

## FINDINGS OVERVIEW

### FINDINGS FROM VALIDATION OF HAPUGASTENNE AND HULU GANGA SMALL HYDROPOWER PROJECTS (CDM.VAL0023)

Each Table below represents a finding from the validation assessment. The findings are numbered consecutively, approximately in the order that they have been identified.

Description of table:

Type	Findings are either New Information Requests (NIR) or Corrective Action Requests CARs are items that must be addressed before a project can receive a recommendation for registration. NIRs may lead to the raising of CARs. Observations are included at the may or may not be addressed. They are primarily to act as signposts for the verifier
Issue	Details the content of the finding
Ref	refers to the item number in the Validation Protocol
Response	Please insert response to finding, starting with the date of entry.

Rows for comments and further response will be appended to the table until the Findings has been addressed to the satisfaction of the Lead Assessor.

Please note that this is an open list and more findings may be added as validation progresses.

Date: 23-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
1	CAR	No Letter of Approval of the Annex I party has been submitted to the validator.	1.2
Date: 25 <sup>th</sup> May 2005 Letter of Approval of Annex 1 country has been received 25 <sup>th</sup> May 2005.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht CAR 1 has been closed out.			

Date: 23-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
2	CAR	The simplified baseline is the annual kWh produced generated by the renewable unit times an emission coefficient. The baseline scenario selected is the expansion of electricity production by thermal power plants. There is no analysis why this is the most likely scenario and no other scenarios are considered.	B.2.5
Date: 2 <sup>nd</sup> June 2005 See revised section B.5 which includes a discussion of uncertainties and alternatives in defining the baseline.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht The discussion on uncertainties has been studied and was found to be satisfactory. CAR 2 has been closed out			

Date: 23-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
3	CAR	The monitoring plan does not cover procedures and responsibilities.	D.5.1
Date: 2 <sup>nd</sup> June 2005 Section D.3 presents additional information on monitoring procedures and responsibilities.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht CAR 3 has been closed out.			

Date: 24-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
4	CAR	The calculations are documented in a complete but not transparent way since not all calculations are correct, e.g. the values in Table 2 do not add up to the figures presented. Commission dates in Table 3 and Table E2 are not the same. Table E2 contains mistakes, e.g. in the calculation of J and therefore also in N and O.	E.3.5
Date: 2 <sup>nd</sup> June 2005 All discrepancies in figures have been addressed. Regarding the commission dates of older power plants, the discrepancy is related to the fact that these plants came on line in stages of power output over 1-3 years. Table E2 calculations are now corrected as well. The only error in "J" involved the Lakhdanavi diesel plant which was not linked to other table data.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht CAR 4 has been closed out.			

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
5	CAR	No uncertainties in the baseline emissions have been assessed.	E.3.7
Date: 2 <sup>nd</sup> June 2005 The PDD baseline emissions calculations are based on Appendix B of the Simplified Modalities and Procedures for Small-Scale CDM project activities. Page 9 of Appendix B states how to calculate baseline emissions based on the weighted average of current thermal power plants serving the grid combined with the build margin of all recently added facilities. There is therefore no uncertainty in the emissions calculation per se.  Baseline uncertainties are addressed in Section B of the PDD which discusses alternative baseline scenarios. The basic conclusion of that analysis is that if the expansion plan were to be realized as foreseen, the addition of coal power plants in the future would drive emissions up, a change that is not accounted for in our calculations. Similarly, our calculations do not account for possible delays in the expansion plan which would also increase emissions because of longer reliance on the oldest, least efficient thermal power plants in the system. The calculations in the PDD therefore represent a conservative estimate of probable future carbon emissions offsets.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht CAR 5 has been closed out			

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
6	CAR	Local stakeholders have been consulted although no overview has been provided.	G.1.1
Date: Information on or any specific stakeholder consultations are available with the operator, EPL.			

EPL is prepared to transmit all relevant supporting documents to the local assessor.

Date: 2<sup>nd</sup> June 2005; Irma Lubrecht  
CAR 6 has been closed out.

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
7	CAR	No summary has been provided but a statement that comments received were generally positive.	G.1.4

Date: 2<sup>nd</sup> June 2005

Detailed information on the stakeholder consultations is available with the operator, EPL. EPL is prepared to transmit all relevant supporting documents to the local assessor.

Date: 7<sup>th</sup> June 2005; Irma Lubrecht  
CAR 7 has been closed out.

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
8	CAR	It remains unclear how stakeholder comments have been invited or how meetings have been announced.	G.1.2

Date: 30<sup>th</sup> June 2005

The only stakeholders in the case of all projects are the small numbers of villagers in the areas surrounding the project. It is not possible to use media to inform villagers of the projects since there are no local newspapers or other avenues for providing such information. The villagers were informed of the project details and their comments were solicited at face to face meeting arranged with them. The meetings were arranged through the local government official called the Grama Niladhari (Village Officer) who is the focal point of all government interaction with villagers at this level. [A typical GN knows every single village household within his GN Division.] For each project we notified the GN of the basic parameters of the project and had him assemble a meeting between us and all villagers who could potentially be affected by the project in any way. Further meeting as necessary were arranged in the same manner during the construction of the projects.

The local representative was shown the minutes of the various meetings that were held with the stakeholders and all comments were recorded in these minutes.

The IFC in consultation with Eco Power prepared two documents, a Summary of Project Information and an Environmental Review Summary. These two documents together provided all salient details relating to the environmental and social aspect of the projects for which PDDs were prepared. These documents were translated into Sinhalese, the local language, and were made available for inspection by the public, including all stakeholders, at the following locations close to each of the projects for a period of one Month, starting on May 9, 2005.

Eco Power's head office and locally at the following addresses Hapugastenne Power House, Hapugastenne Rubber Estate, Gallella Alupola Power House, Alupola Estate, Alupola CECB Magal Ganga Project Office, Maliboda Estate, Nakkawita Hulu Ganga Sub Post Office, Hulu Ganga Town Divisional Secretariat, Meegahakiula via Badula

An advertisement was placed in a large Sinhalese language daily newspaper, the Lankadeepa, informing the public of the availability of the documents and soliciting comments. The comments could be sent to an IFC web site whose address was given in the advertisement or sent directly to the Chief Executive Officer of Eco Power. No comments were received during the one month period or thereafter to date.

Date: 30<sup>th</sup> June 2005; Irma Lubrecht

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
1	NIR	No engineering details have been provided for the project design so it is not possible to assess whether it reflects current good practices.	A.2.3
Date: 2 <sup>nd</sup> June 2005 Detailed information on project engineering is available with the operator, EPL, based in Sri Lanka. EPS is prepared to transmit all relevant supporting documents to the local assessor.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht NIR 1 has been closed out.			

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
2	NIR	The project is not expected to result in a technology transfer to the host country but no details have been provided.	A.2.4
Date: 2 <sup>nd</sup> June 2005 SGS needs to be more specific on the information/details sought on this issue.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht After discussion with the project and check with the local assessor it became clear that this project will not result in technology transfer to the host country. NIR 2 has been closed out.			

Date: 26-05-2005

Raised by: Irma Lubrecht

No.	Type	Issue	Ref
3	NIR	No project emissions have been identified. No construction emissions have been included.	D.2.1
Date: 2 <sup>nd</sup> June 2005 See section E.1.2. for an estimation of construction-related emissions, including diesel engines used on-site combined with diesel used by trucks transporting materials and equipment to the project sites.			
Date: 7 <sup>th</sup> June 2005; Irma Lubrecht NIR 3 has been closed out.			