

ANNEX 3

ASSESSMENT

REGARDING POST REGISTRATION CHANGES
INTERNATIONAL BANK FOR RECONSTRUCTION
AND DEVELOPMENT (IBRD) AS TRUSTEE OF
THE BIOCARBON FUND (BIOCF)

ASSISTED NATURAL REGENERATION OF
DEGRADED LANDS IN ALBANIA

Report No: 8000389372 – 10/492

Date: 2013-05-21

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Assessment Report on post registration changes	Report No.	Rev. No.	Date of 1st issue:	Date of this rev.
	8000389372 – 10/492	0	2013-05-21	2013-05-21
Project:	Title:	Registr. date:	UNFCCC-No.:	
	Assisted Natural Regeneration of Degraded Lands in Albania	2010-01-02	2714	
Project Participant(s):	Name:	Party:		
	Ministry of Environment, Forests and Water Administration	Albania		
	International Bank for Reconstruction and Development (IBRD) as Trustee of the BioCarbon Fund (BioCF)	Several, see FVR		
Applied methodology/ies:	Title:	No.:	Scope:	
	Afforestation and reforestation of degraded land through tree planting, assisted natural regeneration and control of animal grazing	AR-AM0003 ver. 4	14	
Post Registration Changes:	Type of requested changes	Number of changes	Prior Approval required	
	<input type="checkbox"/> Temporary deviations from the MP	-	<input type="checkbox"/>	
	<input type="checkbox"/> Temporary deviations from the MM	-	<input type="checkbox"/>	
	<input type="checkbox"/> Corrections that do not affect the project	-	<input type="checkbox"/>	
	<input type="checkbox"/> Change to the start date of the crediting p.	-	<input type="checkbox"/>	
	<input type="checkbox"/> Permanent changes from the MP	-	<input type="checkbox"/>	
	<input type="checkbox"/> Permanent changes from the MM	-	<input type="checkbox"/>	
	<input checked="" type="checkbox"/> Design changes to the project activity/PoA	-	<input type="checkbox"/>	
	<input checked="" type="checkbox"/> Changes specific to A/R	Several small	<input type="checkbox"/>	
Revised PDD:	Title:	Attached in TC:	Attached clean:	
	Assisted Natural Regeneration of Degraded Lands in Albania	Not required for A/R projects		
Assessment team / Technical Review and Final Approval	Assessment Team:	Technical review:	Final approval:	
	Alexandra Nebel Evgeni Sud (TL, TE)	Inga Köster	Rainer Winter	
Assessment Opinion:	<input type="checkbox"/>	The post registration changes require prior Approval by the Board		
	<input checked="" type="checkbox"/>	The post registration changes do not require prior Approval by the Board		
Document information:	Filename:	No. of pages:		
	2013-05-21 Annex 3 PRC Report.doc	25		

Abbreviations

A/R	Afforestation/Reforestation
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Removal
t-CER	Temporary Certified Emission Removal
I-CER	Long-term Certified Emission Removal
CO₂	Carbon dioxide
CO_{2eq}	Carbon dioxide equivalent
CL	Clarification Request
DFPP	Directorate of Forest pasture Policies
DFS	District Forestry Staff
ER	Emission Removal
FAR	Forward Action Request
FPUA	Forest and Pasture User Association
GHG	Greenhouse gas(es)
GPG	Good Practice Guide
ha	hectare
LULUCF	Land use, land use change and forestry
MP	Monitoring Plan
MoEFWA	Ministry of Environment, Forest and Water Administration
MR	Monitoring Report
NRDP	Natural Recourse Development Project
PDD	Project Design Document
PP	Project Participant
QA/QC	Quality Assurance / Quality Control
SAMRT	Simplified Monitoring Afforestation/Reforestation Tool
UNFCCC	United Nations Framework Convention on Climate Change
VVS	Validation and Verification Standard
XLS	Emission Removal Calculation Spread Sheet

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1 OBJECTIVE / SCOPE

International Bank for Reconstruction and Development (IBRD) as Trustee of the BioCarbon Fund (BioCF) has commissioned the TÜV NORD JI/CDM Certification Program (CP) to assess post registration changes of the project

“Assisted Natural Regeneration of Degraded Lands in Albania”

This report serves for all kind of post registration changes as defined in the PS.

