VALIDATION REPORT

Shreyans Industries Limited

METHANE RECOVERY FROM WASTE WATER GENERATED FROM WHEAT STRAW WASH WATER AT PAPER MANUFACTURING UNIT OF SHREYANS INDUSTRIES LIMITED (SIL) AHMEDGARH DISTRICT SANGRUR PUNJAB

SGS Climate Change Programme
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Date of issue:	Project No.:
12-02-2007	CDM.Val0633
Project title	Organisational unit:
Methane Recovery from waste water generated from wheat straw wash water at paper manufacturing unit of Shreyans Industries Limited (SIL) Ahmedgarh District Sangrur Punjab	SGS Climate Change Programme
Revision number	Client:
1	Shreyans Industries Limited

Summary

SGS India Pvt. Ltd., an affiliate of SGS United Kingdom Ltd. has made a validation of the CDM project activity "Methane Recovery from waste water generated from wheat straw wash water at paper manufacturing unit of Shreyans Industries Limited (SIL) Ahmedgarh District Sangrur Punjab, India" by Shreyans Industries Limited, on the basis of UNFCCC criteria for the CDM, as well as criteria given to provide for consistent project operations, monitoring and reporting. UNFCCC criteria refer to Article 12 of the Kyoto Protocol, the CDM rules and modalities and the subsequent decisions by the CDM Executive Board, as well as the host country criteria.

The scope of validation is the independent and objective review of the project design document, baseline study and monitoring plan and other relevant document of the project. The information in this document is reviewed against the criteria defined in the Marrakech Accords (Decision 17) and the Kyoto Protocol (Article 12) and subsequent guidance from the CDM Executive Board.

The validation is not meant to provide any consulting towards the Client. However, stated requests for clarifications plan and/or corrective actions may provide input for improvement of the project design document (PDD).
The overall validation process, from Contract Review to Validation Report & Opinion, was conducted using internal procedures (UK.PP.12 issue 2 dated 01/07/2005).

The first output of the validation process is a list of Corrective Actions Requests and New Information Requests (CAR and NIR), presented in Annex 2 of this document. Taking into account this output, the project proponent revised its project design document.

In summary, it is SGS's opinion that the proposed CDM project activity correctly applies the baseline and monitoring methodology as mentioned in approved methodology adopted for the proposed project activity and meets the relevant UNFCCC requirements for the CDM and the relevant host country criteria.

Subject.:			
CDM validation			**Indexing terms**
Work carried out by			
Mr. Shivananda Shetty - Team Leader Mr. Sanjeev Kumar - Assessor Mr. Pankaj Mohan - Local Assessor			
Technical review			
Irma Lubrecht			☒ No distribution without permission from the Client or responsible organisational unit
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Abbreviations

CAR	Corrective Action Request
CDM	Clean Development Mechanism
CEA	Central Electricity Authority
CER	Certified Emission Reductions
CO_2	Carbon Dioxide
DNA	Designated National Authority
DOE	Designated Operational Entity
DR	Document Review
EIA	Environment Impact Assessment
GHG	Green House Gas(es)
I	Interview
IPCC	Intergovernmental Panel on Climate Change
ISHC	International Stakeholder Consultation
kWh	Kilo watt hour
MNES	Ministry of Non Conventional Energy Sources
MoEF	Ministry of Environment and Forest
MoV	Means of Verification
MP	Monitoring Plan
MWh	Mega watt hour
MT	Metric Tonne
NIR	New Information Request
PDD	Project Design Document
PPA	Power Purchase Agreement
PPCB	Punjab Pollution Control Board
UNFCCC	United Nations Framework Convention for Climate Change

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1. Introduction

1.1 Objective

Shreyans Industries Limited has commissioned SGS to perform the validation of the project: "Methane Recovery from waste water generated from wheat straw wash water at paper manufacturing unit of Shreyans Industries Limited (SIL) Ahmedgarh District Sangrur Punjab, India" with regard to the relevant requirements for CDM project activities. The purpose of a validation is to have an independent third party assess the project design. In particular, the project's baseline, the monitoring plan (MP) and the project's compliance with relevant UNFCCC and host country criteria are validated in order to confirm that the project design as documented is sound and reasonable and meets the stated requirements and identified criteria. Validation is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of Certified Emission Reduction (CER). UNFCCC criteria refer to the Kyoto Protocol criteria and the CDM rules and modalities and related decisions by the COP/MOP and the CDM Executive Board.

1.2 Scope

The scope of the validation is defined as an independent and objective review of the project design document, the project's baseline study and monitoring plan and other relevant documents. The information in these documents is reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations. SGS has employed a risk-based approach in the validation, focusing on the identification of significant risks for project implementation and the generation of CERs.

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

1.3 GHG Project Description

The proposed CDM project activity is generation of steam by burning the methane recovered by the high rate up flow anaerobic sludge blanket (UASB) reactor in the boilers. The project activity is installed in paper manufacturing unit; located at district sangrur, Punjab state in India. The project activity is in construction stage.

Baseline Scenario:

Under the baseline scenario, the existing anaerobic treatment system without methane recovery from the wheat straw wash water.

With Project Scenario:

The project activity is generation of steam by burning the methane recovered by the high rate up flow anaerobic sludge blanket (UASB) reactor in the boilers and reduces GHG emissions.

Leakage:

As per the methodology AMSIIIH; applicable for the project activity, there is no leakage as there is no transfer of equipments involved in the project activity. It is a new project activity and still in construction phase.

Environmental & Social Impacts:

According to local assessor, there is no negative environmental and social impact expected due to the project activity.

