to section B6 of the table A-1 of the annex 1.

5.2.8 Project Management Planning

The project management planning is appropriate for the purpose of the projects monitoring.

For an in depth evaluation of these topics, please refer to section B.7 of the table A-1 of the annex 1.

5.2.9 Crediting Period

The project starting date is 2009-09 and the duration of the crediting period extends from 2009-12-01 to 2012-12-31, which is deemed realistic and appropriate.

For an in depth evaluation of these topics, please refer to section C of the table A-1 of the annex 1.

5.2.10 Environmental Impacts

The Host Country France does not require an Environmental Impact Assessment (EIA) for the project. Furthermore on the basis of document review and the on-site visit the validation team is convinced that negative environmental impacts due to the project are unlikely to occur.

For an in depth evaluation of these topics, please refer to section D of the table A-1 of the annex 1.

5.2.11 Comments by Local Stakeholders

The global stakeholder consultation for the project was carried out on the TÜV NORD website www.global-warming.de for 30 days, in line with the applicable requirements.

For an in depth evaluation of these topics, please refer to section E of the table A-1 of the annex 1.

5.2.12 Issues for verification

It must be checked at each verification, that, for the time after 16th July 2011, no ERUs will be issued for emission levels which do not go beyond the business as usual scenario, defined by the Arrete prefectoral 2009-07-16 (2,47 kg N_2O/t HNO_3) over a period of 12 months.

The verification should include the checking of the appropriateness of the AMS (with regard to e.g. location of the sampling point, QAL1, QAL 2, uncertainty assessment)..

5.3 General Description of the Project Activity

5.3.1 Participation

LOA

The submission of a full project dossier (including the PDD and preliminary Determination report with a positive determination opinion of an Independent Entity) is a prerequisite for the Host Country Approval from the MEEDDAT.

Project Participants

Project participant involved in the project activity is the PGN S.A. (France) and N.serve Environmental Services GmbH (Germany)

5.3.2 PDD editorial Aspects

A Project Design Document appropriate to the annex 1 („Example illustrating the application of this methodology") of the Projet Domestique Methodology: "Catalytic reduction of N2O at nitric acid plants" has been used.

5.3.3 Technology to be employed.

Within the project, N_2O emissions from the production of nitric acid at GPN's N7 nitric acid plant will be reduced by installation of a secondary N_2O abatement technology.

The description of the project activity is considered to be accurate, complete, presented in a detailed manner and in line with provided evidences and results of the on-site inspection.

5.3.4 Small Scale Projects

Not applicable

5.4 Project Baseline, Additionality and Monitoring Plan

5.4.1 Application of the Methodology

The used baseline methodology provides an algorithm for identification and justification of the baseline. This algorithm stipulates a step-wise approach which should be followed for elaboration of the baseline scenario and justification of the additionality.

Data sources and assumptions as provided within the developed methodology draw upon the main provisions of the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants", stipulated by the French Designated Focal Point (Le Ministère de l'Écologie, de l'Énergie, du Développement Durable et de l'Aménagement du Territoire (MEEDDAT).

5.4.2 Project Boundary

All equipment used within the project activity has been indicated in the PDD including the information about its purpose and the technical specification. Project boundary is clearly described in words and a visualisation of the physical project boundary as well as a table defining all significant GHG gases has been included in the PDD.

In the course of determination the determination team has inspected the whole process of APG utilization. The process encompasses APG production, transportation, separation, preparation (drying) as well as power generation and transportation to different consumer groups. It could be verified that all equipment mentioned has been physically installed and is in a good working condition. Furthermore the technical specification of the installed equipment is in line with provided documentation and is in line the indication in the PDD.

5.4.3 Baseline Identification

The description of baseline identification in the PDD is transparent and verifiable. The procedure to arrive to the baseline is in line with the applied project specific methodology. All plausible alternatives have been identified. Only alternatives were excluded which are assessed not to be plausible alternatives. Within the financial

analysis it could be demonstrated that the identified most plausible alternative (i.e. baseline scenario) is financially more attractive than the project scenario.

5.4.4 Calculation of GHG Emission Reductions

The calculation has been done as per applied project specific methodology. All data not to be monitored have been assessed as correct. The values for the monitoring parameters assumed within the calculation are plausible. It could be concluded that the estimated emission reductions are plausible and conservative.

5.4.5 Additionality Determination

Consideration of JI in decision making (if project start before determination PDD)

The starting date reported is as per JI glossary of terms. Based on provided evidences it could be concluded that JI was considered at the time of the decision making. The corresponding evidences demonstrate that without benefits out of JI the project would be not financial viable. Furthermore the impact of JI has been calculated and it could be demonstrated that benefits out of JI would make the project financial attractive. The consideration of JI has been assessed as serious.

Application of methodology / methodological tools

The developed project specific baseline methodology provides an algorithm for identification and justification of the baseline. Data sources and assumptions as provided within the developed methodology draw upon the main provisions of the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants", stipulated by the French Designated Focal Point (Le Ministère de l'Écologie, de l'Énergie, du Développement Durable et de l'Aménagement du Territoire (MEEDDAT).

The universal 'Benchmark Emissions Factor' (EF_{BM}) should be applied for all nitric acid plants eligible to undertake Projets Domestiques, regardless of their size, their technical characteristics and their past and present emissions levels.

Alternatives

The PDD contains a complete list of all realistic alternatives to the project scenario. Project activity not undertaken as a JI project activity and the continuation of the current practice have been identified as plausible and realistic alternatives.

Investment analysis

Investment analysis shows that the project scenario is not the most attractive alternative or economically feasible without benefits from ERU sales. All parameters applied within the investment analysis have been assessed as plausible. Applied

benchmark has been supported by evidences chosen and has been assessed as appropriate.

Barrier analysis

A detailed barrier analysis has been carried out by PP: In most cases the identified barriers have been assessed as a serious difficulty with reference to the project implementation.

Determination team analysed In the course of the determination a sufficient confidence could be gained that an immense effort has been spent by the project participant to overcome the identified barriers. The justification of the barriers supported by evidence and substantiated. Furthermore the determination team is of the opinion that argumentation as provided by the project participant in this context is convincing.

However the identified barriers could not be assessed as a sufficient to prevent the implementation of this alternative.

Common practice analysis

The common practice analysis provided in the PDD is accurate. The information and data sources used are appropriately references and could be proved in the course of determination.

A sufficient confidence could be gained that the proposed project type (i.e.. technology and/or practice) has not diffused in the relevant sector and geographical area and the time the project started.

Summary

In the course of the determination it be concluded that the baseline scenario has been appropriately elaborated and additionality has been appropriately justified. All conclusions could be supported by the evidences.

5.4.6 Monitoring Methodology

A project specific methodology is determined by the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants".

5.4.7 Monitoring Plan

The monitoring plan covers all monitoring parameters given in the applied monitoring methodology. The monitoring plan can be implemented and are all monitoring arrangements are feasible within the project design.

5.4.8 Project Management Planning

The project management planning is appropriate for the purpose of the projects monitoring.

5.4.9 Crediting Period

The choice of the crediting period is appropriate. The crediting period starting date is appropriate.

5.4.10 Environmental Impacts

Since there is no negative effect on the air quality, water pollution or other environmental conditions, an EIA is not required from host country for this specific type of project.

5.4.11 Comments by Local Stakeholders

As the JI project does not have any relevance for local air, water or soil emissions, a local stakeholder consultation is not considered necessary.

