



POA VALIDATION REPORT

ABLY CARBON SDN. BHD.

REGIONAL BIOGAS POA

Report No: CCL0139/RPP/10022012

Date: 2012-11-06



Validation Report:	Report No.	Rev. No.	Date of 1st issue:	Date of this rev.
	CCL0139/RPP/10022012	0	2012-11-06	2012-11-06
Project:	Title:	Initial PoA-DD Version:	Final PoA-DD Version	
	Regional Biogas PoA	2012-02-14	2012-11-05	
Client:	Ably Carbon Sdn. Bhd.	Client ref:	Stéphane Vidaillet,	
Project Participant(s):	Host Party:	Other involved parties:		
	Malaysia	France		
Applied methodology/ies:	Title:	Version No.:	Scope / TA:	
	AMS III. H., AMS I.A., AMS.I.C., AMS I.D. and AMS I.F.	16, 14, 19, 17 and 02 respectively	13 & 01/13.1, 1.1 & 1.2	
Validation team / Technical Review and Final Approval	Validation Team:	Technical review:	Final approval:	
	Prakash Kumar Mishra (TL) Arshi Vimal (TM) Dhananjay Kumar (T) Gaurav Sharma (T) Chandru a/l Sernyanathan (LE)	Vikash Kumar Singh	Adam Simcock	
Expected Emission reductions: [t CO₂e]	Expected emission reductions over the first crediting period:	Project starting date:		
	193,520 t CO ₂ e	2013/01/01 or the date of registration whichever is later		
Confidential content:	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Summary of Validation Opinion:	<input checked="" type="checkbox"/> Positive validation opinion	<input type="checkbox"/> Negative validation opinion		
Validation Phases	<input checked="" type="checkbox"/> Desk Review <input checked="" type="checkbox"/> Site Visit <input checked="" type="checkbox"/> Resolution of outstanding issues <input checked="" type="checkbox"/> Final opinion			
Validation Stages	<input checked="" type="checkbox"/> Corrective Action Requested <input checked="" type="checkbox"/> Clarification Requested <input checked="" type="checkbox"/> Full approval and submission for registration <input type="checkbox"/> Negative Validation Opinion Within: <input checked="" type="checkbox"/> a completed Clean Development Mechanism Programme of Activities Design Document Form (the "CDM-PoA-DD"); <input checked="" type="checkbox"/> a completed PoA-specific Clean Development Mechanism Program Activity Design Document Form (the "CDM-CPA-DD") with generic information relevant to all CPAs (as the "PoA-Generic CDM-CPA-DD"); <input checked="" type="checkbox"/> a completed CDM-CPA-DD which is to be based on the application of the PoA to one real case (the "Real-Case CDM-CPA-DD").			
Summary	Ably Carbon Sdn. Bhd. has appointed Carbon Check (Pty) Ltd. (Carbon Check) to carry out PoA validation of "Regional Biogas PoA". In the opinion of Carbon Check, PoA-DD and gCPA-DD dated 2012-11-05 meets all relevant UNFCCC requirements for the CDM PoA and correctly applies the baseline and monitoring methodologies Methane recovery in wastewater treatment AMS III.H. version 16, AMS I.A. version 14, AMS I.C. version 19, AMS I.D. version 17 and AMS I.F. version 02. Thus, Carbon Check (Pty) Ltd., requests the registration of the programme as a CDM Programme of Activities.			
Document information:	Filename:	No. of pages:		
	PoA FValR 06-11-2012	106		



Abbreviations

BAU	Business as usual
BOD	Biochemical Oxygen Demand
CA	Corrective Action / Clarification Action
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CL	Clarification Request
CME	Coordinating / Managing Entity
CO ₂	Carbon dioxide
CO _{2e}	Carbon dioxide equivalent
COP	Conference of Parties
COD	Chemical Oxygen Demand
CP	Certification Program
CPA	Component Project Activity
CPA-DD	Component Project Activity Design Document
CMP	Conference of Parties serving as the Meeting of the Parties
DNA	Designated National Authority
DOE	Designated Operational Entities
DR	Document Review
EB	CDM Executive Board
EIA	Environmental Impact Assessment
FA	Final Approver/Approval
FAR	Forward Action Request
FSR	Feasibility Study Report
GHG	Greenhouse gas(es)
GSC	Global Stakeholders Comment during GSCP
GSCP	Global Stakeholder Consultation Process
I	Interview
IPCC	Intergovernmental Panel on Climate Change
KP	Kyoto Protocol
LE	Local Expert
LSC	Local Stakeholder Consultation
MA	Marrakesh Accords
M&P	Modalities and Procedures
MOP	Meeting of the Parties
MS	Management System
MW	Mega Watt
MWh	Mega Watt Hour
NA	Not Applicable
PA	Project Activity
PNG	Papua New Guinea
PP	Project Participants



PoA	Programme of Activities
PoA-DD	CDM Programme of Activities Design Document
PoA-DDs	(CDM PoA and CPA) Design Documents
POME	Palm Oil Mill Effluent
QC/QA	Quality control/Quality assurance
RSA	Republic of South Africa
SMP	Simplified Modalities and Procedures
SV	Site Visit
T	Trainee Auditor
TM	Team Member
TL	Team Leader
TR	Technical Reviewer
UNFCCC	United Nations Framework Convention on Climate Change
VT	Validation Team
VVM	Validation and Verification Manual



Contents

1	INTRODUCTION	6
2	OBJECTIVE / SCOPE	6
3	GHG POA INFORMATION	6
3.1	PoA Characteristics	6
3.2	Involved Parties, Coordinating / managing entity(ies), program participants of the POA and operators of individual CPAs	7
3.3	Programme Boundary and Location	8
3.4	Programme Technical Description	8
4	METHODOLOGY AND VALIDATION SEQUENCE	9
4.1	Validation Steps / Process	9
4.2	Contract review	9
4.3	Appointment of team members and technical reviewers	9
4.4	Consideration of Public Stakeholder Comments	10
4.5	Validation Protocol	11
4.6	Documents Review	12
4.7	Site Visit and Follow-up Interviews	12
4.8	Project comparison	13
4.9	Resolution of outstanding issues	13
4.9.1	Definition	13
4.9.2	Draft Validation	13
4.9.3	Final Validation	13
4.9.4	Technical Review and Final Approval	14
5	VALIDATION FINDINGS	14
6	VALIDATION ASSESSMENT SUMMARY	42
7	VALIDATION OPINION	61
8	REFERENCES	62
9	ANNEX 1: VALIDATION PROTOCOL	69
10	ANNEX 2: STATEMENTS OF COMPETENCE OF ALL INVOLVED PERSONNEL	106



1 INTRODUCTION

Ably Carbon Sdn. Bhd. (hereafter referred as the CME) commissioned Carbon Check (Pty) Ltd. to assess the information in the CDM-PoA-DD for the PoA titled “Regional Biogas PoA” (hereafter called “the PoA”).

This report summarises the findings of the validation of the specific small-scale CDM Programme of Activities Design Document (CDM-SSC-PoA-DD).

2 OBJECTIVE / SCOPE

The purpose of a validation is to have an independent third party assess the PoA-DD, the CPA-DD template and the real-case CPA-DD. In particular, the eligibility criteria for inclusion and demonstration of additionality of PoA and associated CPAs, the programme’s baseline determination, monitoring plan, and the programme’s compliance with relevant UNFCCC and host Party criteria are validated in order to confirm that the programme design, as documented, is sound and reasonable and meets the identified criteria. Validation is a requirement for all CDM PoAs and is seen as necessary to provide assurance to stakeholders of the quality of the programme and its intended generation of certified emission reductions (CERs).

The validation scope is defined as an independent and objective review of the PoA-DD, the generic CPA-DD and the real-case CPA-DD. The PoA-DD, the generic CPA-DD and the real-case CPA-DD were reviewed against the criteria stated in Article 12 of the Kyoto Protocol, the CDM modalities and procedures as agreed in the Marrakech Accords, the simplified modalities and procedures for small-scale CDM project/ programme activities, the procedures for registration of a programme of activities as a single CDM project activity and the relevant decisions by the CDM Executive Board, including the approved baseline and monitoring methodologies AMS III.H. version 16, AMS I.A. version 14, AMS I.C. version 19, AMS I.D. version 17 and AMS I.F version 02.

The validation is not meant to provide any consulting to the project participants. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the project design.

3 GHG POA INFORMATION

3.1 PoA Characteristics

Basic project specific information:

Table 3-1: Project Characteristics

Item	Data
PoA title (version and date)	Regional Biogas PoA Version 6.0 date 2012/11/05
Generic CPA title (version and date)	Regional Biogas PoA – CPA [XX] (name of mill) Version [X.X] date [DD/MM/YYYY]
1st CPA (real case) title (version and date)	Regional Biogas PoA – CPA 1 (Felda Triang) Version 5.0 date 2012/09/17
PoA size	<input type="checkbox"/> Large Scale <input checked="" type="checkbox"/> Small Scale
Programme Scope	<input checked="" type="checkbox"/> 1 Energy Industries (renewable- /non-renewable sources)



(according to UNFCCC sectoral scope numbers for CDM)	<input type="checkbox"/>	2	Energy distribution
	<input type="checkbox"/>	3	Energy demand
	<input type="checkbox"/>	4	Manufacturing industries
	<input type="checkbox"/>	5	Chemical industry
	<input type="checkbox"/>	6	Construction
	<input type="checkbox"/>	7	Transport
	<input type="checkbox"/>	8	Mining/Mineral production
	<input type="checkbox"/>	9	Metal production
	<input type="checkbox"/>	10	Fugitive emissions from fuels (solid, oil and gas)
	<input type="checkbox"/>	11	Fugitive emissions from production and consumption of halocarbons and hexafluoride
	<input type="checkbox"/>	12	Solvents use
	<input checked="" type="checkbox"/>	13	Waste handling and disposal
	<input type="checkbox"/>	14	Afforestation and Reforestation
	<input type="checkbox"/>	15	Agriculture
	<input type="checkbox"/>	16	Carbon Capture & Storage of CO ₂ in geological formations
Applied Methodology (ies) (version)	AMS III.H. version 16, AMS I.A. version 14, AMS I.C. version 19, AMS I.D. version 17 and AMS I.F. version 02		
PoA Duration	28 years		
Starting date of the PoA	2013/01/01 or the date of registration whichever is later		
CPA Crediting period	<input checked="" type="checkbox"/> Renewable Crediting Period (7 y) <input type="checkbox"/> Fixed Crediting Period (10 y)		
Start of crediting period of the 1 st (real case) CPA ¹	2013/01/01 or the date of its inclusion in the PoA, whichever is later.		
Estimated metric tCO ₂ equivalent reductions of the real case CPA over the first crediting period	Annual average		27,646 tCO ₂ e
	Total estimation over the 1 st crediting period		193,520 tCO ₂ e

3.2 Involved Parties, Coordinating / managing entity(ies), program participants of the POA and operators of individual CPAs

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

Table 3-2-1: Parties, CME and Project Participants of the PoA

Party (ies) Involved	CME	Project Participants	Party Participant (Yes/No)
Malaysia	Ably Carbon Sdn. Bhd.	<ul style="list-style-type: none"> Ably Carbon Sdn. Bhd. Felda Palm Industries Sdn. Bhd. 	Yes
France	-	Ably Carbon SAS	-

Table 3-2-2: Operator(s) of the 1st individual CPA

CPA No.	CPA title (version and date)	Operator Name	Contact details
---------	------------------------------	---------------	-----------------

¹ As per the published DDs (version 1)



1	Regional Biogas PoA – CPA 1 (Felda Triang) Version: 5.0 Date: 2012/09/17	Felda Palm Industries Sdn. Bhd.	Jabatan Biomass, Tingkat 4, Balai Felda, Jalan Gurney Satu, 54000, Kuala Lumpur, Malaysia. Tel: +603 2692 8066 Fax: +603 2691 2563
---	---	------------------------------------	---

3.3 Programme Boundary and Location

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

Table 3-3-1: Programme Location

No.	Programme Location
Host Country(ies)	Malaysia

Table 3-3-2: 1st CPA Location

No.	Programme Location
Host Country	Malaysia
Region(s):	Wilayah Persekutuan, Kuala Lumpur
1 st (real case) CPA Project location address:	Jabatan Biomass, Tingkat 4, Balai Felda, Jalan Gurney Satu, 54000, Kuala Lumpur, Malaysia.
Geographic reference (in case of stationary CPA)	3° 16' 12.00" N, 102° 34' 37.92" E, OR 3.2700, 102.5772
Other means of identification (in case of mobile CPAs, such as registration number, GPS devices)	NA

3.4 Programme Technical Description

The technical key data are provided in table 2-4 below

Table 3-4: Technical data of the 1st individual CPA

(This table left blank purposefully for a template for real CPAs to provide technical description):

Parameter	Unit	Value
Nominal volume of Anaerobic reactor		
Type reactor		
COD removal efficiency		
Lining for cover of reactors		
Open Flare capacity		
Biomass boilers capacity		
Bioscrubber's (100% biological treatment process) minimum capacity		
Installed capacity of Power Plant		
Gas engine's electrical efficiency		
Operational lifetime of the equipment for		



Parameter	Unit	Value
gas engine		
Other relevant parameters		

4 METHODOLOGY AND VALIDATION SEQUENCE

4.1 Validation Steps / Process

The validation of the PoA consists of the following steps:

- Contract review
- Appointment of team members and technical reviewers
- Publication of the following DDs
 - the PoA-DD
 - the gCPA-DD
 - the real case CPA-DD
- A desk review of all above mentioned DDs^{/DDs/} submitted by the client and additional supporting documents with the use of customised validation protocol^{/CPM/} according to the Validation and Verification Manual^{/VVM/}, and all PoA related regulations^{/POAR/}
- Validation planning,
- On-Site assessment, background investigation and follow-up interviews with personnel of the project developer and its contractors.
- Draft validation reporting
- Resolution of corrective actions (if any)
- Final validation reporting
- Technical review
- Final approval of the validation

4.2 Contract review

To assure that

- the PoA falls within the scopes for which accreditation is held,
- the necessary competences to carry out the validation can be provided,
- Impartiality issues are clear and in line with the CDM accreditation requirements a contract review was carried out before the contract was signed.

4.3 Appointment of team members and technical reviewers

Involved personnel, consists of one team leader and three team members along with Technical reviewer and Final Approver. Technical Areas are allotted to the team members as per UNFCCC accreditation standard version 4.



Table 4-1: Involved Personnel

Role	Name	Country	Participation						
			Desk review	Site visit / Interviews	Reporting	Supervision of work	TR/FA	Sectoral/Technical Competence	Local
TL	Prakash Kumar Mishra	India	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13.1 <input type="checkbox"/> 1.2 <input checked="" type="checkbox"/> 1.1 ² <input type="checkbox"/>	<input type="checkbox"/>
TM	Arshi Vimal	India	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13.1 <input type="checkbox"/> 1.2 <input checked="" type="checkbox"/> 1.1 <input type="checkbox"/>	<input type="checkbox"/>
T ¹⁾	Dhananjay Kumar	India	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13.1 <input checked="" type="checkbox"/> 1.2 <input type="checkbox"/> 1.1 <input type="checkbox"/>	<input type="checkbox"/>
T ¹⁾	Gaurav Sharma	India	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13.1 <input type="checkbox"/> 1.2 <input type="checkbox"/> 1.1 <input type="checkbox"/>	<input type="checkbox"/>
T ¹⁾	Chandru a/l Sernyanathan	Malaysia	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	13.1 <input type="checkbox"/> 1.2 <input type="checkbox"/> 1.1 <input type="checkbox"/>	<input checked="" type="checkbox"/>
TR ¹⁾	Vikash Kumar Singh	India	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13.1 <input checked="" type="checkbox"/> 1.2 <input checked="" type="checkbox"/> 1.1 <input type="checkbox"/>	<input type="checkbox"/>
FA ¹⁾	Adam Simcock	RSA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13.1 <input type="checkbox"/> 1.2 <input type="checkbox"/> 1.1 <input type="checkbox"/>	<input type="checkbox"/>

TL: Team Leader; TM: Team Member; TR: Technical review; FA: Final approval; LE: Local Expert
¹⁾ No team member

Statements of competence for the above mentioned team members are enclosed in Annex 6 of this report.

4.4 Consideration of Public Stakeholder Comments

According to the modalities and procedures the draft CDM SSC-PoA-DD, Generic CDM-SSC-CPA-DD and one Real-Case CDM-SSC-CPA-DD, as received from the project participants, has been made publicly available on the dedicated UNFCCC CDM website prior to the validation activity commenced. Stakeholders have been invited to comment on the DDs within the 30 days public commenting period.

The comments received are taken into account during the validation process.

² Since at PoA level no technical area expertise is required also the 1st real case CPA does not apply AMS I.C. and hence concerned team members are involved based on 1st real case CPA in the PoA report. This is the reason of non check for technical area 1.1.



The local stakeholder consultation will be carried out at CPA level.

4.5 Validation Protocol

In order to ensure consideration of all relevant assessment criteria, a validation protocol is used. The protocol shows, in a transparent manner, criteria and requirements, means of validation and the results from pre-validating the identified criteria. The validation protocol reflects the generic CDM requirements as well as PoA issues which have to be met by the PoA and those to be included as CPAs. The validation protocol serves the following purposes:

- It organises, details and clarifies the requirements that a PoA and those to be included as CPAs are expected to meet;
- It ensures a transparent validation process where the validating entity will document how a particular requirement has been validated and the result of the determination.

The validation protocol as described in Figure 1.

Validation Protocol Table A-1: Requirement checklist					
Checklist Item	Reference	MoV	Comments by Validation Team	Draft Conclusion	Final Conclusion
<i>The checklist items in Table A-1-1 are linked to the various requirements of the PoA-DD which should meet, and Table A-1-2 are linked to requirements the generic CPA-DD should meet. The checklists are organised in various sections. Each section is then further sub-divided as per the requirements of the topic and the individual project activity.</i>	<i>Gives reference to the information source on which the assessment is based on</i>	<i>Means of verification (MoV) are document review (DR), interview (I) or any other follow-up actions (e.g., on site visit and telephone or email interviews) and cross-checking (CC) with available information relating to projects or technologies similar to the proposed CDM project activity under validation.</i>	<i>The section is used to elaborate and discuss the checklist item in detail. It includes the assessment of the validation team and how the assessment was carried out. The reporting requirements of the VVM shall be covered in this section.</i>	<i>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 validation stage.</i>	<i>In case a corrective action or a clarification the final assessment at the final validation stage is given.</i>

Figure 1: table describing Validation protocol

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



4.6 Documents Review

The published CDM-SSC-PoA-DD (Version 1), Generic CDM-SSC-CPA-DD (Version 1) and Real-Case CDM-SSC-CPA-DD (Version 1) and supporting background documents related to the programme design and baseline were reviewed.

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

4.7 Site Visit and Follow-up Interviews

The validation team has carried out interviews during the site visit in order to assess the information included in the programme documentations and to gain additional information regarding the compliance of the PoA and CPA with the relevant criteria applicable for CDM.

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

Table 4-2: Interviewed persons and interview topics

Interviewed Persons / Entities	Interview topics
Project Participants (PPs), Co-ordinating Managing Entity (CME), CPA operators representatives (Project consultants)	<ul style="list-style-type: none"> - Chronological description of the programme activity with documents of key steps of the implementation. - Current status of programme design - Technical details of the programme realization, programme feasibility, designing, operational life time, monitoring of the programme - Host Country Approval - Approval procedures and status - Monitoring and measurement equipment and system - Financial aspects - Crediting period - Programme activity starting date - Start date of CPA - CER allocation / ownership - Baseline study assumptions - Additionality - Sustainable development issues, Analysis of local stake holder consultation - Monitoring of CPAs - Analysis of local stakeholder consultation process - Roles & responsibilities of the project participants w.r.t. programme management, monitoring and reporting - Financial aspects- - National Legislation - Editorial issues of the DDs

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



4.8 Project comparison

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

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

4.9 Resolution of outstanding issues

4.9.1 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 validation 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 verification.

4.9.2 Draft Validation

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

4.9.3 Final Validation

The final validation starts after receiving the proposed corrective actions (CAs) to the CARs, CLs and FARs from the project participant. The project participant has to reply to all CARs, CLs and FARs and the requests are “closed out” by the validation team in case the response is assessed as sufficient. In case of FARs, the project participant has to respond by identifying necessary actions to ensure that the issues raised in the finding are resolved at the latest during the first verification of each CPA. The validation team has to assess whether the proposed action is adequate or not.



No positive validation opinion can be issued by the validation team if the findings in CARs and CLs are not resolved by the project participant or the proposed action related to the FARs raised cannot be assessed as adequate.

The CAR(s) / CL(s) / FAR(s) are documented in chapter 5.

4.9.4 Technical Review and Final Approval

Technical review of the PoA will be done by personnel appointed/qualified for the same and a technical reviewer will not be part of validation team.

After closure of all issues raised by TR, final approval will be given to project activity by the personnel who have the authority/qualification to do so, before uploading of the project on UNFCCC website.