In this case it serves as an annex to the verification report.

2 GENERAL CHARACTERISTICS

2.1 Project Characteristics

As this assessment was carried out as part of the 1st verification of the project activity please refer to chapter 2 of the verification report.

2.2 Overview of Post Registration Changes

Within this report post registration changes as listed in Table 2-2 are assessed.

Table 2-2: Overview Post Registration Changes

#	Applicable as of / from - to	Type of post registration change ¹⁾	Description
1	201x-xx-xx to 201x-xx-xx	TDfrMP	-
2	201x-xx-xx to 201x-xx-xx	TDfMM	-
3	201x-xx-xx	CrPDD	-
4	201x-xx-xx	ChSD	-
5	201x-xx-xx	PCfrMP	-
6	201x-xx-xx	PCfMM	-
7	201x-xx-xx	CoPD	-
8	2004-12-20	CstAR	Several small changes during implementation

- ¹⁾
- TDfrMP : Temporary deviation from registered monitoring plan
 - TDfMM : Temporary deviation from the monitoring methodology
 - CrPDD : Corrections to the registered PDD
 - ChSD : Change to the start date of the crediting period
 - PCfrMP : Permanent changes from registered Monitoring Plan
 - PCfMM : Permanent changes from Monitoring Methodology
 - CoPD : Changes to the project design of a registered project activity / PoA
 - CstAR : Changes specific to afforestation or reforestation

2.3 Assessment team members and technical reviewers

As this assessment was carried out as part of the 1st verification of the project activity please refer to the main part of the verification report.

2.4 Assessment Steps

The *assessment of post registration changes* consisted of the following steps:

- Appointment of team members and technical reviewers
- A desk review of the registered PDD^{/PDD/} submitted by the client and additional supporting documents
- On-Site assessment (if required)
- Background investigation and follow-up interviews with personnel of the project developer and its contractors,
- Resolution of corrective actions (CARs / CLs) (if any)
- Final reporting
- Technical review
- Final approval.

In this case all activities were carried out as part of the 1st verification of this project activity.

2.5 Review of Documents

The registered PDD and supporting background documents related to the project design and the post registration changes were reviewed.

As far as required the assessment team used additional documentation by third parties like host party legislation, technical reports referring to the project design or to the basic conditions and technical data.

2.6 Follow-up Interviews

The validation team has carried out interviews in order to assess the information included in the project documentation and to gain additional information regarding the compliance of the project 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 2-4.

Table 2-4: Interviewed persons and interview topics

Interviewed Persons / Entities	Interview topics
1. Projects & Operations Personnel 2. IBRD (BioCarbon Fund)	<ul style="list-style-type: none"> - General aspects of the project - Forest implementation - Project boundary - Technical equipment and operation - Changes since validation - Monitoring and measurement equipment - Re-measurement of sample plots - Remaining issues from validation - Calibration procedures (if applicable) - Quality management system - Involved personnel and responsibilities - Training and practice of the operational personnel - Implementation of the monitoring plan - Monitoring data management - Data uncertainty and residual risks - GHG emission removal calculation - Procedural aspects of the verification - Maintenance - Environmental aspects

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

2.7 Resolution of Clarification and Corrective Action Requests

2.7.1 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 intended / implemented changes,
- there is a risk that the changes cannot be approved by the UNFCCC or that emission reductions would not be able to be verified and certified after the implementation of the changes.

A **Clarification Request (CL)** will be issued where information is insufficient, unclear or not transparent enough to establish whether a requirement is met.

2.7.2 Assessment

After reviewing all relevant documents and taken all other relevant information into account, the assessment team issues all findings (in the course of a draft report, if applicable) and hands over the findings to the project proponent in order to respond on the issues raised and to revise the documentation accordingly.

The final reporting step starts after resolution of the raised CARs and CLs. In case the findings from CARs and CLs cannot be resolved by the project proponent or the proposed action related to the FARs raised cannot be assessed as adequate, no positive assessment opinion can be issued by the validation team.