6 DETERMINATION OPINION

GPN S.A. has commissioned the TÜV NORD JI/CDM Certification Program (CP) as a Third Party to determinate the project:

"GPN Grand Quevilly N7 N_2O abatement"

with regard to the relevant requirements of the host country France and of the UNFCCC for JI project activities, as well as criteria for consistent project operations, monitoring and reporting. UNFCCC criteria refer to the Kyoto Protocol Article 6 criteria and the Guidelines for the implementation of Article 6 of the Kyoto Protocol as agreed in the Marrakech Accords.

The project applies to the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants", approved and published by the MEEDDAT in July 2009.

The review of the project design documentation and additional documents related to baseline and monitoring methodology have provided TÜV NORD JI/CDM CP with sufficient evidence to determinate the fulfilment of the stated criteria.

In detail the conclusions can be summarised as follows:

- The project is in line with all relevant host country criteria (France) and all relevant UNFCCC requirements for JI.
- The project additionality is sufficiently justified in the PDD, the monitoring plan is transparent and adequate.
- The calculation of the project emission reductions is carried out in a transparent and conservative manner, so that the calculated emission reductions of 265,459 tCO_2e are most likely to be achieved within the crediting period.

The conclusions of this report show, that the project, as it was described in the project documentation, is in line with all criteria applicable for the determination PDD.

Essen, 2010-04-28

Mr Rainer Winter,
TÜV NORD JI/CDM CP
Determination Team Leader

Essen, 2010-04-28

Eric Krupp
Final Approval Person
TÜV NORD JI/CDM CP

7 REFERENCES

Table 7-1: Documents provided by the project participant

	Document
/**AMSFTN7**/	Offre technique Finetech SARL:"Analyseur FTIR anafin systeme cle en main 1 flux (Technical offer from Finetech SARL regarding an AMS for the stack of N7-plant)
/**AN2ON7**/	Decree of the DRIRE from 16/07/2009 setting the limits for N_2O-emissions for the N7-plant to 2.47 kg/tHNO_3 from July 2011 onwards.
/**APSN7**/	Prescriptions Complementaires (Plant permission (decree) for N5, N6, N7 indicates the plant capacity of HNO_3
/**APSOI**/	Prescriptions Complementaires (Plant permission (decree) for Oissel indicates the plant capacity of HNO_3
/**BREF**/	Reference Document on Best Available Techniques for the Manufacture of Large Volume Inorganic Chemicals – Ammonia, Acids and Fertilizers (August 2007)
/**CALVOLN7**/	Certificat d'etalonnage (Calibration certificate) for the HNO_3-volume flow meter of plant N7, KRONE OPTIFLUX 4000
/**CCVOLN7**/	Debitmetre etalonnage verification (Control chart) of HNO_3-volume flow meter of plant N7
/**CCVOLN7R**/	Debitmetre etalonnage verification (Control chart) of HNO_3-volume flow meter of plant N7 (replaced)
/**CFTIRN7**/	Plan de contrôle suivi des analyseurs à l'émission des nitriques 5,6,7 (Plan of the control measures regarding the AMS
/**CNN7**/	Consigment Note regarding the delivery of the abatement catalyst to the N7 plant.
/**CSPIE**/	Contrat de maintenance courante electricite mesures et regulation analyseurs pysico-chimiques barrieres automatiques usine de Grand-Quevilly (Contact between GPN and the laboratory SPIE regarding maintenance of the AMS of plant N7 and N8)
/**CSPIEA5**/	Annex 5 to /CSPIE/ : "Définition des travaux de maintenance courante électricité, mesures et regulation, analysators physio-chimiques et barriers

	Document
	(Definition of the measures of maintenance the AMS)
/**DNN7**/	Delivery note, dated 2008-06-10 regarding 75x40 kg Yara catalyst 58-Y1.
/**DVOLN7**/	Technical description of the HNO_3-volume flow meter of plant N 7, KRONE OPTIFLUX 4000
/**ISO 14001**/	ISO 14001:2004 Certificate, valid until 20/12/2009, issued by AFAQ at 01/05/2007.
/**ISO 9001**/	ISO 9001:2000 Certificate, valid until 16/01/2011, issued by AFAQ at 04/02/2008.
/**JMPROP1.6**/	Project Preliminary Proposal, Nitrous Oxide (N_2O) Abatement Project in the Nitric Acid Plant of GP Rouen N7 Plant, Plant specific emissions factor: 1.6 kg N_2O per tonne of nitric acid with YARA catalyst
/**JMPROP2.47**/	Project Preliminary Proposal, Nitrous Oxide (N_2O) Abatement Project in the Nitric Acid Plant of GP Rouen N7 Plant, Plant specific emissions factor: 2.47 kg N_2O per tonne of nitric acid with YARA catalyst
/**LOA**/	The LoA of the host country France, issued by the Ministère de l'Écologie, de l'Énergie, du Développement durable et de la Mer (French Ministry of Ecology and Sustainable Development)/mist/ on 2010-04-16.
/**MFTIRN7**/	Principe de mesure et echantillonnage de l'analyseur NH_3, N_2O, NO, NO_2 Nitrique 7 (Description of measurement of the AMS of plant N 7) for N_2, N_2O, NH_3, NO, NO_2
/**MNOXN7**/	Principe de mesure et echantillonnage de l'analyseur NO_X Nitrique 7 (Description of measurement of the AMS of plant N 7) for NO_X
/**MPVOLN7**/	Instrument fiche de vie (Maintenance protocol) of volume flow meter of plant N-7
/**MPVOLN7R**/	Instrument fiche de vie (Maintenance protocols) of HNO_3-volume flow meter of plant N 7 (replaced)
/**PIDN7**/	Flow Sheet of Nitric Acid Production Plant N7, Rev. 1 from 08/2007 (Doc.-No.: 1A0010-PFD-0010-0001).
/**PIDABN7**/	PID Production gaz nitreux/vapeur Schema N°: XD 002 (Flow sheet of Ammonia Burner)
/**PIDGCN7**/	PID Circuit gaz Schema N°: XD 003 (Detailed flow sheet of gas circuit)

	Document
/**PPPN7**/	Project Preliminary Proposal from Johnson Matthey
/**OFTIRN7**/	Organisation de la cellule analysator pour le suivi des analyseurs securite (IPS) (Description of the organisation of the department which is responsible for the maintenance of the measurement devices)
/**QAL1**/	QAL 1 Report **(Pending)**
/**QP**/	Quinquennale des études de danger (5-yearly risk assessment plan) of N7 and N8
/**TRIPN7**/	E-mail from GPN regarding the TRIP-POINTS OF N7
/**TSN7**/	Tableau des securites Nitrique 7 (Trip point table)
/**VFTIRN7**/	Verification de l'analysateur FTIR du Nitrique 7 (Verification procedure of the existing AMS of plant N 7) for N_2, N_2O, NH_3, NO, NO_2
/**VNON7**/	Verification de l'analysateur FTIR du Nitrique 7 (Verification procedure of the existing AMS of plant N 7) for NOX

Table 7-2: Background investigation and assessment documents

Reference	Document
/**B-1**/	Méthode pour les Projets Domestiques Réduction catalytique du N_2O dans des usines d'acide nitrique (Projet Domestique Methodology: Catalytic reduction of N_2O at nitric acid plants)
/**B-2**/	Projet Domestique Methodology Catalytic reduction of N_2O at nitric acid plants (Translation of /B-1/)
/**B-3**/	European Standard DIN EN 14181: "Stationary source emissions – Quality assurance of automated measuring systems
/**B-4**/	Projet Design Document (PDD): YARA Ambès N_2O abatement project Version: 15th June 2009 (Annex 1 of /B-2/)
/**B-5**/	Arrêté du 2 mars 2007 of the 'Ministère de l'écologie et du développement durable (Implementation of the JI-Guidelines in France)
/**B-6**/	Reference Document on Best Available Techniques for the Manufacture of