1.4 The names and roles of the validation team members

Name	*Affiliate*	*Role*
Shivananda Shetty	SGS India	Team Leader / Lead Auditor
Sanjeev Kumar	SGS India	Assessor
Pankaj Mohan	SGS India	Local Assessor
Irma Lubrecht	SGS Netherlands	Technical reviewer

2. Methodology

2.1 Review of CDM-PDD and additional documentation

The validation is performed primarily as a document review of the publicly available project documents. The assessment is performed by trained assessors using a validation protocol.

A site visit is usually required to verify assumptions in the baseline. Additional information can be required to complete the validation, which may be obtained from public sources or through telephone and face-to-face interviews with key stakeholders (including the project developers and Government and NGO representatives in the host country). These may be undertaken by the local SGS affiliate. The results of this local assessment are summarized in Annex 1 to this report.

2.2 Use of the validation protocol

The validation protocol used for the assessment is partly based on the templates of the IETA / World Bank Validation and Verification Manual and partly on the experience of SGS with the validation of CDM projects. It serves the following purposes:

- it organises, details and clarifies the requirements the project is expected to meet; and
- it documents both how a particular requirement has been validated and the result of the validation.

The validation protocol consists of several tables. The different columns in these tables are described below.

Checklist Question	***Means of verification (MoV)***	***Comment***	***Draft and/or Final Conclusion***
The various requirements are linked to checklist questions the project should meet.	*Explains how conformance with the checklist question is investigated. Examples of means of verification are document review (DR) or interview (I). N/A means not applicable.*	*The section is used to elaborate and discuss the checklist question and/or the conformance to the question. It is further used to explain the conclusions reached.*	*This is either acceptable based on evidence provided (**Y**), or a **Corrective Action Request (CAR)** due to non-compliance with the checklist question (See below). **New Information Request (NIR)** is used when the validation team has identified a need for further clarification.*

The completed validation protocol for this project is attached as Annex 2 to this report

2.3 Findings

As an outcome of the validation process, the team can raise different types of findings

In general, where insufficient or inaccurate information is available and clarification or new information is required the Assessor shall raise a **New Information Request (NIR)** specifying what additional information is required.

Where a non-conformance arises the Assessor shall raise a **Corrective Action Request (CAR).** A

CAR

is issued, where:

I. mistakes have been made with a direct influence on project results;

II. validation protocol requirements have not been met; or

III. there is a risk that the project would not be accepted as a CDM project or that emission reductions will not be verified.

The validation process may be halted until this information has been made available to the assessors' satisfaction. Failure to address a NIR may result in a CAR. Information or clarifications provided as a result of an NIR may also lead to a CAR.

Observations may be raised which are for the benefit of future projects and future verification or validation actors. These have no impact upon the completion of the validation or verification activity.

Corrective Action Requests and New Information Requests are raised in the draft validation protocol and detailed in a separate form (Annex 3). In this form, the Project Developer is given the opportunity to "close" outstanding CARs and respond to NIRs and Observations.

2.4 Internal quality control

Following the completion of the assessment process and a recommendation by the Assessment team, all documentation will be forwarded to a Technical Reviewer. The task of the Technical Reviewer is to check that all procedures have been followed and all conclusions are justified. The Technical Reviewer will either accept or reject the recommendation made by the assessment team.

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3. Determination Findings

3.1 Participation requirements

The host Party for this project is India. India has ratified the Kyoto protocol on 26th Aug 2002. A Letter of Approval was missing so CAR01 was raised. The project proponent provided the letter dated 11th September 2006; issued by the Indian DNA (reference number 4/16/2006-CCC) has been provided by the client which was verified from the original copy. Hence CAR01 was closed out.

No Annex I Party has been identified in the PDD and therefore no further Letter of Approval was available. It is observed that the CDM EB has agreed that the registration of a CDM project activity can take place without an Annex I Party being involved at the stage of registration although it should be noted that before CER can be transferred to an Annex I Party, a Letter of Approval will need to be submitted.

3.2 Baseline selection and additionality

The baseline selected by the project proponent was the most likely baseline scenario. Now, the project has applied baseline as mentioned in the small scale methodology AMSIIIH version 03 dated 28th July 2006 as per the small scale CDM project activities.

The project has adopted the Technological barrier and Barrier due to prevailing practices for the present project activity to justify the additionality of the project. In addition to this project proponent has also mentioned other barriers.

The additionality of the project was assessed using the technological barrier. The technological barrier is not transparent in the PDD so CAR11 was raised. The project proponent replied by mentioning that the presence of hydrogen sulphide make the biogas corrosive which will corrode the equipments from inside. This will result in the shut down of project activity for maintenance. Due to this shut down there will be no methane recovery and the wheat straw wash water will be treated and left in drain as was the case before commissioning of project activity. The PDD was rephrased accordingly. This was accepted and hence CAR11 is closed out.

CAR12 was raised to get the clarification on barrier due to prevailing practices mentioned in the PDD and also on the statements “first of its kind in India” and “No paper unit in the state has commissioned high rate UASB digester”. The project proponent replied by rephrasing the PDD and providing the certificate from IPPTA stating there is no unit which is treating wheat straw wash water. The second statement was removed in revised PDD as there is an existing biomethanation unit in the state. This was accepted after verifying the documents and hence CAR12 was closed out. The IPPTA certificate can be uploaded as proof of additionality.

CAR13 was raised to get the clarification on the other barriers mentioned in the PDD. The project proponent replied by explaining that other barrier is due to the unavailability of trained man power and same is mentioned in revised PDD. This was accepted and hence CAR13 was closed out.

The project proponent is claiming credits for Fixed crediting period of ten years from date of registration.

Based on the findings above, it was concluded that the project activity was not a likely baseline scenario and hence additional to any that would occur in absence of project activity.

3.3 Application of Baseline methodology and calculation of emission factors

The proposed CDM project activity is the methane recovery from the wheat straw wash water in an high rate UASB digester and uses baseline methodology as described under Type AMSIIIH version 03 dated 28th July 2006 as per small scale CDM project activities.