The CAR(s) / CL(s) / FAR(s) are documented in the context of the respective chapters.

2.8 Technical review

Before submission of the final assessment report a technical review is carried out. The technical reviewer is a competent GHG auditor being appointed for the scope this project falls under. The technical reviewer is not considered to be part of the verification team and thus not involved in the decision making process up to the technical review.

As a result of the technical review process the assessment opinion as prepared by the validation team leader may be confirmed or revised. Furthermore reporting improvements might be achieved.

2.9 Final approval

After successful technical review of the final report an overall (esp. procedural) assessment of the requested post registration changes will be carried out by a senior assessor located in the accredited premises of TÜV NORD.

Only after this step the notification or the report can be forwarded to the UNFCCC (in case of a positive validation opinion).

3 CHANGES THAT DO NOT AFFECT THE PROJECT DESIGN

3.1 Assessment of Changes

Requested Deviations / Changes #1

- Type of change(s):
- ☐ Temporary Deviation from Monitoring Plan
 - ☐ Temporary Deviation from Monitoring Methodology
 - ☐ Corrections that do not affect the project design
 - ☐ Permanent Change from Monitoring Plan
 - ☐ Permanent Change from Monitoring Methodology
 - ☒ Changes specific to afforestation or reforestation

A. Description of post registration change

Start Date: Please provide the start date of the change	2004-12-20	End Date: Please provide the end date of the change, if applicable	-
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Requested Deviations / Changes #1

<p>Description: Please give a detailed description of the changes</p>	<p>In line with “Guidelines on application of specified versions of A/R CDM methodologies in verification of registered A/R CDM project activities” (Version 01.0) (EB 68, Annex 31), some improvements to early versions of the methodology are allowed and have been adopted in the project monitoring plan.</p> <p>1- Only data and parameters obtained from field measurement are monitored; intermediate values are not considered in monitoring.</p> <p>2- Change in sampling design: Per the post registration change, ref No. PRC-2714-001 approved by the UNFCCC on 12 November 2012, allowable margin of error of 20% of the mean and 90% confidence level was applied.</p> <p>3- Uncertainty analysis is not conducted as sampling approach implemented addresses these issues.</p> <p>4- Loss of carbon in living herbaceous vegetation has not been monitored.</p> <p>5- Emissions from burning of fossil fuel, both within and outside the project boundary were not monitored.</p>
B. Assessment of post registration change – specific to A/R	
<p>Accuracy: Please give a detailed assessment whether the deviation is likely to lead to a reduction in the accuracy of the ER calculation.</p>	<p>All above changes are covered under the “Guidelines on application of specified versions of A/R CDM methodologies in verification of registered A/R CDM project activities” (Version 01.0) (EB68, Annex 31).</p> <p>Therefore it can be concluded that revisions are accurate and correct.</p>
<p>Conservative-ness: Please give a detailed assessment whether conservative assumptions or discount factors have been applied to ensure that ER will not be overestimated.</p>	<p>All revisions are conservative considering and comparing with the latest applicable versions of A/R methodologies.</p>
<p>Appendix 1 PS: Check if the changes fall under one of the scenarios of appendix 1 of the PS.</p>	<p>As per EB 68 Annex 31 these changes do not require prior approval.</p>
C. Revised PDD	

Requested Deviations / Changes #1

Rev. of PDD: Check whether the changes have been fully addressed in a revised PDD.	<input type="checkbox"/> The changes have correctly been reflected in the revised PDD. <input checked="" type="checkbox"/> A revision of the PDD is not required (in case of temp. Changes and A/R specific changes). <input type="checkbox"/> The revised PDD has been forwarded in (i) track-change and (ii) clean version.
D. Prior Approval	
Prior approval: Assess whether the change requires prior approval of the board	<input type="checkbox"/> <i>The post registration change requires prior approval</i> <input checked="" type="checkbox"/> <i>The post registration change does not require prior approval</i>

