CLEAN DEVELOPMENT MECHANISM
PROJECT DESIGN DOCUMENT FORM (CDM-SSC-PDD)
Version 03 - in effect as of: 22 December 2006

CONTENTS

Annexes

Revision history of this document

Version Number	Date	Description and reason of revision
01	21 January 2003	Initial adoption
02	8 July 2005	• The Board agreed to revise the CDM SSC PDD to reflect guidance and clarifications provided by the Board since version 01 of this document. • As a consequence, the guidelines for completing CDM SSC PDD have been revised accordingly to version 2. The latest version can be found at <http://cdm.unfccc.int/Reference/Documents>.
03	22 December 2006	• The Board agreed to revise the CDM project design document for small-scale activities (CDM-SSC-PDD), taking into account CDM-PDD and CDM-NM.

SECTION A. General description of small-scale project activity

A.1 Title of the small-scale project activity:

Fuel switch project on the Gluten 20 dryer of Tongaat Hulett Starch Pty (Ltd) Germiston Mill

Version 13
8 August 2010

A.2. Description of the small-scale project activity:

The purpose of the project is to reduce greenhouse gas emissions and unpleasant offgas smells in a product dryer of Tongaat Hulett Starch (Pty) Ltd by switching fuel from coal to natural gas. Natural gas has a lower greenhouse gas emission factor than coal. The fuel switch will lead to a reduction of around 40% in greenhouse gas emissions from the process. An added advantage is better process temperature control which reduces unpleasant offgas smells generated in the plant.

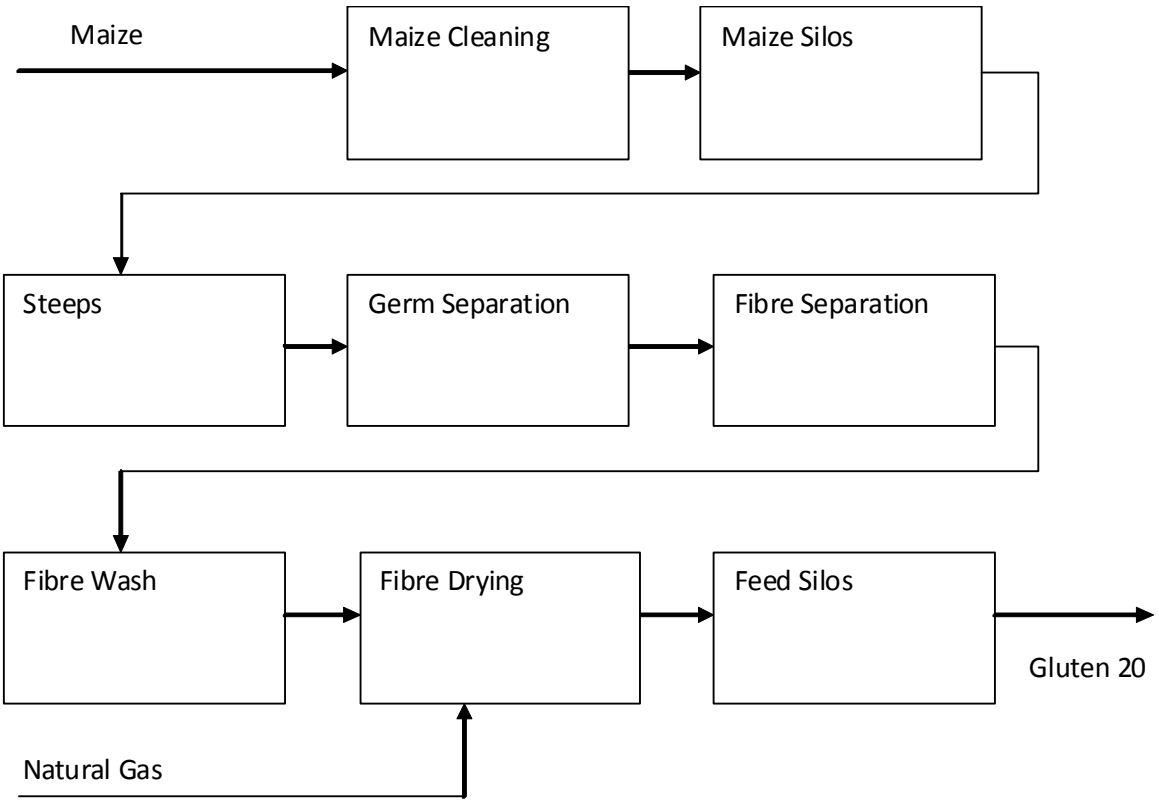


Figure 1: Process Diagram

Gluten 20 is a product made from wet milled maize. The product enters the final stage dryer at around 60% moisture, and is dried in a rotary drier to around 12% moisture. Gluten 20 is a registered trademark for a 20% protein enriched fibrous feed at a 12 % moisture level. The rotary dryer was previously heated by hot gas generated in a furnace. The furnace was fired with coal on a chain grate stoker. The project