Emission reduction calculations excel sheet mentioning baseline emissions and project emissions was not provided by project proponent so CAR10 was raised. The project proponent replied by providing the emission reduction calculation sheet. The local assessor checked the background information for arriving at the values selected as benchmark for baseline emissions. Also the calculations for baseline activity are included in emission reduction calculation spreadsheet. The baseline emission calculations and emission reductions were not in order during the desk review. The project proponent was asked why the emission reduction value has increased from 12564 tCO2 to 12578 t CO2. The project proponent replied by providing justification that the emission factor has decreased and as a result project emissions have decreased so the emission reductions have increased. This was accepted and the actual emission reduction figures would further be checked during verification. The CAR10 is closed out.

3.4 Application of Monitoring methodology and Monitoring Plan

The present CDM project activity uses monitoring methodology as described in AMSIIIH version 03 dated 28th July 2006 as per small scale CDM project activities.

NIR15 was raised to get the clarification on the parameters mentioned in the monitoring plan. It was not clear that flow rate of which parameter will be monitored, unit of electricity was not clear and flaring of which parameter will take place. The project proponent replied by providing the revised PDD mentioning the parameter flow rate of wheat straw wash, unit of electricity and flaring of parameter. This was accepted and hence NIR15 was closed out.

Monitoring of all the other parameters are in accordance with the methodology.

3.5 Project design

The Project Design Document (PDD) was designed as per version 2 of guidelines laid for preparing PDD of large scale CDM project activity hence the format of the present PDD was checked against it.

The project boundary given in the PDD was not clear and hence CAR14 was raised for the same. The project proponent made required corrections in the project boundary and same are included in the rephrased PDD, this was also verified by the local assessor and hence CAR14 was closed out.

CAR6 was raised to get the clarification on the PDD template which was not followed correctly. The project proponent replied by revising the PDD and correcting the errors in implementing the PDD template. This was accepted and hence CAR6 was closed out.

NIR7 was raised to know if some training was provided for operating the project activity or not. The project proponent replied by providing the training schedule and after cross verifying it from Manging Director this was accepted and hence NIR7 was closed out.

Project starting date was not mentioned in PDD clearly so CAR8 was raised. The project developer replied by revising the PDD and mentioning the starting date of project activity with documentary proof which were accepted after verifying the documents and hence CAR8 was closed out.

CAR9 was raised to get the clarification on methodology version applied for the project activity. The project proponent replied by applying the new version of methodology and this was accepted. Hence CAR9 was closed out.

3.6 Environmental Impacts

The compliance with local environmental regulations in that EIA requirement for the project activity was checked and also project proponent submitted consent to establish and operate from Punjab Pollution Control Board (PPCB), a local authority responsible for giving Environmental clearance. The project proponent in table under section F in the PDD mentions in details regarding the Environmental Impacts on various parameters like Air quality, Water, Land, Noise generation and ecology and benefits to these parameters due to project activity. This was also checked from the copy of report which was given by the project proponent to the local assessor. These were in compliance and even during local stakeholder consultation carried out by local assessor no negative comment was reported.

3.7 Local stakeholder comments

The project proponent carried out the local stakeholder consultation as mentioned in the PDD and also got the relevant clearances from panchayat and PPCB but no documentary proof was provided so NIR2 was raised. The project proponent provided the documentary proof i.e. minutes of meeting, NOC from Gram panchayat and also the PPCB Consent order and same were verified during the site visit by the local assessor. This was accepted and hence NIR2 was closed out.

NIR3 was raised to get the evidence for the media used to invite the comments from local stakeholders. The project proponent replied by telling that the local stake holders were invited in person to attend the meeting in factory premises. This was accepted by cross verifying during the local stake holder consultation. Hence NIR3 was closed out.

NIR4 was raised as PDD was not mentioning the summary of stakeholder comments. The project developer replied by mentioning the summary in the revised PDD and also mentioned that no major concerns were raised by the local people and same were verified by the local Assessor after having the interaction with the local people during the site visit this was accepted and hence NIR4 was closed out.

NIR5 was raised as PDD was not mentioning the due consideration of local stakeholder comments. The project developer mentioned that no negative comment was received from the stakeholders and same was mentioned in revised PDD. This was accepted after going through the revised PDD and hence NIR5 was closed out.

The local assessor also verified all the documents during consultation with few people whom he met during the site visit. They praised the project activity and told that it has resulted in positive effects to the people of local community.

4. Comments by Parties, Stakeholders and NGOs

In accordance with sub-paragraphs 40 (b) and (c) of the CDM modalities and procedures, the project design document of a proposed CDM project activity shall be made publicly available and the DOE shall invite comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available. This chapter describes this process for this project.

4.1 Description of how and when the PDD was made publicly available

The PDD and the monitoring plan for this project were made available on the SGS website http://www.sgsqualitynetwork.com/tradeassurance/ccp/projects/project.php?id=112 and were open for comments from 22nd June 2006 to 21st July 2006. Comments were invited through the UNFCCC CDM homepage.

The PDD and the monitoring plan for this project were made available on the SGS website http://www.sgsqualitynetwork.com/tradeassurance/ccp/projects/project.php?id=164 and were open for comments from 15th November 2006 to 14th December 2006. Comments were invited through the UNFCCC CDM homepage. This was done as per EB27 directive.

4.2 Compilation of all comments received

The project was up loaded for International stakeholder consultation (ISHC) for a period of 30 days and received one comment.

