

The following document is written in response to the article “Mtoni Dumpside CDM Project putting livelihoods of farmers and wastepickers at risk” written by Mr. Finnigan Wa Simbeye, and published in the CDM Watch Newsletter #2 / April 2011, chapter 3, pag 10.

Conorzio Stabile Globus (CSG) is a project participant, together with the Dar Es Salaam City Council (DCC), of the CDM project “Landfill gas recovery and electricity generation at “Mtoni Dumpsite”, Dar Es Salaam, Tanzania” (UNFCCC reference 0908).

The comments made in the article by Mr. Finnigan Wa Simbeye suggest that Mtoni Dumpsite was forced to close due to the project participants activities. This is false and misleading. On the contrary, the landfill closure is one of the worst things that could have happen for Mtoni landfill gas project just as would be the case for any landfill project. New additions of collected waste increase the amount of generated landfill gas. Without fresh waste, the amount of generated landfill gas slowly but inevitably decreases over the years, thus making the project less economical attractive.

The description of the project in the PDD, completed on 18/01/2007, was based on the idea that the dumpsite would close in 2016. Based on this information, an estimation of the biogas methane destruction resulted in 202,271 CERs generated per annum was done. Thus it is illogical to suggest that the closure of the dumpsite was due to the CDM project as this closure has had very negative implications on the project.

Unfortunately for the CDM project Mtoni Dumpsite was closed in January 2007. CSG was not implicated in this decision and did not desire this decision. As a consequence of the closure of this landfill the amount of landfill gas that can be extracted has been drastically reduced and is actually only around 21,000 CERs/year. The project participants would be far happier to work with an open active landfill, which houses new fresh waste every day instead of the current closed landfill. The amount of generated landfill gas would be much higher in the first case and thus CER revenues would also be far higher.

As mentioned in the article it is may be correct to claim that Mtoni Dumpsite releases leachate into the local river, especially during heavy rains. It may also be correct to claim that this may be an impact on the activities of local farmers. However it is not explained in Mr. Finnigan Wa Simbeye article how one can impute these negative aspects as a consequence of the CDM project. Mtoni landfill site was open and running well before the CDM project implementation. CSG was not involved in the implementation of the dumpsite and therefore had no influence on the decision of where the landfill should be located or how the landfill foundations should be designed and managed to avoid waste waters. CSG only came into contact with the authorities managing the landfill at a much later stage and when the landfill was already up and running. The CSG CDM project seeks to avoid greenhouse gases (GHG) emissions into atmosphere. The CSG project resolves an issue that is totally different to that which would be required to resolve the wastewater issue. Without the CDM project implementation, the landfill probably would never have been covered over thus increasing the consequences of the rain water and leaving the local people exposed to the heavy odors and methane gases as well as the other inconveniences such as mosquitoes that can be found close to open air dumpsites.

The extraction and combustion plant threats about 5000 cubic meter of methane every day, not 10 cubic meter as declared by Mr. Finnigan Wa Simbeye. This could have easily been verified on the UNFCCC web site where the CDM project details are fully disclosed.

All the heavy initial investment for the project implementation (landfill covering, wells drilling, pipes installation, plant realization, plant installation, etc...) together with all the related annual expenses (employs salaries, plant spare and consumable parts, electricity bills, fuel for the emergency generator, DOE fee, etc...) were paid by CSG and the only revenue from this project is related to the returns from the CERs from the project methane destruction. Thus this project is fully additional, and without this risky upfront investment in this Least Developed Country, this project would never have happened. The agreement between CSG and DCC says that CSG would take care of the project expenses sharing part of the revenue from the CERs with the local DCC. Thus the claims made by Mr. Finnigan Wa Simbeye concerning the financial aspects of this project are also unfounded and lack factual evidence.

CSG never received any communication from the local DNA complaining about the project. On contrary, the only communication received (a paper letter dated 22/10/2010 and signed Ngosi C.X. Mwihava) from Vice President’s Office – Division of Environment as local DNA, congrats the project participants of the “first CDM project in Tanzania to generate real money from the sell of CERs”.

In the article Mr. Finningan Wa Simbeye also claims that the landfill is abandoned. However a security guard is present 24hrs and seven days a week at the plant. A local specialized technician trained by CSG works at the plant taking care of ordinary maintenance. Once every 3 months a specialized technician from Europe (Italy) visits the plant to perform extraordinary maintenance, if necessary, and to monitor directly how the plant is working. Every two days (if the internet connection is working), the technician at the plant connects with the technician in Italy and informs him how the plant is doing.

It is true that there is no fence to protect the external equipment installed on the landfill, simply because it is not necessary as this consist of none harmful plastic tubes and no incidence have been reported over the last three years of operation. Moreover no episodes of vandalism or stealing have been reported (and it would be quite unusual if they start to happen from now on). Internal equipment is protected by walls and a security guard.

It is true that no biogas electricity generation has been implemented at the project, but the reason is self-explanatory. Since the landfill closed nine years before the expected date, the amount of landfill gas extracted is not sufficient to justify technologically or financially such implementation.

When the PDD was written, the initial investment was expected to be repaid in one year. At the time GSC planned to invest more money to install electricity generation. Now, due to the landfill closure, the situation is very different. The revenue from the CERs generated is one tenth of the expected revenue and so the project payback is ten times longer. This means that CSG is unsure that they will even recuperate their initial investment. Moreover the amount of landfill gas extracted is not enough to even produce 1 MW of electricity, and so the ratio (electricity produced) / (cost to produce electricity) is far too low for any investment.

CSG invited Mr. Finnigan Wa Simbeye to visit the plant together with an Italian technician at the beginning of June to verify his claims concerning bad smells, smokes, and poor covering over of the landfill. Unfortunately after showing an initial interest, he did not participate in the organized visit.

CSG is proud to be one of the participants in the first, and only, registered CDM project to this date in Tanzania, even if the payback is extremely long, unsure, and risky, even if there are daily troubles with national electricity supply (as inhabitants of Tanzania know), even if publications are made which lack factual evidence. CSG will continue to support this project that reduces GHG and contributes towards reducing climate change.

Most of the points made in this response can simply be retrieved by looking at the project page on the official UNFCCC web site (<http://cdm.unfccc.int/Projects/DB/DNV-CUK1169853184.14/view>). The rest of the points could have been found by simply asking any party with common knowledge on landfill gas projects. Finally, CSG never refuses to provide information on the project when properly requested.

It is CSG feeling that Mr. Finnigan Wa Simbeye wrote his article using questionable information, and that he made no verification of his claims. It seems like he wanted to discredit the CDM and this landfill project at all costs without seeking the truth. The pictures used in his article do not show Mtoni CDM project and have not been taken at the site since this project was implemented, further putting in question the credibility of this subjective article.

CSG strongly supports the necessity of third parties opinions and discussions because these are the foundations of pluralism. However they cannot allow incompetence and misinformation to discredit an additional CDM project which improves the environment and the living conditions of people in Least Developed Country and which meets all the UNFCCC requirements in terms of monitoring and management procedures.