Requested Deviations / Changes #2

- Type of change(s):
- ☐ Temporary Deviation from Monitoring Plan
 - ☐ Temporary Deviation from Monitoring Methodology
 - ☐ Corrections that do not affect the project design
 - ☐ Permanent Change from Monitoring Plan
 - ☐ Permanent Change from Monitoring Methodology
 - ☒ Changes specific to afforestation or reforestation

A. Description of post registration change

Start Date: Please provide the start date of the change	2004-12-20	End Date: Please provide the end date of the change, if applicable	-
Description: Please give a detailed description of the changes	Inline with Guidelines on accounting of specified types of changes in A/R CDM project activities from the description in registered project design documents" (Version 02.0) (Annex 24, EB 66), following changes have been made to the implementation of the project: a- There have been changes in the schedule of supplemental planting and silvicultural activities intended to assist natural regeneration. b- There have been changes to composition of species in supplemental planting. The changes are consistent with the		

Requested Deviations / Changes #2

	<p>baseline identification and additionality demonstration made at the validation stage</p> <p>c- Considering the project is an assisted natural regeneration project, the changes in stocking density are consistent with the baseline identification and additionality demonstration made at the validation stage. Planting density increased from 200-500 to 1,000 trees per hectare in 328.81 ha.</p> <p>k- <i>Ex post</i> stratification has been implemented taking into account the changes to <i>ex-ante</i> stratum adopted at the project design. Whereas in <i>ex-ante</i> stratification there was one stratum, there are four strata in the <i>ex-post</i> stratification (see Section C).</p> <p>m- As a follow up to <i>ex post</i> stratification, the calculation of number sample plots and their allocation has been revised. Although the number of sample plots in <i>ex-ante</i> and <i>ex-post</i> stratification is the same (95), with re-stratification the <i>ex-ante</i> number of sample plots shall be 292. The number of sample plots laid out, however, was 95, which exceeds the number required (66) to meet 20% precision and 90% confidence. The project submitted a request for deviation as part of the post registration change to apply 20 percent precision level and 90 per cent confidence interval and was approved.</p> <p>n- Changes resulting from exclusion of some areas that are not suitable for implementing the project have reduced the project area. These changes are consistent with the baseline identification and additionality demonstration made at the validation stage.</p> <p>o- Changes in quality assurance/quality control procedures are consistent with procedures used by the national forest inventory.</p> <p>p- Changes in parameters, equations, or methods used in tree biomass estimation are consistent with A/R Tool – “Tool for demonstration of applicability of allometric equations in A/R CDM project activities” The changed parameters, equations or methods do not result in a decrease in precision of the estimate of tree biomass.</p>
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Requested Deviations / Changes #2

B. Assessment of post registration change – specific to A/R

Accuracy:

Please give a detailed assessment whether the deviation is likely to lead to a reduction in the accuracy of the ER calculation.

All above listed changes could be confirmed during the site visit and can be accepted as per the following justification:

a- as described in the MR some area were not yet implemented in the project boundary. Continuous planting is foreseen. No further justification necessary.

b- In some areas species have been changed and adopted as per the actual site conditions. In some cases re-planting was conducted using other species that are expected to be more robust against site conditions. The changes are consistent with the baseline identification and additionality demonstration made at the validation stage. The additionality was proven by barriers that are not affected by this change and the baseline is not affected.

c- Stocking density changed in some areas depending on actual site conditions. Further due to natural regeneration stocking density varies on these sites. The changes are consistent with the baseline identification and additionality demonstration made at the validation stage. The additionality was proven by barriers that are not affected by this change and the baseline is not affected.

k- To perform sampling re-stratification was required. The stratum has been cleared from areas with zero capacity for emission removals (rocky areas and roads). This reduced the variance within the stratum and is thus more precise and acceptable.

m- As per point k revised stratification leads to revised sampling. Further a separate PRC with prior approval has been performed to approve the revised precision level from 10% to 20%.

n- The project boundary has been reduced. Some areas have been removed as not able to be reforested or as indicated under point k, areas with zero capacity for emission removals (rocky areas and roads) have been removed. No increase in project area was observed. The changes are consistent with the baseline identification and additionality demonstration made at