5 VALIDATION FINDINGS

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

Table 5-1: Summary of CARs, CLs and FARs issued

Validation topic ¹⁾	No. of CAR	No. of CL	No. of FAR
CDM-SSC-POA-DD			
General description of the programme of activities (PoA-A)	8	3	0
- Programme title and description			
- PoA operating and implementing framework			
- Policy/measure or stated goal of the PoA			
- Confirmation of voluntary action			
- Coordinating/managing entity and Participation			
- Communication with the Board			
- PP in relation to the PoA			
- Technical description of the PoA			
- PoA boundary and locations			
- Description of a typical CPA			
- Eligibility criteria for CPA inclusion			
- Description of PoA GHG emission reduction			
- Additionality demonstration of the PoA			
- Operational, management and monitoring plan of the PoA			
- Public funding of the PoA			
- POA-DD editorial and consistency aspects			
Duration of the PoA (PoA-B)	1	0	0
Environmental analysis (PoA-C)	1	1	0
Stakeholder Comments (PoA-D)	0	0	0
Application of baseline and monitoring methodology (PoA-E)	6	2	0



- Application of the Methodology to a typical CPA			
- Sources and gases within the CPA boundary			
- Baseline identification			
- Additionality demonstration of a CPA			
- Emission reductions Estimation of a CPA			
- Methodological choices			
- Equations, ex-ante parameters			
- Emission factor determination			
- To be reported CPA data and parameters			
- Monitoring Methodology and Monitoring Plan			
- To be monitored CPA data and parameters			
- CPA monitoring plan			
Editorial	1	0	0
Global Stakeholder Comments (PoA-GSC)	03	0	0
Sum	17	6	0
Generic CDM-SSC-CPA-DD			
General Description of the Component Project Activity (A)	05	01	0
Eligibility of CPA and Estimation of Emission Reductions (B)	05	01	0
Environmental analysis (C)	0	0	0
Local Stakeholder Comments (D)	0	0	0
Editorial (Ed)	0	0	0
Sum	10	02	0

¹⁾ The letters in brackets refer to the validation protocol

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

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

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A1	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	<p>Following consolidated CL is raised on the project description and general operating and implementing framework of the PoA:</p> <ol style="list-style-type: none"> Fate of the recovered biogas is not clear whether it will be destroyed or utilized to generate heat/power. The description of the same not transparently and consistently provided under section A.2 and A.4.2.1 of the PoA-DD. The statement provided under heading 'Economic Criterion' that "proposed project involves a technology transfer in to host country" this is required to be clarified and properly referenced. Section A.2 states that Malaysia, Papua New Guinea <u>and/or</u> Solomon Islands are the host countries while section A.4 states Malaysia, Papua New Guinea <u>and</u> Solomon Islands. Consistency is not found maintained across PoA-DD. Also, PP has not clearly described that how the new treatment plant set up a better management system to improve the discharged 		



	water quality and how the GHGs emissions will be reduced by the involved technology under proposed PoA.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<ul style="list-style-type: none"> i. The PoA-DD has been updated accordingly (refer Section A.2 and A.4.2.1). The recovered biogas will either be combusted for energy and/or heat generation and/or flaring depending on the demands and requirements of the mills, thus avoiding it to escape into the atmosphere. ii. Under the Economic Criteria, the sentence has been edited accordingly. Refer Section A.2, Item 2. iii. The PoA-DD has been updated and it is now consistent. Refer Section A.2 and A.4. iv. Regarding the sentence of “better management and treatment of POME”, it actually refers to the installation of biogas recovery system resulting in a better POME treatment and management of the wastewater. The current practice of wastewater treatment system at the palm oil mill is only treating the POME in the lagoons system, without much control of the anaerobic treatment conditions, such as pH, temperature, organic loading rate. With the proper biogas recovery system, such anaerobic conditions are crucial to ensure optimum COD removal efficiency in the covered lagoon. Introducing such biogas recovery system eventually improves the quality of the discharge wastewater and reduces the emission of GHG when the recovered biogas is flared, combusted for energy and/or heat. PoA-DD has been edited; refer Section A.2, Item 2.
DOE Assessment #1	<ul style="list-style-type: none"> i. Validation team has found that the fate of recovered biogas is appropriately updated with clear description about its utilisation by the proposed project under section A.2 and A.4.2.1 of the revised PoA-DD. CL point is closed. ii. Corrective action taken is not found appropriate, as it has not clarified in the revised PoA-DD, from where the technology will be transferred to the host country. CL point is open. iii. Validation team has found that the word ‘or’ has been removed and now section A.2 and section A.4 of the revised PoA-DD is consistent. CL point is closed. iv. The response provided by the CME is found appropriate that set of a new treatment plant will enhance the efficiency of COD by controlling pH, temp etc. and finally enhance the efficiency and management of the treatment plant. However, the the same does not reflect in the PoA-DD section A.2. CL point is open.
Corrective Action #2 <i>This section shall be filled by the PP.</i>	<ul style="list-style-type: none"> i. Already closed in the 1st assessment. ii. Under the Economic Criteria, the sentence has been further edited, stating that the bio-digester or covered lagoon technology is transferred from either Annex 1 or within South East Asia countries and biogas engines (if applicable) will be transferred from Annex 1 countries. The specific country(ies) from where the technology(ies) is to be transferred to the host country(ies) will be specified in each SSC-CPA-DD during its inclusion to the PoA. Refer Section A.2, Item 2. iii. CL point is closed in the 1st assessment. iv. PoA-DD is now revised as per the response provided.



DOE Assessment #2	<p>i. Already closed in the 1st assessment.</p> <p>ii. Validation team accepted the PP argument and found that the information regarding technology transfer has been updated in the section A.2 of the revised PoA-DD. PP has clearly stated information regarding technology transfer (biogas digester/covered lagoon) will be specified in each SSC-CPA-DD during its inclusion to the PoA and found appropriate. CL point is closed.</p> <p>iii. Closed in the 1st assessment.</p> <p>iv. DOE has found that the revised PoA-DD is consistent with the response provided by the CME. CL point is closed.</p> <p>Validation team reviewed and found the revised section A.2 is in line with the SSC-PoA-DD form, version 01^{/PoA-DD-F/} and clarification raised under finding PoA-A2 is successfully closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A2	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	In section A.2 of the PoA-DD, the CME has not been clearly confirmed with valid evidence that the proposed PoA is a voluntary action.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The PoA-DD has been updated accordingly; refer Section A.2, Item 3. For evidence, refer to SD 28 - Statement of voluntary action- Regional Biogas PoA		
DOE Assessment #1	Section A.2 of the revised PoA-DD was verified and found incorporated with the statement that PoA is a voluntary action by the CME. Moreover, evidence in support of the same submitted by the CME (SD 28) was verified which is a declaration letter about voluntary action ^{/DECL2/} and found to be acceptable by the validation team. CAR raised under finding PoA-A3 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A3	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Letter of Approval (LoA) from the host countries have not been provided to DOE for Validation.		
Corrective Action #1 <i>This section shall be</i>	LoA Malaysia, Papua New Guinea (PNG) and Solomon Islands (host		



<i>filled by the PP.</i>	countries) are still in the process of application, expected to obtain in July 2012.
DOE Assessment #1	Latter of approval from all the parties involved are not submitted to the DOE. CAR raised under finding PoA-A1 is open.
Corrective Action #2 <i>This section shall be filled by the PP.</i>	Refer SD 39 – LoA Malaysia, SD 39F –LoA France. Solomon Islands and PNG have been removed from the PoA as host party and the boundary of the PoA shall be amended post registration to include other countries subject to the conditions presented in Para 6, Annex 26, EB 60. Refer Section A.3 and A.4.1.
DOE Assessment #2	Validation team checked the submitted LoAs from the annex 1 country France ^{/LoA2/} Ministry of Ecology Sustainable Development and Energy (DNA of France), reference no. 12-05515E JBBter dated 2012/09/19 and from the host country Malaysia ^{/LoA1/} , Ministry of Natural Resources and Environment (DNA of Malaysia) reference no. NRE (S) 602-2/11 Jld. 16(9) dated 2012/08/03, which are the listed DNAs on the UNFCCC CDM website and hence, appropriate. Moreover, Solomon Island and PNG have been found removed from the host country list and now Malaysia is the only host party of the proposed PoA and hence, corrective action is found to be appropriate by validation team. CAR PoA-A3 is successfully closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A4	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Following consolidated finding is raised regarding the participation information under section A.3 of the PoA-DD: <ol style="list-style-type: none"> The information provided under section A.3 of webhosted PoA-DD that Ably Carbon is the CME and Felda Palm Industrial Sdn. Bhd. and Ably Carbon Sdn. Bhd. is the project participants of the proposed PoA are ambiguous and needs to be clarified. It is also not clear which Ably Carbon (Sdn. Bhd. Or SAS) is the CME for this proposed PoA. Moreover, name and contact information of project participant Felda Palm industrial Sdn. Bhd. is not found/ provided and also name of another PP is not exactly the same and is not provided under Annex 1 of the PoA-DD PP need to provide the Approval from each party involved for the PoA. Moreover, Malaysia is considered only host party under this section whereas in section A.4.1 of the PoA-DD, Papua New Guinea and Solomon Islands are also included in the host parties. A clarification is required. 		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<ol style="list-style-type: none"> Ably Carbon Sdn. Bhd. will acts as CME as well as Project Participant in the PoA together with Felda Palm Industries Sdn. Bhd. for Malaysia. While Ably Carbon Sdn. Bhd. will acts as 		



	<p>Project Participant for Papua New Guinea and Solomon Islands. Section A.3 has been updated accordingly.</p> <p>Abyl Carbon Sdn. Bhd. is the CME for this PoA. The name of CME has been edited in PoA-DD.</p> <p>There is a spelling mistake for the name of Felda Palm Industries Sdn. Bhd. and it has been corrected and added in Annex 1 of PoA-DD.</p> <p>ii. The LoA from each party is expected to obtain in July 2012.</p> <p>iii. Papua New Guinea and Solomon Islands as the host parties are added in Section A.3 and the LoA for those two Parties are pending for issuance.</p> <p>iv. A new map for Solomon Islands has been added in PoA-DD. Refer Section A.4.1.2 of PoA-DD.</p>
DOE Assessment #1	<p>i. PP has confirmed that the Abyl Carbon Sdn. Bhd. is the CME of the proposed PoA. Moreover, it is also clarified that the Abyl Carbon Sdn. Bhd. and Felda Palm Industries Sdn. Bhd. are the project participants for the project.</p> <p>Validation team has found Section A.3 of PoA-DD is revised accordingly and clear/transparent information regarding CME and project participants is updated. Also, name of the PPs are made consistent under section A.3 and Annex 1 of the revised PoA-DD. CL point is closed.</p> <p>ii. Closure of the CL point is depending up on the submission the LoAs from the parties involved. CL point is open.</p> <p>iii. OK, section A.3 has been found edited. However, closure of this CL point is depends up on the closure of CAR PoA-A3 above.</p> <p>iv. New map for Solomon Island is found clear. CL point is closed.</p>
Corrective Action #2 <i>This section shall be filled by the PP.</i>	<p>i. Closed in the 1st assessment.</p> <p>ii. Refer – LoA Malaysia, LoA France. Solomon Islands and PNG has been removed from the PoA as host party and the boundary of the PoA shall be amended post registration to include other countries subject to the conditions presented in Para 6, Annex 26, EB 60. Refer Section A.3 and A.4.1</p> <p>iii. Solomon Islands and Papua New Guinea (PNG) has been removed from the PoA as host party, only Malaysia is the host party. Refer Section A.3 and A.4.1.</p> <p>iv. Solomon Islands has been removed from the PoA as host party, only Malaysia is the host party. Refer Section A.3 and A.4.1.2</p>
DOE Assessment #2	<p>i. OK, found closed.</p> <p>ii. LoAs from Malaysia (host) and France (Annex 1) have been provided by CME. CL point is closed.</p> <p>iii. OK, since PP has confirmed that the Malaysia is only the host country CL point has lost its relevance. CL point is closed.</p> <p>iv. Since, Solomon Islands is removed, CL point is no more valid.</p> <p>Based on above assessment CAR PoA-A4 is successfully closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<p><input type="checkbox"/> To be checked during the first periodic verification</p> <p><input checked="" type="checkbox"/> Appropriate action was taken</p> <p><input checked="" type="checkbox"/> The project complies with the requirements</p> <p><input type="checkbox"/> Outstanding finding (not closed)</p>



Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-A5	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Description of technologies or measures to be employed by a typical CPA under section A.4.2.1 is not adequately / clearly provided. Also, It is not mentioned that implementation of the project activity is required technology transfer from annex 1 countries to host countries or not. Moreover, PP needs to demonstrate that the proposed technology result in a significantly better performance than any commonly used technologies in the host country.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Technology description under Section A.4.2.1 has been updated, refer PoA-DD.			
DOE Assessment #1	Section A.4.2.1 of the revised PoA-DD, still not provided with description of the equipment involved in the proposed PoA.			
Corrective Action #2 <i>This section shall be filled by the PP.</i>	Technology description has been further revised under Section A.4.2.1 of PoA-DD. Regarding the technology transfer from Annex 1 country to the host countries, it is most likely that biogas engine will be imported from Annex I country (in the cases where recovered biogas is combusted for electricity generation). It has been added in Section A.4.2.1 of PoA-DD. A statement has been added “It is worth noting that recovery of biogas from waste water is not mandatory, nor is it common practice, in the considered Host Country” “In the project activity, each CPA is expected to involve technologies that have better performance in terms of efficiency, reliability and quality than the existing open lagoons treatment system commonly use at the palm oil mill, especially on the introduction of bio-digester with biogas recovery system”.			
DOE Assessment #2	Technical description of a typical CPA to be included under the PoA is found appropriately provided. Moreover, section A.4.2.1 is also updated with the description of the biogas digester/covered lagoon, flaring system and equipment involved in the gainful use of recovered biogas and found in line with the onsite observation and interview during the site visit. CAR raised under finding PoA-A6 is closed successfully.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-A6	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR



Description of finding	<p>A consolidated CAR is raised on the eligibility criteria under section A.4.2.2 of PoA-DD:</p> <ol style="list-style-type: none"> Section A.4.2.2 of the PoA-DD shall have three columns. While the first two columns are appropriate, the additional column should give the documents required to be submitted by CPA as a proof of fulfilling the criteria. Acceptable documents should be listed out in the PoA - DD itself and submission by CPAs should conform to the list given in PoA-DD. Development of eligibility criteria shall cover at least minimum stipulated requirements under § 14 of EB 65 Annex 3. Moreover, sequence of these minimum eligibility criteria requirements is to be provided in accordance with the EB 65 Annex3 § 14. Eligibility criteria under section A.4.2.2 provided with justification of applicability of the methodology, which is not an appropriate place. A dedicated section E.2 in the PoA –DD form has been provided to describe the same. Sec. A.4.4.1 does not state that a declaration will be issued by CME to the effect that the CPA confirms to eligibility criteria and the documents submitted in support thereof are credible and reliable. As regards diversion of ODA, (Sec. A.4.2.3. (eligibility criteria) and A.4.5), declaration from PP alone is not adequate. If Annex I countries are involved, then a letter from the concerned agency should also be submitted.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<ol style="list-style-type: none"> The table of section A.4.2.2 has been reviewed and corrected. The compliance with the eligibility criteria will be checked for each CPA during inclusion, but does not necessarily include a document to be provided (some criteria require just an information confirmation). The Eligibility Criteria and the sequence of the criteria has been updated according to EB65, Annex3, Para 14. Refer PoA-DD, Section A.4.2.2. The justification of applicability of the methodology has been moved to Section E.2. Sec. A.4.4.1 has been amended as follows: “Contractual arrangements will be signed for each CPA with each participating site owner, technology provider and/or Ably Carbon and shall include a statement by the CME to the effect that the CPA confirms to eligibility criteria and the documents submitted in support thereof are credible and reliable”. Moreover, the Operational and Management Arrangement has been provided /O&M/, and includes a template in Annex 2 to that effect.). Sec A.4.4.1 has been amended ‘the PP from Annex 1 country shall confirm, through a specific statement for each CPA, that the CPA is not diverting Official Development Assistance (ODA) funding’. Refer to SD25 for a sample of such statement. It is not required, for this purpose, to obtain a statement from a government agency.
DOE Assessment #1	<ol style="list-style-type: none"> The correction required by DOE has not been carried out. If some eligibility criteria require just a conformation, then the PoA-DD should state who would issue the confirmation and it becomes a



	<p>document for DOE. The explanation provided by PP is not acceptable to the validation team. CAR point is open.</p> <p>ii. Corrective action taken is not found appropriate, as development of eligibility criteria under section A.4.2.2 of the revised PoA-DD is not provided with eligibility criteria as stipulated under § 14 of EB 65 Annex 3. Please also refer the assessment point I above. CAR point is open.</p> <p>iii. OK, the justification of applicability of the methodology is found placed in line with the SSC-PoA-DD form version 1. CAR point is closed.</p> <p>iv. Sec. A.4.4.1 has been suitably modified and CAR point is closed.</p> <p>v. The said eligibility criteria have now been shifted to A.4.2 (h). The required correction has not been made either in A. 4.2.(h) or in A.4.5. DOE requires a declaration from the concerned agency, besides CPA, that there is no diversion of ODA. Mere CPA's declaration is not acceptable. CAR is open</p>
Corrective Action #2 <i>This section shall be filled by the PP.</i>	<p>i. The table of Section A.4.2.2 has been edited with additional column where list of appropriate documents/requirements are listed and to be fulfilled by each CPA-DD.</p> <p>ii. The Eligibility Criteria has been updated accordingly to Para 14, Annex 3, EB65. Refer Section A.4.2.2.</p> <p>iii. CAR point is already closed by DOE in 1st assessment.</p> <p>iv. CAR point is already closed by DOE in 1st assessment.</p> <p>v. Further amendments are added in Section A.4.2.2 (h), where besides CPA implementer, declaration from PP of the Annex I country is required.</p>
DOE Assessment #2	<p>i. CME has revised the table under section A.4.2.2 in line with the CAR raised. Also, list of the documents provided in support of the eligibility criteria specified for CPA inclusion is found to be appropriate. CAR point is closed.</p> <p>ii. The eligibility criteria are found in line with the criteria laid down in § 14 of EB 65 Annex 3. CAR point is closed.</p> <p>iii. Closed during 1st assessment.</p> <p>iv. Closed during 1st assessment.</p> <p>v. Suitable modification has been done by the CME in section A.4.2.2 (h). CAR point is closed.</p> <p>Validation team checked the eligibility criteria under section A.4.2.2 of the revised PoA-DD and confirmed that all criteria and documents required is in line with the EB 65 Annex 3. CAR raised under finding PoA-A8 is closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<p><input type="checkbox"/> To be checked during the first periodic verification</p> <p><input checked="" type="checkbox"/> Appropriate action was taken</p> <p><input checked="" type="checkbox"/> The project complies with the requirements</p> <p><input type="checkbox"/> Outstanding finding (not closed)</p>

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A7	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	In section A.4.2.1 of the webhosted PoA-DD, information on the demand and requirements for training and maintenance is not transparently		



	provided.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Under Section A.4.2.1, the SSC-PoA-DD form only requests to describe the technology or measures to be employed by the SSC-CPA. For training and maintenance requirements, it will be detailed under Section E.7.2 of PoA-DD.
DOE Assessment #1	OK, the validation team accepted that the training or measure to be employed shall be provided in the section E.7.2 and section A.4.2.1 is for the technology or measures to be employed by the SSC-CPA. Section E.7.2 is checked and found that information regarding the maintenance and training is provided. CAR raised under finding PoA-A7 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-A8	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	The explanation given under Sec. A.4.3(ii) is inadequate and not acceptable. How the additionality will be demonstrated has not been explained in detail like whether the projects would use Guidelines for Demonstrating Additionality of Micro-scale Project Activities, Guidelines on Additionality of First-of-its-Kind Project Activities, what documents would be submitted in support of the same, what financial indicators will be used, what benchmarks will be used and the PoA-DD should preferably contain a format for assessment of additionality. The explanation should be exhaustive and nothing should be left to subjectivity.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The details description for the demonstration of additionality is detailed under Section E.5 of the PoA-DD. In the opinion of CME, in Section A.4.3 (ii) it is only required to justify that if the PoA is implementing a voluntary coordinated action, it would not be implemented in the absence of the PoA.			
DOE Assessment #1	PP is correct in revised PoA DD section so far as A.4.3 (i) is concerned. However, A.4.3 (ii) specific requirement is that the CPA would not be implemented in the absence of PoA, implying that carbon credits are imperative. There should at least be a reference in A.4.3 (ii) to the effect that the demonstration of additionality is detailed in Section E.5. CAR is open.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	A further reference is added under Section A.4.3 (ii) stating that description for the demonstration of additionality at CPA level is detailed under Section E.5 of the PoA-DD.			
DOE Assessment #1	OK, Section A.4.3 (ii) of PoA-DD is found corrected, moreover, section E.5 was also assessed for demonstration of additionality of the programme and found appropriate. CAR PoA-A8 is closed.			



Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)
---	--

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-A9	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Section A.4.4.1 of the webhosted PoA-SSC-DD is not in line with the requirements laid down under Annex 3 of EB 65 § 17 and CDM-PoA-DD Form version 01. This section lacks in the following: <ul style="list-style-type: none">i. Clear definition of roles and responsibilities of personnel involved in the process of inclusion of the CPA including the provision to review their competencies.ii. Records of arrangements for training and capacity development for personnel.iii. Procedures for technical review of inclusion of CPAs.iv. Measures for continuous improvement of PoA management system.v. In Sec. A.4.4.1 does not state that a declaration will be issued by CME to the effect that the CPA confirms to eligibility criteria and the documents submitted in support thereof are credible and reliable.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section A.4.4.1 of the PoA-SSC-DD has been amended to reflect the key content of the operational and management plan ^{O&M/} (Operational and management arrangements CME - Regional Biogas PoA), where all the listed requirements as per Para 17, Annex 3, EB65 are addressed. That includes: <ul style="list-style-type: none">i. Clear definition of roles and responsibilities of personnel involved in the process of inclusion of the CPA including the provision to review their competencies.ii. Records of arrangements for training and capacity development for personnel.iii. Procedures for technical review of inclusion of CPAs.iv. Measures for continuous improvement of PoA management systemv. For the declaration to be issued by CME to CPA implementer regarding the fulfillment of eligibility criteria, the template appears in Annex 3 of the Operational and Management Plan (refer /O&M/). Also refer /DECL/ for a sample Statement of eligibility - CPA1 (Felda Triang).			
DOE Assessment #1	Section A.4.4.1 of the revised PoA-DD and reference document ^{/O&M/} have been checked by validation team and found that: <ul style="list-style-type: none">i. The clear definition of roles and responsibility of personnel involved in the process of inclusion of the CPA including the provision to review their competencies are found included in the section.ii. The provision to records of arrangement for training and capacity development for personnel are found included and in line with			



	<p>the observation during onsite assessment and inreview.</p> <p>iii. Procedures for technical review of inclusion of CPAs are included and appropriate.</p> <p>iv. Measures for continuous improvement of the PoA management system are incorporated suitably in the section and acceptable.</p> <p>v. The declaration template is found appropriate. Also, for the CPA1 (Felda Triang), statement of eligibility/DECL1/ from the CME dated 2012-08-08 is provided to DOE and found in line with the requirement.</p> <p>CAR raised under finding PoA-A10 is successfully closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-A10	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	A system/procedure to avoid double accounting mentioned under section A.4.2.2 under eligibility criteria and under section A.4.4.1 is not appropriately and transparently provided. Moreover the procedure provided to detect that a CPA to be included is not a de-bundled component of is also not appropriate. It should be the responsibility of the CME and not the CPA implementer only. The same is required to be corrected with valid/reliable references.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The procedure to avoid double accounting has been updated under Section A.4.4.1. (ii) The procedure to detect CPA to be included is not a de-bundled component has been updated under Section A.4.4.1 (iii).			
DOE Assessment #1	DOE has checked the revised section A.4.4.1 (ii) & (iii) of the PoA –DD and found corrected. PP has clarified that before the inclusion of CPAs under the proposed PoA, the CME will check the CPA and PoA databases in the UNFCCC website i.e. http://cdm.unfccc.int/Projects/registered.html and http://cdm.unfccc.int/ProgrammeOfActivities/registered.html to ensure that a proposed CPA under this PoA has not been registered already. Moreover, justification to avoid double counting by CME that, each included CPA with its reference number will be linked with the geographic coordinates for each facility’s specific site location and a map showing all included CPAs will be provided, is found acceptable to the validation team. Furthermore, before the contractual agreement with the CPA implementer CME will confirm and ensure that the proposed CPA is not a de-bundled component of another CDM programme activity (CPA) or CDM project activity and in line with the EB 54 Annex 13. Clarification raised under finding PoA-A11 is closed.			
Conclusion	<input type="checkbox"/> To be checked during the first periodic verification			



Tick the appropriate checkbox	<input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)
-------------------------------	---

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-A11	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	The consideration of all applicable national and/or sectoral policies and regulations of each host parties, within the boundary of this PoA is not clearly described.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section A.4.1.2 has been updated with the following sentence: "The consideration of all applicable national and/or Sectoral policies and regulations of each host parties, within the boundary of this PoA shall be carried out at CPA level (Refer Section A.4.2.2)". It is also listed under Eligibility Criteria, Section A.4.2.2.		
DOE Assessment #1	Consideration of Policies and regulations by the host country (ies) at each CPA is found to be appropriate by validation team. Moreover, the requirement has been found added in the eligibility criteria for inclusion of CPA under section A.4.2.2 and made mandatory at the CPA level. CAR raised under finding PoA-A5 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-B1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Description of the starting date of the PoA provided under section B.1 of the SSC-PoA-DD is not correct and acceptable, as it mentioned that the starting date will be considered as date of registration of the proposed PoA with CDM Executive board or when the commissioning of first CPA occurs, whichever is later is not in line with Glossary of CDM Terms, version 06.0.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	In the opinion of CME, the description of the starting date of PoA under Section B.1 is not meant for actual physical works started of the PoA-DD, there is no physical project exists in PoA level. The date under Section B.1 is to determine the start date of the PoA, which is maximum 28 years from its registration.		
DOE Assessment #1	The start date of the PoA is found revised as per the registration uploading requirements indicated from the UNFCCC website, in case of small scale PoA, the start date of lifetime of the PoA must be at least 4 weeks after the estimated registration submission date.		
Conclusion	<input type="checkbox"/> To be checked during the first periodic verification		



Tick the appropriate checkbox	<input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)
-------------------------------	---

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-C1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	As per section C.1 of the webhosted PoA-DD, the environmental analysis is done at PoA level. Choice of conducting EIA at the PoA level is not adequately and appropriately justified, as the proposed PoA will be implemented in three different countries i.e. Malaysia, Papua New Guinea and Solomon Island. Choice of conducting EIA at PoA level needs to be substantiated. Also the appropriate and exact reference for the host country requirement of EIA has to be provided in section C.2 of the PoA-DD.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Under Section C.1, environmental analysis shall be carried out at CPA level instead of PoA level. Individual CPAs under this PoA will be implemented at different geographical locations and involve different type of technology. Environmental analysis, if required, will be conducted at individual CPA level. As the environmental analysis has been changed to CPA level, under Section C.2, relevant documents for environmental analysis, if required to be conducted by the Host Party at the CPA level, will be included in the respective CPA-DD.			
DOE Assessment #1	Choice of conducting environmental analysis is changed from PoA to CPA level hence, this CAR has lost its relevance. CAR is closed.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-C2	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	In section C.3 of the PoA-DD ^{/PoA-DD1/,} it is mentioned that environmental impact assessment is done at CPA level for the Papua New Guinea and Solomon Islands, which is not consistent with section C.1 of PoA-DD. A clarification is required for the above. Moreover, the reference provided as footnote 4 and 5 is does not allow the reader to understand whether EIA for the proposed project is not required by host country.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Under Section C.1, environmental analysis shall be carried out at CPA level instead of PoA level. Therefore, EIA assessment, if required, will be determined at each CPA level. Reference for footnote 4 and 5 has been removed as it is not relevant anymore to the PoA-DD.			