Reference	Document
	Large Volume Inorganic Chemicals - Ammonia, Acids and Fertilisers

Table 7-3: Websites used

Reference	Link	Organisation
/bref/	http://eippcb.jrc.ec.europa.eu/reference/	Website of the European Commission, Joint Research Centre, Institute for Prospective Technological Studies (Provision of BAT-Reference documents)
/dfp/	http://www.developpement-durable.gouv.fr/	Ministère de l'Écologie, de l'Énergie, du Développement Durable et de la Mer, en charge des Technologies vertes et des Négociations sur le climat
/dehst/	http://www.dehst.de	German Emissions Trading Authority (DEHSt) at the Federal Environment Agency
/ipcc/	www.ipcc-nggip.iges.or.jp	IPCC publications
/LF/	http://www.legifrance.gouv.fr/	Site of the Legifrance (La service public de la diffusion du droit)
/mist/	http://www.ecologie.gouv.fr/Methodologies-de-projets.html	Ministère de l'Écologie, de l'Énergie, du Développement durable et de la Mer (Ministry of ecology and sustainable development)
/nfg/	http://www.effet-de-serre.gouv.fr/accueil	Mission interministérielle sur l'effet de serre (French Inter-Ministry Mission on the Greenhouse Effect)
/unfccc/	http://ji.unfccc.int	UNFCCC

Table 7-4: List of interviewed persons

Reference	MoI[1]		Name	Organisation / Function
/IM01/	V	☒ Mr. ☐ Ms	Patrick le Calvé	GPN, Technical manager
/IM01/	V	☒ Mr. ☐ Ms	Jean-Claude Lansou	GPN, Production South Plant Manager
/IM01/	V	☒ Mr.	Nicolas Aubertîe	GPN, Head of Electrical

Reference	MoI[1]		Name	Organisation / Function
		☐ Ms		Instrumentation Department
/**IM01**/	V	☒ Mr. ☐ Ms	Gabriel Gombart	GPN, Sustainable Management
/**IM01**/	V	☒ Mr. ☐ Ms	Emmanuel de Trogoff	GPN, Licensing Process Engineer
/**IM01**/	V	☐ Mr. ☒ Ms	Rebecca Cardani-Strange	N.serve, Project manager
/**IM01**/	V	☒ Mr. ☐ Ms	Christopher Brandt	N.serve, CDM/JI Head of Project Management and Legal Counsel
/**IM01**/	V	☒ Mr. ☐ Ms	Fabrice Relmaunay	SPIE, Maintenance Personal for AMS

[1)] Means of Interview: (**T**elephone, **E**-Mail, **V**isit)

ANNEX

A1:	Determination Protocol
A2:	Assessment of Baseline Information
A3:	Assessment of Financial Parameters
A4:	Assessment of Barrier Analysis
A5:	Outcome of the GSCP
A6:	Application of non approved Methodologies Requirement Checklist

ANNEX 1: DETERMINATION PROTOCOL

Table A-1: Requirements Checklist

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
A. General Description of Project Activity				
A.1. Approval *The written approval of the parties involved is a mandatory requirement*				
A.1.1. Which Parties and project Participants are involved in the project?	Parties involved are France (as a Host Party) and Germany. The Project Participant of the Host Country is GPN S.A. The Project Participant of Germany is N.serve Environmental Services GmbH	/PDD/		OK
A.1.2. Are the parties involved eligible for JI Track 1?	By means of checking the UNFCCC website, it was confirmed that France and Germany are eligible under JI track 1.	/mist/ /unfccc/		OK
A.1.3. Has the project provided written approvals of all parties involved?	The Letter of Approval can be applied only after the issuance of the positive determination opinion. Nevertheless, a corresponding CAR was raised.	/PDD/	~~CAR A1~~	OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
A.1.4. Are the approvals issued from organisations listed as DFPs on the UNFCCC JI website?	Please refer to the comment under A.1.3.	/mist/	~~CAR A1~~	OK
A.1.5. Do the written approvals confirm that the corresponding party is a Party to the Kyoto Protocol?	Please refer to the comment under A.1.3.	/unfccc/	~~CAR A1~~	OK
A.1.6. Do the written approvals refer to the precise project title in the PDD submitted for registration?	Please refer to the comment under A.1.3.	/mist/	~~CAR A1~~	OK
A.1.7. Is the information regarding the project participants listed in section A3 and in Annex 1 of the PDD internally consistent to each other?	No, the information regarding the name of the organisation given in Annex 1 is not in line with A.3	/unfccc/	~~CAR A6~~	OK
A.1.8. Are all project participants listed in the PDD approved at least by one Party involved?	Please refer to the comment under A.1.3.	/mist/	~~CAR A1~~	OK
A.1.9. Are any other project participants approved but not listed in the PDD?	Please refer to the comment under A.1.3.	/unfccc/	~~CAR A1~~	OK
A.2. PDD editorial aspects *The PDD used as a basis for determination shall be prepared in accordance with the latest template and guidance from the JISC available on the UNFCCC JI website.*				
A.2.1. Has the latest version of the PDD form been applied?	Since this is a JI Track 1 project activity there are no mandatory forms that have to be used.	/PDD/ /B-1/		OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	A Project Design Document in accordance with the annex 1 („Example illustrating the application of this methodology") of the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants" has been used.	/B-4/		
A.2.2. Has the PDD been duly filled in accordance with the latest guidance(s)?	The PDD is in line with the „Example illustrating the application of this methodology" (Annex 1) of the Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants".	/PDD/ /B-1/ /B-4/		OK
	The PDD have in general been filled in accordance with the structure and guidance given in the methodology, but minor editorial issues have been discussed with the PPs during the site visit. The following findings have been raised and issued as FAR, CAR, CL as listed below:			
	On page 44/45 (Annex 1 of the PDD) the first column should be translated to English since it is written in French.	/PDD/	~~CL A3~~	OK
	The coordinates of the plant location are missing in the PDD.	/PDD/	~~CL A4~~	OK
	The information regarding the name of the organisation given in Annex 1 is not in line with A.3. The name given in A.3. is GPN S.A., in Annex 1 is GPN N7 Nitric acid plant (France)	/PDD/	~~CAR A6~~	OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
A.3. Technology to be employed *Determination of project technology focuses on the project engineering, choice of technology and competence/ maintenance needs. The DOE should ensure that environmentally safe and sound technology and know-how is used.*				
A.3.1. Does the PDD contain a clear, accurate and complete project description?	Within the project, N_2O emissions from the production of nitric acid at GPN's N7 nitric acid plant will be reduced by installation of a secondary N_2O abatement catalyst. The project description was provided in various parts of the PDD, esp. in the chapters A.2, A.4.2 and A.4.3. The project activity is assessed as clear, accurate, complete and sufficient; the PDD is in line with provided evidences and physical implementation of the project activity. The details including the technical specification of the state of the art catalyst technology for the abatement of N_2O have been provided in the PDD in a detailed and appropriate manner. During the on-site visit the determination team has inspected the facilities of the HNO_3-production site and it could be verified that physical implementation of the project activity is in line with the information provided in the PDD. The applicability of the type of abatement catalyst (YARA 58 Y 1) under appropriate plant conditions is suitable to decompose N_2O and the installed AMS fulfils the requirement	/PDD/ /NAPFS/		OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	of the methodology regarding the monitoring of the project emissions. Nevertheless, following CL was raised: The HNO_3-capacity of the N7-plant needs to be corrected. Furthermore, the value of the annual emissions without the installation of the abatement technology needs revision.	/PDD/	~~CL A2~~	OK
A.3.2. Is this description in accordance with the real situation or (in case of greenfield projects) is it most likely that the project will be implemented acc. to the project description?	See A 3.1.			
A.3.3. In case the project involves alteration of the existing installation or process, is a clear description available regarding the differences between the project and the pre-project situation?	Within the project, N_2O emissions from the production of nitric acid at GPN's N7 nitric acid plant will be reduced by installation of a secondary N_2O abatement catalyst. The N_2O catalyst was already installed in June 2008 to carry out a preliminary trial. Previous to this trial campaign, no N_2O abatement-technology was used so that the pre-project situation does not envisages any N_2O abatement measures	PDD		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
A.3.4. Does the project design engineering reflect current good practices?	Yes. The project involves the installation of a secondary catalyst in the ammonia burner to abate nitrous oxide. Since this or similar type of catalyst is installed in several nitric acid plants which are involved in CDM and JI-projects, this project reflects current good practices.	/PDD/		OK
A.3.5. Does the project use state of the art technology or would the technology result in a significantly better performance than any commonly used technologies in the host country?	The employed technology is defined as the best available technology acc. to the BREF-Documents of the EU.	/PDD/ /B-6/		OK
A.4. Small scale project activity *It is assessed whether the project qualifies as small-scale JI project activity*				
A.4.1. Does the project qualify as a small scale project activity as defined by the JISC	Not applicable, because the project activity is a large scale project since the estimated emission reduction of 698.451 tCO_2e between 2009 and 2010 exceeds the limit of 60,000 tCO_2e annually.	/PDD/		OK
A.4.2. Does the project apply one of the approved small scale categories and any methodology	See A.4.1.			