Requested Deviations / Changes #2	
	<p>the validation stage. The additionality was proven by barriers that are not affected by this change and the baseline is not affected.</p> <p>o- Some aspects of the QA/QC have been changed and fully adopted to the procedures used by the national forest inventory in Albania and in accordance with the SOP.</p> <p>p- Latest available allometric equations have been applied to the project for biomass estimations. All equations are completely in compliance with the "Tool for demonstration of applicability of allometric equations in A/R CDM project activities". Follow assessment in section 5 of FVR.</p> <p>Therefore it can be concluded that revisions are accurate and correct.</p>
<p>Conservative-ness: Please give a detailed assessment whether conservative assumptions or discount factors have been applied to ensure that ER will not be overestimated.</p>	<p>The changes are consistent with the baseline identification and additionality demonstration made at the validation stage. They all improve the accuracy of the estimations of ERs. Therefore it can be concluded that revisions are accurate, conservative and correct.</p>
<p>Appendix 1 PS: Check if the changes fall under one of the scenarios of appendix 1 of the PS.</p>	<p>The A/R specific changes do not require approval by the board as they are listed in PS appendix 1 and as per EB 66 Annex 24.</p>
C. Revised PDD	
<p>Rev. of PDD: Check whether the changes have been fully addressed in a revised PDD.</p>	<p><input type="checkbox"/> The changes have correctly been reflected in the revised PDD.</p> <p><input checked="" type="checkbox"/> A revision of the PDD is not required (in case of temp. Changes and A/R specific changes (defined as minor)).</p> <p><input type="checkbox"/> The revised PDD has been forwarded in (i) track-change and (ii) clean version.</p>
D. Prior Approval	
<p>Prior approval: Assess whether the change requires prior approval of the board</p>	<p><input type="checkbox"/> The post registration change requires prior approval</p> <p><input checked="" type="checkbox"/> The post registration change does not require prior approval</p>

3.2 Related Findings

Follow up on related findings in the Final Verification Report.

4 CHANGE TO THE START DATE OF THE CREDITING PERIOD

The post registration changes do not fall under this category.

4.1 Related Findings

No findings have been identified in this context.

5 CHANGES TO THE PROJECT / PROGRAMME DESIGN

The post registration changes do not fall under this category.

5.1 Related Findings

No findings have been identified in this context.

6 SUMMARY OF ASSESSMENT OPINIONS

The below listed changes have occurred after the registration of the project / PoA.

Type of Change occurred	Total No. of changes	No. of changes which require prior approval
<input type="checkbox"/> Temporary deviations from the MP		
<input type="checkbox"/> Temporary deviations from the MM		
<input type="checkbox"/> Corrections that do not affect the project		
<input type="checkbox"/> Change to the start date of the crediting p.		
<input type="checkbox"/> Permanent changes from the MP		
<input type="checkbox"/> Permanent changes from the MM		
<input type="checkbox"/> Design changes to the project activity / PoA		
<input checked="" type="checkbox"/> Changes specific to AR projects		

Non of the changes requires prior approval of the Board.

Hannover, 2013-05-21



Alexandra Nebel
TÜV NORD JI/CDM CP
Assessment Team Leader

Essen, 2013-05-21



Rainer Winter
TÜV NORD JI/CDM CP
Final Approval

7 REFERENCES

All references are listed in the Verification Report to which this assessment is attached.

APPENDIX

- A1:** Assessment of Financial Parameters
- A2:** Assessment of Barrier analysis
- A3:** Competence statements of involved personnel

APPENDIX 1: ASSESSMENT OF FINANCIAL PARAMETERS

Table A-1: Assessment of Financial Parameters (VVS, v. 2.0, §§ 120, 121 / in case financial parameters stem from FSR §122)

<input checked="" type="checkbox"/>	No financial parameters are used for additionality justification					
<input type="checkbox"/>	Assessment of all financial parameters see below					
Parameter	Value applied	Unit	Source of Information (please indicate document and page)	Reference	DOE ASSESSMENT	
					Correctness of value applied	Comment
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	
				//	<input type="checkbox"/>	