DOE Assessment #1	Since the Environmental analysis will be done at CPA level and not at the PoA level. Hence, the raised clarification request is no more relevant and raised CL under finding PoA-C2 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-E1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	<p>The justification provided for all applicability criterions of methodology AMS III.H is not adequate and appropriate under section E.2 of the webhosted SSC-PoA-DD. PP is required to justify each and every applicability criteria appropriately that can be followed by CPA implementer to prove the applicability.</p> <p>Moreover, each methodological applicability criteria including its § and sub § number shall be mentioned as it is provided in the applied methodology, i.e. AMS III. H. version 16.0.</p>			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<p>The justification of each applicability criteria for AMS IIIH (version 16) has been updated accordingly and now refers to PoA-DD level. Refer Section E.2 of SSC-PoA-DD.</p> <p>Further justification for Type-I methodologies AMS-IA, AMS-ID, AMS-IF has been added accordingly under Section E.2 of SSC-PoA-DD.</p>			
DOE Assessment #1	<p>Validation team checked section E.2 of the revised PoA-DD and found that CME has updated the applicability criteria and, § and sub § number according to the applied methodology. However, following points are not appropriately updated:</p> <ul style="list-style-type: none">i. Justification is provided for the methodology AMS-IA, AMS-ID and AMS-IF, while AMS-IC is omitted. PP is required to provide the clarification that why AMS-IC is not included which is not in line with in table E.2 point 5 and point 7 of the AMS III.H.ii. Justification provided for point 6 of the AMS III.H under table E.2 of the PoA-DD is not found correct.iii. As per AMS I.A (table E.2A), the electricity generation unit shall supply the individual household/users of group of households/user included in the project boundary, whereas as per PoA-DD, the supply of electricity generation is to Industry i.e. Palm Oil Mill and not to the household/users. Justification is required.			
Corrective Action #2 <i>This section shall be filled by the PP.</i>	<ul style="list-style-type: none">i. Under Section E.2 as per requirement to Table E.2, point 5 and 7 is now “Not Applicable” as the SSC-CPA will not involve biogas bottling and distribution, therefore AMS-IC is not required. Refer Section E.2, Table E.2 for the update.ii. Justification for Point 6 under Table E.2 has been corrected accordingly.iii. As the PoA-DD involves only Palm Oil Mill and not the household/users, therefore AMS-I.A methodology is not applicable and has been removed from the PoA-DD.			



DOE Assessment #2	As per the mail of the CME regarding re adoption of AMS I.C and AMS I.A, the correction action provided is not correct and hence CAR E1 is open.
Corrective Action #3 <i>This section shall be filled by the PP.</i>	<p>1. CME wishes to re-apply AMS-IC to the proposed PoA. Moreover, as per the sectoral expertise of the CME and the nature of the proposed PoA, the project is implemented mainly in the palm oil industry in Malaysia where palm kernel shell (PKS) is used for thermal energy generation as per the process requirement in the industry and hence emission reductions corresponding to steam generation from recovered biogas cannot be claimed as replacement of biomass (PKS) by biogas is carbon neutral. Moreover, AMS-IC is only applicable in cases where real case CPA use fossil fuel for thermal energy generation in the baseline. Emission reductions due to the fossil fuel displacement can be claimed.</p> <p>2. Justification for Point 6 under Table E.2 has been corrected accordingly.</p> <p>3. As per the nature of the PoA, it involves only palm oil mill industry and not the households/users. Moreover, in case if real case CPA produces renewable energy and supply to individual households / users directly, ASM-IA will be applicable.</p> <p>In addition to this, revised PoA-DD along with gCPA-DD has been incorporated with appropriate justification of applicability of the methodology AMS-IA and AMS-IC in Section E.2 of PoA-DD and Section B.2 of gCPA-DD.</p>
DOE Assessment #3	<p>1. Justification of the CME regarding the use of AMS I.C. in particular conditions especially in the case where recovered biogas from the project shall replace the fossil fuel. The same is verified during onsite observation and interview with the CME. Sectoral and local expertise of the validation team also supports the same.</p> <p>2. Table E.2 of PoA-DD^{/PoA-DD6/} is found corrected with regards to point 6.</p> <p>3. Justification of the CME regarding the use of AMS I.A. is acceptable to the validation team based on onsite assessment, interview with local stake holders, CME and local expertise.</p> <p>Moreover, revised PoA-DD^{/PoA-DD6/} and gCPA-DD was assessed with regards to justification of applicability criteria of all the applied methodologies (AMS III.H., AMS I.A., AMS I.C., AMS I.D. and AMS I.F.) under section E.2 is found to be adequately provided, hence acceptable to the validation team.</p> <p>CAR PoA-E1 is successfully closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<p><input type="checkbox"/> To be checked during the first periodic verification</p> <p><input checked="" type="checkbox"/> Appropriate action was taken</p> <p><input checked="" type="checkbox"/> The project complies with the requirements</p> <p><input type="checkbox"/> Outstanding finding (not closed)</p>

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
---------------------	--	---	---



Finding	PoA-E2	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	In section E.3 of the webhosted PoA-DD, the sources and gases included in the SSC-CPA boundary is provided in tabular form. However, project boundary of the proposed PoA is not in line with § 15 of AMS III.H.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section E.3 has been updated accordingly based on Para 15 of AMS IIIH, version 16. The listed sources of gases are general in PoA-DD, and will be determined in each CPA based on actual scenario of each site, as per Para 15 of AMS IIIH (version 16).			
DOE Assessment #1	Validation team has found that sources and gases are included in the project boundary but section E.3 of the revised PoA-DD still not in line with requirement of § 15 of AMS III.H version 16 as demonstration of the project boundary using schematic diagram of project site and equipments including GHGs emission reduction point is not included. CAR is open.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	A schematic diagram for the project boundary has been added under Section E.3.			
DOE Assessment #1	Validation team has checked and confirmed that Schematic diagram for the project boundary is found included in the section as required by § 15 of AMS III.H version 16 and also in line with onsite visit. CAR raised under finding PoA-E2 is closed.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-E3	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Under section E.6.3 of the webhosted PoA-DD, the data and parameters reported in CDM-SSC-PoA-DD form is not complete as it does include the Volume of wastewater treated in baseline wastewater treatment system i in year y (m ³) Q _{ww,i, y} , and Chemical oxygen demand of the wastewater inflow to the baseline treatment system i in year y (t/m ³) COD _{inflow, i, y} . Also, the dry matter in the sludge that would have been treated by the sludge treatment system j in the baseline scenario (t) is not provided in the section.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section E.6.3 has been updated accordingly with added parameters, including Q _{ww,BL,y} and COD _{inflow,BL,y} and Sludge generation rate and POME sludge density for the baseline treatment system.			
DOE Assessment #1	Validation team has checked section E.6.3 of the revised PoA-DD and found that the missing parameters and data are added correctly.			
Conclusion <i>Tick the appropriate</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken			



<i>checkbox</i>	<input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)
-----------------	---

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-E4	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Section E.5.1 of the webhosted PoA-DD is not correct and complete. This section does not explain how CPAs will demonstrate additionality. Mere reference to Attachment A to Appendix B, Annex 34, EB 35 or Annex 5, EB 62 is not adequate. Moreover, there is no reference to: <div><div>i.</div><div>Compliance of project Annex 13, EB 62 and discussion of alternatives/why the discussion on alternatives is not necessary for CPAs.</div></div> <div><div>ii.</div><div>Parameters that will be made available in each CPA along with source.</div></div> <div><div>iii.</div><div>Sensitivity analysis, what parameters will be selected and to what variation they will be subjected to the break even analysis</div></div> The entire section needs to be modified.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section E.5.1 of PoA-DD has been updated accordingly with more explanations.			
DOE Assessment #1	<p>The section has been enlarged, but it is a mere reproduction of Annex 34, EB 35.</p> <p>Additionality demonstration arises only if the project conforms to Annex 13, EB 62. If the project does not conform to Annex 13, EB 62, there is no question additionality demonstration at all. Hence, the PoA should state what documents would be submitted by CPA to demonstrate the conformity to Annex 13, EB 62.</p> <p>The PoA is for recovery of biogas and flaring it or utilising it. Therefore, there cannot be any problem in standardising the documents, which are well known and from the list of documents whichever are applicable need to be submitted and whichever are not applicable due to project characteristics need not be submitted. But the list should form part of PoA.</p> <p>The edited section is not up to the standard. Since this is a PoA, documents cannot be left to CPA's and CME's discretion. An all-exhaustive document list for Annex 13, EB 62, Investment analysis, broad list of parameters that would be subjected to sensitivity analysis should be explained in detail in this section. CAR is open.</p>			
Corrective Action #2 <i>This section shall be filled by the PP.</i>	<div><div>i.</div><div>The PoA-DD has been updated with addition of Prior consideration of the CDM (Annex 13, EB62). Only CPA that having project start date after 20/03/2012 is eligible to be included to the SSC-PoA. Each SSC-CPA must provide either signed Contract documents to show the implementation or construction or real action of a project activity begin or can be checked during physical site visit for projects where construction</div></div>			



	<p>has not started yet, as per Eligibility Criteria Item (d) under Section A.4.2.2. of SSC-PoA-DD.</p> <p>Besides, for CPA that apply Simple Cost Analysis, realistic and credible alternative(s) available to the PP that provide outputs or services comparable with the proposed CDM project activity will need to be provided as per Para 26, Annex 21, EB65.</p> <p>ii. The parameters for investment analysis are details under Section E.5.1 and E.5.2. of SSC-PoA-DD.</p> <p>iii. The parameters for Sensitivity Analysis have been included under Section E.5.2 of SSC-PoA-DD.</p> <p>iv. Project or Equity IRR will be used to demonstrate additionality of the project activity.</p> <p>For Item a, b, c and d, as the individual CPAs involve different type of measures (gainfully use of the recovered biogas), type of financing (equity/debt) and revenue sources, therefore it will be appropriate to only describe and demonstrate in details under CPA level. Further reference to EB62, Annex 5 (Guidelines on The Assessment of Investment Analysis) or the updated version in the future when demonstrating Investment Barrier is added under Section E.5.1, Investment Barrier.</p>
DOE Assessment #2	<p>Section E.5.1 and E.5.2 have been modified. However, it is a mere reproduction of Attachment A to Appendix B. Last paragraph of Sec. E.5.1 states "In order to make the assessment of additionality as objective as possible, the CME will test the financial additionality of the SSC-CPA through an investment analysis". If the investment analysis is envisaged to be used, then clarify the objective of reproducing (b), (c) and (d) of Attachment A to Appendix B in this section. CAR is still open.</p>
Corrective Action #3 <i>This section shall be filled by the PP.</i>	<p>Option (a), (b), (c) and (d) of Attachment A to Appendix B in section E.5.1 has been removed. Further elaboration on Investment Barrier has been added in the paragraph.</p>
DOE Assessment #3	<p>The section E.5.1 and E.5.2 are found corrected with regard to the demonstration and assessment of additionality and hence acceptable to the validation team. CAR raised under finding PoA-E3 is closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<p><input type="checkbox"/> To be checked during the first periodic verification</p> <p><input checked="" type="checkbox"/> Appropriate action was taken</p> <p><input checked="" type="checkbox"/> The project complies with the requirements</p> <p><input type="checkbox"/> Outstanding finding (not closed)</p>

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-E5	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	<p>In section E.6.1 of the PoA-DD^{PoA-DD1/}, the explanation that how the procedures provided in the methodology is applied is not described. Also, PP is required to justify every selected options offered by the applied methodology under this section.</p> <p>Moreover, a justification is required that why leakage effect is not considered.</p>		
Corrective Action #1 <i>This section shall be</i>	<p>Section E.6.1 has been updated accordingly, including the justification required for the leakage.</p>		



<i>filled by the PP.</i>	
DOE Assessment #1	Validation team has checked the section E.6.1 of the revised PoA-DD and found that appropriate justification is provided for selected sources of baseline and project emission. Moreover, determination of leakage is also found described in the section. CAR raised under finding PoA-E4 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-E6	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	<p>Monitoring plan provided under section E.7.2 of the webhosted PoA-DD has not been clearly provided with the operational and management structure in a transparent way along with procedure and hierarchy for flow of information in the organisation.</p> <p>Furthermore, the emergency procedures for breakdown are not found to be appropriate.</p>		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<p>An operational and management structure diagram has been added in Section E.7.2.</p> <p>Further details for emergency procedures have been added.</p>		
DOE Assessment #1	Validation team has checked and confirmed that the hierarchy of flow information with clear operational and management structure has incorporated in section E.7.2 of the revised PoA-DD. Also, CME has added emergency procedure for breakdown and hence found in accordance with EB 65 Annex 3 § 17. CAR raised under finding PoA-E6 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-E7	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Section E.8 of the webhosted PoA-DD, the completion date of baseline study was 12/03/2012 whereas the PoA-DD is completed on 14/02/2012 (refer to section A.2, PoA-DD). A clarification is required that how the PoA-DD is completed prior to baseline study.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The completion date for the baseline study was 2012/03/12. It was a mistake to state that the PoA-DD is completed on 2012/02/14. The updated date for the completion and revision of PoA-DD has been corrected. Refer Section A.1.		



DOE Assessment #1	The date of completion and revision of PoA-DD is found corrected as 2012/06/20, which is after the date of baseline study. Clarification raised under finding PoA-E7 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-E8	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	In section E.8 of the webhosted PoA-DD, name of the responsible person/entity for the application of the baseline and monitoring methodology is not clearly mentioned. Moreover, information is not provided whether this person/entity is considered a project proponent.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The PoA-DD has been updated accordingly. Refer PoA-DD, Section E.8.			
DOE Assessment #1	Section E.8 of the revised PoA-DD is found corrected with regards to date of completion of baseline study and the person responsible. Revised PoA-DD clearly mentioned that Sim Kean Hong is responsible person from Ably Carbon Sdn. Bhd., which is the CME and project participant. CAR raised under finding PoA-E8 is closed.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	PoA-Ed	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	<div><div>i.</div><div>Acronym for POME is not provided in section A.2 of the PoA-DD.</div><div>ii.</div><div>PP needs to mention the name, version, EB #, of the tools, guidance etc. used, wherever applicable throughout the PoA-DD.</div><div>iii.</div><div>In section E.4 of the PoA-DD, ‘a’ is repeated for numbering under the last §.</div><div>iv.</div><div>In section E.5.1 of the PoA-DD, there is a typographical error in 2nd line of § 1st.</div><div>v.</div><div>In annex 3 of the PoA-DD, the information provided regarding baseline information is not clear and unnecessary. A clarification is required.</div></div>			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<div><div>i.</div><div>Acronym of POME provided in Section A.2.</div><div>ii.</div><div>All relevant Tools, Guidance, EB reports have been updated in the PoA-DD.</div><div>iii.</div><div>Section E.4, the numbering has been corrected.</div></div>			



	iv. The typo error is corrected under Section E.5.1. v. Information provided in Annex 3 has been removed. The information shall only provide in CPA level.
DOE Assessment #1	Validation team checked the revised PoA-DD and found that raised editorial issued corrected as: i. Acronym for POME i.e. Palm Oil Mill Effluent is edited in the section A.2. ii. The tools, guidance and EB report used in the PoA-DD is the latest and valid one. iii. Numbering has corrected in section E.4. iv. Typo error corrected in the section E.5.1. v. Validation team has checked and found that information is removed from the Annex 3 of the revised PoA-DD. Editorial CAR PoA-Ed1 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-GSC1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	The PoA in Section A.4.1 does not list Papua New Guinea and Solomon Islands as Host Parties, nor does it address environmental regulations in these two jurisdictions, even though it purports to have these two countries in its Boundary.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	PP decided to remove both Papua New Guinea and Solomon Islands as host parties. Section A.4.1 of the PoA-DD has been updated accordingly. The environmental regulations are addressed at CPA level.		
DOE Assessment #1	B. Validation team has assessed the response to the GSC comment made by CME and cross-verified the same from the revised PoA-DD. Since the proposed PoA is in the physical boundary of Malaysia only. Hence corrective action provided is found appropriate and acceptable. CAR PoA-GSC1 is successfully closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-GSC2	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR



Description of finding	Section C.2 states that no environmental approval is necessary for these biogas projects in Malaysia, but this is untrue – an environmental permit is necessary and a detailed Material Balance for the changes to the WWT facility is required to be submitted with an Environmental Change Application for each project in Malaysia. The other two country requirements are not even addressed and Section C.3 states that the Environmental Considerations are done at the PoA level, so not necessary for each CPA. This is bordering on the absurd.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	<p>Under Section C.2. it was stated that EIA is not required. The revised PoA-DD now states that the Environmental Considerations is done at CPA level.</p> <p>In Malaysia, there is a requirement to obtain Written Approval from Department of Environment of each state where the project is located for the modification of wastewater treatment system; that will be carried out at CPA level and shall be site specific. Papua New Guinea and Solomon Islands have been removed as the host parties of the PoA-DD.</p> <p>Section C.3 now states that the Environmental Considerations is done at CPA level.</p>
DOE Assessment #1	<p>Choice of conducting EIA at CPA level is found to be incorporated in the revised PoA-DD. Moreover, validation team has checked the local regulations in the Malaysia applicable for the proposed type. CME has submitted the supporting evidences in this regards such as; EIA Exemption letter^{/EIA2/} from Department of Environment, Pahang Darul Makmur and environmental, Mill Licence^{/LICENCE1/} vide reference number 004382 (Environmental Quality Act 1974) compliance schedule, issued by Director general of Environment dated 2011-03-24.</p> <p>Furthermore, Papua New Guinea and Solomon Islands have found to be removed as the host parties of the PoA-DD.</p> <p>Based on above, validation team concludes, that corrective action provided by CME is appropriate and hence, acceptable.</p> <p>CAR PoA-GSC2 is successfully closed.</p>
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input checked="" type="checkbox"/> PoA-DD	<input type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	PoA-GSC3	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	<p>The CME noted as Ably Carbon could not be found as a registered company in Malaysia at the time of web-hosting and the phone number of 03 4042 1177 in Annex 1 for Stephane Vidaillet is for Polcher & Co., an audit firm, and the receptionist did not know anything about Ably Carbon. It is difficult to believe that Ably Carbon can be a CME for this PoA. Where are the local Malaysian staff of the CME that should be listed in the PoA Procedures document that is necessary for any PoA before it is in validation? This is a requirement from EB 65, Annex 3, Section 17.</p>		



Corrective Action #1 <i>This section shall be filled by the PP.</i>	Aby Carbon Sdn Bhd is registered in Malaysia. The phone number (+60 3 4042 1177) is correct, and it is not the one of Polcher and Co. One can only assume that Mr Hamaliuk dialled the number incorrectly. The local Malaysian manager in charge of the project has more than 5 years experience in CDM and in POME in particular, as has been assessed by the DOE.
DOE Assessment #1	To assess the same, validation team requested for certificate of incorporation ^{/MoA/} of CME in Malaysia. Submitted incorporation certificate by CME was verified also did web search to check the authenticity of this incorporation, and found to be appropriate. During on site assessment, validation team met and interviewed the Local Manager of the CME (Mr Sim Kean Hong) and found him to be competent person for the assigned job as a representative of CME. CAR GSC 3 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-A1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	The title of the template used for CDM SSC-CPA-DD (gCPA) is mentioned as "CDM-SSC-PDD form version 3", which is not correct as the proposed project is a PoA. Furthermore, the title of proposed PoA is also not provided at the cover page of CDM SSC-CPA-DD and hence not in line with CDM SSC-CPA-DD-Form, version 01.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The revised gCPA-DD is consistent with the latest template CDM-SSC-CPA-DD and title of the PoA has now been incorporated.		
DOE Assessment #1	Validation team reviewed and found that the title of the template is corrected viz. CDM SSC-CPA-DD version 1. Also, the title of the PoA i.e. Regional Biogas PoA is added on the cover page of the template. CAR gCPA-A1 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-A2	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Under section A.1 of the webhosted gCPA-DD, provision for title,		



	version and date for the CPA is provided. However, provision for including unique title of the CPA to be included in the PoA (Regional Biogas PoA) is not correct.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The format of the title for CPA is updated and now it clearly indicates that the proposed CPA is under this PoA.
DOE Assessment #1	The provision for including CPA title is found corrected. The new title format i.e. Regional Biogas PoA – CPA [XX] (name of mill) is suitably represent that the proposed CPA is a part of the Regional Biogas PoA. CAR gCPA-A2 is successfully closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	gCPA-A3	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	In section A.3 of the webhosted gCPA-DD, there is no provision to define that the CPA implementer is project participant or not. Correction is required for the same.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section A.3 of the revised gCPA-DD is updated accordingly.			
DOE Assessment #1	Provision to define that the CPA is implementer is/is not a project participant for the proposed CPA is found added in section A.3 of the revised gCPA-DD. CAR gCPA-A3 is closed.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD	
Finding	gCPA-A4	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Template for providing technical description of the CPA provided under section A.4 of the webhosted gCPA-DD is not exhaustive.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section A.4 is restructured and a table is added to define the anaerobic digester details (template).			
DOE Assessment #1	Section A.4 of the revised gCPA-DD is found appropriately provided with the technical description of the CPAs to be included in the PoA. CL gCPA A4 is successfully closed.			
Conclusion	<input type="checkbox"/> To be checked during the first periodic verification			



<i>Tick the appropriate checkbox</i>	<input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)
--------------------------------------	---

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-A5	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Under section A.4.2.1 of the webhosted g-CPA-DD, the description provided for the starting date is not in line with the EB 66 Annex 63.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Section A.4.2.1 is updated and now the start date would be the first date on which contract/purchase order is awarded for the CPA [e.g. earthworks/mechanical of biogas system, any related project equipment], corresponding to the first financial commitment on implementation of the project). Moreover, the start date of the CPA is not or will not be, prior to the commencement of validation of the PoA, which was 20/03/2012.		
DOE Assessment #1	Section A.4.2.1 of the revised gCPA-DD is checked by the validation team and found appropriately corrected. CAR gCPA-A5 is closed successfully.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-A6	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Under section A.4.4 and B.5.3 of the webhosted gCPA-DD, in table provided for emission reduction, year 1,2,3 is not acceptable as it is unable to provide information, from when emission reduction is estimated to be accrued. Correction is required for the same.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The year is now mentioned instead of number of years as [YYYY] in section A.4.4, which is indicating the year in which the emission reduction is calculated.		
DOE Assessment #1	Validation team checked section A.4.4 of the revised gCPA-DD and found that the year format is corrected properly. CAR gCPA-A6 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-B1	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	In section B.1 of the webhosted gCPA-DD, the provision for providing reference number of registered PoA is missing.		