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
and tool referred therein?				
A.4.3. Is the small scale project activity not a debundled component of a larger project activity?	See A.4.1.			
B. Project Baseline, Additionality and Monitoring Plan				
B.1. Application of the Methodology				
B.1.1. What kind of methodology has been used?	Name: Méthode pour les Projets Domestiques: Réduction catalytique du N_2O dans des usines d'acide nitrique (Projet Domestique Methodology: Catalytic reduction of N_2O at nitric acid plants) Version: 1 Type: ☐ I: CDM Approved Methodology – latest version ☐ II: CDM Approved Methodology – older version ☒ III: National Methodology ☐ IV: Combination of Approved Methodologies ☐ V: Project specific Methodology	/PDD/ /B-1/ /B-2/ /B-4/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.1.2. In case of methodology types I and II: Is the applied CDM methodology identical with the version available on UNFCCC website or -in case of a country or project-specific methodology- is the methodology approved by the Host Country?	The proposed project activity applies the French Projet Domestique Methodology: "Catalytic reduction of N_2O at nitric acid plants", which was approved and published by the French Ministry of ecology and sustainable development in 2009-07.	/PDD/ /mist/		OK
B.1.3. Are all applicability criteria in the methodology, the applied tools or any other methodology component referred to therein fulfilled?	Yes, the applicability criteria in the methodology, the applied tools and other methodology components are in line with: • French guidelines for the implementation of JI-Projects • Local decrees regarding the limiting of N_2O-emissions As the validity date of the local decree (Arrete Prefetoral) was 15th of July instead of June 2009, CL A5 was raised and the PDD and accordingly, the emission reduction calculation have to be revised. The methodology is applicable to project activities using secondary and tertiary N_2O abatement technology.	/PDD/ /B-2/ /B-5/ /AN2ON7/	~~CL A5~~	OK
B.1.4. Is the project in accordance to every other stipulation or requirement mentioned in all sections of the methodology?	Yes, the project meets all stipulations of the methodology. In this context it has to be mentioned, that there has been a close contact between the project proponents and the DFP regarding the development of the project specific methodology.	/PDD/ /B-2/ /AN2ON7/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.2. Project Boundaries *Project Boundaries are the limits and borders defining the GHG emission reduction project*				
B.2.1. Are the project's spatial boundaries (geographical) clearly defined?	The project boundary includes the nitric acid plant from the inlets to the ammonia burner to the outlet of the stack. All NO_X and N_2O abatement-devices and the AMS in the stack are included. According to the methodology, only the emissions of N_2O as tail gas emission have to be considered in the project boundary. This is -according to the methodology- clearly described in words and a visualisation of the physical project boundary as well as a table defining all significant GHG gases has been included in the PDD. A CAR B2 was raised, because Table 3 (Sources and gases included in the project boundary) was not completed acc. to the methodology.	/PDD/ /NAPFS-SS/	~~CAR B2~~	OK
B.2.2. Are all sources and GHGs included in the project boundary as required in the applied methodology?	The methodology only considers N_2O as the main emission source in tail gas after the destruction facility. All other gases/sources are not included in the project boundary.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.2.3. In case the methodology allows to choose whether a source and/or gas is to be included, is the choice sufficiently explained and justified?	See B.2.2	/PDD/		OK
B.3. Baseline Identification *The choice of the baseline scenario will be validated with focus on whether the baseline is a likely scenario, and whether the methodology to define the baseline scenario has been followed in a complete and transparent manner.*				
B.3.1. What has been identified as the baseline scenario?	The baseline scenario includes the installation of a N_2O-abatement-technology (catalyst) to reduce the N_2O-emissions according to the legal requirements. Considerably less (in comparison to the project activity) of catalyst material would be needed to achieve compliance with the local decree.	/PDD/ /AN2ON 7/		OK
B.3.2. What possible baseline scenarios have been considered?	Following alternative to the project activity has been identified: • Continuation of the *Status Quo*, where only a sufficient amount of secondary catalyst material is installed to ensure compliance with any applicable legal N_2O regulations (Business as Usual). • Separation and utilisation of N_2O	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.3.3. In case alternatives have to be considered, are all scenarios supplemental to those provided in the methodology reasonable in the context of the project activity?	No additional scenarios have been considered.			
B.3.4. Has the baseline scenario been determined according to the methodology?	No, several reference scenarios listed in the methodology have not been investigated. To clarify this, CAR B1 was raised.	/PDD/	~~CAR B1~~	OK
B.3.5. Is the list of alternatives complete?	See B.3.4.			
B.3.6. Has the baseline scenario been determined using conservative assumptions where possible?	Yes, e.g. the baseline emissions have been calculated applying the regulatory values/baseline value as presented in B.5.4.	/PDD/		OK
B.3.7. Does the baseline scenario sufficiently take into account relevant national and/or sectoral policies, macro-economic trends and political aspirations?	Yes, as explained above, the legal requirements have been taken into account.	/PDD/ /AN2ON 7/		OK
B.3.8. Is the baseline scenario determination compatible with the available data and are all literature and sources clearly referenced?	The baseline scenario determination is compatible with the available data and literature sources are clearly referenced. The PDD provides references to all relevant literature sources (sources were submitted for determination, too) and data.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.4. Additionality Determination *The assessment of additionality will be validated with focus on whether the project itself is not a likely baseline scenario.*				
B.4.1. Methodology				
B.4.1.1. Did the additionality justification follow the requirements of the applied methodology and/or methodological tools?	The additionality has been proved according to the methodology, which includes a scheme for the assessment of the reference scenario and additionality of the project activity.	/PDD/ /B-1/ /B-2/		OK
B.4.2. Consideration of JI before project				
B.4.2.1. Is the project starting date reported in accordance with the glossary of JI terms??	Since a country specific methodology has been applied, the glossary accordance with the JI glossary of terms is not necessary The start of the project activity at N7 was September 2009/CNN7/, /DNN7/, . At this date, the N_2O abatement catalyst was installed in the ammonia boiler.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.4.2.2. In case the project start date is before commencing of determination, was the incentive from JI seriously considered and are details given in the PDD?	Yes, the PDD explains, that without the sale of the ERUs generated by the project activities there would be no incentive to justify the additional costs associated with the implementation of the additional N_2O abatement system under project activity.	/PDD/ /INV/		OK
B.4.2.3. How and when was the decision to proceed with the project?	The project will proceed, which means the complete amount of catalyst will remain in the plant, if the project activity is registered.	/PDD/		OK
B.4.2.4. Is the project start date consistent with the available evidences?	No, the starting date was communicated during the on-site visit. The evidence which approves the date of the start up of the plant is still outstanding. Thus, CL B5 was raised.	/PDD/	~~CL B5~~	OK
B.4.2.5. Was the decision to proceed with the project taken by a person entity which has the authority to do so?	Yes, the decision to proceed with the project has been taken by the decision board of GPN S.A.	/PDD/		OK
B.4.2.6. How was the JI involved in the decision making process?	JI was considered in the early stage of the project. For this reason, GPN contracted N.serve to develop the JI-project activity.	/PDD/		OK
B.4.2.7. Can the JI involvement in the decision be assessed as serious?	Yes (see above)	/PDD/		OK
B.4.3. Identification of alternatives Step 1 (in case of SSC projects pl. skip steps 1 and 2)				