activity involved the decommissioning of the coal fired furnace and the conversion of the rotary drier by the installation of a directly fired natural gas burner.

Apart from Gluten 20 a range of products are produced from maize on this site. These products are destined for the biscuits, beverages, beer, dog food or paper industries, mainly in South Africa.

The project makes the following contribution to sustainable development:

Environmental:
The project activity eliminates the consumption of coal in the Gluten 20 drying process. This has the following direct environmental benefits:

- Greenhouse gas reduction.
- The emission of SO_2 due to the combustion of coal is eliminated. It is estimated that the reduction of SO_2 emission from the site due to the fuel switch is in the order of 8 to 10 tons per month of SO_2.
- The emission of particulates from the coal combustion is eliminated.
- The environmental impact of coal mining is reduced.
- The environmental impact of coal ash disposal from the Gluten 20 drying process is eliminated.
- The environmental impacts and emissions associated with coal transport are avoided.

Social:
The implementation of the project has an impact in the reduction of burnt cereal smell from the factory. This has a positive impact on the living conditions in the areas surrounding the mill.

There were no job losses in the implementation of the project.

Economic:
The project operates at a loss however with carbon credits the project will earn foreign reserves for the country.

The Gluten 20 product quality is not affected by the implementation of the project activity.

A.3. Project participants:

Name of Party involved (*) ((host) indicates a host Party)	Private and/or public entity(ies) project participants (*) (as applicable)	Kindly indicate if the Party involved wishes to be considered as project participant (Yes/No)
Republic of South Africa (host)	Tongaat Hulett Starch Propriety Ltd	No
(*) In accordance with the CDM modalities and procedures, at the time of making the CDM-PDD public at the stage of validation, a Party involved may or may not have provided its approval. At the time of requesting registration, the approval by the Party(ies) involved is required.		
Note: *When the PDD is filled in support of a proposed new methodology (forms CDM-NBM and CDM-NMM),* at least the host Party(ies) and any known project participant (e.g. those proposing a new methodology) shall be identified.		

A.4. Technical description of the small-scale project activity:

A.4.1. Location of the small-scale project activity:

A.4.1.1. Host Party(ies):

South Africa

A.4.1.2. Region/State/Province etc.:

Gauteng Province

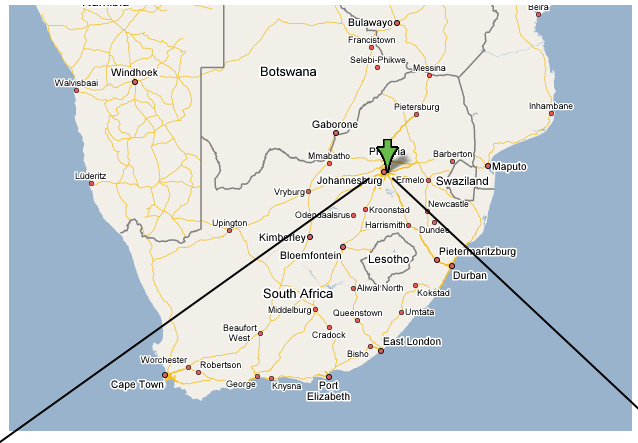
A.4.1.3. City/Town/Community etc:

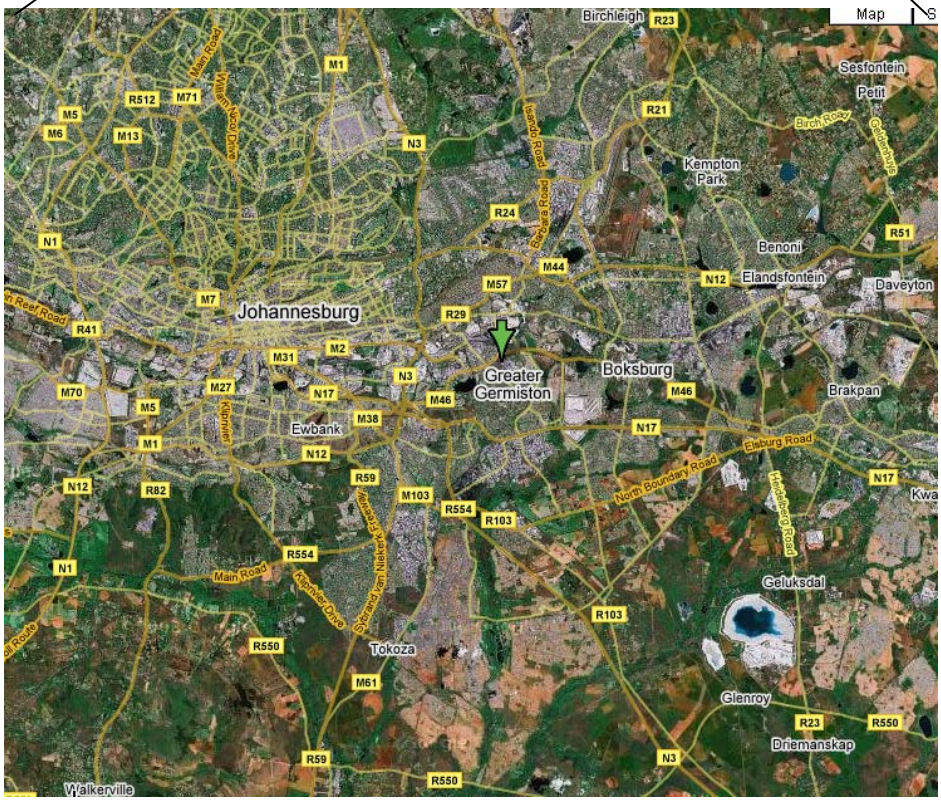
Germiston

A.4.1.4. Details of physical location, including information allowing the unique identification of this small-scale project activity :

The mill is located in Power Street, Germiston, in the South of Johannesburg, South Africa

GPS coordinates: 26° 13’ 11” S
28° 10’ 42” E





A.4.2. Type and category(ies) and technology/measure of the small-scale project activity:

The project is of type III B: Switching fossil fuels, Version 14.

The technology employed involves the switching from coal to natural gas. The positive environmental impact of this switch is not only limited to a reduction in greenhouse gasses, but have added environmental spin-offs in the reduction of SO_2, particulate emissions as well as a reduction in the environmental impacts associated with the mining and transportation of coal.

The technology of burning natural gas in directly fired heaters has not been used by the project participant prior to the implementation of the project activity. This technology is commercially available in South Africa. Burner, instrumentation and control technology was purchased from local suppliers acting as agents for technology vendors from Annex I countries. See below a photo, taken at night, of the gas burners in front of the gluten20 rotary dryer. The energy required for ignition, is considered negligible.

Photo 1: The gas burner installation of the $Gluten_{20}$ dryer

A.4.3 Estimated amount of emission reductions over the chosen crediting period:

The estimated amount of emission reduction over the chosen crediting period is:

Years	Annual estimation of emission reductions in tonnes of CO2e
1 May 2010 – 30 April 2011	5,807
1 May 2011 – 30 April 2012	5,807
1 May 2012 – 30 April 2013	5,807
1 May 2013 – 30 April 2014	5,807
1 May 2014 – 30 April 2015	5,807
1 May 2015 – 30 April 2016	5,807
1 May 2016 – 30 April 2017	5,807
Total estimated reductions (tonnes of CO2e)	**40,650**
Total number of crediting years	**7, renewable twice**
Annual average over the crediting period of estimated reductions (tonnes of CO2e)	5,807

A.4.4. Public funding of the small-scale project activity:

No public funding has been used in the development or implementation of this project.

A.4.5. Confirmation that the small-scale project activity is not a debundled component of a large scale project activity:

The size of the dryer in this facility falls well within the limit for small scale projects and the Tongaat Hulett Starch Pty (Ltd) has not registered a similar project within a 1 km radius of the Germiston site, within the previous 2 years. Therefore it is not a debundled component of a large scale project.