	.
Corrective Action #1 <i>This section shall be filled by the PP.</i>	UNFCCC Ref. No. of the PoA is added in section B.1.
DOE Assessment #1	Under section B.1 of the revised gCPA-DD, the reference No. of the Regd. PoA is found added. CAR gCPA-B1 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-B2	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	The list of documents required to substantiate/justify the eligibility criteria are not provided in table B.1 under section B.2 of the webhosted gCPA-DD. Moreover, the additional eligibility criteria based on the applied methodology is not included in the section.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The provision for the list of documents in line with the PoA-DD (eligibility criteria) is added under column "justification" in table B.1. Also, eligibility criteria other than EB 65 Annex 3 i.e. based on applied meth i.e. AMS III.H version 16, AMS I.D version 17 and AMS I.F version 02 is also added.		
DOE Assessment #1	Section B.2 of the revised gCPA-DD is checked and found the documents list in line with the PoA-DD. Moreover, the eligibility criteria for inclusion of the CPA are also included the applicability criteria of applied methodologies. CAR gCPA-B2 is successfully closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-B3	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	One more column should be added in Table B.2 of section B.3 the webhosted gCPA-DD, for the source of input parameters. Since all projects are POME project in and inputs cannot differ, there is no reason as to why the input list cannot be given, by making it very exhaustive if need be. DOE should know what document will be submitted in support of each input parameters		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	One more column is added in the table (now Table B.4) under section B.3 of the gCPA-DD.		



DOE Assessment #1	Section B.3 of the revised gCPA-DD is checked and found that the new column namely “basis” is included in table B.4 and hence, acceptable. CL gCPA- B3 is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-B4	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Under section B.5.2 of the webhosted gCPA-DD, the sources for the value of the fixed parameter(fixed) are not provided.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	The sources are provided for the fixed value applied for the emission reduction.		
DOE Assessment #1	Section B.5.2 of the revised gCPA-DD is reviewed by validation team and found the sources for the methane producing capacity of the wastewater (0.25 kg CH ₄ /kg COD), Global Warming Potential for methane (21), model correction factor to account for model uncertainties (0.89) etc. is provided correctly. CAR gCPA-B4 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
Finding	gCPA-B5	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL <input type="checkbox"/> FAR
Description of finding	Justification is required as the leakage emission is considered zero.		
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Since the technology to be installed is not using equipment transferred from another activity, hence the leakage is taken zero.		
DOE Assessment #1	Justification provided for the leakage consideration (0) is found in line with the requirement stipulated under §31 of the AMS III.H version 16. CAR gCPA-B5 is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)		

Related PDDs	<input type="checkbox"/> PoA-DD	<input checked="" type="checkbox"/> generic CPA-DD	<input type="checkbox"/> real case CPA-DD
---------------------	---------------------------------	--	---



Finding	gCPA-B6	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding	Under section B.6.1 of the webhosted gCPA-DD information regarding training and monitoring is not clear, adequate and complete. It is also not clearly demonstrated about the operation and management arrangements established by the CME. Moreover, Roles and responsibility of the personnel involved in GHG monitoring i.e. organisational structure is not found included under this section.			
Corrective Action #1 <i>This section shall be filled by the PP.</i>	Operational and management arrangement demonstration along with the information regarding training and monitoring is completed in the revised gCPA-DD under section B.6.			
DOE Assessment #1	Section B.6.1 of the revised gCPA-DD is found included with the training and monitoring procedure adequately. Moreover, demonstration about the operational and management structure and roles and responsibility of the personnel involved are added in the section suitably. CAR gCPA-B6 is successfully closed.			
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the first periodic verification <input checked="" type="checkbox"/> Appropriate action was taken <input checked="" type="checkbox"/> The project complies with the requirements <input type="checkbox"/> Outstanding finding (not closed)			

6 VALIDATION ASSESSMENT SUMMARY

6.1 General Description of the Project Activity

The process undertaken to validate the accuracy and completeness of the project description include the document review, interview of project participants, local stakeholders and on-site assessments.

The PoA will cover all states of Malaysia. The same was concluded after the assessment of Malaysian LoA^{/LoA1/}.

A typical CPA will be an individual palm oil mill that will implement the project activity by installing a new treatment system with biogas recovery or installing a biogas recovery system for the existing anaerobic treatment system that currently emits biogas methane directly to the atmosphere. In the project case, a controlled, covered anaerobic process with biogas recovery system will treat the POME. The captured biogas will combust in an open/closed flare and/or utilised to generate power.

Where the projects generate electrical energy, the generation could be either exported to national/regional grid or exported to mini-grid or displace electricity imported by the candidate project from national/regional grid. Accordingly, the SSC-CPA under this PoA will



use a combination of AMS III. H., AMS I.A., AMS I.C., AMS I.D. and AMS I.F. methodologies.

The main objective/goal of proposed project activities is to reduce greenhouse gas (GHG) emissions from palm oil mills by capturing the biogas generated in the existing open wastewater treatment systems, treating palm oil mill effluent (“POME”), instead of allowing it to escape into the atmosphere.

Participation:

LOA

The Letter of Approval (HCA)^{/LoA1/} vide reference - NRE(S) 602-2/11 Jld.16 (19), dated 2012-08-03 issued by Ministry of Natural Resource and Environment (Malaysian DNA) confirmed the voluntary participation of Ably Carbon Sdn. Bhd. as the Coordinating and Managing Entity (CME) in the CDM PoA. As per § 9 &10 of EB 55 annex 38 the CME shall obtain LoAs of its coordination from each host party at PoA level and not required at each CPA level. Since Malaysia is the only host party where the proposed programme will be implemented, the issued LoA from Malaysian DNA is found to be appropriate. Host party Approval^{/LoA/} confirmed that:

- (i) The project proposal for Regional Biogas PoA as defined in the PoA-DD is found to be in compliance with the national criteria for the CDM activities.
- (ii) Malaysia has ratified the Kyoto Protocol on 2002-07-04
- (iii) Malaysia participates voluntarily in this proposed PoA.

As per the Host party Approval the project proponent has to consider following conditions:

- (i) Host country Malaysia does not support unilateral CDM project, hence this approval (LoA) is considered void if this project is found to be unilateral project by the CDM Executive Board.
- (ii) This LoA^{/LoA1/} is valid up to one year to submitted the project to Executive Board (EB) for the registration and this period (one year) is independent to the time taken by the EB to register the project.
- (iii) Project Participant is required to submit a written report to the DNA on the stages and progress of the project implementation atleast twice a year.

The Annex 1 party is France for the proposed PoA. The validation team received a Letter of Approval^{/LoA2/} Ref no 12-0551 5E JBBter dated 2012-09-19 from the CME . The LoA^{/LoA2/} issued from the Ministry of Ecology, Sustainable Development and Energy (acting as French DNA to the UNFCCC) declares that:

- (i) The name of proposed PoA is “Regional Biogas PoA”.
- (ii) France participates in the CDM voluntarily.
- (iii) France has ratified Kyoto Protocol to the UNFCCC on Climate Change on 2002/05/31.
- (iv) Approved to the proposed PoA^{/PoA/} in Malaysia to be carried out under article 12 of the Kyoto protocol as presented by Ably Carbon SAS to the DNA^{/DNA-F/}.



- (v) France does not intend to be involved in taking any decision on the distribution the CERs generated by the project.

Project Participants

The validation team confirms that Ably Carbon Sdn. Bhd. is the Coordinating and Managing Entity (CME) for the proposed CDM PoA^{/LoA1/} and has been consistently reported in the PoA-DD. Felda Palm Industries Sdn. Bhd. is also a project participants as the first CPA implementer which is clearly found mentioned in the Annex-1 of the PoA-DD and in the Letter of Approval from Malaysian DNA^{/LoA1/}.

Furthermore, Other party involved from Annex-1 country is the Ably Carbon SAS^{/LoA2/}, which is clearly mentioned in the PoA-DD, and LoA obtained from the French DNA^{/LoA2/}.

6.1.1 Contribution to Sustainable Development

Letter of Approval, Ref no NRE(S) 602-2/11 Jld.16 (19), dated 2012-08-03 issued by DNA of Malaysia^{/LoA1/} from Ministry of Natural Resource and Environment clearly stated that the proposed CDM Programme of Activities contribute to the sustainable development in the host country and in compliance with the national criteria set for the CDM activities in the host country. However, DNA has right to review and/or amend the national criteria as necessary to achieve the national sustainable goals.

6.1.2 PoA -DD's Editorial aspects

The PoA-DD is applying the latest template (Version 01) and the g-CPA-DD is applying the latest template (Version 01). However, during the course of validation the DOE has raised CAR PoA-EDT 1 related to editorial aspects and closed successfully.

Validation team confirms that the guidelines for the completion of the PoA documents (as contained in the DD form itself) in their most recent version have been followed. The Managing entity and/ or project participants in the applicable PoA sections provided relevant information.

6.1.3 Technology to be employed

The Coordinating and Managing Entity (CME) Ably Carbon Sdn. Bhd promote the CDM Programme of Activities, "Regional Biogas PoA". This program involves the installation the bio-digester/covered lagoon to recover the biogas (methane) from waste water treatment process (with or without sludge treatment), which is previously (in open lagoon system) escaped in the environment (base case). The recovered biogas in the waste water treatment system will either be combusted for energy and/or flaring depending on the demands and requirements of the mills under each individual CPA. Moreover, the installation of the biogas recovery system will result in a better POME treatment and management of the wastewater, through improved control of the anaerobic treatment conditions such as pH, temperature, organic loading rate. It will also promote biogas utilization in the host country especially from palm oil industry. It is assessed that recovery of the biogas from the waste water treatment is not mandatory or common practice in the Malaysia.



It is expected that several technologies will be available to be considered for each SSC-CPA and each technology will comprise measures that recover, flare and/or utilize the biogas for power generation based on the approved methodology AMS III.H. version 16 or above .

Technology in the project boundary considered to be deemed good practice.

The validation team has verified the above categorization with the AMS III.H. Version-16 type III and along with AMS I.A., AMS I.C., AMS I.D. & AMS I.F., and confirm that the above categorization is compatible with the applied baseline and monitoring methodology.

Moreover, actual case CPA-DD apply every technology/measure included in the PoA design document i.e. measures that recover, flare and/or utilize the biogas for power generation based on the approved methodology AMS III.H. version 16 or above and hence in accordance with the § 93 b of EB 69 meeting report.

However, during the course of validation, CAR PoA-A5 was raised and closed successfully.

6.1.4 Eligibility Criteria for CPA Inclusion

Review of PoA-DD, g-CPA-DD (template) and interview with representatives of CME reveals that the CME of the PoA employs clear and unambiguous criteria for the inclusion of the CPAs. The eligibility criteria have been stated in Table A.1 of the PoA-DD and validation team confirms the eligibility criteria are in line with requirement of §14 of EB 65 Annex 3. Also, Additional eligibility criteria based on the applicability of the applied methodology are also included in the section E.1 of Table PoA-DD, which are found appropriate and acceptable to the validation team. The eligibility criteria can be checked at the CPA level by the CME and shall be confirmed by the DOE before inclusion of the CPAs in the PoA.

CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
a.	The geographical boundary of the CPA including any time-induced boundary consistent with the geographical boundary set in the PoA,	In each CPA-DD, it shall be demonstrated with GPS coordinates that the CPA does take place within the borders of Malaysia. This can be evidence through declaration from CME or Operational and Management Plan from CME – that includes GPS coordinates of the proposed site, showing that it is inside the Host Country	<input checked="" type="checkbox"/>	Justification provided to check whether the CPA is well within the geographical boundary of the proposed PoA is found to be appropriate by the validation team and hence, acceptable. At the time of inclusion of each proposed CPA, CME shall submit the mentioned documents to the DOE who will be performing validation for the consistency and



CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
				integrity check. The DOE will confirm at the time of inclusion of the CPA that the proposed location of the CPA is comes under set boundary of the PoA i.e. Malaysia.
b.	Conditions that avoid double counting of emission reductions like unique identifications of product and end-user locations (e.g. programme logo).	In each CPA-DD, it shall be confirmed that the CPA is not already included in another PoA or developed as a stand-alone CDM registered project. Documented evidence from the CME following the system/procedure detailed in section A.4.4.1, including a list of PoAs, CPAs and PDDs reviewed in said CDM database, as well as the unique identification number of all included CPAs and a map showing all included CPAs.	<input checked="" type="checkbox"/>	At the time of inclusion request of CPA, DOE will check the unique number provided to CPAs from the CME. This unique number revealed that the CME has check and ensure that the CPA is already not a part of the other Programme of Activities or developed as stand-alone CDM project.
c.	The specifications of technology / measure including the level and type of service, performance specifications including compliance with testing/certifications.	Documented evidence from the CME such as (inter alia) for the main equipments to be installed: proposals, requests for quote, quotations, tender documents, project design diagram, project report, or equivalent documents provided by the CPA implementer.	<input checked="" type="checkbox"/>	At the time of inclusion request of any proposed CPA, CME shall submit the document as evidence to the DOE as mentioned in the PoA-DD for specification of technology. The documents prescribed are: proposals, requests for quote, quotations, tender documents, project design diagram, project report or equivalent documents provided by the CPA. Validation team found that this is appropriate and sufficient for this criterion to be fulfilled.
d.	Conditions to check the start date of the CPA through documentary evidence	Documented evidence from the CME showing a start date after 2012/03/20, such as (inter	<input checked="" type="checkbox"/>	CME shall checked and submit the evidence provided by CPA implementer for the start



CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
		<p>alia):</p> <ul style="list-style-type: none"> - investment decision from the CPA implementer, related to a main project component, including the planned date for starting the work - signed Contract documents related to a main project component - evidence that a main project component has started, collected during physical site visit by the CME. <p>The main project components include, inter alia: a) interconnecting piping system for biogas plant; b) Piping system; c) Pumps; d) A system for collecting and distributing the recovered biogas to flare(s) / biogas burner(s) / biogas engine(s); e) Biogas treatment systems for hydrogen sulphur and moisture removal; f) Major earth/civil works for ponds/tanks.</p>		<p>date of CPA. The document list provided is found appropriate and in line with the EB 66 Annex 63. Moreover, the CPA start date is/will not before the date of upload of PoA-DD (i.e. 2012/03/20) for GSC as stipulated in §7(d) of EB 55 Annex 38. The same has been mentioned by the CME and found appropriate.</p>
e.	Conditions that ensure compliance with applicability and other requirements of single or multiple methodologies applied by CPAs.	<p>All applicability conditions and requirements are listed in Section E.2 for AMS-III.H version 16 and for the relevant Type-I methodologies.</p> <p>CME shall issue a declaration of applicability after checking the applicability criteria for the applied methodology(ies).</p> <p>Evidences / documents required for the applicable criteria shall be substantiated accordingly.</p>	<input checked="" type="checkbox"/>	<p>Applicability of methodology shall be checked by the CME and shall be confirmed to the DOE that the CPA meets all the applicability criterion of the applied methodology (ies) as stipulated in the PoA-DD. This is found appropriate and sufficient by the validation team.</p>
f.	The conditions that	Each small-scale CPA	<input checked="" type="checkbox"/>	The DOE at the time of



CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
	ensure that CPAs meet the requirements pertaining to the demonstration of additionality as specified in Section A of EB 65 Annex 3.	shall meet the requirements of Guidelines On The Demonstration Of Additionality Of Small-Scale Project Activities, Annex 27 (version 09.0), EB68 and General Guidelines for SSC CDM Methodologies along with corresponding supporting documents for the demonstration of additionality.		inclusion of the CPA shall confirm that the additionality argument put forth in the PoA-DD for the typical CPA of the PoA is valid and applicable for the subject to CPA under consideration.
g.	The PoA-specific requirements stipulated by the CME including any conditions related to undertaking local stakeholder consultations and environmental impact analysis.	(1) Local stakeholders must have been consulted. (2) The CPA must be compliant with the Host Country requirements in terms of environmental impact analysis. Moreover, following document need to be submit to the CME: i) Invitation letters and/or newspaper advertisement and/or public notice for the invitation of local stakeholders ii) Photographs and/or video evidence of stakeholder consultation iii) Attendance list of attended stakeholders iv) Q&A or Minutes Meeting of stakeholder consultation v) EIA exemption letter from Department of Environment or EIA report from authorized party, or letter from an environmental lawyer confirming that the EIA requirements or equivalent is not necessary for the CPA	<input checked="" type="checkbox"/>	As per the provisions in PoA-DD, LSC and Environmental Analysis will be done at the CPA level. Provision to ensure that LSC have been conducted and Environmental impact analysis is not necessary for the CPAs is found satisfactory to the validation team.
h.	Conditions to provide an	Documented evidence	<input checked="" type="checkbox"/>	At the time of inclusion



CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
	affirmation that funding from Annex I parties, if any, does not result in a diversion of official development assistance	from the CME including: - a declaration from Annex 1 Project Participant that the CPA does not receive any public funding, or if it does receive public funding, that such funding does not constitute ODA diversion. - a declaration from the CPA implementer that the CPA does not receive any public funding, or if it does receive public funding, that such funding does not constitute ODA diversion.		request of any proposed CPA, CME shall submit the mentioned documents to the DOE who will be performing validation for the consistency and integrity check. This eligibility criterion will ensure non-diversion of ODA during inclusion validation.
i.	Where applicable, target group (e.g. domestic / commercial / industrial, rural / urban, grid-connected / off-grid) and distribution mechanisms (e.g. direct installation).	The target group is prospective Palm oil mills in Malaysia. There are no specific distribution mechanisms. Relevant documents to prove it is palm oil mill that processing fresh fruit bunches, such as Mill License, business license, etc.	<input checked="" type="checkbox"/>	The applicable, target group is Palm Oil Mill as per the PoA-DD. Document to show that the in the CPA target group is Palm Oil Mill found appropriate and sufficient. The DOE shall verify the same at the time of CPA inclusion.
j.	Where applicable, the conditions related to sampling requirements for a PoA in accordance with the approved guidelines/standard from the Board pertaining to sampling and surveys.	For wastewater samples, specific guidance in the applicable methodology shall be followed. For all wastewater sampling for COD tests, the samples and measurements shall ensure a 90/10 confidence/precision level as per AMS-III.H, version 16, Table III.H.2. A minimum once a month sample will be drawn for COD test.	<input checked="" type="checkbox"/>	The CME shall ensure that mentioned criteria followed by the CPA implementer. At the time of inclusion of the CPA. DOE also crosscheck and confirm that the CPA implementer correctly follows the provision for the sampling and survey. This is inline with the requirement of applied methodology.
k.	Where applicable, the conditions that ensure that every CPA in aggregate meets the small-scale or	Each small-scale CPA shall meet the small-scale threshold criteria and remain within this threshold throughout the	<input checked="" type="checkbox"/>	CME shall check the document prescribed at the time CPA inclusion consideration. DOE also crosscheck and confirm



CME Demonstration			DOE Assessment	
No	Eligibility Criteria	Justification and Evidence	Appropriate and sufficient	Explanation of final result
	microscale threshold criteria and remains within those thresholds throughout the crediting period of the CPA	crediting period of the CPA (less than 60 ktCO ₂ / year) for Type III and 15MW for Type I methodologies. For Type III, CERs calculation spreadsheet in the CPA shall confirm the threshold of 60k CER/year during validation. For Type I, documented evidence from the CME such as (inter alia) design document, request for quote, proposal, signed contract, approved board decision, or equivalent, showing that the installed capacity (or planned capacity) is below 15 MW.		the same. The justification and document list is found appropriate by the validation team.
1.	Where applicable, the requirements for the debundling check, in case CPAs belong to small-scale (SSC) or microscale project categories.	Documented evidence from the CME such as (inter alia): - Contractual agreement between CME and CPA implementer including confirmation with list of projects implemented by CPA Implementer that apply the same technology / measure. - if applicable, list of CPAs of a large scale PoA with the same CME applying the same technology / measure.	<input checked="" type="checkbox"/>	CME shall check the mentioned list in the prescribed documents and submit to the DOE who will be performing validation for the consistency and integrity check. This eligibility criterion will ensure debundling check during CPA inclusion.
m.	The consideration of all applicable national and/or sectoral policies and regulations of each host parties, within the boundary of all host countries.	The consideration of all applicable national and/or sectoral policies and regulations of each host parties, within the boundary of this PoA shall be carried out at CPA level.	<input checked="" type="checkbox"/>	At the time of inclusion request of any proposed CPA, CME shall check that the CPA is in line with applicable national and/or sectoral policies and regulation.