Comment 1	19-07-06 5:55pm
Name: preet kaur	**City: new delhi**
Organisation: individual	**Country: india**

Since A.4.3 of the pdd states that “in absence of the project activity SIL would have continued treating its waste stream in the existing anaerobic lagoons”, the DOE should get an explicit undertaking from SIL that it is not undertaking this project for any statutory compliance whatsoever. This is important because in paper industry disposal of wastewater is a major problem and the norms to be followed have been tightened by the Government agencies over a period of time. The DOE should ensure that this project has not been undertaken to fulfill commitment made by SIL, as a part of a package to be implemented in phases, to government or judicial bodies.

Comments on the barriers to the project activity given under B.3 of the pdd

Satia Paper Mill in Muktsar District of Punjab has been using this process since 1997. An excerpt from the website of Ministry of Environment and Forest, Government of India (http://www.envfor.nic.in/divisions/ic/wssd/doc3/chapter16/css/Chapter16.htm) is reproduced below:
“Managing Methane
Satia Paper Mills, Muktsar, Punjab was generating large amounts of organic waste,including methane, as a result of its manufacturing process. They were also using 20 tonnes of rice husk per day in their boilers, leading to substantial emission of greenhouse gases. The conventional effluent treatment system was not able to meet the norms set by the Pollution Control Board and the mill was becoming economically unviable. In 1997 the mill switched to a technology which provided a solution to both its effluent treatment and energy requirement problems. As part of the UNDP- supported ‘Development Of High Rate Biomethanation Processes as means of Reducing Green House Gases Emission’ project being implemented by the Ministry of Non-conventional Energy Sources, an Upflow Anaerobic Sludge Blanket Bioreactor was installed at the mill. The reactor uses the organic waste from the mill to produce biogas. The biogas is used in the boilers, resulting in net saving of operating cost of the mill. The use of rice husk is also avoided which further reduces its emission levels. The new technology has meant 45 per cent reduction in Chemical Oxygen Demand and around 80-85 per cent Biological Oxygen Demand reduction. This technology can be used in a variety of production processes where organic waste levels are high, including leather factories and tanneries, dairies, confectioneries, food processing units and breweries. Started in 1994, the US $5.5 million MNES project is serving not only to control emissions of methane, a greenhouse gas, but also its utilization as a clean fuel. The project aims to provide technical assistance and institutional preparation for formulating a national

strategy for biogas generation and utilisation, in introducing, demonstrating and standardizing a wide variety of technologies, and in bringing about an awareness amongst policy makers, waste generators, and others."

This paper mill is about 100 Km away from SIL plant and in the same state of Punjab using this technology for almost a decade without availing any CDM benefits. Thus besides addressing the affluent treatment problem, this project has been undertaken to reduce the rice husk being consumed by SIL in its boiler as the price of rice husk has increased very rapidly in the last few years in the state of Punjab and the success of this project is not dependent on its getting the CDM benefits.
The technological and resource barrier do not exist based on the above facts. Regarding the barrier due to prevailing practice, the pdd has used a lot of qualifying words,to discriminate this project from those presently operational:

1. "The project activity is the first of its kind in India wherein waste water from wheat straw wash would be treated in a UASB digestor and gas liberated would be recovered and burnt"
2. "No paper unit in the state has commissioned high rate UASB digestor so far"

In case of Satia Paper Mill the digestor is called bioreactor and it just does not process only wheat straw wash but other waste water as well.
Also, the pdd itself states that this technology was introduced in India in late eighties and although it may not have widespread use but still a lot of units are using this without availing CDM benefits.

Thus this project is not at all additional but business as usual.

During the second international uploading from 15-11-2006 to 14-12-2006 there was no comment received.

4.3 Explanation of how comments have been taken into account

Following is the reply to her comments:

1. The project activity of SIL has not been undertaken to fulfil any statutory or judiciary requirements. The plant was meeting its waste water discharge standards with its anaerobic treatment system. The consent to operate from "state pollution control board" a statutory authority was accorded to the unit before the implementation of the CDM project activity also.

2. The project of Satia Paper mentioned in the report was a pilot project funded by UNDP and MNES. Satia Paper mill did not have any chemical recovery system and was treating black liquor in anaerobic lagoons prior to digesters, since black liquor is a highly polluting waste with high BOD-COD content, Satia paper were unable to meet the discharge standards without digesters. Shreyans Paper unit is having a chemical recovery process in place wherein they are recovering chemicals from black liquor thereby reducing the BOD-COD contents to the limit of discharge standards.

3. Implementation of UASB technology for the first time in India for treating wash water spent has been certified by the Indian Pulp & paper technical association which is an apex association of paper manufacturers in India.

Comment by DoE:- The reply to international stakeholder comments are satisfactory and with documentary evidences are also provided. The IPPTA certificate and pollution control consent was also seen and obtained the copy for the same. These were checked and found to be in order and this was accepted and the reply is OK.

During second uploading as per EB27 meeting report there was no comment received.

5. Validation opinion

SGS has performed a validation of the project: "Methane Recovery from waste water generated from wheat straw wash water at paper manufacturing unit of Shreyans Industries Limited (SIL) Ahmedgarh District Sangrur Punjab, India", by Shreyans Industries Limited. The Validation was performed on the basis of the UNFCCC criteria and host country criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting. Using a risk based approach, the review of the project design documentation and the subsequent follow-up interviews have provided SGS with sufficient evidence to determine the fulfilment of the stated criteria. In our opinion, the project meets all relevant UNFCCC requirements for the CDM and all relevant host country criteria. The project will hence be recommended by SGS for registration with the UNFCCC.

SGS has received confirmation by the host Party that the project activity assists it in achieving sustainable development.

By using methane as fuel for generation of thermal energy, the project results in reductions of greenhouse gas emissions that are real, measurable and give long-term benefits to the mitigation of climate change. A review of the technological barrier and barrier due to prevailing practices demonstrates that the proposed project activity was not a likely baseline scenario. Emission reductions attributable to the project are hence additional to any that would occur in the absence of the project activity. The project is under implementation stage and is likely to achieve the estimated amount of emission reductions.

