

**Ref. No.:** CCIPL/Admin/CCL287/10-11/02062015

**Date:** 2<sup>nd</sup> June 2015

Dear CDM Team,

RE: Request for renewal of the crediting period INCOMPLETE: EnviroServ Chloorkop Landfill Gas Recovery Project. (0925)

This letter is in response to the information and reporting check comment raised by UNFCCC on the subject project received by Carbon Check on 12<sup>th</sup> February 2015. Please find below point wise reply to the issue raised.

**Information and reporting check comment:**

*1: The DOE has validated that the project does not imply any change in the waste received at the landfill and has not reduced the amount of organic waste that would have been recycled in the absence of the project activity, assessed based on knowledge of the project from the initial validation, subsequent verifications and the confirmation from the project participant through interview. However, the DOE is required to confirm, through additional sources (such as national/local statistics, interview with authorities and experts on the waste sector in South Africa), that the implementation of the project will not reduce the amount of organic fraction of the waste that would have been recycled by the project activity. Organic fraction of waste to be disposed in the landfill. Please refer to VVS version 07.0 paragraph 359 (b).*

In response to the above concern, the following steps have been taken by Carbon Check and the PP.

**PP Response:**

PP has provided a separate letter and revised PDD (submitted along with this submission) responding each of the issues raised. In addition PP provided an official letter, confirming that the subject project has not and will continue to not reduce the amount of organic waste that would have been recycled in the absence of the project activity.

**DOE Response:**

Validation team confirms that it took cognizance of paragraph 359(a) and (b) during course of validation( as reiterated below) of VVS, version 07.0.

*"The DOE shall assess the validity of the original baseline or its update through an assessment of the following issues:*

*(a) The impact of new relevant national and/or sectoral policies and circumstances on the baseline taking into account relevant guidance from the Board with regard to renewal of the crediting period at the time of requesting renewal of crediting period;*

*(b) The correctness of the application of the approved methodology and, where applicable, the approved standardized baseline for the determination of the continued validity of the baseline or its update, and the estimation of emission reductions for the applicable crediting period."*

Please refer to the assessment contained in section 04 and 05 of the validation report. We wish to submit further (additional) information as required on compliance of bullet (b) above, in particular on the following applicability criterion of the methodology ACM0001, version 15.

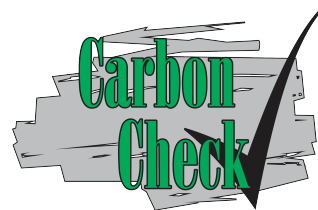
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*“Do not reduce the amount of organic waste that would be recycled in the absence of the project activity.”*

Validation Team further reviewed a letter from the division/company responsible for collecting and depositing of waste at Chloorkop Landfill (attached as a part of appendix 3 of the revised PDD), which confirms that *“EnviroServChloorkop Landfill Gas Recovery Project did not and will also continue to not imply any change to the waste received at the landfill and therefore has not reduced the amount of organic waste that would have been recycled in the absence of the project activity”*. Such a letter from the company dealing with waste management in South Africa could be categorized as other additional sources.

In addition to the above, the validation team, based on the review of South African Waste Information Centre (SAWIC) website: <http://sawic.environment.gov.za>, further confirms that recycling of organic waste is not a common/widely used practice in South Africa and in the region of the project. Thus the validation team concluded that the project does not reduce the amount of organic waste that would be recycled in the absence of the project activity.

Validation report has been revised to incorporate the above response. Please refer to the revised validation report.

## **Issue 2**

*The PP is required to indicate in the PDD and the DOE is required to validate which option (Option A: Apply a default value for flare efficiency; Option B: Measure the flare efficiency) was selected to determine the flare efficiency according to the "Project emissions from flaring" version 02.0. In doing so, the PP shall document in the PDD and the DOE shall validate whether the flare is a low height flare or not and apply the relevant discount factor, if necessary. The PP shall also include in the PDD the relevant steps of the tool to calculate ERs.*

### **PP response:**

PP has provided a separate letter and revised PDD (attached along with this submission) responding each of the issues raised.

### **DOE response:**

PP has revised Section B.6.1 of the PDD to address the issue raised. Validation team confirms that PP has opted Option B.1 i.e. Biannual measurement of flare efficiency of the applied methodological tool i.e. “Project emissions from flaring” (Version 02.0) to determine the flare efficiency. Furthermore, validation team based on review of revised PDD confirms that PP has opted to use a discount factor of 0.1 as per the requirement of the methodological tool to the determined flare efficiency as the flare are low height flares.