Moreover, during the course of validation CAR PoA-A6 related to eligibility criteria and successfully closed.

6.2 Geographical/Project Boundary

The CME has correctly described the project boundary in the revised PoA –DD in line with the applied methodology.

The project boundary is the physical, geographical site where the wastewater and sludge treatment takes place, in the baseline and project situations. It covers all facilities affected by the project activity including sites where processing, transportation and application or disposal of waste products as well as biogas takes place.

The geographical boundary of the proposed PoA is within the host country of Malaysia.

The geo-graphical boundary is defined in the PoA-DD as per applied methodologies AMS III.H, AMS I.A, AMS I.C., AMSI.D and AMS I.F. Moreover, a schematic diagram is provided for a project typical CPA in the PoA-DD^{/PoA-DD/}.

Based on above, validation team confirm that the project boundary taken in the PoA is correct and the selected sources and gases are justified for the project activity and meet the requirements of the applied methodology (ies).

Moreover, during the course of validation, CAR PoA-A4 (iii) and CAR PoA-E2 related to geographical/project boundary were raised and successfully closed.

6.3 Baseline Identification

The baseline scenario is the existing wastewater treatment system without biogas recovery system and without sludge treatment. As verified during the site visit all the characteristics stipulated under § 2 of AMS III.H version 16 are met^{/3//BL2,SLUDGE/}.

The CME has justified the selection of base line scenario in line with the applied methodology and the same is deemed reasonable which was also conformed during the on site assessment^{/SV/} and subsequent interview with the local stakeholders, CME and CPA implementer.

The present wastewater treatment with open anaerobic system without biogas recovery is able to treat the wastewater and meet current environmental standards, as evidenced from the EIA exemption letter^{/EIA2/} from the Department of Environment, Malaysia.

CME has clearly stated in the PoA-DD that baseline shall be established on each CPA and the identified baseline must be in accordance with the procedures provided in the approved methodology of AMS-III.H version 16.

A detailed description about baseline is provided in the first real case CPA^{/CPA/} validation report. However, during the course of validation CAR PoA-A11 was raised and closed successfully.

³ <http://cdm.unfccc.int/methodologies/DB/4ND00PCGC7WXR3L0LOJTS6SVZP4NSU>



6.4 Calculation of GHG Emission Reductions

The calculation of GHGs emissions is done in line with the applied methodology under the revised PoA-DD. The revised PoA-DD appropriately considers the baseline emission, project emissions and leakage emissions as required for the project category by applied methodologies i.e. AMS III.H, AMS I.A., AMS I.C., AMS I.D. and AMS I.F..

The validation team confirms that equations and algorithms used to calculate baseline emission, project emission, leakages (If the technology is using equipment transferred from another activity, leakage effects at the site of the other activity are to be considered and estimated (L_{EY}) and emission reduction are correct. To assess algorithms and/or formulae used to determine emission reductions detail and transparent spread sheet calculation in excel file for first real case CPA-DD is provided by the CME to the DOE for validation and found to be appropriate.

However during the course of validation several CARs and CLs were raised regarding baseline emissions, projects emissions and eventually emissions reductions calculations and successfully closed.

6.5 Additionality Determination

Additionality at PoA and CPA level:

The description under the PoA DD ^{/PoA-DD6/} demonstrates the compliance of § 6(e) of annex 38 of EB 55^{/EB55A38/}. The stepwise validation of the same is summarised below:

Relevant text of § 6(e) of annex 38 of EB 55	Assessment of the compliance
The proposed PoA is a voluntary coordinated action;	Based on the description provided in the PoA DD and the onsite visit and subsequent interviews with stakeholders and CME, validation team confirms that the proposed program is voluntary coordinated action by the CME. Furthermore review of regulation on the biogas recovery project of Malaysia reveals that there is no mandate ^{/ENV-Q/EIA/} to implement such CPA (project) to CPA implementer and CME in the host country. Hence the proposed PoA is a voluntary coordinated action.
If the PoA is implementing a voluntary coordinated action, it would not be implemented in the absence of the PoA;	This § is relevant for the subject PoA under consideration. The relevant assessment of the investment barrier to demonstrate additionality, which is claimed for the substantiation of this paragraph, is explained



	in later part of this section.
If the PoA is implementing a mandatory policy/regulation, this would/is not enforced;	This is not applicable for this PoA.
If mandatory a policy/regulation is enforced, the PoA will lead to a greater level of enforcement of the existing mandatory policy/regulation.	This is not applicable for this PoA.

The additionality of the programme has been presented in section A.4.3 of the PoA-DD /PoA-DD6/. The claim of the CME made in the PoA-DD has been assessed through document review^{/DR/}, on-site observation^{/SV/} and subsequent interviews^{/I/}.

As the PoA applies the small scale methodology AMS III.H., therefore the additionality has been demonstrated using the guidance given in ‘Attachment A to Appendix B’ of the “Simplified modalities and procedures for small-scale CDM project activities”, which is in line with requirements of § 9 of annex 3 of EB 65^{/EB65A38/}.

The additionality arguments in the PoA-DD have been validated as follows:

A typical SSC-CPA to be included in this PoA will consist of the installation of biogas recovery system comprising bio-digester(s) or covered lagoon(s) for recovery of biogas from anaerobic digestion of POME and flaring the recovered biogas and/or utilising it for electrical energy generation. Where the projects generate electrical energy, the generation could be either exported to national/regional grid or exported to mini-grid or displace electricity imported by the candidate project from national/regional grid. Accordingly, the SSC-CPA under this PoA will use a combination AMS III-H and AMS I.A., AMS I.C., AMS I.D. and AMS I.F. methodologies.

CME has identified a common approach for demonstration of investment barrier. In response to the finding under CAR PoA-A8 and PoA-E4, PP has excluded the following barriers for additionality demonstration:

- Technological Barrier
- Barrier due to Prevailing Practice
- Other Barriers

Thus, the additionality of all SSC-CPAs under this PoA will be demonstrated based on “Simplified modalities and procedures for small scale CDM project activities” (Annex 27, EB 68) read with “Non-binding best practice examples to demonstrate additionality for SSC project activities” (Annex 34, EB 35), “Guidelines on the Assessment of Investment Analysis” (Annex 5, EB 62)

6.5.1 Prior Consideration of CDM



All CPAs to be included in the PoA will have a start date after 2012/03/20, that is, the date on which the validation of PoA commenced^{/GSP/}. Since the start date of the project will be after 2012/03/20, all the CPAs to be included in the PoA will be *new project activities* as per Annex 13, EB 62. As per clarifications offered by EB Vide § 3 of Annex 26, EB 60, since no CPAs will commence prior to the start date of validation of PoA, provisions of Annex 13, EB 62 do not apply to CPAs. In order to make the CPA transparent, the CPAs to be included in the PoA will clearly state the start date of the projects in conformity with Glossary or CDM terms (Ver 06) and furnish credible documentary evidence in support of the same.

6.5.2 Application of methodology / methodological tools

As per requirement, the SSC-CPA under this PoA will use a combination of AMS III.H., AMS I.A., AMS I.C., AMS I.D and AMS I.F. methodologies which is in line with paragraph 57 of EB 56 where it is noted that combination of methodologies (Type III methodologies where activity lead to generation of methane in the present case, i.e., AMS III.H) can be used with any type I meth that utilises methane for generating renewable energy. This is acceptable to the validation team. However, CAR PoA-A6 (iii), CAR PoA-E1, CAR PoA-E2 and CAR PoA-E5 were raised and closed successfully during the course of validation.

Additionality of all SSC-CPAs under this PoA will be demonstrated based on “Simplified modalities and procedures for small scale CDM project activities” (Annex 27, EB 68) read with “Non-binding best practice examples to demonstrate additionality for SSC project activities” (Annex 34, EB 35), “Guidelines on the Assessment of Investment Analysis” (Annex 5, EB 62).

6.5.3 Appropriateness of Alternatives

All the CPAs to be included in this PoA will have only two alternatives, viz.

- (a) The proposed project activity undertaken without being registered as a CDM project activity.
- (b) Continuation of the current situation (no project activity or other alternatives undertaken).

In Malaysia, palm oil mills discharge treated POME either in the river or as land application as approved by Department of Environment under the Environmental Quality Regulations^{/ENV-Q/}(1977) Palm Oil Effluent Discharge Standard. While the discharge limit may vary from state to state, the regulations do not specify the treatment technologies to be used. There is also no regulation on the GHG emissions from wastewater treatment operation for the palm oil mill^{/EIA1,2/}. Each Palm Oil Mill is regulated according to its operating permit. Therefore, both the alternatives are credible and are in conformity with local regulations. Moreover, since approved Methodologies AMS-III.H., AMS-I.A., AMS I.C., AMS I.D. and AMS I-F prescribe the base line, as per paragraph 105 of VVM (01.2), no discussion on alternatives is necessary. In the above background, validation team confirms that the PoA is in conformity with §106 of VVM (01.2).



6.5.4 Appropriateness of Investment analysis

The project activities getting registered under the PoA would be either new or existing palm oil projects setting up biogas recovery plant and flaring the recovered biogas or utilizing it for electrical energy generation. In cases where the recovered biogas is flared, the operation of project activity will not result in any additional income and such projects will demonstrate additionality through simple cost analysis. However, in cases where the recovered biogas is used for electrical energy generation, the operation will result in saving (cost of fossil fuel purchased or energy cost paid to national/regional grid for power imported) or income (income earned from the sale of power to grid) over and above CER income, and hence in such cases simple cost analysis cannot be used. Since the palm oil projects have an option to use the open lagoons treatment system without recovery of biogas, or install bio-digester(s) or covered lagoon(s) for recovery of biogas and utilizing the recovered biogas for electrical energy generation, investment comparison analysis is not appropriate and hence benchmark analysis will be used. Validation team is, therefore, convinced that the use of simple cost analysis (in cases where the recovered biogas is flared) and benchmark analysis (where the recovered biogas is used for electrical energy generation) are appropriate and the selected investment analyses, therefore, conform to Guidance 19 of Annex 5, EB 62 and Paragraph 108 of VVM (Ver. 01.2).

6.5.5 Appropriateness of Financial Indicator

In cases where the recovered biogas is flared, the CPAs will use simple cost analysis, as there is no income other than CER income. However in cases where the recovered biogas is used for generation of electrical energy, since the operation will result in savings / income, other than CER income, CPAs will use Internal Rate of Return (IRR) as financial parameter for additionality demonstration. While Equity IRR will be used where the project is funded entirely by equity, project IRR will be used where the project is funded by a debt and equity mix. IRR is one of the financial indicators used by banks and investors alike all over the world to ascertain the investment worthiness of the project. Moreover, Annex 34, EB 35 and Annex 5, EB 62 also permit the use of equity and project IRR as one of the financial indicators for additionality demonstration. Therefore, validation team considers the project/equity IRR as most suitable financial indicators for the project type and decision making context and is in conformity with paragraph 109 (a) and (c) of VVM (01.2).

6.5.6 Benchmark

CPAs included in the PoA will select the benchmark depending on the financing pattern of the projects and the financial indicator used for additionality demonstration. In general, CPAs will use local commercial lending rates, weighted average costs of capital (WACC) or internal company benchmark as benchmark for project IRR and required/expected returns on equity including the default rate of return on equity prescribed in the Appendix to Annex 5, EB 62 converted to nominal terms based on the methodology prescribed in the said Appendix, as benchmarks for Equity IRR. The selection of benchmarks is appropriate for the financial indicator selected and therefore conforms to paragraph 12 of Annex 5, EB 62. Since the biogas recovery projects cannot be set up by any other project developer than the CPA, use of internal benchmark is also in conformity with guidance 14 of Annex 5, EB 62. All the parameters used for the benchmark determination will be standard in the market and sourced



from independently verifiable public sources. The benchmark selection therefore conforms to Annex 5, EB 62 read with paragraph 112 of VVM (01.2).

6.5.7 Validation of input parameters

As stated earlier, project activity under this PoA will consist of the installation of waste water treatment and biogas recovery system comprising bio-digester(s) or covered lagoon(s) for recovery of biogas from anaerobic digestion of POME and flaring the recovered biogas and/or utilising it for electrical energy generation. Therefore, the projects (CPAs) eligible under PoA can be broadly divided into three categories, viz.

- a) Projects recovering biogas and flaring it
- b) Projects recovering biogas and utilizing it for electrical energy generation, which could be either exported to national/regional grid or exported to mini-grid and
- c) displace electricity imported by the candidate project from national/regional grid
- d) displace biomass/fossil fuel used for steam generation

PoA has, therefore, standardised the input parameters and the documentary evidence to be submitted in support of each of the input parameters. Depending on the projects, a few parameters will not be applicable. For example in case the CPA involves only flaring then the cost of gas generator and power tariff will not be applicable and in case the CPA proposes to consume the power in-house, then the RE tariff will not apply. The acceptable source for input parameters has been determined in the PoA-DD and leaves no scope for the projects to use alternative sources. Besides, while validating each project seeking registration under the PoA, the DOE will cross check the input parameters with available evidence, third-party or publicly available sources and with other parameters located in the same area and set up around the same time. In case the input parameters is sourced from FSR, the validation team would cross check the information contained in the PDD vis-a-vis the FSR and based on its local and sectoral expertise, ensure the input parameters are valid and applicable at the time of investment decision^{/MD/}. PoA incorporates an IRR calculation template. The template also clearly states the input parameters (requiring manual entry) used and what are calculations (which the system automatically does once the input parameters are entered). All the cells are linked appropriately and with very little manual intervention, the template will yield the financial indicator. The validation team will check the calculations and ensure the CPA conforms to guidance given vide paragraph 88 and 113 of VVM (01.2).

6.5.8 Accounting principles and Arithmetical Accuracy

The worksheet template is fully linked and requires very little manual intervention. Since cells are linked, the template ensures arithmetical accuracy of calculations also. In the above background, the validation team concludes that the accounting principles have been taken care of and the template assures arithmetical accuracy. Therefore, the PoA project activities would conform to the requirements of paragraph 111 of VVM (Ver. 01.2).

6.5.9 Sensitivity analysis



PoA project activities would be tested for the robustness of the conclusion, viz., that the project activity is not economically or financially attractive by subjecting critical parameters to reasonable variations. Accordingly, the following parameters will be subjected to sensitivity analysis:

- a) Project cost
- b) O&M cost
- c) Project revenue
- d) Biomass/fossil fuel cost
- e) Power tariff

All the costs reckoned above will constitute 20% of the project cost/total revenue. Depending on the projects, tariff, biomass/fossil fuel cost, manpower cost or a few other costs will also be subjected to sensitivity analysis. Besides, where the power is exported to grid and the FiT tariff is not taken into consideration, a sensitivity analysis will be conducted to ascertain the continued additionality of the project, if FiT tariff were to be applied. All the parameters will be subjected to a 10% variation on either side in conformity with guidance 21 of Annex 5, EB 62. Template contains facility to check the sensitivity analysis results. The validation team is, therefore, convinced that the sensitivity analysis conforms to Guidance 20 and 21 of Annex 5, EB 62 and paragraph 111 of VVM (01.2).

6.5.10 Conclusion

The performance of the template (PoA-DD, worksheet, gCPA-DD) has been checked for the real case CPA submitted along with the PoA-DD. The financial spreadsheet calculation of the real case CPA has also been presented, which confirms that IRR of project activity is less than the benchmark. In the above background, validation team is convinced that the proposed methodology for evaluating the additionality of the PoA project activities is appropriate and valid.

6.5.11 Other Barriers

CME has decided to demonstrate the additionality of the project only through investment barrier in order to make the assessment of additionality as objective as possible. Hence, demonstration of additionality based on technological barrier, barrier due to prevailing practice and other barriers does not arise for CPAs to be included in the PoA.

6.6 Monitoring Methodology

The validation team confirms that a valid monitoring methodology “Methane Recovery in wastewater treatment” i.e. AMS III.H version 16 is used along with other referred type I methodologies for the proposed programme of activity.

6.7 Monitoring Plan

The validation team confirms that the monitoring plan complies with the requirements of the applied methodology.



Steps taken to assess whether the monitoring arrangements described in the monitoring plan are feasible within the project design are described below.

Determination of the baseline project parameters are explained in PoA-DD and found acceptable and in accordance to methodology AMS III H version 16.

For the first real case CPA, for parameters monitored ex-post, their monitoring methods, frequencies and measurement equipment are acceptable and in line with applied methodology i.e. AMS III.H. version 16 along with used type I methodologies.

The validation team conclude that selected parameters, monitoring methods, frequencies and the measurement equipment were in line with the methodology. Leakage is not considered in the CPAs to be included, where there is no equipment is transferred from other activities.

Aby Carbon Sdn. Bhd. Being a co-ordinating and managing entity will manage the monitoring done by each CPA to make sure every CPA meets the requirement for data collection, storage, protection, processing and reporting. Each CPA will be verified individually based on the unique identification number as a reference to ensure single counting of the PoA. The CPA reference number will be linked with geographical coordinates marked by GPS coordinate based on each specific fixed site location.

An Operational and Management Agreement Procedure^{/O&M/} will be established by the CME for monitoring and recording of data and operation and maintenance of the equipments. All relevant monitoring equipment will be calibrated at pre-determined frequency to ensure valid monitoring results. CDM operation and management Agreement (Draft) was checked and found to be appropriate by the validation team. Manual will be prepared before the start of the first crediting period to ensure that CERs are calculated in a transparent manner and monitoring is carried to ensure the accrued emission reductions in transparent and reliable manner.

The DOE, after the closure of all findings confirms that all monitoring arrangements are feasible. For a detailed assessment please refer to the validation protocol under Annex-A1 of the report.

However during the course of validation CAR PoA-A7 and PoA-E6 were raised and closed successfully.

Based on onsite observation, interview with representatives of CME and CPA implementer and above, the validation team hereby confirms that the project participants (CME and CPA implementers) are able to implement the monitoring plan adequately

6.8 Project Management Planning

The validation team during the document review found that the PoA-DD was not transparently provided the operational and management structure in a transparent way along with procedure and hierarchy for flow of information in the organisation. In this context a CAR PoA-A7 and a clarification PoA-E6 is raised and successfully closed.



CME is the responsible entity for implementation and developing a management and operational system for CPA under the proposed PoA. As per the plan, monitoring will be carried out by the site operators or third party, at each individual site and CME will ensure consistency in monitoring, processing and reporting of data required for the calculation of emission reductions achieved by each CPA.

CME will prepare a monitoring report after data checking of the monitored data by CPA implementer. Details of the CPA monitoring plans will be described in each CPA-DD respectively. However, CPA implementers will be responsible for implementing appropriate operation and maintenance procedures to ensure the monitoring equipment meet the CDM requirements and to submit a periodic report on the monitored parameters to CME. Clear roles and responsibilities of the key persons involved in the CPA will be defined in each SSC-CPA-DD.

6.9 Crediting Period

The choice of crediting period for the CPA to be included is provided in unambiguous manner in the first real case CPA-DD. The provision for the same found included in the PoA DD and generic CPA-DD. Starting date of first crediting period taken in the first real case CPA-DD as 01-01-2013 or the date of inclusion of the CPA in to this proposed PoA. The same is found to be appropriate by the validation team.

6.10 Environmental Impacts

The PoA-DD clearly mentions that the environmental analysis will be undertaken at the CPA level. However, during the course of validation, the DOE raised CAR under finding PoA-C1 and clarification PoA-C2 that were successfully closed.

Environmental Impact Analysis is not required for the proposed type of project in the host country of Malaysia^{/EIA1,2/}.

6.11 Comments by Local Stakeholders

The DOE during document review of the webhosted PoA-DD found that the local stakeholder consultation would be undertaken at the CPA level and approach for the same is found to be appropriate.

For the CPA level local stakeholders consultation, validation team based on interview taken at the time of site visit and reviewing the related documents submitted by the PP^{/LSC/} confirms that it has been done before the GSC commenting period. The relevant local stakeholders have been invited through posters and invitation letters. The summary of this stakeholder meeting is provided to the validation team. The validation team has reviewed the documentation in order to validate the inclusion of relevant stakeholders

The summary of comments presented in the PoA-DD has been verified with the documentation of the stakeholder consultation and has been found to be complete. Comments



presented by the local stakeholders have been taken into account by the CME and has been verified with information obtained from stakeholder interview during the site visit. Hence, the local stakeholder consultation has been performed adequately at the CPA level according to the CDM and PoA specific requirements.



7 VALIDATION OPINION

Carbon Check (Pty) Ltd. has performed validation of the small-scale programme of activity (PoA) "Regional Biogas PoA" and the PoA specific CDM-SSC-CPA-DD with generic information relevant to all CDM programme activities (CPAs) to be included in this PoA. The validation was performed on the basis of UNFCCC criteria for programme of activities under the Clean Development Mechanism (CDM) and host Party criteria, as well as criteria given to provide for consistent programme operations, monitoring and reporting. The review of the programme design documentation, follow-up interviews with CME and local stakeholders and assessment of required evidences have provided Carbon Check (Pty) Ltd. with sufficient evidence to determine the fulfilment of stated criteria. The host Party is Malaysia and France has been identified as Annex 1 party of this PoA. The host Party Malaysia fulfils the participation criteria and has approved the programme and authorized the project participant on 2012-08-03. The DNA from Malaysia confirmed that the programme assists in achieving sustainable development. The programme correctly applies approved methodologies Methane recovery in wastewater treatment AMS III.H. version 16, Grid connected renewable electricity generation AMS I.D. version 17 and Renewable electricity generation for captive use and mini-grid AMS I.F. version 02. The programme envisages installation of biogas recovery system (covered anaerobic lagoon) in the POME (waste water) treatment. Recovered biogas shall be used to generate renewable energy and exporting the power to grid and/or replacing import from the grid. It is demonstrated that the programme is not a likely baseline scenario. Emission reductions attributable to the programme are hence additional to any that would occur in the absence of the programme of activity. The emission reduction forecast has been checked and it is deemed likely that the stated amount is achieved given that the underlying assumptions do not change. Adequate training and monitoring procedures have been described. In summary, it is Carbon Check (Pty) Ltd.'s opinion that the PoA "Regional Biogas PoA", as described in the CDM-SSC-PoA-DD of 2012-11-05, meets all relevant UNFCCC requirements for a PoA under the CDM and all relevant host Party criteria and correctly applies the baseline and monitoring methodology "Methane recovery in wastewater treatment AMS III.H." version 16, along with type I methodologies i.e. AMS I.A. version 14, AMS I.C. version 19 AMS I.D. version 17 and AMS I.F. version 02. Carbon Check (Pty) Ltd. thus requests the registration of the PoA "Regional Biogas PoA" as a PoA under the CDM.