SECTION B. Application of a baseline and monitoring methodology

B.1. Title and reference of the approved baseline and monitoring methodology applied to the small-scale project activity:

AMS III. B. Switching fossil fuels. Version 14

B.2 Justification of the choice of the project category:

Criteria as described in AMS III.B

	Technology/measure	*In the project activity*
1.	*This methodology comprises fossil fuel switching in industrial, residential, commercial, institutional or electricity generation applications.(Fuel switch in transportation technologies is not eligible under this methodology.)*	The project activity comprises fossil fuel switching in an industrial application. It is not a fuel switch in transportation technologies.
2.	*Fuel switch may be in a single element process or may include several element processes within the facility. Multiple fossil fuel switching in an element process however is not covered under this methodology.*	The project activity is a fuel switch in a single element process within the facility. The project activity does not involve multiple fossil fuel switching.
3.	*This methodology is applicable for new facilities as well as for retrofit or replacement of existing installations.*	The project activity is a replacement of an existing intstallation.
4.	*Fuel switching may also result in energy efficiency improvements. If the project activity primarily aims at reducing emissions through fuel switching, it falls into this methodology. If fuel switching is part of a project activity focussed primarily on energy efficiency, the project activity falls under a Type II methodology.*	The project activity primarily aims at reducing emissions through fuel switching as mentioned in Tontaat-Hulett's 2005 sustainability report.
5.	*New facilities (Greenfield projects) and project activities involving capacity additions compared to the baseline scenario are only eligible if they comply with the related and relevant requirements in the General Guidance for SSC methodologies.*	The project activity is not a new facility nor does it involve capacity additions compared to the baseline scenario.
6.	*This methodology is not applicable to project activities that propose switch from fossil fuel use in the baseline to renewable biomass, biofuel or renewable energy in the project scenario. A relevant Type I methodology shall be used for such project activities that generate renewable energy displacing fossil fuel use. This methodology is also not applicable to project activities involving the use of waste gas; these project activities might be eligible under AMS-III.Q.*	The project activity is fuel switch from coal to natural gas, not renewable biomass, biofuel or renewable energy. The project activity does not involve the use of waste gas.

7.	*The facility may involve grid connected elemental processes however this methodology does not cover emission reductions on account of shift from use of grid electricity.*	The project activity does not involve grid connected processes.
8.	*This category is applicable to project activities where it is possible to directly measure and record the energy use/output (e.g., heat and electricity) and consumption (e.g., fossil fuel) within the project boundary.*	It is possible to directly measure and record the energy use and consumption within the project boundary.
9.	*Heat or electricity produced under the project activity shall be for on-site captive use and/or export to other facilities included in the project boundary. In case energy produced by the project activity is delivered to another facility, or facilities, within the project boundary, a contract between the supplier and consumer(s) of the energy will have to be entered into specifying that only the facility generating the energy can claim emission reductions from the energy displacement.*	Heat produced under the project activity is for on-site captive use and is included in the project boundary.
10.	*Regulations do not constrain the facility from using the energy sources cited in paragraph 1 before or after the fuel switch. Regulations do not require the use of low carbon energy source (e.g., natural gas or any other fuel) in the element processes*	In South Africa, regulations do not constrain the facility from using coal before or after the fuel switch. Regulations do not require the facility use natural gas or any other fuel.
11.	*The project activity does not result in integrated process change. The purpose is to exclude measures that affect other characteristics of the process besides switch of energy sources e.g., operational conditions, type of raw material processed, use of non-energy additives, change in type or quality of products manufactured etc.*	The project activity does not result in integrated process change. The only difference is a change in the use of fossil fuel. Product quality remains the same after the project.
12.	*Measures are limited to those that result in emission reductions of less than or equal to 60 kt CO_2 equivalent annually*	The average annual emission reduction is estimated at 5 807 t CO_2, well below the 60 000 t CO_2 reduction limit of this category.

The project meets all the conditions set forth in the approved small-scale methodology III.B. Hence, the selected methodology is appropriate for the project activity.

This fuel switch project is not a project activity under a programme of activities.

B.3. Description of the project boundary:

The project boundary is the Gluten 20 Dryer at the physical site of Tongaat-Hulett Starch Pty (Ltd) in Germiston.

B.4. Description of baseline and its development:

In accordance with the methodology the emission baseline is the emissions per output before the fuel switch. The project baseline is the use of coal, and in the three years preceding the fuel switch an average of 5,037 MJ/ton gluten was needed for drying. The IPCC default factors for other bituminous coal were used - calorific value of 25.8 MJ/kg and emission factor of 0.0946 t CO_2/ GJ coal. Detail around the data used in the baseline is attached in Annex 3.

