
VALIDATION REPORT

EID Parry (India) Limited

**BAGASSE BASED CO-GENERATION
PROJECT AT PUDUKKOTTAI TAMIL
NADU INDIA**

SGS Climate Change Programme

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|---|------------------------------|
| Date of issue: | Project No.: |
| 11-05-2007 | CDM.Val0710 |
| Project title | Organisational unit: |
| Bagasse based cogeneration project at Pudukkottai Tamil Nadu India. | SGS Climate Change Programme |
| Revision number | Client: |
| 1 | EID Parry (India) Limited |

Summary

SGS India Pvt. Ltd., an affiliate of SGS United Kingdom Ltd. has made a validation of the CDM project activity "Bagasse based cogeneration project at Pudukkottai Tamil Nadu India." by EID Parry India Limited in Pudukkottai, Tamil Nadu state in India, 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.

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|---|-------------------------------------|---|
| Subject.: | | |
| CDM validation | | Indexing terms |
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| Date of final decision: | Number of pages: | |
| 12-07-2007 | 34 | <input type="checkbox"/> Unrestricted distribution |

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) |
| MWh | Mega watt hour |
| 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 |
| MT | Metric Tonne |
| NIR | New Information Request |
| PDD | Project Design Document |
| PP | Project Proponent |
| PPA | Power Purchase Agreement |
| UNFCCC | United Nations Framework Convention for Climate Change |

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Annex 1: Local assessment

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1. Introduction

1.1 Objective

E.I.D Parry (India) Limited has commissioned SGS to perform the validation of the project: "Bagasse Based Co-generation Project at Pudukkottai Tamil Nadu 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 bagasse based power generation project for captive use in sugar manufacturing unit; located at Pudukkottai, Tamil Nadu state in India. . The starting date of project activity was 20-12-2004.

Baseline Scenario:

The electricity generated by project activity would have otherwise been generated by Southern Regional grid which is predominantly fossil fuel based.

With Project Scenario:

The project activity is generating electricity using bagasse as fuel. There is no associated anthropogenic emission of green house gases as the project activity will not use any amount of fossil fuel i.e. coal in power plant. The project displaces the power that would have otherwise been generated by Southern Regional grid which consists of power plants operating on a mix of hydro, nuclear and fossil fuels but are primarily fossil fuel based.

Leakage:

This was the new installation and the energy generating equipment was not transferred from another activity or the existing equipment was not transferred to another activity. So, no leakage is considered.

Environmental & Social Impacts:

According to Local assessor, there is no negative environmental and social impact reported or seen from project activity during the site visit or during the local stakeholder consultation carried out as a

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validation protocol.

1.4 The names and roles of the validation team members

| Name | Supplier | Role |
|-----------------|-----------------|--------------------|
| Sanjeev Kumar | SGS India | Lead Assessor |
| Pankaj Mohan | SGS India | Assessor |
| Martin Beckmann | SGS Germany | 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 |
|--|---|---|--|
| <i>The various requirements are linked to checklist questions the project should meet.</i> | <i>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.</i> | <i>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.</i> | <i>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.</i> |

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.

3. Determination Findings

3.1 Participation requirements

The host Party for this project is India. India has ratified the Kyoto protocol on 26 August 2002. Initially, no Letter of Approval was provided and a CAR1 was raised. A Letter of Approval dated 22nd February 2007 with reference F.No. 4/19/2006-CCC issued by the Indian DNA was provided subsequently. The approval of the project was also verified from the original letter provided by Ministry of Environment & Forest, Government of India. Hence CAR1 was closed out.

No Annex 1 Party has been identified in the PDD and therefore no further 'Letter of Approval' from a Annex I party was obtained. As registration of a CDM project activity can take place without an Annex 1 Party being involved at the stage of registration, this is not a mandatory requirement at this stage. However, it should be noted that before CER's can be transferred to an Annex I Party, a Letter of Approval should be submitted.

3.2 Baseline selection and additionality

The project has applied the Approved consolidated methodology for grid connected Electricity Generation from biomass residues ACM0006 version 4. The baseline selected by the project proponent was the likely baseline scenario. The project activity is producing the electricity for captive use and will also be sold to the grid.

Investment barrier & Common practice barrier is used to demonstrate additionality.

The project was started on 20th December 2004 and it is operational at present. The project activity faces "Investment barrier". This barrier mentions that there is high upfront cost for the high pressure configuration along with the air cooled condenser. The cost of air cooled condenser is more than the water cooled condenser and it is not mandatory to install air cooled condenser. The supporting documents provided were reviewed and found that these are in order and these are strong enough to prove the additionality. Sub-step 3a and 3b were not clearly described in PDD with any documentary evidences so CAR3 was raised. The project proponent replied by providing the documentary evidences for the investment barrier along with the loan documents. The documentary evidences provided like Proposal to the board which was discussed in the board meeting and also seen minutes of meeting which indicates that the PP would not have gone ahead if the CDM funds are not available and with the CDM funds only the barrier of investment will be mitigated. The PP also provided the loan documents. The Client also provided the excel sheet for the project cost calculations. The documentation provided were desk reviewed by the local assessor and found to be in order. The PDD was also rephrased. This was accepted and hence CAR3 was closed out.