Validation team has checked the revised PDD which incorporates the relevant steps of the methodological tool “Project emissions from flaring” (Version 02.0) to calculate the Ex Post Emission Reductions; checked and confirmed by the validation team. In addition to that the flare specifications as required by the methodological tool has been provided in section B.6.2 of the PDD as an ex-ante parameter; checked and confirmed by the validation team.

Validation team based on PP’s response and revision in the PDD confirms that the issue raised has been addressed in the revised documents. Please refer to the attached PP response, revised PDD and Validation Report.

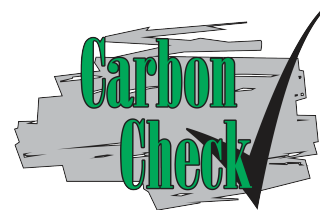
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### Issue 3

*The PP is required to indicate in the PDD and the DOE is required to validate which option was selected to determine the basis of the flow-rate of gas and methane concentration (wet or dry) according to the "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" version 02.0.0. In doing so, the PP shall include in the PDD the relevant equations of the tool to calculate the gas flow.*

#### **PP response:**

PP has provided a separate letter and revised PDD (submitted along with this submission) responding each of the issues raised.

#### **DOE response:**

PP has revised Section B.6.1 of the PDD to address the issue raised. Validation team confirms that PP has opted Option B from Table 1 of the applied "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (Version 02.0.0) to measure the volume flow of the gaseous stream on a wet basis and to measure the volumetric fraction of CH<sub>4</sub> on a dry basis. Furthermore, PP has included the relevant equations of the applied to calculate the gas flow; checked and confirmed by the validation team.

Validation team based on PP's response and revision in the PDD confirms that the issue raised has been addressed in the revised documents. Please refer to the attached PP response and the revised PDD. Validation report has been revised to address the issue raised.

### Issue 4

*Paragraph 33 (a) of the applied version of ACM0001 requires that "the gaseous stream the tool shall be applied to the LFG delivery pipeline to each item of electricity generation or heat generation equipment j, or the natural gas distribution system, or the trucks". However, the PDD does not indicate whether the measurements will be made for each flare or not and where the instruments will be located.*

#### **PP response:**

PP has provided a separate letter and revised PDD (submitted along with this submission) responding each of the issues raised.

#### **DOE response:**

PP has revised Section B.6.1 of the PDD to address the issue raised. Validation team confirms that in the project activity no electricity or heat is generated, and natural gas use is not applicable. Hence compliance of Paragraph 33 (a) of the applied version of ACM0001 only required to be adhered for the flaring. PP in revised PDD indicated that for each flare measurement would be carried out as each flare is fitted with a flow-meter (fitted to the gas inlet and the main burner gas train) and a gas analyser (connected to the outlet of the extraction fan) to measure the flow rate of the gas and the methane concentration of the gas respectively; checked and confirmed by the validation team.

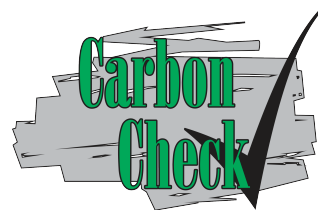
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Validation team based on PP's response and revision in the PDD confirms that the issue raised has been addressed in the revised documents. Please refer to the attached PP response, revised PDD and the revised Validation Report.

#### **Issue 5**

*The PP is required to include in the monitoring plan the monitoring system of the parameters required to measure the moisture of the gas, if applicable, and the flare efficiency.*

#### **PP response:**

PP has provided a separate letter and revised PDD (submitted along with this submission) responding each of the issues raised.

#### **DOE response:**

Validation team based on review of revised PDD confirms that the measurement of moisture content is not applicable as "Option 2: Simplified calculation without measurement of the moisture content" from the "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (Version 02.0.0) was selected for determining the absolute humidity. Section B.6.1 of the PDD was updated by PP to reflect this; checked and confirmed by the validation team.

Furthermore, PP has included all parameters as required by the applied methodological tool to calculate flare efficiency; checked and confirmed by the validation team.

Validation team based on PP's response and revision in the PDD confirms that the issue raised has been addressed in the revised documents. Please refer to the attached PP response and the revised PDD.

We apologise as the previous documents were not transparent on the above issues, however during the course of validation the above concerns were considered by the validation team. We are hereby submitting the revised PDD (clean and track) and validation report (clean and track). We hope that the revised documents are inline with the requirements and will find acceptance.

Please do not hesitate to contact us should you require any further information or clarification.

Kind regards,

Amit Anand  
**Chief Executive Officer**

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