Delhi, 2012-11-06

Prakash Kumar Mishra
Carbon Check (Pty) Ltd.
Validation Team Leader

Johannesburg, 2012-11-06

Adam Simcock
Carbon Check (Pty) Ltd.
Final Approval



8 REFERENCES

Table 8-1: Documents provided by the project participant

Reference	Document
/AGR/	Agreement to subscribe for CPA1 (Felda Triang) between Ably Carbon Sdn. Bhd. and Felda Palm Industries Sdn. Bhd. dated 2012-06-05.
/BL1/	Study on Grid Connected Electricity Baselines in Malaysia 2009 dated January 2011
/CPA-DD1/	Webhosted real case CPA titled Regional Biogas PoA – CPA 1 (Felda Triang) dated 2012-03-12 version 01
/CPA-DD2/	Webhosted real case CPA titled Regional Biogas PoA – CPA 1 (Felda Triang) dated 2012-06-20 version 02
/CPA-DD3/	Webhosted real case CPA titled Regional Biogas PoA – CPA 1 (Felda Triang) dated 2012-08-01 version 03
/CPA-DD4/	Webhosted real case CPA titled Regional Biogas PoA – CPA 1 (Felda Triang) dated 2012-09-02 version 04
/CPA-DD5/	Revised real case CPA-DD titled Regional Biogas PoA – CPA 1 (Felda Triang) dated 2012-09-17 version 05
/CON/	Signed contract between Carbon Check (Pty) Ltd. and Ably Carbon Sdn. Bhd. vide ref. no. CCL0139/RPP/10022012 dated 2012-02-21
/gCPA-DD1/	Webhosted generic CPA-DD
/gCPA-DD2/	Revised generic CPA-DD



Reference	Document
/DECL/	<ol style="list-style-type: none"> 1. Declaration from Ably Carbon Sdn. Bhd. for the Statement of eligibility for CPA1 (Felda Triang) dated 2012-08-08 2. Declaration from Ably Carbon Sdn. Bhd. for the Statement of voluntary action for Regional Biogas PoA dated 2012-06-29
/EIA/	<ol style="list-style-type: none"> 1. Appendix_2 of EIA prescribed activities based on Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) Order 1987 2. EIA exemption letter issued by Department of Environment Malaysia dated
/ENV-Q/	Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977 for Palm Oil related activities in Malaysia.
/FiT/	<ol style="list-style-type: none"> 1. SEDA presentation on FiT in Malaysia 2. Presentation on Fit in Malaysia (for existing RE tariff price 0.21c/kWh) dated 2010-05-20 3. FAQs on FiT in Malaysia by Ministry of Energy, Green Technology and Water
/MoA/	Memorandum of Association of CME (incorporation certificate) as per The Companies Act, 1965 in Malaysia, dated 2012-04-18.
/LIT 1/	Study on CDM Potential in the Waste Sectors in Malaysia dated December 2004
/LIT 2/	Journal for Oil palm biomass for the calorific value of PKS published in year 2008
/LIT3/	Report on Renewable Energy Palm oil wastes in Malaysia published in August 2007
/LIT4/	Journal of A Technical and Economic Analysis of Heat and Power Generation from Bio-methanation of Palm Oil Mill Effluent. Electricity Supply Industry in Transition: Issues and Prospect for Asia dated 2004-01-14
/LIT5/	Presentation on CDM in Malaysia by Greentech Malaysia dated 2010-05-12
/LIT6/	Malaysia Standards Annual Report year 2011



Reference	Document
/LoA1/	Host Country Approval from Malaysia DNA i.e. Ministry of natural Resource and Environment; Ref no. NRE(S) 602-2/11 Jld.16 (19) dated 2012-08-03
/LoA2/	Annex 1 LoA Approval from France with Ref no. 12-0551 5E JBBter dated 2012-09-19
/MoC/	Modalities of Communication dated 2012/09/17
/MoM/	Minutes Meeting of Biomass & Special Project Department of Felda Palm Industries Sdn. Bhd. on the biogas recovery project in Triang Palm Oil Mill dated 2011-04-21
/MANUAL/	Operational and management arrangements CME - Regional Biogas PoA
/ODA/	<ol style="list-style-type: none"> 1. Letter of No ODA from Felda Palm Industries Sdn. Bhd. dated 2012-03-02 2. Letter of No ODA from Annex -1 party i.e. Ably Carbon SAS dated 2012-06-05
/PoA-DD1/	Webhosted PoA-DD, titled "Regional Biogas PoA" Version 01 dated 2012-02-14
/PoA-DD2/	PoA-DD, titled "Regional Biogas PoA" Version 2.0 dated 2012-06-20
/PoA-DD3/	PoA-DD, titled "Regional Biogas PoA" Version 3.0 dated 2012-08-01
/PoA-DD4/	PoA-DD, titled "Regional Biogas PoA" Version 4.0 dated 2012-09-02
/PoA-DD5/	PoA-DD, titled "Regional Biogas PoA" Version 5.0 dated 2012-09-17
/PoA-DD6/	PoA-DD, titled "Regional Biogas PoA" Version 6.0 dated 2012-11-05
/PRICE-CER/	Historical records of CERs spot price by BlueNext from 2011-06-06 till 2011-06-13
/TARIFF/	RE Tariff Regulation year 2007 dated 2008-11-17
/XLS1/	CER_IRR_ calculation spread sheet along with CPA-DD1



Reference	Document
/XLS2/	CER_IRR_ calculation spread sheet along with CPA-DD2
/XLS3/	CER_IRR_ calculation spread sheet along with CPA-DD3
/XLS4/	CER_IRR_ calculation spread sheet along with CPA-DD4
/XLS5/	CER_IRR_ calculation spread sheet along with CPA-DD5

Table 8-2: Background investigation and assessment documents

Reference	Document
/AMSIII.H/	Methane recovery in wastewater treatment, version 16 (EB 58 annex 22).
/AMS I.A/	Electricity generation by the user, version 14 (EB 54 annex 8).
/AMS I.C/	Thermal energy production with or without electricity, version 19 (EB61 annex 16).
/AMS I.D/	Grid connected renewable electricity generation, version 17 (EB 61 annex 17)
/AMS I.F/	Renewable electricity generation for captive use and mini-grid, version 02 (EB 61 annex 18).
/CPAT/	CPA DD Templates (F-CDM-CPA-DD) and (F-CDM-SSC-CPA-DD)
/CPA-DD-F/	SSC CDM-CPA-DD Design Document form (version 01, EB 33 Annex 44)
/EB55A38/	Procedures for registration of a PoA as a single CDM project activity and issuance of CERs for a PoA, version 04.1
/EB65A3/	Standard for demonstration of additionality, development of eligibility criteria and application of multiple methodologies for Programme of Activities, EB 65 annex 3
/EB65A2/	Standard for sampling and surveys for CDM project activities and programme of activities, EB 65 annex 2.



Reference	Document
/GFD/	UNFCCC: Guidelines on Assessment of Debundling for SSC Project Activities (ver. 3.0; EB54 Annex 13)
/GT/	Glossary of CDM Terms version 06.0
/IPCC-GP/	IPCC Good Practice Guidance & Uncertainty Management in National Greenhouse Gas Inventories, 2000
/IPPC-RM/	Revised 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Reference Manual
/KP/	Kyoto Protocol (1997)
/MA/	Decision 3/CMP. 1 (Marrakesh – Accords & Annex to decision (17/CP.7))
/PoA-DD-F/	Small Scale CDM Programme of Activities Design Document form (version 01, EB 33 Annex 43)
/VVM/	Validation and Verification Manual (Version 1.2; EB 55 Annex 1)

**Table 8-3:** Websites used

Reference	Link	Organisation
/cd4cdm/	www.cd4cdm.org	UNEP Riso Centre
/dna-M/	http://www.nre.gov.my/english/Pages/Home.aspx	Ministry of Natural Resources and Environment (DNA of Malaysia)
/dna-F/	http://www.developpement-durable.gouv.fr/	Ministry of Ecology, Sustainable Development, and Energy (DNA of France)
/ipcc/	www.ipcc-nggip.iges.or.jp	IPCC publications
/unfccc/	http://cdm.unfccc.int	UNFCCC

Table 8-4: List of interviewed persons

Reference	MoI ¹	Name	Organisation / Function
/IM01/	V	Abdul. Karim Bin	Felda Palm Industrial Sdn Bhd, Manager
/IM01/	V	Mohd. Amir Bin Abdul Rahaman	Felda Palm Industrial Sdn Bhd, Assistant Manager
/IM01/	V	Mohd. Jawahari B. Mohamad	Felda Palm Industrial Sdn Bhd, Lab Assistant
/IM01/	V	Sim Kean Hong	Aby Carbon Sdn Bhd, Country manager
/IM03/	V	Hasunala A Mohamad	Felda Palm Industrial Sdn Bhd, Local Stake holder
/IM03/	V	Abdul Ghani B Yusof	Felda Palm Industrial Sdn Bhd, Local Stake holder
/IM03/	V	Kasim B. Noor	Felda Palm Industrial Sdn. Bhd., Local Stake holder
/IM03/	V	Tuan Pauzi B Tuan Harun	Felda Palm Industrial Sdn. Bhd., Local Stake holder

¹⁾ Means of Interview: (Telephone, E-Mail, Visit), IM01-CME/PP, IM02-Consultant, IM03-Stakeholders



ANNEX

A1: Validation Protocol

A2: Statement of Competence

9 ANNEX 1: VALIDATION PROTOCOL

Table A-1: Requirements Checklist

Checklist Item	Ref	MoV	Comments by validation team	Draft conclusion	Final conclusion
A. General Description of the Programme of Activities					
<i>The project design is assessed</i>					
A.1. Title of the PoA					
<p>A.1.1. Does section A.1 of the PoA-DD include a clearly identifiable project title, version number and date of the PoA-DD?</p> <p><i>Is PoA DD fulfilling all the requirements of F-CDM-SSC-PoA-DD and Guidelines for completing the programme design document form for small-scale CDM programmes of activities</i></p>	/PoA-DD1/, /PoA-DD-F/ /unfccc/	DR	Yes, during the document review, the PoA-DD and PoA-DD template have been compared and also verified from UNFCCC website and confirmed that the project title, current version number and the date of the PoA-DD has been provided correctly in section A.1 of the PoA-DD.	OK	OK
A.2. Description of the Programme of Activities					
<p>A.2.1. Has PoA DD in section A.2 contains a sufficient description of general operating and implementing framework of the proposed PoA?</p> <p><i>(Ref: § 6 of EB 55 Annex 38)</i></p>	/PoA-DD1/, /PoA-DD-F/	DR	<p>Description of project (PoA) and the general operating and implementing framework has been provided in the section A.2 of the PoA-DD. However, CL PoA-A1 is raised in section A.4 of the PoA DD in this context.</p> <p>Please refer section 5 (PoA-A1) of this report above.</p>	CL PoA-A1	OK
A.2.2. Has PoA DD in section A.2 contains the description of the	/PoA-DD1/	DR, SV, I	CME has provided the description of the policy/measure or stated goal. The goal/objective	CL PoA-A1	OK

policy/measure or stated goal that the PoA seeks to promote in a transparent manner with sufficient reference of the policy/measure/stated goal if any? <i>(Ref: §6 (c) of EB 55 Annex 38)</i>	/PoA-DD-F/		of the PoA is to reduce GHGs emission by recover the biogas from the wastewater treatment system of Palm Oil Mill and bring sustainable development in Malaysia. However, in this regard clarification under finding PoA-A1 is raised.		
A.2.3. Is the PoA-DD in accordance with the applicable requirements for completing PoA DDs? <i>Is PoA DD fulfilling all the requirements of F-CDM-SSC-PoA-DD and Guidelines for completing the programme design document form for small-scale CDM programmes of activities</i>	/PoA-DD1/ /PoA-DD-F/	DR	Yes, PoA-DD provided is in accordance with the requirement of CDM-SSC-PoA-DD Form. However. Number of CAR s and CLs were raised in this regard. Please refer section 5 of this report.	OK	OK
A.2.4. Has the confirmation is clearly provided that the proposed PoA is a voluntary action by the CME? <i>Please compare Aneex 38 of EB 55 § 6 d</i>	/PoA-DD1/	DR	No, the CME has not been clearly confirmed with valid evidence that the proposed PoA is a voluntary action and in this context a CAR PoA-A2 is raised.	CAR PoA-A2	OK
A.2.5. Has the host Party confirmed that the programme assists it in achieving sustainable development?	/PoA-DD1/ /LoA/	DR	Section A.2 of the PoA DD describes that how the PoA encourage assisting in achieving sustainable development. However, CAR PoA-A3 is raised, as LoA from DNA (parties) involved was not submitted for validation. Please refer section 5 of this report.	CAR PoA-A3	OK
A.2.6. Will the programme create other environmental or social benefits than GHG emission	/PoA-DD1/ /LoA/	DR	The PoA will lead to technological, economic and environmental benefits in addition to GHG emission reductions. In this regard CME has	CAR PoA-A3	OK

reductions?			provided information in section A.2 of the webhosted PoA-DD. However, CAR PoA-A3 was raised in this regard. Please refer section 5 of this report.		
A.3. Participation Requirements <i>Referring to Part A, Annex 1 and 2 of the PoA-DD as well as the CDM glossary with respect to the terms Party, Letter of Approval, Authorization and Project Participant.</i>					
A.3.1. Which Parties and programme participants are participating in the programme?	/PoA-DD1/	DR	Malaysia is the host country of this PoA and France is the Annex 1 party involved under this programme. The same was provided in the PoA DD, however, please refer CL PoA-A4, raised in this regard under section 5 of this report.	CL PoA-A4	OK
A.3.2. Has the project provided written approvals of all parties involved? (EB 55 Annex 1, § 44) <i>Indicate whether a letter of approval has been received, with a clear reference to the supporting documentation.</i> <i>Indicate whether this letter was provided to the DOE by the project participants or directly by the DNA</i>	/PoA-DD1/ /LoA/	DR	Letter of Approvals (LoAs) from the parties involved are provided to DOE for Validation by the CME. A CAR PoA-A3 is raised in this context. Please refer section 5 of this report.	CAR PoA-A3	OK
A.3.3. Are the approvals issued from organisations listed as DNAs on the UNFCCC CDM website? <i>(EB 55 Annex 1, §§ 44, 47, 48, 49 (b), 49 (c), 53)</i> <i>Indicate the means of validation employed to assess the authenticity, i.e. in case of doubt whether LoA has been verified with the DNA. Further describe which entity submitted the LoA for validation.</i>	/PoA-DD1/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK

A.3.4. Do the written approvals confirm that the corresponding party is a Party to the Kyoto Protocol? <i>(EB 55 Annex 1, § 45(a))</i>	/PoA-DD1/ /LoA/	DR	The approvals are not submitted to validation team. Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.5. Do the written approvals confirm that the participation is voluntary? <i>(EB 55 Annex 1, § 45(b))</i>	/PoA-DD1/ /DECL/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.6. Does the written approval from the host country confirm that the project contributes to the sustainable development in the country? <i>(EB 55 Annex 1, § 45(c))</i>	/PoA-DD1/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.7. Do the written approvals refer to the precise project title in the PDD submitted for registration or an additional specification of the project activity, e.g. PDD version number? <i>(EB 55 Annex 1, §§ 45(d), 50)</i>	/PoA-DD1/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.8. Are the written approvals unconditional with regard to A.3.2 to A.3.7? <i>(EB 55 Annex 1, § 46)</i>	/PoA-DD1/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.9. Is the information regarding the project participants listed	/PoA-DD1/	DR	Name of the project participant, listed in section A.3 and annex 1 of the webhosted PoA-DD are	CL PoA-A4	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

in section A.3 and in Annex 1 of the PoA-DD internally consistent to each other? <i>(EB 55 Annex 1, § 51)</i>			not found consistent. Please refer CL PoA-A4 raised under section 5 of this report.		
A.3.10. Are all project participants listed in the PoA-DD approved at least by one Party involved? <i>(EB 55 Annex 1, § 51)</i> <i>Indicate whether the participation of the project participant(s) has been approved by a Party to the Kyoto Protocol.</i> <i>Describe the means of validation employed to draw this conclusion.</i>	/PoA-DD1/ /LoA/	DR	Please refer section A.3.2 of the checklist item above.	CAR PoA-A3	OK
A.3.11. Are any other project participants approved but not listed in the PoA-DD? <i>(EB 55 Annex 1, § 52)</i>	/PoA-DD1/	DR	Please refer section A.3.2 of the Annex 1.	CAR PoA-A3	OK
A.3.12. Does the DoE have a direct contractual relationship with the PP? <i>(EB 55 Annex 1, § 51; EB 50 Annex 48, §§ 7-9)</i> <i>Check whether the PPs listed in the published PDD are still listed in the PDD going to be submitted to request for registration.</i>	/PoA-DD1/ /CON/	DR	Ably Carbon Sdn. Bhd. signed a direct contract with Carbon Check (Pty) Ltd. on 2012-02-21; hence requirements of EB 50 annex 48 §§ 7-9 are being fulfilled.	OK	OK
A.3.13. Do all project participants and parties involved are listed in tabular form. <i>Indicate whether project participants and parties which are involved in the proposed project activity are listed as per PDD filling guideline.</i>	/PoA-DD1/	DR	All involved parties and project participants are not found listed in the tabular form in section A.3 of the webhosted PoA-DD. Please refer section A.3.1	CL-PoA- A4	OK
A.3.14. In case of doubt regarding the	/PoA-DD1/	DR	Please refer section A.3.2 of the checklist item	CAR	OK

authenticity of the letter of approval, describe how it was verified that the letter of approval is authentic			above.	PoA-A3	
A.4. Technical description of the PoA					
<i>Programme Boundaries are the limits and borders defining the GHG emission reduction project.</i>					
A.4.1. Location of the PoA					
A.4.1.1. Have all host countries been correctly listed?	/PoA-DD1/	DR	All host countries viz. Malaysia, Papua New Guinea and Solomon Island are listed in section A.4.1.1 of the webhosted PoA-DD. However, the names of host countries are not clearly provided under section A.2 of the PoA-DD, and for this a CL PoA-A1 point (iii) is raised under section 5 of this report.	CL PoA-A1	OK
A.4.1.2. Does the CDM-PoA-DD include boundary for the PoA in terms of a geographical area (e.g., municipality, region within a country, country or several countries) within which all CPAs included in the PoA will be implemented?	/PoA-DD1/	DR I	PoA-DD has included the geographical boundary of Malaysia, Papua New Guinea and Solomon Island within which all future CPAs shall be implemented. However, Please refer A.4.1.1 above.	CL PoA-A1	OK
A.4.1.3. Are the programme's system boundaries as per applied methodology (components and facilities used to mitigate GHGs) clearly defined?	/PoA-DD1/ /AMSIII.H/	DR	Programme system boundary is clearly provided in the PoA DD and accordance with applied methodology. Moreover please refer CAR PoA-E2 in section 5 of this report.	CAR PoA-E2	OK
A.4.1.4. Can each CPA under the PoA be clearly identified	/PoA-DD1/	DR	PoA clearly identify the spatial boundary in which CPA will be included. The same is clearly	OK	OK

individually including spatial boundaries (geographical) clearly defined?			described in the CPA inclusion eligibility criteria.		
A.4.1.5. Do CPAs under the programme qualify as small scale CDM project activities as defined in paragraph 6 (c) of decision 17/CP.7 on the modalities and procedures for the CDM?	/PoA-DD1/ /AMSIH.H/ /M&P/ /ADD1,2,3/	DR SV I	Table A.1, section A.4.2.1 of the webhosted PoA eligibility criteria 'k' for inclusion of CPA clearly mentions that each small-scale CPA shall meet the small-scale threshold limit and remain within this threshold throughout the crediting period of the CPA (less than 60 ktCO ₂ /year) for Type III and 15MW for Type I methodologies. Which is as per the limit of small-scale projects as defined in paragraph 6 (c) of decision 17/CP. 7 ^{/M&P/} . The same was checked during the site visit and interview and also proposal from the technology suppliers regarding design capacity of gas engine i.e. 1.2 MW.	OK	OK
A.4.2. Description of typical CPA					
A.4.2.1. Does the PoA-DD contain a clear, accurate and complete description of the CPAs with regard to the technology / measures to be used? <i>((Ref : §6(f) of EB 55 Annex 38))</i>	/PoA-DD1/ /AMS III.H/	DR	Description of technologies or measures to be employed by a typical CPA under section A.4.2.1 is not adequately/clearly provided. In this regards CAR PoA-A5 is raised in this context. Please refer section 5 of this report.	CAR PoA-A5	OK
A.4.2.2. Does the project use state of the art technology or would the technology result in a significantly better performance than any	/PoA-DD1/	DR	Please refer section A.4.2.1 of above of checklist item.	CAR PoA-A5	OK

commonly used technologies in the host country?					
<p>A.4.2.3.Does the programme establish eligibility criteria for inclusion of a project as a CPA under the proposed PoA?</p> <p><i>(EB 65 Annex 3 § 14 and EB 55 Annex 1 § 167)</i></p>	/PoA-DD1/ /EB65A3/	DR	<p>Webhosted PoA-DD has provided the eligibility criteria for inclusion of CPAs under section A.4.2.2. Moreover, a consolidated CAR PoA-A6 was raised as the same is not clearly described and/or not in line with the eligibility criteria as stipulated by EB 65 annex 3 § 14.</p> <p>Please refer CAR PoA-A6 in section 5 of this report.</p>	CAR PoA-A6	OK
<p>A.4.2.4.Are appropriate criteria for demonstration of additionality of the CPA, and all type and/or extent of information (e.g. criteria, indicators, variables, parameters or measurements) that shall be provided by each CPA in order to ensure its eligibility?</p> <p><i>(EB 65 Annex 3 § 14 and EB 55 Annex 1 § 167)</i></p>	/PoA-DD1/ /EB65A3/	DR	Please refer section A.4.2.3 of checklist item.	CAR PoA- A6	OK
A.4.3. Assessment and demonstration of additionality					
<p>A.4.3.1.Has the PoA demonstrated that in the absence of the CDM one of the following would have occurred:</p> <ul style="list-style-type: none"> the proposed voluntary measure would not be implemented, or the mandatory policy/regulation would be 	/PoA-DD1/	DR	<p>The CME has not addressed the demonstration of additionality on the PoA level in section A.4.3.</p> <p>In this CAR PoA-A8 was raised.</p>	PoA-A7 PoA-A8	OK