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
B.4.3.1. Have all realistic alternatives been identified to the project?	No, several scenarios like the • installation of a non selective catalytic reductions • implementation of a primary, secondary or tertiary N_2O destruction technology have not been taken into consideration. However these scenarios are discussed later in step 2 of the PDD. To correct this, CAR B1 was raised.	/PDD/	~~CAR B1~~	OK
B.4.3.2. Contains the list of alternatives at least the status-quo situation and the project not undertaken as a JI project?	No, the alternative that the project is not undertaken as a JI project is not included in the list of alternatives. In this context, CAR B1 was raised.	/PDD/		OK
B.4.3.3. Do all identified alternatives comply with applicable regulation?	Yes, the alternatives are complying with the legal obligations, which limit the N_2O-emissions of the plant.	/PDD/		OK
B.4.4. Investment analysis Step 2 *In case the investment analysis as per step 2 is chosen to justify the additionality Annex 2 "Assessment of Financial Parameters" has to be used to provide additional details of the calculation parameters..*				
B.4.4.1. Is an appropriate analysis method chosen for the project (simple cost analysis, investment comparison analysis or benchmark analysis)?	It was clarified in the PDD that no significant financial or economic benefits other than JI related income can be generated by any of the possible N_2O destruction technologies. According to the methodology, the investment requirements, caused by the implementation of the project activity, should be depicted in an investment cost sheet.	/PDD/	~~CL B4~~	OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	Since this financial calculation sheet was not available at the site visit, a corresponding CL B4 was raised.			
B.4.4.2. Is a clear, viewable and unprotected Excel spreadsheet available for the investment calculation?	No, see B.4.4.1.		~~CL B4~~	OK
B.4.4.3. Does the period chosen for the investment analysis reflect the technical lifetime of the project activity or in case a shorter period is chosen, is the fair value of the project activity's assets at the end of the investment analysis period (as a cash inflow) included?	No, see B.4.4.1.	-	~~CL B4~~	OK
B.4.4.4. Is the fair value calculated in accordance with local accounting regulations (where available) or international best practice?	N/A	-	-	-
B.4.4.5. Is the book value as well as the expectation of the potential profit or loss included in the fair value calculation?	N/A	-	-	-
B.4.4.6. Are depreciation and other non-cash related items added back to net profits for the purpose to calculate the financial indicator?	N/A	-	-	-
B.4.4.7. Is taxation excluded in the investment analysis or is the benchmark intended for post tax comparisons?	N/A	-	-	-

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.4.4.8. Were the input values used in the investment analysis valid and applicable at the time of the investment decision?	N/A	-	-	-
Investment comparison				
B.4.4.9. In case of project IRR: Are the costs of financing expenditures (loan repayments and interests) excluded from the calculation of project IRR?	N/A	-	-	-
B.4.4.10. In case of equity IRR: Is the part of the investment costs, which is financed by equity considered as net cash outflow and is the part financed by debt excluded in net cash outflow?	N/A	-	-	-
B.4.4.11. Is the type of benchmark chosen appropriate for the type of IRR calculated (e.g. local commercial lending rates or weighted average costs of capital for project IRR; required/expected returns on equity for equity IRR)?	N/A	-	-	-
B.4.4.12. Is the benchmark value suitable for the project activity?	N/A	-	-	-
B.4.4.13. Is it ensured that the project cannot be developed by other developers than the PP?	N/A	-	-	-

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
B.4.4.14. Was the benchmark consistently used in the past for similar projects with similar risks?	N/A	-	-	-
B.4.4.15. Was sensitivity analysis appropriately done by the project participants?	N/A	-	-	-
B.4.5. **Barrier analysis Step 3 or SSC additionality assessment**				
B.4.5.1. Are there any barriers given whose issues have a clear and definable impact on the profitability of the project?	N/A	-	-	-
B.4.5.2. How is it justified and evidenced that the barriers given in the PDD are real?	N/A	-	-	-
B.4.5.3. How is it justified that one or a set of real barriers prevent(s) the implementation of the project activity?	N/A	-	-	-
B.4.6. Common practice analysis Step 4 (in case of SSC projects skip this step)				
B.4.6.1. Is the defined region for the common practice analysis appropriate for the technology/industry type?	N/A	-	-	-
B.4.6.2. To what extent similar projects have been undertaken in the relevant region?	N/A	-	-	-