The dryer has not changed before or after the fuel switch. The net output of the dryer is linked to the grinding capacity of the site. The facility is designed to grind up to 900 tonnes of maize per day, 350 days a year. The actual realistic throughput is 750 tonnes of maize per day. 17% of the maize is converted to Gluten 20. Gluten 20 is a registered trademark product, a fibrous feed containing 20% protein and 12 % moisture.

B.5. Description of how the anthropogenic emissions of GHG by sources are reduced below those that would have occurred in the absence of the registered small-scale CDM project activity:

In accordance with the simplified modalities and procedures for small scale projects this project activity should demonstrate that it is additional and would not have occurred anyway due to at least one of the following barriers:

(a) Technological barrier: a less technologically advanced alternative to the project activity involves lower risks due to the performance uncertainty or low market share of the new technology adopted for the project activity and so would have led to higher emissions;

The burning of coal is less technologically advanced than gas combustion. Tongaat Hulett Starch has not implemented any gas fired drying operation prior to the implementation of this project. The continued operation of the coal based equipment (chain grate stoker furnace) therefore constitutes the lower risk alternative.

At the time of the conversion the specification of the gas changed due to the construction of a 865 km pipeline to transport natural gas from Mozambique to South Africa. This necessitated conversion of the design of the network as well as the combustion equipment, which introduced more uncertainty into the project.

(b) Barrier due to prevailing practice: prevailing practice or existing regulatory or policy requirements would have led to implementation of a technology with higher emissions;

Prevailing practice circumstances relevant to the baseline:
South Africa has large reserves of coal, and coal has been, and is, the cheapest energy source for industrial facilities. South Africa has only small deposits of oil and natural gas and relies on coal production for most of its energy needs (http://www.eia.doe.gov/emeu/cabs/South_Africa/Background.html). More than 90% of South African electricity is generated by coal and this statistic is also applicable to the generation of steam for industrial purposes (Associated Energy Services overview). In 2004, Sasol opened its gas pipeline from Mozambique to its Mpumalanga synthetic fuels plant. This raised the country's use of natural gas as a primary energy source from 1.5% to 4.3% of total demand (South Africa.info). This is significantly less than the consumption of coal.

Prevailing practice national policy relevant to the baseline:
There is no specific national policy prescribing the use of coal or natural gas. However, government has noted that a shift to natural gas for energy is unlikely. From the Department of Minerals and Energy White Paper on the Renewable Energy Policy of the Republic of South Africa, November 2003: “South Africa relies heavily on coal to meet its energy needs because it is well-endowed with coal resources.... Coal is and is likely to remain, from a financial viewpoint, an attractive source of energy for South Africa.” From the same paper: “Regarding a potential shift to natural gas as a significant contributor to energy supply needs to be placed in the context of available local and regional gas reserves. The Integrated Energy Plan (DME, 2003) indicates that the energy content of the known gas reserves, (including those of Namibia and Mozambique), are 0.5% of the known coal reserves. Hence, it is manifest that under these

circumstances gas is unlikely to form any major component of primary energy supply over any extended period when compared with coal".

The prevailing practice in South Africa is the use of coal for thermal energy requirements. The project activity constitutes a departure from this practice.

(c) Barrier due to commercial risk: The baseline of the project is the continued use of coal. The coal-mining industry is highly concentrated with five companies accounting for 85 percent of saleable coal production (Department of Minerals and Energy). However there are numerous coal suppliers in South Africa. The well traded coal market results in competitive pricing of coal. There is however only one supplier of piped gas in South Africa. Sasol Gas is currently the sole supplier of pipeline gas in South Africa (Associated Energy Services overview). The absence of a well traded market introduces a commercial risk to the project. This commercial risk is the dependence on one supplier which could open the door to monopolistic behaviour. Should there be a default in this one supplier, no alternatives suppliers are available in South Africa.

These three barriers did not prevent the continued use of coal. These barriers were however real barriers when the decision to implement the fuel switch on this site was made. The public image associated with this voluntary, lower emission project, the fuel switch, and the anticipated revenue from carbon credits lowered these barriers sufficiently, to develop this project as a CDM activity.

Tongaat Hulett Starch management considered CDM benefits as necessary in the decision to undertake the project. The chronology of events for the project activity appears in the table below.