The validation is based on the information made available to SGS and the engagement conditions detailed in the report. The validation has been performed using a risk based approach as described above. The only purpose of this report is its use during the registration process as part of the CDM project cycle. Hence SGS can not be held liable by any party for decisions made or not made based on the validation opinion, which will go beyond that purpose.

The DOE declares herewith that in undertaking the validation of this proposed CDM project activity it has no financial interest related to the proposed CDM project activity and that undertaking such a validation does not constitute a conflict of interest which is incompatible with the role of a DOE under the CDM.

6. List of persons interviewed

Date	*Name*	*Position*	*Short description of subject discussed*
31-07-2006	Mr. Arun Kumar	ED & CEO	Project Proponents view on project activity, Board Minutes and IRR Calculation sheet
31-07-2006	Mr. K N Tiwari	GM (R&D &QC)	Technical description of project activity and baseline and data monitoring for project activity
31-07-2006	Mr. A K Goyal	GM (HRD)	Local stakeholder consultation minutes of meeting.
01-08-2006	Mr. Kishori lal Badhan	Municipal Councillor	Local stakeholder
01-08-2006	Mr. Jatinder Kumar Bhola	President Municipal Council	Local stakeholder
01-08-2006	Mr. Balwinder Singh	Sarpanch	Local stakeholder
01-08-2006	Mr. Major Singh	Panch	Local stakeholder

7 Document references

Category 1 Documents (documents provided by the Client that relate directly to the GHG components of the project, (i.e. the CDM Project Design Document, confirmation by the host Party on contribution to sustainable development and written approval of voluntary participation from the designated national authority):

/1/ Letter of Approval

/2/ Modalities of communication

/3/ PDD version 1 dated 4th April 2006 (web hosted)

/4/ PDD version 2 dated 21st August 2006

/5/ PDD version 3 dated 26th October 2006

/6/ PDD version 4 dated 12th December 2006

/7/ PDD version 5 dated 5th February 2007 (present)

Category 2 Documents (background documents used to check project assumptions and confirm the validity of information given in the Category 1 documents and in validation interviews):

/1/ NOC from Village Panchayat

/2/ Consent to establish from Punjab Pollution control Board (PPCB)

/3/ Revised CER Calculation sheet

/4/ Revised Northern regional baseline excel sheet

/5/ Project Starting date proof Board MOM for considering CDM

/6/ IPPTA Certificate

/7/ GHG Manual

/8/ Stakeholder MOM

/9/ IARPMA Letter

/10/ SIL_IARPMA correspondance

Annex 1

TABLE 12ADDITIONAL INFORMATION TO BE VERIFIED BY LOCAL ASSESSORS / SITE VISIT

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
Technology will not be changed during the crediting period. To be checked during site visit.			The letter stating there will be no change in technology during the crediting period is given by the project proponent.	OK	OK
EIA was carried out by the project proponent. Report to be checked during site visit.			EIA Report received	OK	OK
Project boundary to be checked during site visit			Project boundary will be checked during verification stage as the project is in construction stage.	OK	OK
Monitoring plan to be discussed during site visit.			Monitoring plan is OK.	OK	OK
Technology barrier mentioned is not clearly defined in PDD.			Documentary evidences provided.	OK	OK
"Barrier due to prevailing practices" mentioned in PDD is not clear. - Provide evidence for the statement that the project is first of its kind in India.			The cocumentary evidences have been provided and the PDD has been revised.	OK	OK
Other barrier mentioned in PDD is not transparent and clear.			It is mentioned clearly in revised PDD.	OK	OK
Start date of project activity mentioned in PDD to be checked with the documentary proof during the site visit.			Documentary proof provided and PDD is revised.	OK	OK

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Annex 2

TABLE 1 PARTICIPATION REQUIREMENTS FOR CLEAN DEVELOPMENT MECHANISM (CDM) PROJECT ACTIVITIES (REF PDD, LETTERS OF APPROVAL AND UNFCCC WEBSITE) ALL CDM PROJECT ACTIVITIES

REQUIREMENT	MoV	Ref	Comment	Draft finding	Concl
1.1 The project shall assist Parties included in Annex I in achieving compliance with part of their emission reduction commitment under Art. 3 and be entered into voluntarily.	Document Rev	PDD	Yes, Project will reduce GHG emissions, but no Annex-1 Party is listed	OK	OK
1.2 The project shall assist non-Annex I Parties in achieving sustainable development and shall have obtained confirmation by the host country thereof, and be entered into voluntarily	DR	PDD	Yes, The project activity will contribute to sustainable development. Host Country Approval from Designated National Authority is to be provided by the client.	CAR1	OK CAR1 closed
1.3 All Parties (listed in Section A3 of the PDD) have ratified the Kyoto protocol and are allowed to participate in CDM projects	DR	UNFCCC	Yes, India has ratified the protocol on 26th August 2002 and is allowed to participate. (http://unfccc.int/parties_and_observers/parties/items/2109.php)	OK	OK
1.4 The project results in reductions of GHG emissions or increases in sequestration when compared to the baseline; and the project can be reasonably shown to be different from the baseline scenario	DR	PDD	Yes, The project activity results in reduction of GHG emissions by treatment of waste water generated from wheat straw wash using high rate UASB technology.	OK	OK