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.4.6.3. In case similar projects are identified, are there any key differences between the proposed project and existing or ongoing projects and what kind of differences are observed?	N/A	-	-	-
B.5. Calculation of GHG Emission Reductions *It is assessed whether the calculations of project emissions, baseline emissions, leakage emissions are stated according to the methodology and whether the argumentation for the choice of default factors and values – where applicable – is justified. Furthermore calculation of emission reductions shall be assessed.*				
B.5.1. Are the emission reductions real, measurable and give long-term benefits related to the mitigation of climate change?	The emission reductions are real, measurable and give long-term benefits related to the mitigation of climate change.	/PDD/		OK
B.5.2. Are the equations applied correctly according to the applied approved methodology?	Yes, the equations applied for calculation are correctly applied according to the approved methodology. The formulae to calculate the project, baseline and leakage emissions are presented in the section B.6.1. of the PDD in a clear and transparent manner.. The calculation of estimated emission reductions has been carried out in the section B.6.2. of the PDD. The calculations	/PDD/I /B-1/ /B-2/ /B-3/	~~CAR E2~~ ~~CAR B3~~	OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	as presented in this section strictly follow the algorithm of the monitoring plan. The considering of leakage is discussed in the methodology. In accordance with the methodology, no leakage calculation is required, because the technology used is a secondary catalyst. However, following Cars and CL were raised: CAR E2: The Arrêté of 2 March 2007 stipulates, that: "the total amount of issued Emission Reduction Units equates to 90% of the GHG emissions effectively avoided due to the implementation of the project activity". Since the PDD does not regard this restriction in the calculation of ERUs, clarification is needed. CL B3: For the time after 16th July 2011, it has to be clarified in the PDD how it can be assured that no ERUs will be issued for emission levels which do not go beyond the business as usual scenario, which is defined by the Arrete prefectoral 2009-07-16 (2,47 kg N_2O/t HNO_3) over a period of 12 months.			
B.5.3. In case the methodology allows for different methodological choices, are the equations	The project specific methodology has been developed for the considered project activity. The methodology provides clear	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
applied properly justified and have they been used reflecting the other methodological choices (i.e. baseline identification)?	procedure for calculation of the emission reductions. There are no provisions for choices between different methodological approaches.	/B-1/ /B-2/ /B-3/		
B.5.4. Have conservative assumptions been used when calculating the project emissions?	Yes. The baseline methodology takes into account a decree of the MEEDAT, setting the benchmark Emission Factors (EF_{BM}) for the calculation of the reduction of N_2O-Emission in future years. These values/years are: 2009 2010 2011 2012 2.5 2.5 2.5 1.85 kg N_2O/t HNO_3 (100%) In addition to that, the DRIRE introduced a plant specific regulatory limit of 2.47 kg N_2O/t HNO_3 (100%) from July 2011 on. The baseline for ERU calculation takes into account the lowest available values, so that the baseline values future calculation of emission reduction are: These values/years are: **2009 2010 to 2011-06 to 2011-12 to 2012-12** **2.5 2.5 2.5 2,47 1.85**	/PDD/ /B-1/ /B-2/ /B-4/ /AN2ON 7/	~~CAR B3~~	OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	Values in [kg N_2O/t HNO_3 (100%)] These values represent the reference case and the maximum legal emission levels for N_2O (see 4.3.). That means that an exceedance of these legal values leads to a corresponding reduction of the ERUs. A CL B3 was raised to clarify this approach in the PDD.			
B.5.5. Are all data and parameters which remain fixed throughout the crediting period correct, applicable to the project and will lead to a conservative estimation of emission reductions?	Yes, the regulatory limits and benchmark values are fixed over the crediting period. Nevertheless, a CL D2 (Monitoring plan) was raised to secure, that the regulatory framework needs to be followed up during the crediting period.	/PDD/	~~CL D2~~	OK
B.5.6. Is the choice of the value for the data and parameters which have to be monitored reasonable?	Yes, the choice of data is • in line with the methodology and • checked to be reasonable.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.6. Monitoring of Emission Reductions *It is assessed whether the monitoring plan is appropriate for the project activity and in line with the applied methodology.*				
B.6.1. Are all monitoring parameters required by the applied methodology contained in the monitoring plan?	A monitoring methodology and description of a monitoring plan is specified in the methodology of the "Project Domestiques". The parameters required by this methodology are contained in the monitoring plan. Nevertheless, a CL D2 was raised to include the follow up of the regulatory framework in the monitoring plan.	/PDD/	~~CL D2~~	OK
B.6.2. In case different approaches can be chosen acc. to the methodology, is the selection of parameters justified and correct?	N/A	-	-	-
B.6.3. Are the means of monitoring of all parameters contained in the monitoring plan in accordance with the requirements of the applied methodology?	Yes	/PDD/		OK
B.6.4. Are all parameters appropriately labelled?	Yes	/PDD/		OK
B.6.5. Is it likely that the monitoring arrangements described in the PDD can properly be implemented in the context of the project	Yes The verification team assessed the implemented and installed AMS at the on-site-visit and came to the conclusion	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
activity?	that the application is suitable for the purpose of monitoring the project emissions.			
B.6.6. Are the means of implementation of the monitoring plan, including QA/QC procedures sufficient to ensure that emission reductions can be reported without material misstatement?	The monitoring plan presented in chapter B.7. is comprehensive and provides QA/QC procedures to insure the appropriate reporting of emissions and emission reductions. This includes quality measures related to the AMS according to the EN 14181. Following CL, FAR were raised: CL D1: It should be made clear in the PDD whether the EN 14181 will be followed completely or if other eligible standards, like AFNOR XP X43-305, which are in line with the methodological requirements will be applied for this project activity. FAR D3: The verifier has to check the appropriateness of the AMS (with regard to e.g. Location of the sampling point, QAL1, QAL 2, uncertainty assessment).	/PDD/	~~CL D1~~ ~~FAR D3~~	OK
B.6.7. Will all monitored data required for verification and issuance be kept for two years after the end of the crediting period or the last issuance of CERs, for this project activity, whichever occurs later?	Yes, all monitored data required for verification and issuance will be stored in a central data system of the company and kept for two years after the project end.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.6.8. Does the monitoring plan provide for the collection and archiving of all relevant data necessary for determining baseline emissions, project emissions, and leakage within the project boundary during the crediting period?	<u>Baseline emissions:</u> It was ruled by the national authorities, that baseline emissions should be calculated applying a "Benchmark Emission Factor (EF_{BM}), or if lower, regulatory limits of local authorities (see B.5.4.). Therefore, the acquisition of data of N_2O-emissions in order to determine the baseline emissions is not necessary. However, the monitoring of trip point values and data related to the amount of produced HNO_3 are completely included in the monitoring plan. <u>Project emissions:</u> According to the methodology, the monitoring plan provides all relevant data necessary for measurement of the GHG emissions within the project boundary. <u>Leakage:</u> According to the methodology, leakage shall not be monitored. Caused by an increased amount of catalyst, a constant pressure loss in the tail gas reactor occurs, but will not be monitored over the crediting period.	/PDD/		OK
B.6.9. Are the choices of GHG indicators reasonable and conservative?	Yes, e.g. the reference value (benchmark emissions factor) that will be applied to calculate the emissions reductions from a specific verification period was determined according to French Government decision.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	The violation of these limits will lead to a reduction of ERUs for the relevant period.			
B.6.10. Is the measurement method clearly stated for each indicator to be monitored and also deemed appropriate?	Yes, the monitoring plan provides clear measurement methods in for project emissions in chapter B.6.2 of the PDD.	/PDD/		OK
B.6.11. Is the measurement equipment described and deemed appropriate?	The measurement equipment of project emissions is described appropriate in the PDD and in documents provided during the site visit. Several documents regarding QS/QA of the AMS where provided.	/CALVOL N7/ /CCVOL N7/ /CCVOL N7R/ /DVOLN 7/ /MFTIRN 7/		OK
B.6.12. Is the measurement accuracy addressed and deemed appropriate? Are procedures in place on how to deal with erroneous measurements?	As documents/certificates regarding the appropriateness of the AMS for measurement of project emissions could not provided during the site visit, the verifier has to check the suitability of the AMS with regard to e.g.: • location of the sampling point • QAL1, QAL 2	/PDD/	~~FAR D3~~	OK