Activity	**Date**
African Products' Sustainability Report 2005 stated that "African Products has embarked on a process of reducing greenhouse gas emission by converting from steam generation based on coal to steam generation based on natural gas." African Products, as a listed company in South Africa is obliged to issue this document on an annual basis. The report was signed by the Chairman, Cedric Savage.	01/01/2005 to 31/12/2005
Equipment purchase order (Starting date of the project according to the Guidelines for Completing the Project Design Document (Annex 12 EB 41 2 August 2008))	02/12/2005
Email from The Development Bank of Southern Africa to African Products to discuss loan financing for CDM projects.	27/02/2006
Switch to natural gas from coal (Possible starting date of the project according to the Guidelines for Completing the Project Design Document (Annex 16 EB 25 28 July 2006). This definition of the project activity changed in 2 August 2008 at EB 41)	30/04/2006
Email request by African Products to book meeting room. Meeting to explore CDM opportunities.	16/02/2007
PDD development order between African Products and Promethium Carbon, a CDM developer.	30/05/2007
African Products officially changed its name to Tongaat Hulett Starch	20/08/2007
Local stakeholder consultation press release	02/11/2007
Start of global stakeholder process by TÜV SÜD	07/11/2007

Letter of approval from DNA	09/02/2009[1]

B.6. Emission reductions:

B.6.1. Explanation of methodological choices:

The fuel switch entailed the addition of a gas installation on site and the retrofitting of the dryer. The dryer conversion was commissioned in April 2006.

In accordance with the small scale methodology no leakage (e.g. fugitive emissions associated with the gas distribution) has to be taken into account.

B.6.2. Data and parameters that are available at validation:

(Copy this table for each data and parameter)

Data / Parameter:	**FC_{BSL}**
Data unit:	Tons per year
Description:	Total amount of coal consumed for captive energy generation in the baseline situation
Source of data used:	Coal receipts
Value applied:	7 017
Justification of the choice of data or description of measurement methods and procedures actually applied :	Average of three years monthly data, prior to the fuel switch
Any comment:	-

Data / Parameter:	**NCV_{coal}**
Data unit:	TJ/ton coal
Description:	Net calorific value for coal
Source of data used:	IPCC default value for other bituminous coal
Value applied:	0.0258
Justification of the choice of data or description of measurement methods and procedures actually applied :	IPCC default
Any comment:	-

[1] The South African DNA requires a signed Validation Report before it will issue its Letter of Approval. There was a delay in generating the validation report due to staff turnover at TÜV SÜD. The lead auditor left the company and a new TÜV SÜD auditor had to continue the process of drafting the Validation Report. During the period, TÜV SÜD was suspended by the EB, which led to further delays.

Data / Parameter:	**$EF_{CO2,coal}$**
Data unit:	tons CO2/TJ
Description:	CO2 emission factor for the baseline fossil fuel
Source of data used:	IPCC default value for other bituminous coal
Value applied:	94.6
Justification of the choice of data or description of measurement methods and procedures actually applied :	IPCC default
Any comment:	-

Data / Parameter:	**Q_{BSL}**
Data unit:	MWh
Description:	Net energy generated in the baseline situation
Source of data used:	Coal quantities and calorific value
Value applied:	51,656
Justification of the choice of data or description of measurement methods and procedures actually applied :	Average over the three years prior to the fuel switch
Any comment:	

Data / Parameter:	**$EF_{CO2, gas}$**
Data unit:	tCO_2/TJ
Description:	CO_2 emission factor for natural gas
Source of data to be used:	IPCC
Value of data	0.0561
Description of measurement methods and procedures to be applied:	IPCC default
QA/QC procedures to be applied:	-
Any comment:	-

Data / Parameter:	NCV_{gas}
Data unit:	GJ/m^3
Description:	Net calorific value for natural gas
Source of data to be used:	From Sasol, the supplier of the natural gas
Value applied:	0.03653
Description of measurement methods and procedures to be applied:	Should source of gas change, the new NCV will be obtained from the supplier.
QA/QC procedures to be applied:	-
Any comment:	-

B.6.3 Ex-ante calculation of emission reductions:

$$BE_y = EF_{BSL} * Q_y \quad \textbf{(1)}$$

Where:

BE_y Baseline emissions in year y (tCO_2e)
EF_{BSL} Emission factor for the baseline situation (tCO2e/MWh)
Q_y Net output in project activity in year y (MWh)

$$EF_{BSL} = (FC_{BSL} * EF_{CO2,coal} * NCV_{coal}) / Q_{BSL} = 0.332 \quad \textbf{(2)}$$

Where the validated values are:

FC_{BSL} Total amount of coal consumed for captive energy generation in the baseline situation (tons/year)
$EF_{CO2,coal}$ CO2 emission factor for the baseline fossil fuel (tCO2/TJ)
NCV_{coal} Net calorific value for the baseline fossil fuel (GJ/m^3)
Q_{BSL} Net energy generated in the captive plant in the baseline situation during the corresponding period of time for which the total fuel consumption was taken (MWh)

$$PE_y = FC_y * EF_{CO2,gas} * NCV_{gas} \quad \textbf{(3)}$$

Where:

PE_y Project emissions in year y (tCO2e)
FC_y Total amount of natural gas consumed for captive energy generation in the project activity (Nm^3)
$EF_{CO2,gas}$ CO2 emission factor for the natural gas (tCO2/TJ)
NCV_{gas} Net calorific value for the natural gas (GJ/m^3)

$ER_y = BE_y - PE_y$ **(4)**

Where
ER_y Emission reductions in year y (ton CO_2e)

B.6.4 Summary of the ex-ante estimation of emission reductions:

Year	BE	PE	ER
1 May 2010 – 30 April 2011	14,856	9,049	5,807
1 May 2011 – 30 April 2012	14,856	9,049	5,807
1 May 2012 – 30 April 2013	14,856	9,049	5,807
1 May 2013 – 30 April 2014	14,856	9,049	5,807
1 May 2014 – 30 April 2015	14,856	9,049	5,807
1 May 2015 – 30 April 2016	14,856	9,049	5,807
1 May 2016 – 30 April 2017	14,856	9,049	5,807

B.7 Application of a monitoring methodology and description of the monitoring plan:

B.7.1 Data and parameters monitored:

(Copy this table for each data and parameter)

Data / Parameter:	**FC_y**
Data unit:	Nm^3
Description:	Total amount of natural gas consumed for captive energy generation in the project activity for the year
Source of data to be used:	Normalized gas meter reading
Value of data	4,415,637
Description of measurement methods and procedures to be applied:	Continuous meter reading, reported electronically monthly. Totalled over 12 months to obtain the yearly amount.
QA/QC procedures to be applied:	Calibrated meter is in place.
Any comment:	-

Data / Parameter:	**Q_y**
Data unit:	MWh
Description:	Net energy requirement per year to dry the Gluten 20
Source of data to be used:	Gas quantities (FC_y) and calorific value (NCV_{gas})

Value applied:	44,806, using an NCV_{gas} of 0.03653 GJ/m^3
Description of measurement methods and procedures to be applied:	Monthly average gas quantities consolidated into a annual energy value with the NCV from the gas suppliers Technical Data Sheet. FC_y (m^3) * NCV_{gas} (MWh/m^3)
QA/QC procedures to be applied:	If the gas supplier changes or if the client is notified that the gas composition has changed, obtain new NCV.
Any comment:	-

B.7.2 Description of the monitoring plan:

The emission reduction will be calculated, in accordance with the methodology, as the difference between the baseline emissions and project emissions.

The monitoring plan involves the continued monitoring of the natural gas consumption and the gas quality required for drying the Gluten 20.

The dryer has its own gas meter that was calibrated upon installation and maintained in accordance with equipment specifications.

The responsibility of the daily electronic data procedures is with the production manager. The financial system is the responsibility of the financial manager and emission reduction reporting will be calculated from the gas consumption.

As an ISO 9001 certified operation, internal quality audits will be performed on the dryer and associated equipments.

B.8 Date of completion of the application of the baseline and monitoring methodology and the name of the responsible person(s)/entity(ies)

The application of the baseline and monitoring methodology was completed by Promethium Carbon (Pty) Ltd in 31 July 2007. Promethium is not a project participant.

SECTION C. Duration of the project activity / crediting period

C.1 Duration of the project activity:

C.1.1. Starting date of the project activity:

2 December 2005.

C.1.2. Expected operational lifetime of the project activity:

The equipment, meters and gas burners as well as the dryer have a projected lifespan of 21 years if well maintained, matching the life of the CDM project.

C.2 Choice of the crediting period and related information:

C.2.1. Renewable crediting period

C.2.1.1. Starting date of the first crediting period:

01/05/2010

C.2.1.2. Length of the first crediting period:

Seven years.