A NIR2 was raised to clarify about step 0 i.e. starting date of project activity. The project proponent replied by providing documentary evidence for starting date of project activity. This was reviewed by the local assessor and found to be in line with the document showed during site visit. PDD was rephrased for starting date of project activity. This was accepted and NIR2 was closed out.

Common practice Analysis was not clear in the PDD and documentary evidences were missing so NIR4 was raised. The project proponent replied by providing the documentary evidences for the common practice analysis. It is not a standard practice in the sugar industry of the region to install Air cooled condenser. The project is not a common practice in the region as it is not mandatory by law to export electricity to the grid. The documents provided were PPA, O&M Manual of Air cooled condenser and electrical commissioning certificate from respective authorities. These were verified by the local assessor and hard copy provided was also reviewed and found to be OK. Hence NIR4 was closed out.

Based on the evidences, calculations and the findings above, it was concluded that the project activity was not a likely baseline scenario and hence additional to any which would have been used in the

absence of project activity.

3.3 Application of Baseline methodology and calculation of emission factors

The project has applied the Approved consolidated methodology for grid connected Electricity Generation from biomass residues ACM0006 version 4. The baseline of project activity is that the project proponent would have continued to generate in its existing low pressure cogeneration plant with no power export to the grid. The heat generation would have been by burning bagasse into existing boilers.

NIR5 was raised to clarify about the baseline emissions mentioned in the PDD. The project proponent rephrased the PDD and mentioned about the baseline emissions clearly. The proofs for the same were also submitted and they were desk reviewed by the assessor and found to be OK. Hence, NIR5 was closed out.

The project is replacing equivalent amount of electricity from southern regional grid. The baseline was calculated based on regional grid and the project emissions were not calculated as per the approved methodology so NIR6 was raised. The project proponent replied by modifying the excel sheet and it was verified by the assessor. This was cross checked with the database of the values used and also values arrived by using the formulas. This was found to be OK hence NIR6 was closed out.

The emission reductions have been determined in accordance with the methodology described.

3.4 Application of Monitoring methodology and Monitoring Plan

The present CDM project activity uses monitoring methodology as described in ACM0006 version 04 for "Consolidated Baseline methodology for grid connected electricity generation from biomass residues" as per CDM project activities. The data to be collected in order to monitor emissions from the project activity is detailed in the project design document and the desk review showed that the monitoring plan is OK.

As per the methodology the monitoring plan should include all the data related to Project Management Planning which consists of information on role and responsibilities of project management, authority and responsibility for registration, monitoring, measurement and reporting, procedures for training monitoring personnel, emergency preparedness procedure, calibration procedure, operation and maintenance procedure for monitoring equipment, procedure for monitoring and recording, procedure for data adjustment and uncertainty, procedure for data review, procedure for internal GHG audit, procedure for project performance. The same has not been found in the PDD and hence NIR07 to NIR14 were raised. Project proponent in his clarification mentions the QA/QC procedures clearly. It was also mentioned that, the shift operator is responsible for collection and collation of the data. The data is recorded at end of every shift (every 8 hours) on the "Power Plant, Daily Check List" report. At the end of each day, the Shift in-charge verifies the generation, auxiliary consumption, generation hours and average load in the log books and prepares "Power Plant – Daily Report". This Daily Report is checked and signed by the in-charge of the section. These reports, which are held electronically, are provided to the Unit head and subsequently sent to Director of the sugar factory. All this data is included in Annex 4 of rephrased PDD. The information given by project proponent is verified in accordance with the methodology and no further clarification on that is required and hence NIR07 to NIR14 were closed out.

3.5 Project design

The Project Design Document (PDD) was designed as per version 3.1 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 was listed for comments on the UNFCCC website from 13/09/2006 till 12/10/2006. One comment was received during the subsequent period of web hosting.

The PDD was not mentioning the project starting date, and CAR19 was raised for the same. The project proponent provided the document for starting date of the project activity and the PDD has been rephrased so CAR19 was closed out.

NIR18 was raised to know that if initial training was provided or not. The project proponent clarified that training regarding operation and maintenance of high pressure cogeneration system has been provided to the employees. The training certificate was also submitted which was verified during site visit and this was accepted and hence NIR18 was closed out.

3.6 *Environmental Impacts*

The project proponent has obtained the consent to operate from the state pollution control board

EIA was carried out by the project proponent but the copy of EIA was not provided so NIR15 was raised. The project proponent replied by providing the copy of EIA. This was checked by the local assessor and found to be OK. This was accepted and hence NIR15 was closed out.