REQUIREMENT	MoV	Ref	Comment	Draft finding	Concl
1.5 Parties, stakeholders and UNFCCC accredited NGOs shall have been invited to comment on the validation requirements for minimum 30 days (45 days for AR projects), and the project design document and comments have been made publicly available	DR	UNFCCC web	Yes, the project is listed on UNFCCC website from 22nd June to 21st July 2006. One comment was received. The project was also listed on SGS climate change website from 22nd June to 21st July 2006 and one comment was received. The web link is provided below as:- http://www.sgsqualitynetwork.com/tradeassurance/ccp/projects/project.php?id=112	OK	OK
1.6 The project has correctly completed a Project Design Document, using the current version and exactly following the guidance	DR	PDD	Yes, the guidelines for completing the PDD has been followed , except some pending closure of CARs and NIRs	Pending	OK
1.7 The project shall not make use of Official Development Assistance (ODA), nor result in the diversion of such ODA	DR	PDD	No, ODA is Utilized	OK	OK
1.8 For AR projects, the host country shall have issued a communication providing a single definition of minimum tree cover, minimum land area value and minimum tree height. Has such a letter been issued and are the definitions consistently applied throughout the PDD?	DR	PDD	Not Applicable	Not Applicable	N/A
1.9 Does the project meet the additional requirements detailed in: Table 9 for SSC projects Table 10 for AR projects Table 11 for AR SSC projects	DR	PDD	See table 9	Pending	OK
1.10 Is the current version of the PDD complete and does it clearly reflect all the information presented during the validation assessment.	DR	PDD	This is the only version of PDD we have utilized and present all the information.	OK	OK

REQUIREMENT	MoV	Ref	Comment	Draft finding	Concl
1.11 Does the PDD use accurate and reliable information that can be verified in an objective manner?	DR	PDD	Yes, the PDD uses accurate and reliable information	OK	OK

Table 7Comments by local stakeholders (Ref PDD Section G) All CDM Project Activities

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
7.1 Have relevant stakeholders been consulted?	DR	Sec G	The list of local stake holders consulted should be provided. To be checked during site visit.	NIR2	OK NIR2 closed
7.2 Have appropriate media been used to invite comments by local stakeholders?	DR		Media used to invite the comments is not mentioned in PDD.	NIR3	OK NIR3 closed
7.3 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?	DR	G.1	No, stake holder consultation process is not required as per law. For CDM requirements the stakeholder consultation by the project participant was carried out.	OK	OK
7.4 Is a summary of the stakeholder comments received provided?	DR	G.2	No, Summary of comments not mentioned clearly in PDD. To be provided by the client.	NIR4	OK NIR4 closed
7.5 Has due account been taken of any stakeholder comments received?	DR		No, Due account of stakeholder comments is not clearly mentioned in PDD	NIR5	OK NIR5 closed

TABLE 8 OTHER REQUIREMENTS ALL CDM PROJECT ACTIVITIES

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
8.1 Project Design Document					

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CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
8.1.1 Editorial issues: does the project correctly apply the PDD template and has the document been completed without modifying/adding headings or logo, format or font.	DR.	PDD	No, The PDD template is not followed correctly. Page1 of PDD is different. Underlining is done is monitoring plan and some pages of PDD also.	CAR6	OK CAR6 closed
8.1.2 Substantive issues: does the PDD address all the specific requirements under each header. If requirements are not applicable / not relevant, this must be stated and justified	DR		Pending Closure of CARS / NIRS	Pending	OK
8.2 Technology to be employed					
8.2.1 Does the project design engineering reflect current good practices?			Yes, The project design reflect current good practices	OK	OK
8.2.2 Does the project use state of the art technology or would the technology result in a significantly better performance than any commonly used technologies in the host country?			Yes, the project is using the technology that would result in better performance than the technology used earlier. The technology used will capture methane and will be burnt as fuel in boiler for producing steam.	OK	OK
8.2.3 Is the project technology likely to be substituted by other or more efficient technologies within the project period?			Probably not during the crediting period. To be checked during site visit.	TBC	OK
8.2.4 Does the project require extensive initial training and maintenance efforts in order to work as presumed during the project period?			No, the training requirement is not mentioned in PDD clearly. Provide evidence for the same.	NIR7	OK NIR7 closed
8.3 Duration of the Project/ Crediting Period					

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CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
8.3.1 Are the project's starting date and operational lifetime clearly defined and reasonable?			Project starting date is not mentioned clearly in the PDD but, the operational life time is clearly defined as 25 years. Proof of starting date needs to be furnished by the project proponent.	CAR8	OK CAR8 closed
8.3.2 Is the assumed crediting time clearly defined and reasonable (renewable crediting period of max. two x 7 years or fixed crediting period of max. 10 years)?			Yes, Fixed crediting period of 10 years is defined in the PDD.	OK	OK
8.3.3 Does the project's operational lifetime exceed the crediting period	DR		Yes, the operational lifetime (25 years) exceeds the crediting period (10 years).	OK	OK

TABLE 9 ADDITIONAL REQUIREMENTS FOR SSC PROJECT ACTIVITIES ONLY

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
9.1 Does the project qualify as a small scale CDM project activity as defined in paragraph 6 (c) of decision 17/CP.7 on the modalities and procedures for the CDM?		UNFCCC	Yes, the project qualifies as a small scale project activity in type 13 category.	OK	OK
9.2 The project conforms to one of the categories listed in Appendix B to Annex II to Decision 21/CP8		UNFCCC	Yes, The project conforms to Type 13 category i.e. waste handling and disposal.	OK	OK
9.3 The small scale project activity is not a debnudled component of a larger project activity?		DR	No, Small scale project activity is not a debnudled component of a larger project.	OK	OK
9.4 PDD has been prepared in accordance with appendix A of Annex II to Decision 21/CP8			Yes, PDD has been prepared in accordance with Appendix A of Annex II but pending closure of CARs and NIRs.	Pending	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
9.5 The project uses a simplified baseline and monitoring methodology specified in Appendix B. If not, they may propose changes to the meths or a new SSC project category		UNF CCC	Yes, The project is using simplified baseline and monitoring methodology (AMS III H) as specified in Appendix B but of older version i.e. AMS III H version 1. The baseline scenario of project activity is the continuation of existing anaerobic treatment system resulting in methane discharge to the atmosphere.	CAR9	OK CAR9 closed
9.6 Are the emission reductions determined in accordance with the methodology described			Yes, the emission reductions are determined in accordance with the methodology but of older version. Calculation sheet was also not provided by the project proponent for desk reviewing for both project activity emissions and baseline emissions. CER calculation sheet was also not provided by the project proponent.	CAR10	OK CAR10 closed
9.7 Is there any bundling of SSC activities into one PDD? If so, does the monitoring plan consider sampling of activities? Refer to para 19 of Annex II. Also, note bundling provisions in SSC Briefing Note and SSC meths I C / I D and III D and Para 22e of Appendix B			NO, there is no bundling of SSC activities into one PDD.	OK	OK
9.8 Is EIA required by host party? If not, none is required irrespective of SHC. If yes, has one been performed consistent with local requirements?	F		EIA is not required by host party. EIA was carried out by the project proponent. Report to be checked during site visit.	TBC	OK