Checklist Item (incl. guidance for the determination team)	**Determination Team Comments** (Means and results of assessment)	**Ref.**	**Draft Concl.**	**Final Concl.**
	• uncertainty assessment. Regarding these issues, FAR D3 was raised			
B.6.13. Is the measurement interval identified and deemed appropriate?	The AMS for project emissions is working as an online- and permanent-measurement device.	/PDD/		OK
B.6.14. Is the registration, monitoring, measurement and reporting procedure defined?	The procedures are defined in chapter B.7.2. of the PDD to a sufficient extent. The data of the AMS for the calculation of project emissions will be transferred to central data acquisition system of the company and evaluated by N.serve according to the regulations of the methodology.	/PDD/		OK
B.6.15. Are procedures identified for maintenance of monitoring equipment and installations? Are the calibration intervals being observed?	The AMS for emission reduction will be maintained using a QA/QS programme which refers to the EN 14181 and through internal measures for quality assurance related to ISO 9001 and 14001. Although several CARS were raised related to the QS/QA measures, the measurement equipment can be described as appropriate.	/PDD/		OK
B.6.16. Are procedures identified for day-to-day records handling (including what records to keep, storage area of records and how to process performance documentation)	See B.6.8.	/PDD/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
B.7. Project Management Planning *It is checked that project implementation is properly prepared for and that critical arrangements are addressed.*				
B.7.1. Is the authority and responsibility of overall project management clearly described?	Yes, the operational structure of the QMS of the plant is certified against ISO 9001 and 14001 requirements. An external laboratory has been contracted for maintenance of the AMS. The determination of the raw N_2O-data sets will be carried out by N.serve.	/PDD/ /ISO 14001/ /ISO 9001/		OK
B.7.2. Are procedures identified for training of monitoring personnel?	Specific training measures are not intended, but specific activities related to the JI-project will be carried out by experienced and qualified companies as described above.	/PDD/		OK
B.7.3. Are procedures identified for review of reported results/data?	Yes, all monitoring related data will be sent to N.serve for revision, plausibility check and calculation of the project emissions.	/PDD/		OK
B.7.4. Is the authority and responsibility of overall project management clearly described?	Yes, see above.	/PDD/		OK
B.7.5. Are procedures identified for training of monitoring personnel?	N/A	/PDD/ /IM01/		OK

Checklist Item (incl. guidance for the determination team)	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
C. Duration of the Project/ Crediting Period *It is assessed whether the temporary boundaries of the project are clearly defined.*				
C.1. Is the project's starting date and the project duration clearly defined and evidenced?	Yes, project starting date is June 2008 which is described in B.4.2.1., but not evidenced yet, a CL B5 was raised in this context. The Crediting period will start after the registration of the project at the NFP. This is envisaged at December 2009. However, CAR C1 was raised, because section C.1. should also reflect the technical aspects of the project implementation.	/PDD/	~~CAR C1~~	OK
C.2. Is the project's operational lifetime clearly defined and evidenced?	The operational lifetime (efficiently of the catalyst) is estimated at 3 years, but during the annual downtime for maintenance, an exchange can be carried out, if necessary.	/PDD/		OK
C.3. Is the start of the crediting period clearly defined and reasonable?	The start of crediting period is 01.12.2009.	/PDD/		OK
D. Environmental Impacts *Documentation on the analysis of the environmental impacts will be assessed, and if deemed significant, an EIA should be provided to the DOE.*				

Checklist Item (incl. guidance for the determination team)		Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
D.1.	Has an analysis of the environmental impacts of the project activity been sufficiently described?	The environmental impacts are sufficiently described in the PDD under Section D.: Environmental Impacts. Apart from the reduction of emissions of N_2O, there will be no significant further positive or negative impacts on the environment occur.	/PDD/		OK
D.2.	Are there any Host Party requirements for an Environmental Impact Assessment (EIA), and if yes, is an EIA approved?	The host government (France) does not request an EIA.	/B-5/		OK
D.3.	Will the project create any adverse environmental effects?	See D.1.	-	-	-
D.4.	Are transboundary environmental impacts considered in the analysis?	See D.1.	-	-	-
D.5.	Have identified environmental impacts been addressed in the project design?	N/A	-	-	-
D.6.	Does the project comply with environmental legislation in the host country?	Yes, the project fully complies with environmental legislation of France. A decree was raised from the local government to limit the emission of N_2O for this type of plants.	/AN2ON 7/		OK
E. Stakeholder Comments *The DOE should ensure that stakeholder comments have been invited with appropriate media and that due account has been taken of any comments received.*					
E.1.	Have relevant stakeholders been invited to	A global stakeholder consultation was carried out on the TÜV	/PDD/		OK

Checklist Item (incl. guidance for the determination team)		Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.
	consultation?	NORD website www.global-warming.de for 30 days as of 2009-08-03. No comments were received. The local stakeholder process has not been carried out. This is considered to be appropriate for this kind of project activities as no affected local stakeholders could be identified.			
E.2.	Have appropriate media been used to invite comments by local stakeholders?	See E.1.	/PDD/		OK
E.3.	If a stakeholder consultation process is required by regulations/laws in the host country, has the stakeholder consultation process been carried out in accordance with such regulations/laws?	See E.1.	/PDD/		OK
E.4.	Is an appropriate summary of the stakeholder comments received provided in the PDD?	See E.1.	/PDD/		OK
E.5.	Has due account been taken of any stakeholder comments received?	See E.1.	/PDD/		OK

ANNEX 2: ASSESSMENT OF BASELINE IDENTIFICATION

Table A-2: Assessment of Baseline Identification

☐	Baseline alternatives are not identified
☒	Assessment of alternatives of baseline see below

Baseline Alternatives identified	Inline with the Metho-dology?	Eli-mina-ted	Reasons for elimination / non-elimination from list of alternatives	Evi-dence used	DOE Assessment	
					Appro-priate-ness of elimi-nation	Assessment of determination team (results and means of assessment)
a) Continuation of the Status Quo (Business as Usual Scenario). The continuation of the business as usual scenario, where: i) there is no N_2O destruction technology installed.	☒	☒	**The scenario not to install any N_2O abatement technology is not in complience with the "Arrêté Préféctoral" which limits the N_2O emissions to 2.47 kg N_2O/t HNO3 (100%).**	**/PDD/ /AN2ON 7/**	☒	The determination team follows the statements for the elimination of scenario a)i), since the 'Arrêté Préféctoral', which is an official decision of the local government obliges the plant operator to reduce the emission level to the limit of 2.47kg N_2O/tHNO_3.
a) Continuation of the Status Quo (Business as Usual Scenario). The continuation of the business as usual scenario, where: ii) only sufficient secondary catalyst is	☒	☐	**The scenario which includes the option to install only just enough tertiary catalyst material in the de-N_2O bed to achieve compliance with the local 'Arrêté Préféctoral' on N_2O emissions will not lead to an emission reduction beyond the 2.47kg**	**/PDD/ /AN2ON 7/ /B-1/**	☐	The determination team follows the statement for the eligibility of scenario a)ii), since only the reduction of emissions below the limits of the governmental decree will lead to claim for Emission Reduction Units in compliance with the country specific methodology.