C.2.2. Fixed crediting period:

C.2.2.1. Starting date:

Not applicable.

C.2.2.2. Length:

Not applicable.

SECTION D. Environmental impacts

D.1. If required by the host Party, documentation on the analysis of the environmental impacts of the project activity:

No environmental impact assessment is needed for fuel switching in South Africa. The environmental impact of the fuel switch is however positive as the local air quality, with regards to particulates and smell is improving.

D.2. If environmental impacts are considered significant by the project participants or the host Party, please provide conclusions and all references to support documentation of an environmental impact assessment undertaken in accordance with the procedures as required by the host Party:

The environmental impact of this project is not considered significant.

SECTION E. Stakeholders' comments

E.1. Brief description how comments by local stakeholders have been invited and compiled:

Newspaper advertisement:

The neighbours, local business and local communities were informed about the CDM gas dryer initiative at the Germiston mill via the regional newspaper (Germiston City Press) and no comments were received.

Complaints to the municipality:

The reduction in smell in the area reduced the number of complaints that the local municipality was dealing with. Lists of complaints before and after the fuel switch are available on site as part of the quality documentation.

E.2. Summary of the comments received:

Newspaper advertisement:

No comments were received from the newspaper announcement.

Complaints to the municipality:

The complaints received are all similar and relate to odour issues in the area, and don't always originate at the mill. An example of complaints received by the municipality:
Recieved by M Pietersen from Mrs Kim de Kock via SMS at 8h29 dated 13/08/2006: Hello, disgusting burnt smell evident this morning causing burning nose.

E.3. Report on how due account was taken of any comments received:

Newspaper advertisement:

As no comments were received relating to the fuel switch, no due account was taken.

Complaints to the municipality:

The complaints recieved by the municipality were not directly linked to the fuel switch of the project activity and as such, were simply monitored over time.

Annex 1

CONTACT INFORMATION ON PARTICIPANTS IN THE PROJECT ACTIVITY

Organization:	Tongaat Hulett Starch Propriety Limited	
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Building:	Daniel Place, 2 Dick Kemp Street	
City:	Meadowdale, Germiston	
State/Region:	Gauteng	
Postfix/ZIP:	1600	
Country:	South Africa	
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FAX:		
E-Mail:	Daniel.loubser@tonstarch.co.za ; Garth.Macpherson@tonstarch.co.za	
URL:	http://www.tongaathulettstarch.co.za/	
Represented by:		
Title:		
Salutation:	Mr.	Mr.
Last Name:	Loubser	Macpherson
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Personal E-Mail:	Daniel.loubser@tonstarch.co.za	Garth.Macpherson@tonstarch.co.za

Annex 2

INFORMATION REGARDING PUBLIC FUNDING

No public funding was used in either the development or implementation of this project

Annex 3

BASELINE INFORMATION

Data for coal consumption used in the baseline calculations

Date	Coal consumed in tons	Actual cost	Gluten 20 production in tons
Apr-04	627.6	R 135,857.98	2,646
May-04	668.5	R 138,185.36	2,810
Jun-04	564.8	R 108,470.36	2,770
Jul-04	504.1	R 107,883.82	2,615
Aug-04	527.5	R 112,876.44	2,244
Sep-04	725.4	R 155,242.02	3,283
Oct-04	576.3	R 123,326.06	2,861
Nov-04	681.0	R 145,727.58	3,313
Dec-04	484.3	R 103,635.92	3,008
Jan-05	520.8	R 111,446.92	2,933
Feb-05	414.7	R 88,739.38	3,044
Mar-05	466.4	R 99,805.32	2,788
Apr-05	579.1	R 123,925.26	3,254
May-05	669.0	R 139,444.50	3,615
Jun-05	569.1	R 120,252.97	3,634
Jul-05	579.9	R 121,510.57	3,212
Aug-05	497.8	R 103,055.27	3,486
Sep-05	674.5	R 139,615.92	3,323
Oct-05	599.0	R 123,984.73	3,054
Nov-05	690.7	R 142,973.87	3,457
Dec-05	653.2	R 135,216.54	3,135
Jan-06	620.8	R 128,514.00	2,845
Feb-06	692.6	R 143,361.86	2,867
Mar-06	448.0	R 92,731.15	2,758

Annex 4

MONITORING INFORMATION

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