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
9.9 The project results in emission reductions that are additional in accordance with the following requirements: • (para 26) The project is additional if emissions are reduced below those in the absence of the project • (Para 27) Simplified baseline can be used; if not, baseline proposed shall cover all gases, sectors and sources listed in Annex A to the KP • Para 28) One or more barriers as detailed in attachment A to Appendix B to Annex II will be used to demonstrate that the project would not proceed without the CDM	PDD B.3	DR	Technological barrier is not transparent and clear. Explain. "Barrier due to prevailing practices" mentioned in PDD is not clear. - Provide evidence for the statement that the project is first of its kind in India. - Provide evidence for the statement that no paper unit in the state has commissioned high rate UASB digesters so far. Other barrier mentioned in PDD is not transparent and clear.	CAR11 CAR12 CAR13	OK CAR11 closed OK CAR12 closed OK CAR13 closed
9.10 Leakage is calculated according to the provisions of the SSC methodologies in Appendix B			Leakage is not considered as there is no equipment is transferred from another activity to the project activity or no existing equipment is transferred from project activity to another activity.	OK	OK
9.11 The project boundary shall be constructed in accordance with the requirements of the SSC meths in Appendix B	PDD		Project boundary is not clear. From the project boundary it appears that gas holder is supplying to industry. Clarify.	CAR14	OK CAR14 closed
9.12 The Monitoring plan shall be consistent with the requirements of the SSC methodology in Appendix B and shall provide for the collection and archiving of data needed to determine project emissions, baseline emissions and leakage.			Yes, Monitoring plan looks consistent. Following parameters are not clear. Flow rate—of what? Unit of electricity is not clear.	NIR15	OK NIR15 closed

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CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
9.13 The monitoring plan shall present good monitoring practice appropriate to the circumstances of the project activity (para 33)			Pending NIR15	Pending	OK
9.14 If project activities are bundled, separate monitoring plan shall be prepared for each of the activities or an overall plan reflecting good monitoring practice will be prepared, consistent with the above requirements			No, the project is not a bundled project activity.	OK	OK

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Annex 3

FINDINGS OVERVIEW

Findings from validation of methane recovery from waste water generated from wheat straw wash at paper manufacturing unit of Shreyan industries limited (sil) ahmedgarh, district sangrur, punjab cdmval0633.

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 (CAR). 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 end and may or may not be addressed. They are primarily to act as signposts for the verifying DOE.
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: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
1	CAR	Host Country Approval from Designated National Authority is to be provided.	1.2
Date: 29/08/06 [comment client] Host country approval has been obtained and scanned copy is attached.			
Date: 03-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] Original scanned copy of host country approval (HCA) received and checked with the original copy of the HCA. So CAR1 could be closed out.			
Date: 03-10-2006 S Shetty [Acceptance and close out] OK CAR1 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
2	NIR	The list of local stakeholders consulted should be provided	7.1
Date: 29/08/06 [comment client] Stakeholder consultation meeting minutes and list of participants is attached.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Minutes of meeting missing and list of participants is found attached. NIR 2 could not be closed out.			
Date: 26/10/06			

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[comment client] Minutes of stakeholder consultation meetings attached.
Date: 27-10-06 Syed Khursheed Zaidi [Comment Local Assessor] Minutes of stakeholder consultation meetings attached were reviewed and found to be OK. This was also verified by local assessor during the meeting with some of local stake holders during site visit. The minutes were discussed and no negative comment reported or seen during the site visit. Hence NIR2 could be closed out.
Date: 27-10-2006 S Shetty [Acceptance and close out] OK NIR2 closed out.

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
3	NIR	Media used to invite the comments is not mentioned in PDD.	7.2
Date: 29/08/06 [Comment Client] Comments were invited from local stakeholders by convening a meeting. Local stakeholders were invited by SIL personnel.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Minutes of meeting not provided and invitation letter also missing. NIR 3 could not be closed out.			
Date:26/10/06 [Comment Client] Minutes of stakeholder consultation meetings attached. The meeting was convened by informing stakeholders personally and not by invitation letters.			
Date: 27-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] This was accepted and hence NIR3 could be closed out			
Date: 27-10-2006 S Shetty [Acceptance and close out] OK NIR3 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
4	NIR	Summary of comments not mentioned clearly in PDD.	7.4
Date: 29/08/06 Minutes of stakeholder meeting were provided to local assessor.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Please Check the query raised. NIR4 could not be closed out.			
Date:26/10/06 [Comment Client] Summary of the comments received has been included in the PDD.			
Date: 27-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] Revised PDD received was reviewed and found to be OK. This was accepted and hence NIR4 could be closed out.			
Date: 27-10-2006 S Shetty [Acceptance and close out] OK NIR4 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
5	NIR	Due account of stakeholder comments is not clearly mentioned in PDD	7.5
Date: 29/08/06 [Comment Client] Minutes of stakeholder meeting were prepared			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Please check the query raised. NIR5 could not be closed out.			