APPENDIX 2: ASSESSMENT OF BARRIER ANALYSIS

Table A-2: Assessment of Barrier Analysis (VVS, v. 2.0, §§ 124-127)

<input checked="" type="checkbox"/>		No barrier parameters are used for additionality justification		
<input type="checkbox"/>		Assessment of barriers see below		
Kind of Barrier (invest, tech, other)	Description of Barrier	Evidence used	Assessment of validation team	
			Appropriateness of information source	Explanation of final result
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	
			<input checked="" type="checkbox"/>	



APPENDIX 3: STATEMENTS OF COMPETENCE OF INVOLVED PERSONNEL

Statement of Competence
Appointment and authorization according to the procedures
of the TÜV NORD JI/CDM Certification Program

Ms. Alexandra Nebel

SCHEME	STATUS	VALID UNTIL
CDM	Senior Assessor (Validation, Verification) Technical Reviewer	2016-03-03
Ji	Senior Assessor Technical Reviewer	2016-03-03
VCS / ISO 14064-2	Senior Assessor Technical Reviewer	2016-03-03

Authorization status for technical areas within sectoral scopes:

CODE	TECHNICAL AREA
14.1	Forestry

095 - Rev. 4, Date: 2013-03-04

095_S01-VAN00-F20_2013-03-04_rev4.doc

S01-VAN00-F20 rev3 / 2012-10-25

Statement of Competence
Appointment and authorization according to the procedures
of the TÜV NORD JI/CDM Certification Program

Ms. Inga Köster

SCHEME	STATUS	VALID UNTIL
CDM	Lead Assessor (Validation, Verification) Technical Reviewer	2012-01-15
Ji	Lead Assessor Technical Reviewer	2012-01-15
VCS	Lead Assessor Technical Reviewer	2012-01-15

Authorization status for technical areas within sectoral scopes:

CODE	TECHNICAL AREA	TR SUBCATEGORIES
14.1	Forestry	
15.1	Agriculture	

045 - Rev. 2, Date: 2011-08-29

045_S01-F003_2011-08-29_rev2

S01-F003 rev1 / 2011-08-02

Statement of Competence
Appointment and authorization according to the procedures
of the TÜV NORD JI/CDM Certification Program

Mr. Rainer Winter

SCHEME	STATUS	VALID UNTIL
CDM	Senior Assessor (Validation, Verification) Technical Reviewer	2013-07-03
Ji	Senior Assessor Technical Reviewer	2013-07-03
VCS	Senior Assessor Technical Reviewer	2013-07-03

Authorization status for technical areas within sectoral scopes:

CODE	TECHNICAL AREA	TR SUBCATEGORIES
1.1	Thermal Energy Generation	
1.2	Renewable Energies	1.2.1 Hydro 1.2.2 Wind 1.2.3 Geothermal 1.2.4 Solar 1.2.5 Total
4.1	Cement Sector	
4.3	Iron and Steel	
4.5	Waste Heat Recovery	
5.1	Chemical Process Industries	
9.1	Metal Production	
11.1	Chemical Process Industries	
11.2	GHG Capture and Destruction	
12.1	Chemical Process Industries	
13.1	Waste Handling and Disposal	13.1.1 Waste Management

003 - Rev. 5, Date: 2011-08-01

003_S01-F003_2011-08-01_rev5

S01-F003 rev4 / 2010-04-19



Statement of Competence
Appointment and authorization according to the procedures
of the TÜV NORD JI/CDM Certification Program

Mr. Evgeni Sud

SCHEME	STATUS	VALID UNTIL
CDM	Lead Assessor (Validation, Verification) Technical Reviewer	2013-11-04
JII	Lead Assessor Technical Reviewer	2013-11-04
VCS	Lead Assessor Technical Reviewer	2013-11-04

Authorization status for technical areas within sectoral scopes:

CODE	TECHNICAL AREA
1.2	Renewable Energies
13.1	Waste Handling and Disposal

052 – Rev. 1, Date: 2011-08-29

052_S01-F003_2011-08-29_rev1

S01-F003 rev3 / 2010-04-19