<p>systematically not enforced and that non-compliance with those requirements is widespread in the country / region, or</p> <ul style="list-style-type: none"> that the PoA will lead to a greater level of enforcement of the existing mandatory policy /regulation. <p><i>EB 55 Annex 38§6(e)</i></p>					
A.4.4. Operational, management and monitoring plan for the programme					
<p>A.4.4.1. Do the operational and management arrangements established by the coordinating entity include a record keeping system for each CPA under the programme?</p> <p><i>EB 55 Annex 1 § 166</i></p>	/PoA-DD1/ /EB65A3/	DR	<p>The operational and management arrangements established by CME in section A.4.4.1 and E.7.2 of the webhosted PoA-DD are not found adequate and also not in line with the requirement stipulated under §17 of the EB 65 Annex 3. In this context CAR PoA-A8 is raised.</p> <p>Please refer CAR PoA-A9 and CL PoA-E6 raised in section 5 of this report.</p>	CAR PoA-A9 CL PoA-E6	OK
<p>A.4.4.2. Do the operational and management arrangements established by the coordinating entity include a system/procedure to avoid including CPAs that have already been registered either as CDM project activity or as a CPA of another PoA?</p>	/PoA-DD1/ /EB65A3/	DR	<p>The responsibility of operational and management arrangement to avoid double counting is not found clearly defined under section A.4.4.1 of the PoA-DD. Moreover, the system/procedure to avoid double accounting mentioned in section A.4.2.2 under eligibility criteria is not appropriately and transparently provided.</p> <p>Also, the procedure provided to detect that a CPA to be included is not a de-bundled component of is also not appropriate. Regarding</p>	CL PoA-A10	OK



			this please refer to raised CL PoA-A10.		
A.4.4.3. Do the operational and management arrangements established by the coordinating entity include provisions to ensure that CPA implementers are aware and have agreed that their activity is being subscribed to the PoA?	/PoA-DD1/ /EB65A3/	DR SV I	Please refer section A.4.4.1 of Annex 1.	CAR PoA-A9 CL PoA E6	OK
A.4.4.4. Does the monitoring plan include a description of a proposed statistically sound sampling method and procedure to be used by designated operational entities for verification of GHG emission reductions by CPAs under the programme? OR If the programme does not use verification method that applies a statistical method for sampling, has a system been defined to avoid double counting of CERs, and is the system transparent?	/PoA-DD/ /EB65A3/ /AMSIIIH/	DR	Programme use verification method, which applies a statistical method for sampling in accordance with the applied methodology, AMS III.H. version 16. However, please refer section A.4.4.1 of checklist item.	CAR PoA- A9 CL PoA-E 6	OK
A.4.5. Public Funding of the PoA					
A.4.5.1. Is there a confirmation that official development assistance has not been diverted to the implementation of the PoA in	/PoA-DD1/ /ODA/	DR	CME has confirmed that the no public fund is used for the proposed PoA. Moreover, CAR PoA-A6 point (v) is raised to make clear provision to provide the declaration regarding	CAR PoA-A6	OK

case public funding is used? (EB 55 Annex 38, §6(n))			the diversion of ODA from all party involved in the respective CPA at the time of CPA inclusion.		
B. Duration of the Programme of Activities, Crediting Period					
B.1. What is the starting date of the PoA?	/PoA-DD1/ /EB66A63/	DR	Description of the starting date of the PoA provided under section B.1 of the SSC-PoA-DD is not correct and acceptable, as it is not in line with Glossary of CDM Terms, version 06.0. CAR PoA-B1 is raised in this context. Please refer section 5 of this report.	CAR PoA-B1	OK
B.2. What is the length/lifetime of the PoA? Is it reasonable? <i>PoA duration should not exceeding 28 years (60 years for A/R) (EB 55 Annex 38, §6(h))</i>	/PoA-DD1/ /EB55A38/	DR	The length of the PoA, mentioned under section B.2 of the webhosted PoA-DD is as 28 years which is in line with the requirement stipulated in §6 (h) of EB 55 Annex 38.	OK	OK
C. Environmental Analysis					
<i>Documentation on the analysis of the environmental impacts will be assessed, and if deemed significant, an EIA should be provided to the DOE.</i>					
C.1. Has it been clearly indicated on which level i.e. PoA or CPA an environmental Analysis has been carried out or will be carried out? (EB 55 Annex 38 § (I)) <i>Please check whether the indication is in line with the provided documentation.</i>	/PoA-DD1/	DR	Under section C.1 of the webhosted PoA-DD, it is clearly stated that the environmental analysis is done at the PoA-level. However, Choice of conducting EIA at the PoA level is not adequately and appropriately justified, as the proposed PoA will be implemented in three different countries i.e. Malaysia, Papua New Guinea and Solomon Island. Choice of conducting EIA at PoA level needs to be substantiated. Also the appropriate and exact reference for the host country requirement of EIA has to be provided in section C.2 of the PoA-DD. Please refer CAR PoA-C1 raised in section 5 of this report.	CAR PoA-C1	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

C.2. Has documentation on the analysis of environmental impact, including transboundary impacts done?	/PoA-DD1/	DR	<p>The documentation/reference has been provided only for Malaysia and it is mentioned in section C.3 of the webhosted PoA-DD that environmental impact assessment is done at CPA level for other host countries i.e. Papua New Guinea and Solomon Islands, which is not consistent with information provided in section C.1.</p> <p>Moreover, the reference provided as footnote 4 and 5 of the PoA-DD does not allow the reader to understand whether EIA for the proposed project is not required by host country. In this context CL PoA-C2 is raised. Please also refer checklist item C.1 above.</p>	CAR PoA-C1 CL PoA-C2	OK
<p>C.3. Has an environmental analysis of the PoA as per requirements of the CDM modalities and procedures been undertaken and described in the CDM-POA-DD?</p> <p><i>EB 55 Annex 38, §6(l). If this analysis is not undertaken for the PoA but is to be done at the CPA level this shall be described and reflected in the CDM-POA-DD and the CDM-CPA-DD</i></p>	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA-C1 CL PoA-C2	OK
<p>C.4. Are there any Host Party requirements for an Environmental Impact Assessment (EIA)?</p> <p><i>(EB 55 Annex 1, § 136 (d))</i></p>	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA-C1 CL PoA-C2	OK
C.5. Will the programme create any adverse environmental effects?	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA-C1 CL PoA-C2	OK

				C2	
<p>C.6. Are transboundary environmental impacts considered in the analysis?</p> <p><i>(EB 55 Annex 1, §§ 131 – 133)</i></p> <p><i>Check the documents and local official sources / expertise regarding transboundary environmental impacts.</i></p>	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA- C1 CL PoA- C2	OK
<p>C.7. Have identified environmental impacts been addressed in the programme design?</p>	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA- C1 CL PoA- C2	OK
<p>C.8. Does the programme comply with environmental legislation in the host country?</p>	/PoA-DD1/ /EIA/	DR	Please refer section C.1 and C.2 of checklist item above.	CAR PoA- C1 CL PoA- C2	OK
<p>D. Stakeholder Comments</p> <p><i>The validator should ensure that stakeholder comments have been invited with appropriate media and that due account has been taken of any comments received.</i></p>					
<p>D.1. Has it been clearly indicated on which level i.e. PoA or CPA stakeholder comments have been or will be invited?</p>	/PoA-DD1/ /LSC/	DR	Section D.1 of the webhosted PoA-DD indicates that the local stakeholder consultation will take place at CPA level.	OK	OK
<p>D.2. Are local stakeholders invited by the PPs to comment on the proposed CDM project activity prior to the publication of the PoA-DD on the UNFCCC website.</p> <p><i>(EB 55 Annex 1, § 128)</i></p>	/PoA-DD/	DR	NA Please refer checklist item D.1 above.	NA	NA
<p>D.3. Have relevant stakeholders been</p>	/PoA-DD1/	DR	NA	NA	NA

consulted? (EB 55 Annex 1, §129)			Please refer checklist item D.1 above.		
D.4. Have appropriate media been used to invite comments by local stakeholders? (EB 55 Annex 1, §129)	/PoA-DD1/	DR	NA Please refer checklist item D.1 above.	NA	NA
D.5. 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? (EB 55 Annex 1, §§132, 133)	/PoA-DD1/	DR	NA Please refer checklist item D.1 above.	NA	NA
D.6. Is a summary of the stakeholder comments received provided? (EB 55 Annex 1, §129 (b))	/PoA-DD1/	DR	NA Please refer checklist item D.1 above.	NA	NA
D.7. Has due account been taken of any stakeholder comments received? (EB 55 Annex 1, §129 (c))	/PoA-DD1/	DR	NA Please refer checklist item D.1 above.	NA	NA
E. Application of a baseline and monitoring methodology <i>The validation of the programme baseline establishes whether the selected baseline methodology is appropriate and whether the selected baseline represents a likely baseline scenario.</i>					
E.1. Title and reference of the methodology					
E.1.1. Does the programme apply an approved methodology and the correct version thereof?	/PoA-DD1/ /unfccc/ /AMS III.H./	DR	Yes, the proposed PoA applies AMS III.H. version 16, which is an approved CDM methodology and the correct and latest available version available on UNFCCC website.	OK	OK
E.2. Justification of the choice of the methodology					
E.2.1. Is the justification of the	/PoA-DD1/	DR	The justification of choice of applied	CAR PoA	OK

choice of an approved baseline and monitoring methodology for the typical CPA sufficient? (EB 55 Annex 38 §6(f))	/AMSIII.H/		methodology AMS III.H version 16 is not found adequate and appropriate under section E.2 of the webhosted SSC-PoA-DD. In this context CAR PoA-E1 is raised. Please refer CAR PoA-E1 under section 5 of this report.	E1	
E.2.2. Does a typical CPA apply a combination of approved methodologies? If so, has such combination been approved only once in accordance with “Procedures for approval of the application of multiple methodologies to a programme of activities” ? (EB 55 Annex 38 § 6(f))	/PoA-DD1/ /AMSIII.H/ /AMS I.A/ /AMS I.C/ /AMS I.D/	DR	Yes, PoA has a provision that a typical CPA may apply a combination of approved methodologies. The combination has provided in webhosted PoA-DD is AMS-I.A, AMS-I.C, AMS-I.D and AMS I.F. However, the justification of applicability of the above mentioned methodologies is not found clear and appropriate and this regard CAR PoA-E1 is raised. Moreover, Please refer section E.2.1 above.	CAR PoA-E1	OK
E.2.3. Does the typical CPA apply one of the approved small scale categories and any methodology and tool referred therein?	/PoA-DD1/ /AMSIII.H/ /AMS I.A/ /AMS I.C/ /AMS I.D/	DR	Yes, typical CPA has applied the approved small- scale methodology i.e. AMS III.H version 16.0 “Methane recovery in wastewater treatment”. The various small scale tools and methodologies used referred by the applied methodology provided in section E.1 of the webhosted PoA-DD. However, CAR PoA-E1 is raised on the applicability of some of the referred Methodologies. Please refer section E.2.1 above.	CAR PoA-E1	OK
E.2.4. Are the applicability criteria in the baseline methodology all fulfilled?	/PoA-DD1/ /AMSIII.H/	DR	Please refer section E.2.1 above.	CAR PoA-E1	OK
E.3. Description of the sources and gases included in the CPA boundary					

E.3.1. Are the CPA's spatial boundaries (geographical) of the CPAs to be included are clearly defined?	/PoA-DD1/	DR	No, the CPA's spatial boundaries of the CPAs to be included are not clearly provided and in this context a clarification under PoA-A4 point (iii) has raised. Moreover, also refer CAR PoA-A11.	PoA-A4 PoA-A11	OK
E.3.2. Are all sources and GHGs included in the project boundary as required in applied methodology?	/PoA-DD1/ /AMSIII.H/	DR	No, the sources and gases included in the project boundary are not in line with § 15 of AMS III.H version 16. Hence, CAR PoA-E2 is raised in this context.	CAR PoA- E2	OK
E.3.3. In case the methodology allows to choose whether a source and/or gas is to be included, is the choice sufficiently explained and justified?	/PoA-DD1/ /AMSIII.H/	DR	Please refer checklist item E.3.2 above.	CAR PoA- E2	OK
E.4. Baseline Scenario Determination <i>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.</i>					
E.4.1. Does the PoA-DD make provisions to identify possible baseline scenarios to be considered for CPAs?	/PoA-DD1/ /AMSIII.H/	/DR/ /unfccc/	Yes, PoA-DD has the provision to select and calculate the baseline as per the applied methodology AMS III.H version 16.0 for the CPAs.	OK	OK
E.4.2. Does the PoA-DD make provisions to identify the list of all alternatives? Is the list of alternatives complete?	/PoA-DD1/ /AMSIII.H/	/DR/	Not applicable, as the applied methodology is not allowed identifying the list of alternatives for baseline; rather it has clearly provided the baseline description and the calculation methods and equations accordingly.	OK	OK
E.4.3. Does the PoA-DD make provision to identify the	PoA-DD1/ /AMSIII.H	DR	Please refer section E.4.1 and E.4.2 above.	OK	OK

baseline scenario for each CPA?					
E.4.4. Does the PoA-DD make provisions to identify the baseline scenario according to the methodology for each CPA?	PoA-DD1/ /AMSIII.H/	DR	Yes, Please refer section E.4.1 and E.4.2 above.	OK	OK
E.4.5. Does the PoA-DD make provisions that any plausible alternative scenario is not excluded?	PoA-DD1/ /AMSIII.H/	DR	Please refer section E.4.1 and E.4.2 above.	OK	OK
E.4.6. Does the baseline alternatives sufficiently take into account relevant national and/or sectoral policies? <i>(EB 55 Annex 38 § 6(b))</i>	/PoA-DD1/ /AMSIII.H/	DR	The consideration of all applicable national and/or sectoral policies and regulations of each host parties, within the boundary of this PoA is not clearly described and in this context CAR PoA-A11 has raised.	CAR PoA-A11	OK
E.4.7. Are the provisions for the baseline scenario determination compatible with the available data and are all literature and sources clearly referenced?	/PoA-DD1/ /AMSIII.H/	DR	Please refer section E.4.1 and E.4.2 above.	OK	OK
E.4.8. Has the baseline scenario been determined using conservative assumptions where possible?	/PoA-DD1/ /AMSIII.H/	DR	Please refer section E.4.1 and E.4.2 above.	OK	OK
E.5. Additionality of the CPA					
E.5.1. Does the PoA-DD make provision to describe the additionality justification, which follows the	/PoA-DD1/ /EB65A5/	DR	The additionality justification provided in section E.5.1 of the PoA-DD is not appropriate/adequate. Moreover, explanation that how CPAs will demonstrate additionality is	CAR PoA-E4	OK

requirements of the applied methodology and/or other methodological tools?			not provided in the PoA-DD. Hence, CAR PoA-E4 is raised in section 5 of this report. Please refer section 5.		
E.5.2. Has it been demonstrated that the programme is a voluntary coordinated action that would not be implemented in the absence of CDM?	/PoA-DD1/ /PoA-DD-F/	DR	No, the demonstration that the programme is a voluntary coordinated action that would not be implemented in the absence of CDM under section A.4.3 of the webhosted PoA-DD is not adequate and hence not acceptable to validation team. In this context CAR PoA-A8 is raised. Please refer section 5.	CAR PoA-A8	OK
E.5.3. Which criteria have been established to assess the additionality of CPA under this PoA?	/PoA-DD1/ /AMSIII.H/	DR	Please refer checklist item E.5.1 above.	CAR PoA-E4	OK
E.5.4. Is the type of investment analysis selected correctly?	/PoA-DD1/ /AMSIII.H/	DR	Please refer checklist E.5.3 above.	CAR PoA-E4	OK
E.5.5. Is the selected financial indicator chosen and applied correctly, if applicable?	/PoA-DD1/ /AMSIII.H/	DR	Please refer checklist E.5.3 above.	CAR PoA-E4	OK
E.5.6. If the programme is implementing a mandatory policy/regulation, has it been demonstrated whether the policy/regulation is being enforced? If it is enforced, has it been demonstrated that the programme will lead to a higher level of enforcement?	/PoA-DD1/ /ENV-Q/	DR SV I	In Malaysia, palm oil mills discharge treated POME either in the river or as land application as approved by Department of Environment under the Environmental Quality Regulations (1977) Palm Oil Effluent Discharge Standard ^{/ENV-Q/} . While the discharge limit may vary from state to state, the regulations do not specify the treatment technologies to be used. There is also no regulation on the GHG emissions from wastewater treatment operation for the palm oil mill. Each Palm Oil Mill is regulated according to its operating permit.	OK	OK

E.5.7. Are all assumptions stated in a transparent and conservative manner?	/PoA-DD1/ /AMSIII.H/	DR	Please refer section E.5.1 and E.5.2 above.	CAR PoA-E4 CAR PoA-A8	OK
E.5.8. Is sufficient evidence provided to support the relevance of the arguments made?	/PoA-DD1/ /AMSIII.H/	DR	Please refer section E.5.1 and E.5.2 above.	CAR PoA-E4 CAR PoA-A8	OK
E.6. Estimation of GHG Emission Reductions of a CPA <i>It is assessed whether the ex-ante 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.</i>					
E.6.1. In case the methodology allows for different methodological choices, are the equations applied properly justified and have they been used reflecting the other methodological choices (i.e. baseline identification)? <i>(EB 55 Annex I § 90)</i> <i>Assess the correct selection and application of methodological choices. Describe whether proper justification has been provided (based on the choice of the baseline scenario, context of the project activity and other evidence provided) and whether the correct equations have been used reflecting the relevant methodological choices.</i>	/PoA-DD1/ /AMSIII.H/	DR	The methodology allows for different methodological choices, nevertheless explanation that how the procedures provided in the methodology are applied, is not described under section E.6.1 of the PoA-DD. Also, CME has not justified every selected option offered by the applied methodology. In this regard CAR PoA-E5 is raised by the validation team. Please refer CAR PoA-E5 raised in section 5 of this report.	CAR PoA-E5	OK
E.6.2. Are the equations applied correctly according to the applied approved methodology? <i>(EB 55 Annex I, §§67 (c), 89,90, 92)</i> <i>Describe clearly the steps taken to assess whether the methodology has been applied correctly to calculate project emissions, baseline emissions, leakage and</i>	/PoA-DD1/ /AMSIII.H/	DR	Yes, the equations provided under section E.6.2 to calculate the project emission reductions is according to approved applied methodology AMS III.H version 16.0. The CME has replicated the equations in the section as provided in the applied methodology.	OK	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

<i>emission reductions. Further take into consideration that all estimates of the baseline emissions can be replicated using the data and parameter values provided in the PDD.</i>					
<p>E.6.3. Have conservative assumptions been used when calculating the project emissions?</p> <p><i>(EB 55 Annex 1 §§ 90,91)</i></p> <p><i>Describe clearly the steps taken to assess whether all the assumptions and data used by the PP are listed in the PDD including references and sources and are conservatively interpreted in the PDD.</i></p>	/PoA-DD1/ /AMSIII.H/	DR	The approach for calculating project emission and formulae/equation applied to calculate the project emission is provided in section E.6.2 of the PoA-DD as per the applied methodology and hence, appropriate. However, specific data and assumption will be verified at the CPA level.	OK	OK
<p>E.6.4. 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?</p> <p><i>Describe clearly the steps taken to assess whether the values used for the fixed parameters are considered reasonable, correct and applicable in the context of the project activity.</i></p>	/PoA-DD1/ /AMSIII.H/	DR	<p>The data and parameters reported in the webhosted PoA-DD form is not complete as it does include the Volume of wastewater treated in baseline wastewater treatment system and Chemical oxygen demand of the wastewater inflow to the baseline treatment system. Also, the dry matter in the sludge that would have been treated by the sludge treatment system in the baseline scenario is not provided.</p> <p>CAR PoA-E3 is raised in this regard.</p> <p>Please refer section 5 of this report above.</p>	CAR PoA-E3	OK
<p>E.6.5. Are all ex-ante calculation values for monitoring parameters (as defined as per chapter E.6.3) reasonable?</p> <p><i>Describe clearly the steps taken to assess whether the values used for the monitoring parameters are considered reasonable, applicable and conservative in the context of the project activity</i></p>	/PoA-DD1/ /AMSIII.H/	DR	<p>Subjected to closure of CAR raised PoA-E3.</p> <p>Please refer section E.6.4 above.</p>	CAR PoA-E3	OK