3.7 *Local stakeholder comments*

There was no information available on list of stakeholders consulted so NIR16 was raised seeking clarification on the issue. Responding to this client informed that the representatives of the village community were contacted on one to one basis and through invitation letters. This was verified by the local assessor through meetings with some representatives during site visit. No adverse comment was received. This was also verified by MOM provided to the validator. PDD was rephrased and hence NIR 16 was closed out.

Stakeholder consultation process is not required by regulations/laws in the host country. The client obtained "Consent to establish and operate" from State Pollution Control Board which is an indication of regulatory acceptance. The host country approval has been accorded to project activity by Ministry of Environment and Forests, the host country approval confirms that the project leads to sustainable development in India (annex4). These documents were desk reviewed and found to be OK.

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=141> and were open for comments from 13th September 2006 to 12th October 2006. Comments were invited through the UNFCCC CDM homepage.

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

13-09-06 2:44pm

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| | |
|--|-------------------------|
| Name: Joergen Fenhann | City: Roskilde |
| Organisation: UNEP Risoe Centre | Country: Denmark |

Dear SGS

Only 6 pages of this PDD is available!!

Regards
Joergen Fenhann
UNEP Risoe Centre

4.3 Explanation of how comments have been taken into account

One comment was received. The PDD was opening on the day of uploading later in the day. The person might have opened it when it was just uploaded. Later it was opening correctly when checked by DoE. Hence this was taken care of on that day it self. The issue was addressed.

Local stakeholder consultation was taken up as a validation protocol by the validator. It was found that there was no negative environmental impact reported or seen by the local assessor. The project activity helped them economically and also helped in providing good infrastructure facilities to the local people. This project activity will help in reducing the power cuts in the area as told by local stakeholders. Overall the project activity has provided positive impacts to the environment and social development.

5. Validation opinion

SGS has performed a validation of the project “Bagasse Based Co-generation Project at Pudukkottai Tamil Nadu India”. 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 utilizing bagasse for generation of electricity, 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 Investment Barrier & common practice analysis, demonstrates that the proposed project activity is 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. If the project is implemented as designed, the project is likely to achieve the estimated amount of emission reductions. The project is already implemented 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.

6. List of persons interviewed

| <i>Date</i> | <i>Name</i> | <i>Position</i> | <i>Short description of subject discussed</i> |
|--------------------|-----------------------|----------------------------|--|
| 11-10-2006 | Mr. K N Radhakrishnan | GM (Commercial) | Project proponents view on project activity and CDM funds. |
| 11-10-2006 | Mr. W R Vasudevan | GM (Technology & Projects) | Technical description of project activity |
| 12-10-2006 | Mr. A N Soundararajan | Sr. Mgr (Engg) | Baseline and data monitoring for project activity |
| 13-10-2006 | Mr. Ravi Kumar | villager | Local stakeholder consultation |

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/ HCA letter given by MoEF, Government of India
- /2/ Modalities of communication
- /3/ PDD version1 dated September 2006 (web-hosted)
- /4/ PDD version 2 dated 12-03-2007
- /5/ PDD version 3 dated 09-04-2007
- /6/ PDD version 4 dated 02-07-2007 (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/ Turbine Purchase order
- /2/ Boiler Purchase order
- /3/ DCS Purchase order
- /4/ Historic Power Generation
- /5/ Pollution Clearance
- /6/ PPA
- /7/ RT-8C Form
- /8/ Proof of CDM consideration
- /9/ Baseline Calculation sheet
- /10/ EIA copy
- /11/ MOM Stake holder meet
- /12/ Stake holder invitation letters
- /13/ Start date proof
- /14/ Proof of data used in barrier analysis

Annex 1

Project Specific criteria to be confirmed by Local Assessor

Questions be defined by team leader, Answer and Objective Evidence / Source of information / Persons Interviewed to be completed by Local Assessor; Compliance to be reviewed by Team Leader.

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

| | | | | | |
|--|--|-----|--|----|----|
| Specifications mentioned in PDD for the CDM project activity. | | PDD | Purchase orders of Boiler and turbine received from the project proponent mentioning the specification mentioned in the PDD version 3. | OK | OK |
| Proof of calculation of Emission reduction mentioned in PDD | | PDD | The excel sheet provided was checked and found that the excel sheet was not in order so modified and provided again. This was checked and found to be in order mentioning all the formulas used. | OK | OK |
| Common practice analysis was not providing the proof of the data mentioned in PDD. | | PDD | The project proponent provided the proofs of the data mentioned in the PDD which were cross verified by the local assessor and found to be OK. The rephrased PDD version 3 mentions the content in detail. | OK | OK |
| Project boundary was not clearly described in PDD. | | PDD | The project boundary is now clearly defined in revised PDD version 3. This was also checked by local assessor during site visit. | OK | OK |
| Start date was not clearly mentioned in PDD. | | PDD | Proof of start date is provided by the project proponent and same was verified by the local assessor during site visit. | OK | OK |
| Start date of crediting period was not clear. | | PDD | This was rephrased in PDD version 3 by the project proponent. | OK | OK |

| | | | | | |
|--|--|-----|---|----|----|
| Monitoring Plan mentioned to be checked during site visit | | PDD | The project activity is still in construction stage so the physical verification was not possible and this can be verified during verification stage. The monitoring plan of PDD was discussed at site and it was concluded that the project proponent will take care in implementing the final monitoring plan and also maintain the proper records of the same. | OK | OK |
| Proof that EIA was carried out to be obtained during site visit. | | PDD | Copy of EIA obtained from project proponent. Checked during site visit. | OK | OK |