Baseline Alternatives identified	Inline with the Metho-dology?	Eli-mina-ted	Reasons for elimination / non-elimination from list of alternatives	Evi-dence used	DOE Assessment	
					Appro-priate-ness of elimi-nation	Assessment of determination team (results and means of assessment)
installed to ensure compliance with any applicable legal N2O regulations.			**N_2O/tHNO_3 and the project activity will not take place.**			
B) Alternative uses of N2O, such as: ***- Recycling of N_2O for feedstock*** ***- External use of N_2O***	☒	☒	**The use of N_2O as a feedstock for the production of nitric acid is technically not feasible, because it is not possible to produce nitric acid from N_2O at the quantities found in the tail gas of nitric acid plants.**	**/PDD/ /BREF/**	☒	Due to low concentrations of N_2O in the exhaust of the plant, the recycling is not a technically suitable and economically attractive alternative.
c) Installation of NCSR (Non Specific Catalytic Reduction)	☒	☒	**The application of a Non Specific Catalytic Reduction Unit causes high investment and operation costs due to permanent demand of a reduction agent. This technology produces emissions of CO, CO_2 and remaining hydrocarbons.**	**/PDD/ /BREF/**	☒	Since there is an efficient N_2O-abatement system available, there is no need to choose a not-state-of-the-art-technology.
d) Implementation of a primary, secondary or tertiary N_2O destruction technology in the absence of the registration of the project activity as a Projet Domestique.	☒	☒	**<u>Primary catalyst:</u>** **For the specific reduction of N_2O emissions, producers only consider installation of the already widely-tested and well-proven secondary and tertiary catalyst technologies in order to minimise the influence on the HNO_3-production process.**	**/PDD/ /BREF/**	☒	The secondary and tertiary abatement technologies are state-of-the art technologies and will not lead to any negative influence on the HNO_3-production process.

Baseline Alternatives identified	Inline with the Metho-dology?	Eli-mina-ted	Reasons for elimination / non-elimination from list of alternatives	Evi-dence used	DOE Assessment	
					Appro-priate-ness of elimi-nation	Assessment of determination team (results and means of assessment)
			Implementation *in the absence of the registration of the project activity as a Projet Domestique:* See alternative a)ii)			

ANNEX 3: ASSESSMENT OF FINANCIAL PARAMETERS

Table A-3: Assessment of Financial Parameters

☒	No financial parameters are used for additionality justification so far
☐	Assessment of all financial parameters see below

A completed table will be provided in the final Determination Report

Parameter	Value applied	Unit	Source of Information (please indicate document and page)	Reference	DOE ASSESSMENT		
					Correctness of value applied	Appropriateness of information source	Comment
Project revenues	2,389,134 (2009 – 2012 period)	EUR	GPN N7 100120 (Excel sheet)	- Project documentation	The values are correct	The information sources are checked to be appropriate	The parameter "Project revenues" of the cost analysis is related to following figures: • Expected HNO_3 production (t) • Benchmark emissions (tCO_2e) • Project Emissions (tCO_2e) • 10% deduction is correct calculated and assessed. There are no emission taxes regarding N_2O-emission included as an additional income.
Tax savings	248,094 (2009 – 2012 period)	EUR	GPN N7 100120 (Excel sheet)	- Project documentation	The values are correct	The information sources are checked to be appropriate	A special environmental tax is payable in accordance with article 45 of the 'Loi de Finances 1999' and article 266 nonies of the 'Code des Douanes'. The law stipulates a tax of 64.84 EU per tonne N_2O emitted. The tax

Parameter	Value applied	Unit	Source of Information (please indicate document and page)	Reference	DOE ASSESSMENT		
					Correctness of value applied	Appropriateness of information source	Comment
							savings were not added to the project revenues but used as an argument, that the project activity can not be financed with these tax savings and without support of the ERU issuing.
Secondary Catalyst costs	682,009 (2009 – 2012 period)	EUR	GPN N7 100120 (Excel sheet)	- Project documentation - /CON1/	The values are correct	The information sources are checked during on site visit to be appropriate	The parameter "Secondary Catalyst Costs" of the cost analysis includes the costs for • Leasing: o Amount of 1,960 kg catalyst without the project activity (max. 2.47 $kgN_20/tHNO_3$) from 06/11 and €0.48/tHNO3) o Amount of 3,000 kg catalyst with the project activity (max. 2.5/1.85 $kgN_20/tHNO_3$) from Sept 2009 and €0.72/tHNO3) • 2 days lost production per year (basket & catalyst check)metal losses and is correct calculated and assessed. Evidences are provided.
Automated monitoring system costs	170,474 (2009 – 2012 period)	EUR	GPN N7 100120 (Excel sheet)	- Project documentation - /CON/	The values are correct	The information sources are checked during on site visit to be appropriate	The parameter "Finetech AMS costs" of the cost analysis includes the costs for • AMS o N2O analyser Orbital AIT Anafin o Stack volume flow meter

Parameter	Value applied	Unit	Source of Information (please indicate document and page)	Reference	DOE ASSESSMENT		
					Correctness of value applied	Appropriateness of information source	Comment
							○ Cabinet • Installation and connection • Sampling points, cal gases, pressure regulators, access platform • Engineering Study and is correct calculated and assessed. Evidences are provided in the financial proposal of Finetech as AMS supplier/FINETECH/.
JI Project operating costs	230,000 (2009 – 2012 period)	EUR	GPN N7 100120 (Excel sheet)	- Project document ation	The values are correct	The information sources are checked during on site visit to be appropriate	The parameter "JI Project operating costs" of the cost analysis includes the costs for • QAL2 audit (2009, 2012) • QAL 3 (maintenance, calibrations etc) (ongoing) • Annual Surveillance Test (2010, 2011) • Determination (once) • First Verification • Subsequent Verifications (x 5) and is correct calculated and assessed. The determination team valuating these costs as customary and correct.

ANNEX 4: ASSESSMENT OF BARRIER ANALYSIS

Table A-4: Assessment of Barrier Analysis

☐	No barrier parameters are used for additionality justification
☒	Assessment of barriers see below

Kind of Barrier (invest, tech, other)	Description of Barrier	Evidence used	Assessment of determination team	
			Appropriateness of information source	Explanation of final result
Investment	None of the N_2O destruction technology options (including NSCR) are expected to generate any financial or economic benefits other than JI-related income (minor tax savings caused by lower N_2O-emissions excepted). Their operation does not create any marketable products or by-products. However, any operator willing to install and thereafter operate such technology faces significant investment and additional operating costs	/PDD/ Check of legal frame conditions of the country	The sources are appropriate to prove, that there are no financial benefits which can be generated by the reduction of N_2O or other GHG emissions.	The PP could prove, that the project activity faces an investment barrier

Techno-logical	It is unlikely that any plant operator would install such technologies on a voluntary basis without the incentive of any regulatory requirements (emissions caps) or financial benefits (such as revenues from the sale of ERUs).	/PDD/ /BREF/	The BREF documents show clearly, that the imple-mentation of an additional N_2O abatement technology in an exis-ting plant is coupled with com-prehensive construc-tion works.	The PP could prove, that the project activity faces a technological barrier

ANNEX 5: OUTCOME OF THE GSCP

Table A-5: Outcome of the Global Stakeholder Consultation Process

☒	No comments were received during the global stakeholder consultation period
☐	Comments were received during the global stakeholder consultation period. The comments (in unedited form) and the consideration/response of the determination team are presented below:

Comment No.:	Comment by:	Inserted on:	Subject	Comment *)	Response determination team *)	Conclusion (incl. CARs CLs or FARs)

*) In case clarifications have been requested by the determination team corresponding rows shall be added

ANNEX 6: APPLICATION OF NON APPROVED METHODOLOGIES REQUIREMENTS CHECKLIST

Table A-6: Non approved Methodologies Requirement Checklist

☒	An approved CDM or country specific methodology was applied.
☐	A non approved methodology was applied.

Checklist Item	Determination Team Comments (Means and results of assessment)	Ref.	Draft Concl.	Final Concl.