Date:26-10-06 [Comment Client] PDD has been revised
Date: 27-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] revised PDD mentions about the due account of stake holder comments clearly. This was accepted and hence NIR5 could be closed out.
Date: 27-10-2006 S Shetty [Acceptance and close out] OK NIR5 closed out.

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
6	CAR	The PDD template is not followed correctly. Page 1, section D of PDD has underlined some units. In section B.5 the date of completion is underlined. Please clarify.	8.1.1
Date: 29/08/06 The PDD has been revised and underlines are removed.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Rephrased PDD is checked and underlines had been removed. CAR6 could be closed out.			
Date: 03-10-2006 S Shetty [Acceptance and close out] OK CAR6 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
7	NIR	The training requirement is not mentioned in PDD clearly	8.2.4
Date: 29/08/06 The training requirement is mentioned on page 9 of attached GHG manual.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] The GHG manual provided is having information on training requirement and hence NIR7 could be closed out.			
Date:03-10-2006 S Shetty [Acceptance and close out] OK NIR7 closed out			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
8	CAR	Project starting date is not mentioned clearly in the PDD. Provide evidence.	8.3.1
Date: 29/08/06 Project start date has been revised with proof of the same attached.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Start date proof received and same is reviewed and found to be OK. Hence CAR8 could be closed out.			
Date: 03-10-2006 S Shetty [Acceptance and close out] OK CAR8 closed out			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
9	CAR	Older version of methodology AMS III H is used.	9.5
Date: 29/08/06			

PDD has been revised using latest methodology AMS III H- Version 03 dated 28th July 2006.
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Rephrased PDD is using the current version of AMS-IIIH dated 28th july 2006 version -03. Hence CAR9 could be closed out.
Date: 03-10-2006 S Shetty [Acceptance and close out] OK CAR9 closed out

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
10	CAR	CER calculation sheet for both baseline and project activity to be provided.	9.6
Date: 29/08/06 CER calculation sheet has been attached.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Calculation sheet attached is not clear and shows increased number of emission reductions. The emission reductions have increased from 12564 tCO2 eq to 12578 tCO2 eq annually. Explain. Hence CAR 10 could not be closed out.			
Date:26-10-06 [Comment Client] Increase in CER is due to decrease in project a emission which again is due to lowering of emission factor from 957 tCO2/GwH to 896 tCO2/Gwh. This change in emission factor is due to inclusion of electricity generation data of 2005-06 while doing the calculations.			
Date: 27-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] This was accepted after reviewing the excel sheet and CAR10 could be closed out.			
Date: 27-10-2006 S Shetty [Acceptance and close out] OK CAR10 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
11	CAR	Technological barrier is not transparent and clear. Explain.	9.9
Date: 26/10/06 [Comment Client] Technological barrier has been revised in the PDD.			
Date: 27-10-2006 Syed Khursheed Zaidi [Comment Local Assessor] Rephrased PDD is mentioning the technological barrier with some modifications. As it is used to prove the additionality so it should be the strongest and it is there in the rephrased PDD. Hence CAR11 could be closed out			
Date: 27-10-2006 S Shetty [Acceptance and close out] OK CAR 11 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
12	CAR	Barrier due to prevailing practices" mentioned in PDD is not clear. - Provide evidence for the statement that the project is first of its kind in India. - Provide evidence for the statement that no paper unit in the state has commissioned high rate UASB digesters so far.	9.9

Date: 29/08/06 [Comment Client] Barrier due to prevailing practice is revised mentioning that the project activity. Recovery of methane in UASB digesters from wheat straw wash is first of its kind in India. IPPTA's certificate is attached which is the leading association of paper technologists in India.
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] The IPPTA's certificate mentioning no other unit is treating wheat straw wash is found to be OK and it answers the first part of the query. The reply to second part is not mentioned in the reply. Hence CAR12 could not be closed out.
Date: 26-10-06 [Comment Client] The statement has been removed from the PDD as there is an existing biomethanation unit in the state which was commissioned to treat black liquor waste on pilot basis.
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] As there is an existing biomethanation in the state so PDD has been rephrased and this was accepted. Hence CAR12 could be closed out.
Date: 27-10-2006 S Shetty [Acceptance and close out] OK CAR 12 closed out.

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
13	CAR	Other barrier mentioned in PDD is not clear. Explain	9.9
Date: 29/08/06 Other barriers explained in the PDD are related to unavailability of trained manpower.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Rephrased PDD is mentioning that the other barrier is due to the lack of availability of trained man power. This was accepted hence CAR13 could be closed out.			
Date: 03-10-2006 S Shetty [Acceptance and close out] OK Car13 closed out.			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
14	CAR	Project boundary is not clear. From the project boundary it appears that gas holder is supplying to industry	9.11
Date: 29/08/06 Project boundary has been revised.			
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Rephrased PDD is clearly marking the project boundary and hence CAR14 could be closed out.			
Date: 03-10-2006 S Shetty [Acceptance and close out] OK CAR14 closed out			

Date: 25-7-2006 Raised by: S Shetty

No.	Type	Issue	Ref
15	NIR	Parameters of Monitoring plan are not clear. - Flow rate of what - Unit of electricity is not clear. - Flaring of what	9.12
Date: 29/08/06			

Parameters of monitoring plan have been revised in revised PDD version.
Date: 29-09-2006 Syed Khursheed Zaidi [Comment Local Assessor] Parameters of monitoring plan are clearly defined in rephrased PDD by the project developer. This is accepted and hence NIR15 could be closed out.
Date: 03-10-2006 S Shetty [Acceptance and close out] OK NIR15 closed out

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