Annex 2

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

| | | | | | |
|---|----|--------|---|------|-------------------------------|
| 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. | DR | PDD | The project is a unilateral project. However it would assist Annex-1 Party/ies through the sale of CERs. | 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 | Copy of letter of approval from Indian DNA needs to be provided. | CAR1 | OK CAR 01 close d |
| 1.3 All Parties (listed in Section A3 of the PDD) have ratified the Kyoto protocol and are allowed to participate in CDM projects | | UNFCCC | India ratified the Kyoto Protocol on 26 th 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 result in reduction of GHG emissions as it uses Baggase as fuel for the generation of electricity by replacing older power plant with energy efficient power plant. | OK | OK |
| 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 | | UNFCCC | The project is open for comments on the UNFCCC website from 13 th September 2006 to 12 th October 2006. It was also uploaded on SGS website from 13-09-2006 to 12-10-2006 http://www.sgsqualitynetwork.com/tradeassurance/ccp/projects/project.php?id=141 | OK | OK |
| 1.6 The project has correctly completed a Project Design Document, using the current version and exactly following the guidance | DR | PDD | Pending CARs / 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 | Site visit | 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? | | | Not Applicable | N/A | OK |
| 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 | | | Not Applicable | N/A | OK |
| 1.10 Is the current version of the PDD complete and does it clearly reflect all the information presented during the validation assessment | | | Pending Closure of CARs / NIRs | Pending | OK |

| | | | | | |
|--|--|--|---|----|--|
| 1.11 Does the PDD use accurate and reliable information that can be verified in an objective manner? | | | Yes, The PDD uses accurate and reliable information that can be verified in objective manner. | OK | |
|--|--|--|---|----|--|

TABLE 2 BASELINE METHODOLOGY(IES) (REF: PDD SECTION B AND E AND ANNEX 3 AND AM)

| | | | | | |
|--|-----|----|---|------------|----|
| 2.1 Does the project meet all the applicability criteria listed in the methodology | PDD | DR | Yes, the project meet all the applicability criteria listed in the methodology | OK | OK |
| 2.2 Is the project boundary consistent with the approved methodology | PDD | DR | Yes, the project boundary is consistent with the approved methodology. To be checked during site visit. It was checked physically by the local assessor and found to be in order as per PDD. | Site visit | OK |
| 2.3 Are the baseline emissions determined in accordance with the methodology described | PDD | DR | Yes, the baseline emissions are determined in accordance with the methodology. To be checked during site visit. The local assessor checked excel sheet during site visit. | Site Visit | OK |
| 2.4 Are the project emissions determined in accordance with the methodology described | PDD | DR | Yes, the project emissions are determined in accordance with the methodology. To be checked during site visit. It was checked through excel sheets and each figure was checked and found to be OK. | Site Visit | OK |
| 2.5 Is the leakage op the project activity determined in accordance with the methodology described | PDD | DR | No leakage is considered as per the methodology. | OK | OK |

| | | | | | |
|---|-----|----|--|---------|----|
| 2.6 Are the emission reductions determined in accordance with the methodology described | PDD | DR | Pending data to be checked during site visit. Checked during site visit by the local assessor. | Pending | OK |
|---|-----|----|--|---------|----|

Table 3 Additionality (Ref: PDD Section B5 and AM)

| | | | | | |
|---|-----|----|---|------------------------------|--|
| 3.1 Does the PDD follow all the steps required in the methodology to determine the additionality | PDD | DR | Yes, the PDD follow all the steps required in the methodology to determine the additionality. | OK | OK |
| 3.2 Is the discussion on the additionality clear and have all assumptions been supported by transparent and documented evidence | PDD | DR | Starting date of the project activity is mentioned. Documentary evidences are to be provided by the Client. Sub step 3a and 3b are not clear. Excel sheet needs to be provided. In Common practice analysis provide proofs for the table b5 and data mentioned in PDD | NIR2 CAR3 NIR4 | OK NIR02 closed OK CAR03 closed OK NIR04 closed |
| 3.3 Does the selected baseline represent the most likely scenario among other possible and/or discussed scenarios? | PDD | DR | Yes, the baseline represents the most likely baseline scenario among the possible scenarios. | OK | OK |
| 3.4 Is it demonstrated/justified that the project activity itself is not a likely baseline scenario | PDD | DR | Yes the project activity itself is not a baseline scenario as there is no legislation or law which says that the sugar industry has to export power to grid. | OK | OK |