E.6.6. Are the emission reductions real, measurable and give long-term benefits related to the mitigation of climate change.	/PoA-DD1/ /AMSIII.H/	DR	Subjected to closure of CAR PoA-E3. Please also refer section E.6.4 above.	CAR PoA-E3	OK
<i>Describe the steps taken to validate this issue.</i>					
E.7. Calculation of GHG Emission Reductions – Project emissions <i>It is assessed whether the procedure for calculating project emissions is according to the methodology and whether the argumentation for the choice of default factors and values – where applicable – is justified.</i>					
E.7.1. Has the procedure to calculate project emissions of an individual CPA been documented according to the approved methodology and in a complete and transparent manner?	/PoA-DD1/ /AMSIII.H/	DR	Yes, under section E.6.2 of the webhosted PoA-DD, the project emission sources identified and equations provided to calculate project emission are complete and according to the applied methodologies. The validation team cross-checked and found appropriate.	OK	OK
E.7.2. Have conservative assumptions been used when determining the procedure to be used to calculate the project emissions?	/PoA-DD1/ /AMSIII.H/	DR	Yes, the procedure provided to determine the project emissions are as per the applied methodology and there is no inconsistency found and hence acceptable.	OK	OK
E.8. Calculation of GHG Emission Reductions – Baseline emissions <i>It is assessed whether the procedure for calculating baseline emissions is according to the methodology and whether the argumentation for the choice of default factors and values – where applicable – is justified.</i>					
E.8.1. Has the procedure to calculate baseline emissions of an individual CPA been documented according to the approved methodology and in a complete and transparent	/PoA-DD1/ /AMSIII.H/	DR	Yes, the procedure to calculate baseline emission of an individual CPA been documented in section E.6.2 of the PoA-DD is according to the applied methodology.	OK	OK

manner?					
E.8.2. Have conservative assumptions been used when determining the procedure to be used to calculate the baseline emissions?	/PoA-DD1/ /AMSIH.H/	DR	Yes, please refer to section E.8.1 above.	OK	OK
E.8.3. Does PoA DD clearly mentioned with the date of completion of the application of the baseline study and monitoring methodology and the name of the responsible person(s)/entity(ies) ?	/PoA-DD1/ /PoA-DD-T/	DR	No, PoA DD does not clearly provide the name of person/entity responsible for application of the baseline and monitoring methodology, and hence in this regards CAR PoA-E8 is raised in the section 5 of this report. Please refer CAR PoA-E8 under section 5 of this report.	CAR PoA-E8	OK
E.9. Calculation of GHG Emission Reductions – Leakage <i>It is assessed whether the procedure for calculating leakage is according to the methodology and whether the argumentation for the choice of default factors and values – where applicable – is justified.</i>					
E.9.1. Has the procedure to calculate leakage emissions of an individual CPA been documented according to the approved methodology and in a complete and transparent manner?	/PoA-DD1/ /AMSIH.H/	DR	In section E.6.2 of the PoA-DD, it is clearly stated that “if the technology is using equipment transferred from another activity, leakage effects at the site of the other activity are to be considered and estimated (L_{Ey})” which is found in line with the approved methodology AMS III.H. Moreover under section E. 6.1 justification for not considering the leakage emission is missing. In this regard CAR PoA-E5 is raised. Please refer section 5 of this report.	CAR PoA-E5	OK
E.9.2. Have conservative assumptions been used when determining the procedure to be used to calculate the	/PoA-DD1/ /AMSIH.H/	DR	Please refer section E.9.1 above.	CAR PoA-E5	OK

leakage emissions?					
E.10. Emission Reductions					
<i>The emission reductions shall be real, measurable and give long-term benefits related to the mitigation of climate change.</i>					
E.10.1. Does the PoA-DD provide a clear and correct way of calculating the emission reductions from each CPA?	/PoA-DD1/ /AMSIH.H/	DR	Yes, PoA-DD has provided a clear and transparent way to calculate the project emission, baseline emission and leakage emission and the emission reduction.	OK	OK
E.11. Monitoring Methodology					
<i>It is assessed whether the project applies an appropriate monitoring methodology.</i>					
E.11.1. Is the monitoring plan documented according to the approved methodology and in a complete and transparent manner?	/PoA-DD1/ /AMSIH.H/	DR	The monitoring Plan provided in section A.4.4.1 and E.7.2 of the webhosted PoA-DD is not sufficient and appropriate and in this regard CAR PoA-A9 and CAR PoA-E6 are raised. Moreover, Please refer checklist item A.4.4.1 above.	CAR PoA-A9 PoA-E6	OK
E.11.2. 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 programme, whichever occurs later?	/PoA-DD1/	DR SV I	Yes, CME has clearly mentioned in section A.4.4.1, A.4.4.2 and E.7.2 of the PoA-DD that all data collected as part of the monitoring will be archived electronically and stored for at least for 2 years after the end of the last crediting period and hence found appropriate.	OK	OK
E.12. Monitoring Plan					
<i>It is established whether the monitoring plan provides for reliable and complete emission data over time.</i>					
E.12.1. Does the monitoring plan provide for the collection and archiving of all relevant data necessary for estimation or measuring the greenhouse gas	/PoA-DD1/ /AMS III.H/	DR	Please refer checklist item E.11.1 above.	CAR PoA-A9 CL-PoA- E6	OK

emissions within the programme boundary during the crediting period?					
E.12.2. Are the choices of programme GHG indicators reasonable and conservative?	/PoA-DD1/ /AMSIII.H/	DR	PoA choice of GHGs indicator found to be reasonable and sufficient based on document review and onsite observation.	OK	OK
E.12.3. Is the measurement method clearly stated for each GHG value to be monitored and deemed appropriate?	/PoA-DD1/ /AMSIII.H/	OK	Yes, the description of measurement method, equipment, data unit and source of the data used, are provided for each parameter to be monitored under section E.7.1 and found deemed appropriate and in accordance with the applied methodology.	OK	OK
E.12.4. Is the measurement equipment described and deemed appropriate?	/PoA-DD1/ /AMSIII.H/		Please refer section E.12.3 above	OK	OK
E.12.5. Is the measurement accuracy addressed and deemed appropriate? Are procedures in place on how to deal with erroneous measurements?	/PoA-DD1/ /AMSIII.H/	DR SV I	Based on document review and onsite assessment, compared with applied methodology, it is concluded that measurement accuracy addressed at PoA level is deemed appropriate. There is provision of cross checking the data to avoid erroneous measurement.	OK	OK
E.12.6. Is the measurement interval identified and deemed appropriate?	/PoA-DD1/ /AMSIII.H/	DR	Yes, the measurement interval has been identified and provided in QA/QC procedure of the table provided for the parameter to be monitored under section E.7.1 of the PoA-DD.	OK	OK
E.12.7. Is the registration, monitoring, and measurement and reporting procedure defined?	/PoA-DD1/ /AMS III.H/	DR	Please refer checklist item E.11.1 above.	CAR PoA-A9 CL-PoA- E6	OK

E.12.8. Are procedures identified for maintenance of monitoring equipment and installations? Are the calibration intervals being observed?	/PoA-DD1/ /AMS III.H/	DR	Please refer checklist item E.11.1 above.	CAR PoA-A9 CL-PoA- E6	OK
E.12.9. Are procedures identified for day-to-day records handling (including what records to keep, storage area of records and how to process performance documentation)?	/PoA-DD1/ /AMSIH/	DR SV I	Yes, the procedure for continuous and day to day recording of the data and storage is described in section E.7.2 of PoA-DD.	OK	OK
E.13. Monitoring of Sustainable Development Indicators/Environmental Impacts <i>It is assessed whether choices of indicators are reasonable and complete to monitor sustainable performance over time.</i>					
E.13.1. Is the monitoring of sustainable development indicators/ environmental impacts warranted by legislation in the host country?	/PoA-DD1/ /LoA/	DR SV I	Environmental impacts or sustainable development indicators are not warranted by any legislation in the host country (PoA boundary) of Malaysia.	OK	OK
E.13.2. Does the monitoring plan provide for the collection and archiving of relevant data concerning environmental, social and economic impacts?	/PoA-DD1/ /LoA/	DR SV I	NA	NA	NA
E.13.3. Are the sustainable development indicators in line with stated national priorities in the Host Country?	/PoA-DD1/ /LoA/	DR SV I	NA	NA	NA
E.14. Management System and Quality Assurance for Monitoring and Reporting <i>It is checked that programme implementation is properly prepared for and that critical arrangements are addressed.</i>					
E.14.1. Is the authority and	/PoA-DD1/	DR	No, the operation and management structure	CAR	OK

responsibility of overall programme management clearly described?			with the hierarchy of the flow of information is not provided in a transparent manner. Moreover the name of CME is not also clearly provided in section A.3 of the PoA-DD. In this regard CAR PoA-A4 and CL PoA-E6 is raised. Please refer CAR PoA-A4 and CL PoA-E6 in the section 5 of this report.	PoA-A4 CL PoA-E6	
E.14.2. Are procedures identified for training of monitoring personnel?	/PoA-DD1/	DR	No, the procedure for training of monitoring personnel is not found provided by the CME and this regard CAR under PoA-A9 point (ii) is raised. Please refer CAR PoA-A9 in the section 5 of this report.	CAR PoA-A9	OK
E.14.3. Are procedures identified for emergency preparedness for cases where emergencies can cause unintended emissions?	/PoA-DD1/	DR	No, the emergency plan procedure for breakdown is not provided and this regard, CAR PoA-E6 is raised. Please refer section 5 CAR PoA-E6 above.	CAR PoA-E6	OK
E.14.4. Are procedures identified for review of reported results/data?	/PoA-DD1/	DR	Please refer section 5 CAR PoA-A9	CAR PoA-A9	OK
E.14.5. Are procedures identified for corrective actions in order to provide for more accurate future monitoring and reporting?	/PoA-DD1/	DR	Please refer section 5 CAR PoA-A9	CAR PoA-A9	OK
E.15. Editorial Issues Identified (Ed)					



E.15.1. Are there any editorial issues identified in the PoA-DD?	/PoA-DD1/	DR	Yes, there are several editorial issues identified in the PoA-DD. In this regards CAR Edt-1	Car PoA-Ed 1	OK
--	-----------	----	---	-------------------------	----

**Table A-1-2: Generic CDM-SSC-CPA-DD (gCPA-DD) Requirements Checklist**

Checklist question	Ref	MoV	Comments by validation team	Draft conclusion	Final conclusion
A. General Description of CPA					
A.1. Are title, current version number and the date of document completion given in section A.1 of the generic CPA-DD?	/gCPA/	DR	Yes, gCPA –DD contains the format for project title, current version and completion date. However, The title of the template used for CDM SSC-CPA-DD (gCPA) is mentioned as “CDM-SSC-PDD form version 3”, which is not correct as the proposed project is a PoA. Furthermore, the title of proposed PoA is also not provided at the cover page of CDM SSC-CPA-DD and hence not in line with CDM SSC-CPA-DD-Form, version 01. CAR gCPA A1 was raised in this regard. Please refer gCPA A1 under section 5 of this report above.	CAR gCPA A1	OK
A.2. Has the latest version of the CDM-SSC-CPA-DD form been applied? <i>(EB 55 Annex 1, § 55)</i>	/CPA-DD-T/ /gCPA/	DR	Provision for title, version and date for the CPA is provided. However, format for providing unique title of the future CPA to be included in the PoA (Regional Biogas PoA) is not correct. Please refer checklist A.1 above and section 5 of this report above.	CAR gCPA A2	OK
A.3. Does the generic CPA-DD include means of unique identification of a CPA? <i>(EB 55 Annex 38, §7(a))</i> <i>In case of stationary CPA, geographic reference should be</i>	/gCPA/	DR	Yes, CPA-DD contains unique identification of CPA	OK	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

<i>used; in case of mobile CPAs, registration number, GPS devices, etc. should be used.</i>					
A.4. Has it been indicated that the CPA is within the geographical borders of the PoA? <i>(EB 55 Annex 38, §7(a))</i>	/gCPA/	DR	Yes, it is indicated that the CPA is within the geographical borders of the PoA.	OK	OK
A.5. Is there any provision to enter name of the parties and CPA implementers participating in the CPA? <i>(EB 55 Annex 38, §7 (b))</i>	/gCPA/	DR	Yes, g-CPA-DD has provision to provide name of the parties and CPA implementers participating in the CPA. However, in section A.3 of the webhosted gCPA-DD, there is no provision to define that the CPA implementer is project participant or not. CAR gCPA-A3 is raised in this regard. Please refer CAR gCPA-A3 under section 5 of this report above.	CAR gCPA-A3	OK
A.6. Does the generic CPA-DD include name/contact details of the entity/individual responsible for the operation of the CPA? <i>(EB 55 Annex 38, §7 (a))</i> <i>In case of stationary CPA, geographic reference please describe this entity/individual responsible for the CPAs and steps taken to verify the information.</i>	/gCPA/	DR	Yes, the provision for name/contact details and geographic reference of the CPA is found provided.	OK	OK
A.7. Is the Generic CPA-DD using the provisions of the proposed PoA-DD? <i>(EB 55 Annex 38, §7)</i>	/gCPA/	DR	Yes, Generic CPA-DD using the provisions of the proposed PoA-DD. However, template for providing technical description of the CPA provided under section A.4 of the webhosted gCPA-DD is not exhaustive and provision for providing reference number of registered PoA is not included	CL gCPA-A4 and CAR gCPA-B1	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

			In this regards CL gCPA-A4 is raised under section 5 of this report.		
<p>A.8. Does the gCPA include provisions that the start date can be clearly defined and evidenced?</p> <p><i>(EB 55 Annex1, §99)</i></p> <p><i>Apply the definition as per the "Glossary of CDM terms".</i></p>	/gCPA/ /GT/	DR	<p>No, section A.4.2.1 of the webhosted g-CPA-DD lacks in providing description for the starting date and hence, not in line with the EB 66 Annex 63.</p> <p>In this regard CAR gCPA-A5 is raised.</p> <p>Please refer CAR gCPA-A5 under section 5 of this report above.</p>	CAR gCPA-A5	OK
<p>A.9. Does the generic CDM-CPA-DD include a confirmation that the start date of any CPA is not, or will not be, prior to the PoA validation commencement, i.e. the date on which the CDMPOA-DD is first published for global stakeholder consultation?</p> <p><i>(EB 55 Annex 38, §7(d))</i></p> <p><i>Please consider the following:</i></p> <p><i>The CDM Executive Board decided to grant an exemption to PoAs that have commenced validation prior to 31 December 2009. Therefore such PoAs may include CPAs with a starting date between 22 June 2007 and the commencement of validation of the PoA, if a list of such specific CPAs is provided to validating DOE and UNFCCC secretariat prior to 31 January 2010. (EB47 Report Para72)</i></p>	/gCPA/	DR	<p>Yes, CPA DD includes a confirmation that, the start date of any CPA is not, or will not be, prior to the PoA validation commencement, i.e. the date on which the CDMPOA-DD is first published for global stakeholder consultation. The same is clearly evidenced at the real case CPA level. Same is found included in g-CPA-DD.</p>	OK	OK
<p>A.10. Does the gCPA include provisions to ensure that the operational lifetime can be clearly defined and evidenced?</p>	/gCPA/	DR	<p>Yes, there is the provision in g-CPA to include operational life time of the real case CPA and evidenced.</p>	OK	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

<p><i>(EB55 Annex 38 para7(d))</i></p> <p><i>Check whether the project lifetime can be clearly defined. Consider the guidance on the assessment of investment analysis (annex to the additionality tool). Check in case of phased implementation this has been reflected throughout the whole PDD incl. the financial assessment, if applicable.</i></p>					
<p>A.11. Does the generic CDM-CPA-DD address the starting date of the crediting period of the CPA?</p> <p><i>(EB 55 Annex 38, §7(c))</i></p> <p><i>The starting date of a crediting period of the CPA shall be the date of its inclusion in the registered PoA or any date thereafter.</i></p>	/gCPA/	DR	Yes, gCPA-DD addresses the starting date of the crediting period of the CPA.	OK	OK
<p>A.12. Does the generic CDM-CPA-DD include the option to choose the type (fixed or renewable) and duration of the crediting period of the CPA?</p> <p><i>(EB 55 Annex 38, §7(c))</i></p> <p><i>Taking into account that the duration of the crediting period shall not exceed the end date of the PoA.</i></p>	/gCPA/	DR	Yes, gCPA-DD provided options to choose the type and duration of the CPA crediting period.	OK	OK
<p>A.13. Does the generic CPA-DD include information to confirm that the proposed small-scale CPA is not a de-bundled component?</p> <p><i>Refer to the guidance for determining the occurrence of de bundling under a programme of activities (EB 54, Annex 13)</i></p>	/gCPA/	DR	Yes, g-CPA DD provided information on confirmation that proposed CPA is not a debundled component of another CDM project activity.	OK	OK
<p>A.14. Does the generic CPA-DD include provisions for a</p>	/gCPA/	DR	Yes, the generic CPA-DD include provisions for a confirmation that the CPA is neither registered	OK	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

confirmation that the CPA is neither registered as a CDM project activity nor included in another registered PoA? <i>(EB 55 Annex 38, §7(h))</i> <i>Make sure that each single subsystem of the CPA, e.g., solar cooker, bio-digester, etc. is not registered as part of a CDM project or included in another registered PoA. Make sure that no double counting of any emission reductions will occur.</i>			as a CDM project activity nor included in another registered PoA.		
A.15. Are there provisions to ensure that those operating the CPA are aware and have agreed that their activity is being subscribed to the PoA? <i>(EB 55 Annex 38, §6(i))</i>	/gCPA/	DR	Yes, there are provisions to ensure that those operating the CPA are aware and have agreed that their activity is being subscribed to the PoA.	OK	OK
A.16. Is all necessary information consistent between POA-DD and the Generic CPA-DD? <i>(EB 55 Annex 38, §15(d))</i>	/gCPA/	DR	Yes, all necessary information consistent between POA-DD and the Generic CPA-DD. However, the acronyms used in gCPA-DD are not provided with its explanation. In this regards CAR Ed 1 was raised.	OK	OK
B. Eligibility of CPA and ER Estimation					
B.1. Eligibility of CPA and Additionality					
<i>It is assessed whether the CPA complies with the criteria for inclusion in the registered programme of activities. EB55 Annex 38 para6(g)</i>					
B.1.1. Does the generic CPA-DD include information how each CPA will fulfill the eligibility criteria specified in the POA-DD? <i>(EB 55 Annex 38, §7(e))</i> <i>Including, as appropriate, the demonstration of the</i>	/gCPA/	DR	Yes, gCPA-DD include information that, how each CPA will fulfil the eligibility criteria as specified in the POA-DD. However, list of the documents required to substantiate/justify the eligibility criteria are not provided in table B.1 under section B.2 of the webhosted gCPA-DD. Moreover, the additional eligibility criteria based	CAR gCPA-B2	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

<i>additionality of the CPA.</i>			on the applied methodology is also not provided. CAR gCPA-B2 is raised in this regard. Please refer section 5 of this report above.		
B.1.2. Does the gCPA include provisions to demonstrate the application of the baseline and monitoring methodology as described in the most updated PoA-DD? <i>(EB55 Annex 38 § 7(e))</i>	/gCPA/ /AMS.III.H/	DR	Please refer checklist item B.1.2 above.	CAR gCPA-B2	OK
B.1.3. Does the gCPA include provisions to provide a financial analysis to demonstrate that without CDM revenue the CPA is not a financially attractive option? <i>(EB55 Annex 1 VVM Additionality assessment)</i>	/gCPA/	DR	Yes, gCPA include provisions to provide a financial analysis to demonstrate that without CDM revenue the CPA is not a financially attractive option and hence additional. Moreover list of input parameters with source are missing. In this regard CL gCPA-B3 is raised. Please refer CL gCPA-B3 under section 5 of this report above.	CL gCPA- B3	OK
B.1.4. Does the gCPA include provisions for a barrier analysis to demonstrate that the project activity faces significant barriers that are overcome through the CDM? <i>(EB55 Annex 1 VVM Additionality assessment)</i>	/gCPA/	DR	Yes, the gCPA include provisions for a barrier analysis (investment barrier) to demonstrate that the project activity faces significant barriers that are overcome through the CDM revenue.	OK	OK

B.1.5. Does the gCPA-DD include provisions to demonstrate that there are essential differences between the CPA and similar activities that are occurring (common practise analysis)?	/gCPA/	DR	No common practice analysis is done in this PoA.	NA	NA
B.2. CPA ER Estimation <i>It is assessed whether it is ensured that the project emissions will be stated according to the methodology and the PoA-DD and whether the argumentation for the choice of default factors and values - where applicable – is justified.</i>					
B.2.1. Does the generic CPA-DD include calculations of baseline emissions and estimated emission reductions according to specified information in the POA-DD? <i>(EB 55 Annex 38, §7(e))</i>	/gCPA/	DR	Yes, the generic CPA-DD include calculations of baseline emissions and estimated emission reductions according to specified information in the POA-DD. However please refer CAR gCPA-A6 and CAR gCPA-B4 were raised on ex-ante emission reduction. Please refer CAR gCPA-A6 and CAR gCPA-B4 under section 5 of this report above.	CAR gCPA-A6 CAR gCPA-B4	OK
B.2.2. Does the CPA-DD ensure that leakage, additionality, establishment of the baseline scenario, baseline emissions are unambiguously defined? <i>(EB55 Annex 38 §7 (e))</i>	/gCPA/ /AMS.III.H/	DR	CAR gCPA B-5 was raised on leakage emission. Please refer CAR gCPA-B5 under section 5 of this report above.	CAR gCPA-B5	OK
B.2.3. Is the calculation of baseline emissions, project emissions and leakage emissions of the CPA in accordance with the procedure described in the PoA-DD?	/gCPA/	DR	Please refer CAR gCPA-A6, CAR gCPA-B4 and CAR gCPA-B5 under section 5 of this report above.	CAR gCPA-A6 CAR gCPA-B4 CAR	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

<i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i>				gCPA-B5	
B.2.4. Are CPA-specific conservative assumptions used and uncertainties addressed when calculating the baseline emissions, project emissions and leakage emissions?	/gCPA/	DR	Yes, CPA-specific conservative assumptions used and uncertainties addressed when calculating the baseline emissions, project emissions and leakage emissions.	OK	OK
<i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i> B.2.5. Does the gCPA include provisions to demonstrate that the total emission reductions of the CPA will be real, measurable and give long term benefits related to the mitigation of climate change? <i>(EB55 Annex1 VVM § 35).</i> <i>The validation team shall raise a corrective action request (CAR) if one of the following occurs: (a) The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions.</i>	/gCPA/	DR	Yes, the gCPA-DD include provisions to demonstrate that the total emission reductions of the CPA will be real, measurable and give long term benefits related to the mitigation of climate change	OK	OK
B.3. Monitoring Plan and CPA Management Planning <i>It is assessed whether the project emissions are stated according to the methodology and the PoA DD and whether the argumentation for the choice of default factors and values - where applicable – is justified.</i>					
B.3.1. Is the monitoring plan of the gCPA documented according to the approved methodology, in accordance with the programme of activities and in a complete and transparent manner? <i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i>	/gCPA/	DR	Yes, the monitoring plan of the gCPA documented according to the approved methodology, in accordance with the programme of activities and in a complete and transparent manner. Moreover, please refer CAR gCPA-B6 raised with regards to the monitoring requirements.	CAR gCPA-B6	OK



			Please refer CAR gCPA-B6 under section 5 of this report above.		
B.3.2. Does the gCPA-DD include provisions that 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 programme, whichever occurs later? <i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i>	/gCPA/	DR	Yes, the gCPA-DD include provisions for all monitored data required for verification and issuance and to be kept for two years after the end of the crediting period or the last issuance of CERs, for this programme, whichever occurs later.	OK	OK
B.3.3. Are the measurement methods clearly stated for each GHG value to be monitored and deemed appropriate? <i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i>	/gCPA/	DR	Yes, the measurement methods clearly stated for each GHG value to be monitored and deemed appropriate.	OK	OK
B.3.4. Are the measurement equipment and calibration procedures described and deemed appropriate? <i>(EB55 Annex38 § 6(g) & 7(e(ii)))</i>	/gCPA/	DR	Yes, the measurement equipment and calibration procedures described and deemed appropriate.	OK	OK
B.3.5. Is the authority and responsibility of overall CPA management clearly described? <i>(EB55 Annex38 § 6(i))</i>	/gCPA/	DR	Yes, the authority and responsibility of overall CPA management clearly described.	OK	OK
B.3.6. Are procedures identified for training of monitoring personnel? <i>(EB55 Annex38 § 6(i))</i>	/gCPA/	DR	Yes, the procedures identified for training of monitoring personnel and deemed appropriate.	OK	OK

Carbon Check (Pty) Ltd.

P-No.: CCL0139/RPP/10022012

B.3.7. Are procedures identified for emergency preparedness for cases where emergencies can cause unintended emissions? <i>(EB55 Annex38 § 6(i))</i>	/gCPA/	DR	Yes, provision is identified for emergency preparedness for cases where emergencies can cause unintended emissions	OK	OK
B.3.8. Are procedures identified for review of reported results/data? <i>(EB55 Annex1 § 33)</i>	/gCPA/	DR	Yes, provision for review of data is identified in the gCPA-DD.	OK	OK
C. Environmental Impacts					
C.1. Does the generic CDM-CPA-DD include environmental analysis as per requirements of the CDM modalities and procedures? <i>(EB 55 Annex 38, §7(f))</i>	/gCPA/	DR	Yes, gCPA-DD provides provision for environmental analysis as per requirements of the CDM modalities and procedures.	OK	OK
D. Stakeholders' Comments					
D.1. Does the generic CDM-CPA-DD include information on how comments by local stakeholders shall be invited, a summary of the comments shall be received and how due account shall be taken of any comments to be received, as applicable? <i>(EB 55 Annex 38, §7(g))</i> <i>It is assessed whether stakeholders have been properly consulted in the development of the CPA. EB48 Annex29Para4(m)</i>	/gCPA/	DR	Yes, gCPA-DD provides provision to include information that how comments by local stakeholders shall be invited, a summary of the comments shall be received and how due account shall be taken of any comments to be received, as applicable.	OK	OK



10 ANNEX 2: STATEMENTS OF COMPETENCE OF ALL INVOLVED PERSONNEL