Table 4 Monitoring methodology (PDD Section B6.2, B7.1 and AM)

| | | | | | |
|---|-----|----|--|----|----|
| 4.1 Does the project meet all the applicability criteria listed in the monitoring methodology | PDD | DR | Yes, the PDD meet all the applicability criteria | OK | OK |
|---|-----|----|--|----|----|

| | | | | | |
|---|-----|----|--|------|--------------------|
| 4.2 Does the PDD provide for the monitoring of the baseline emissions as required in the monitoring methodology | PDD | DR | The baseline emission for generation of electricity is monitored as per monitoring methodology. Proofs for the values used needs to be provided. | NIR5 | OK NIR05 closed |
| 4.3 Does the PDD provide for the monitoring of the project emissions as required in the monitoring methodology | PDD | DR | Yes, the PDD provides the monitoring of the project emissions as required in the monitoring methodology. Proofs to be provided for the values used in the monitoring plan. | NIR6 | OK NIR06 closed |
| 4.4 Does the PDD provide for the monitoring of the leakage as required in the monitoring methodology | PDD | DR | No leakage is considered as per the methodology ACM0006 version 3 May 19 2006. | OK | OK |
| 4.5 Does the PDD provide for Quality Control (QC) and Quality Assurance (QA) Procedures as required in the monitoring methodology | PDD | DR | Yes, as the company is a ISO14001 company so procedures are in place. | OK | OK |

Table 5 Monitoring plan (PDD Annex 4)

| | | | | | |
|---|-----|----|---|---------|----|
| 5.1 Monitoring of Sustainable Development Indicators/ Environmental Impacts | PDD | DR | The project proponent claims that the project leads to sustainable development and environmental impacts are minimal. Pending CAR1. | Pending | OK |
| 5.1.1 Does the monitoring plan provide the collection and archiving of relevant data concerning environmental, social and economic impacts? | | | Not Applicable | N/A | OK |

| | | | | | | |
|---------------------------------|--|-----|----|--|------------|--------------------|
| 5.1.2 | Is the choice of indicators for sustainability development (social, environmental, economic) reasonable? | | | Not Applicable | N/A | OK |
| 5.1.3 | Will it be possible to monitor the specified sustainable development indicators? | | | Not applicable | N/A | OK |
| 5.1.4 | Are the sustainable development indicators in line with stated national priorities in the Host Country? | PDD | DR | Pending closure of CAR 1 (Host country Approval) | Pending | OK |
| 5.2 Project Management Planning | | | | | | |
| 5.2.1 | Is the authority and responsibility of project management clearly described? | PDD | DR | Yes, the authority and responsibility of project management clearly described. | OK | OK |
| 5.2.2 | Is the authority and responsibility for registration, monitoring, measurement and reporting clearly described? | PDD | DR | Data missing on authority and responsibility for registration, monitoring, measurement and reporting | NIR7 | OK NIR07 closed |
| 5.2.3 | Are procedures identified for training of monitoring personnel? | PDD | DR | Data missing on training of monitoring personnel | NIR8 | OK NIR08 closed |
| 5.2.4 | Are procedures identified for emergency preparedness for cases where emergencies can cause unintended emissions? | PDD | DR | Procedure for emergency preparedness is missing from the PDD | NIR9 | OK NIR09 closed |
| 5.2.5 | Are procedures identified for calibration of monitoring equipment? | PDD | DR | The company is ISO-14001 company so procedure will be in place. To be checked during site visit. | Site visit | OK |
| 5.2.6 | Are procedures identified for maintenance of monitoring equipment and installations? | PDD | DR | Procedure for maintenance of monitoring equipment and installations are missing. | NIR10 | OK |

| | | | | | | |
|--------|--|-----|----|--|------------|--------------------|
| 5.2.7 | Are procedures identified for monitoring, measurements and reporting? | PDD | DR | Yes, to be checked during site visit. | Site visit | OK |
| 5.2.8 | Are procedures identified for day-to-day records handling (including what records to keep, storage area of records and how to process performance documentation) | PDD | DR | Yes, to be checked during site visit. | Site visit | OK |
| 5.2.9 | Are procedures identified for dealing with possible monitoring data adjustments and uncertainties? | PDD | DR | Data is missing for possible monitoring data adjustments and uncertainties. | NIR11 | OK NIR11 closed |
| 5.2.10 | Are procedures identified for review of reported results/data? | PDD | DR | Procedure for identification for review of reported results is missing in PDD. | NIR12 | OK NIR12 closed |
| 5.2.11 | Are procedures identified for internal audits of GHG project compliance with operational requirements where applicable? | PDD | DR | Procedure for internal GHG audit is missing. | NIR13 | OK NIR13 closed |
| 5.2.12 | Are procedures identified for project performance reviews before data is submitted for verification, internally or externally? | PDD | DR | Pending NIR13 | Pending | OK |
| 5.2.13 | Are procedures identified for corrective actions in order to provide for more accurate future monitoring and reporting? | PDD | DR | No, procedures for corrective actions to provide more accurate future monitoring and reporting is not mentioned clearly in PDD | NIR14 | OK NIR14 closed |

Table 6 Environmental Impacts (Ref PDD Section D and relevant local legislation)

| | | | | | | |
|-----|---|-----|----|--|-------|--------------------|
| 6.1 | Has an analysis of the environmental impacts of the project activity been sufficiently described? | PDD | DR | No significant impacts expected. | OK | OK |
| 6.2 | Are there any Host Party requirements for an Environmental Impact Assessment (EIA), and if yes, is an EIA approved? | PDD | DR | EIA is carried out as per the guidelines of TNPCB. Copy of the EIA needs to be submitted | NIR15 | OK NIR15 closed |

| | | | | | |
|---|-----|----|---|----|----|
| 6.3 Will the project create any adverse environmental effects? | PDD | DR | No, the project does not create any adverse environmental effects. | OK | OK |
| 6.4 Are transboundary environmental impacts considered in the analysis? | PDD | DR | Yes, no adverse impacts | OK | OK |
| 6.5 Have identified environmental impacts been addressed in the project design? | PDD | DR | Identified environmental impacts has been addressed in the project design document. | OK | OK |
| 6.6 Does the project comply with environmental legislation in the host country? | PDD | DR | Yes, the project comply with environmental legislation in the host country. | OK | OK |

Table 7 Comments by local stakeholders (Ref PDD Section E)

| | | | | | |
|--|-----|----|--|-------|--------------------|
| 7.1 Have relevant stakeholders been consulted? | PDD | DR | Relevant stakeholders have been consulted. Proofs needs to be provided. | NIR16 | OK NIR16 closed |
| 7.2 Have appropriate media been used to invite comments by local stakeholders? | PDD | DR | Yes, appropriate media been used to invite comments by local stakeholders. | OK | OK |
| 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? | PDD | DR | Stakeholder consultation process is not required as per law. It was carried out as per CDM requirement. | OK | OK |
| 7.4 Is a summary of the stakeholder comments received provided? | PDD | DR | Summary of stakeholder comments is clearly mentioned in PDD | OK | OK |
| 7.5 Has due account been taken of any stakeholder comments received? | PDD | DR | Due account of stakeholder comments mentioned in PDD clearly. | OK | OK |

TABLE 8 OTHER REQUIREMENTS

8.1 Project Design Document

| | | | | | |
|--|-----|----|---|------------|--------------------|
| 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. | PDD | DR | The project correctly applies the older PDD template from page 13 onwards. | CAR17 | OK CAR17 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 | PDD | DR | Pending CARs / NIRs | Pending | OK |
| 8.2 Technology to be employed | | | | | |
| 8.2.1 Does the project design engineering reflect current good practices? | PDD | DR | Yes, the project design engineering reflects 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? | PDD | DR | Yes, the project uses state of art technology. | OK | OK |
| 8.2.3 Is the project technology likely to be substituted by other or more efficient technologies within the project period? | PDD | DR | Not likely to be changed during the crediting period. To be checked during site visit. | Site visit | OK |
| 8.2.4 Does the project require extensive initial training and maintenance efforts in order to work as presumed during the project period? | PDD | DR | Training requirement not mentioned in the PDD clearly. | NIR18 | OK NIR18 closed |
| 8.3 Duration of the Project/ Crediting Period | | | | | |
| 8.3.1 Are the project's starting date and operational lifetime clearly defined and reasonable? | PDD | DR | Project starting date is not mentioned. Operational lifetime is clearly mentioned. | CAR19 | OK CAR19 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)? | PDD | DR | Yes, fixed crediting time is clearly defined as 10 years. | OK | OK |
| 8.3.3 Does the project's operational lifetime exceed the crediting period | PDD | DR | The projects operational time is 25 years and exceeding the crediting period of 10 years. | OK | OK |

Annex 3 FINDINGS OVERVIEW

Findings from validation of “BAGASSE BASED COGENERATION PROJECT AT PUDUKKOTTAI CDMVAL0710”.

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:14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|---|------|---|-----|
| 1 | CAR | Copy of letter of approval from Indian DNA needs to be provided | 1.2 |
| Date: 12-03-2007 [Comments- CLIENT] The letter of approval from the Indian DNA (Ministry of Environment and Forests) has been received on 22.02.2007. A copy of the same has been enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Copy of the HCA is obtained and same in original is scanned. This is accepted and CAR01 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK CAR01 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|--|-----|
| 2 | NIR | Documentary evidence of start date to be furnished | 3.2 |
| Date: 12-03-2007 [Comments: CLIENT] During August 2004, EID Parry started corresponding with International Finance Corporation (IFC) regarding the prospect of CDM benefits for its proposed biomass based power project at its Pudukkottai sugar plant. The project proposal was taken up and approved by EID Parry's Board meeting held on 11.10.2004. | | | |

Subsequently, techno-commercial parameters and supply contract for major equipments like boiler and Turbo Generator (TG) were negotiated and finalised on 13.12.2004. The purchase orders for the major equipments were released on 20.12.2004 (Boiler and TG).

As prescribed by UNFCCC "The starting date of a CDM project activity is the date at which the implementation or construction or real action of a project activity begins." Since release of purchase orders was the first major "real" activity, the date of that activity (20.12.2004) has been mentioned as the starting date in the revised PDD. Copies of the purchase orders are enclosed.

Date: 26-03-2007 [Pankaj Mohan]

[Comment Assessor] The documentation provided was checked and found to be OK. This can be accepted and NIR02 could be closed out.

Date: 27-03-2007 [Sanjeev Kumar]

[Acceptance and close out] OK NIR02 closed out.

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|-----|------|---|-----|
| 3 | CAR | Sub-step 3a and 3b are not clear. Excel sheet needs to be provided. | 3.2 |

Date: 12-03-2007

[Comments: CLIENT]

The sub-steps 3a and 3b have been clarified in the revised version of the PDD. All necessary facts and figures are substantiated with supporting documents and references. Excel sheet for the calculation of incremental energy generation, baseline emission factor, CERs and other supporting information are enclosed.

Date: 26-03-2007 [Pankaj Mohan]

[Comment Assessor] The project proponent provided the proposal to the board which was discussed in the board meeting and also provided minutes of meeting which indicates that the PP would not have gone ahead if the CDM funds are not available and with the CDM funds only the barrier of investment will be mitigated. The PP also provided the loan documents. The documentation provided was desk reviewed and found to be OK. Excel sheet provided was also checked and found to be in order. Hence CAR03 could be closed out.

Date: 27-03-2007 [Sanjeev Kumar]

[Acceptance and close out] OK CAR03 closed out.

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|-----|------|--|-----|
| 4 | NIR | Documentary evidences for common practice analysis needs to be provided. | 3.2 |

Date: 12-03-2007

[Comments: CLIENT]

Documentary proof for the common practice analysis is attached. The proof is based on publicly available information of Indian state and central government organisations.

Date: 26-03-2007 [Pankaj Mohan]

[Comment Assessor] It is not mandatory in the region to export electricity to the grid and it is also not mandatory to install air cooled condenser in the project activity. The documentary proof provided was PPA, O&M Manual for Air cooled condenser and electrical inspector report which were checked by local assessor and found to be in order and hence NIR04 could be closed out.

Date: 27-03-2007 [Sanjeev Kumar]

[Acceptance and close out] OK NIR04 closed out.

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|-----|------|---|-----|
| 5 | NIR | Proof of values used in baseline emissions needs to be provided | 4.2 |

Date: 12-03-2007

[Comments: CLIENT]

Data used in baseline emission calculation and their proof:

- Net Energy Generation in pre-project scenario: This data has been obtained from historical energy meter data which is recorded in EID Parry's System Application Protocol (SAP). Monthly data from the SAP has been compiled and provided in the enclosed excel sheet.
- Biomass consumption in pre-project scenario: This data has been obtained from the sugar plant's "Form 7c/8c" reports. The reports contain detailed information on the biomass (bagasse) generation. Monthly data from these forms have been compiled and provided in the enclosed excel sheet.
- Net Calorific Value (NCV) of biomass used in pre-project scenario: This data has been obtained from third party fuel analysis reports of the biomass used in the pre-project scenario. Copies of fuel analysis reports are enclosed.
- Pre-project efficiency: Based on the above three data, the operating efficiency of the pre-project system has been calculated as per formula provided in ACM0006.
- Energy generation in the project plant: This value is estimated based on the rated capacity of the power plant (18MW), fuel availability, plant load factor (Assumed 93%), operating days (250 days during season and 50 days in off-season) and auxiliary consumption (Assumed as 9%).
- Biomass consumption in project scenario: During the sugar crushing season, the project activity would consume the entire quantity of bagasse generated (i.e., At 4000 Tonnes of cane crushed per day, 27% bagasse on cane crushed and an average crushing season of 250 days, around 270000 tonnes of bagasse would be available for crushing.). During the off-season, the project activity may be operated based on the external biomass/bagasse availability. The project activity boiler is designed to intake other biomass (other than bagasse) up to 20%. It is expected that sufficient biomass/bagasse may be available to operate the project activity for around 50 days during off-season (i.e., Estimated requirement of bagasse for 50 days is around 40,800 tonnes).
- Net Calorific Value of biomass in the project scenario: The historical average NCV figures of bagasse have been adopted.

A compilation of all the above information and calculation methods have been provided in the enclosed excel sheets.

Date: 26-03-2007 [Pankaj Mohan]

[Comment Assessor] The documentation received and the excel sheet was also checked and found to be in order. This can be accepted and hence NIR05 could be closed out.

Date: 27-03-2007 [Sanjeev Kumar]

[Acceptance and close out] OK NIR05 closed out.

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|-----|------|--|-----|
| 6 | NIR | Proof of values used in project emissions needs to be provided | 4.3 |

Date: 12-03-2007

[Comments: CLIENT] Data used in project emission estimation and their proof:

Quantity and calorific value of coal used: EID Parry does not envisage any coal usage during normal operation. Coal firing is expected only in emergency situations.

| |
|--|
| CO ₂ Emission Factor of trucks used in transportation of external biomass: This value is calculated as a product of the truck fuel economy and emission factor of the fuel used. Fuel economy data is obtained from the truck operator. CO ₂ emission factor of fuel used is taken as default IPCC values. |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Proof are still missing. NIR06 is still open. |
| Date: 09-04-2007 [Comments: CLIENT] The necessary proof (truck fuel economy supporting data) has been submitted to the DOE now. |
| Date: 15-04-2007 Sanjeev Kumar [Acceptance and close out] The proof is provided and it is OK and NIR6 closed out. |

| Date: 14-10-2006 | | Raised by: Pankaj Mohan | |
|---|------|---|-------|
| No. | Type | Issue | Ref |
| 7 | NIR | Data missing on authority and responsibility for registration, monitoring, measurement and reporting in Annex4 of PDD | 5.2.2 |
| Date: 12-03-2007 [Comments: CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions this and hence NIR07 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR07 closed out. | | | |

| Date: 14-10-2006 | | Raised by: Pankaj Mohan | |
|--|------|---|-------|
| No. | Type | Issue | Ref |
| 8 | NIR | Data missing on training of monitoring personnel in Annex4 of PDD | 5.2.3 |
| Date: 12-03-2007 [Comments: CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions this but supporting evidence is missing. Hence NIR08 is open. | | | |
| Date: 09-04-2007 [Comments: CLIENT] The supporting evidence for training of monitoring personnel on CDM parameters have been submitted to the DOE now (Copies of meeting register and minutes of the meeting). | | | |
| Date: 15-04-2007 Sanjeev Kumar [Acceptance and close out] The supporting document is provided and found to be OK. Hence NIR8 closed out | | | |

| Date: 14-10-2006 | | Raised by: Pankaj Mohan | |
|---|------|--|-------|
| No. | Type | Issue | Ref |
| 9 | NIR | Procedure for emergency preparedness is missing from Annex4 of the PDD | 5.2.4 |
| Date: 12-03-2007 [Comments: CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions the procedure for emergency preparedness. Hence | | | |

| |
|---|
| NIR09 could be closed out. |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR09 closed out. |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|---|------|---|-------|
| 10 | NIR | Procedure for maintenance of monitoring equipment and installations are missing in Annex4 of PDD. | 5.2.6 |
| Date: 12-03-2007 [Comments:CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Procedure for maintenance of monitoring equipment and installation is mentioned in revised PDD. This can be accepted and hence NIR10 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR10 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|--|-------|
| 11 | NIR | Data is missing for possible monitoring data adjustments and uncertainties in Annex4 of PDD. | 5.2.9 |
| Date: 12-03-2007 [Comments:CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Procedure for monitoring data adjustments is mentioned in revised PDD. This is accepted and hence NIR11 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR11 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|--|--------|
| 12 | NIR | Procedure for identification for review of reported results is missing in Annex4 of PDD. | 5.2.10 |
| Date: 12-03-2007 [Comments:CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions the procedure for Review of reported results. This is accepted and hence NIR12 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR12 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|-----|------|-------|-----|
|-----|------|-------|-----|

| | | | |
|--|-----|---|--------|
| 13 | NIR | Procedure for internal GHG audit is missing in Annex4 of PDD. | 5.2.11 |
| Date: 12-03-2007 [Comments:CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions the procedure for internal audit. This is accepted and hence Nir13 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR14 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|--|--------|
| 14 | NIR | procedures for corrective actions to provide more accurate future monitoring and reporting is not mentioned clearly in Annex4 of PDD | 5.2.13 |
| Date: 12-03-2007 [Comments:CLIENT] The necessary data has been incorporated in the Annex 4 of the revised PDD which is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Revised PDD mentions this and can be verified during verification stage as well. This is accepted and hence NIR14 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR14 closed out. | | | |

Date: 14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|--|-----|
| 15 | NIR | EIA is carried out as per the guidelines of TNPCB. Copy of the EIA needs to be submitted | 6.2 |
| Date: 12-03-2007 [Comments:CLIENT] A copy of the EIA report is enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Copy of EIA obtained was checked and found to be OK. This can be accepted and NIR15 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR15 closed out. | | | |

Date:14-10-2006

Raised by: Pankaj Mohan

| No. | Type | Issue | Ref |
|--|------|---|-----|
| 16 | NIR | Relevant stakeholders have been consulted. Proofs needs to be provided. | 7.1 |
| Date: 12-03-2007 [Comments:CLIENT] During the stakeholder consultation, a written response was collected from the local stakeholders. Further, an attendance list signed by the stakeholders and photography of the event are available. A copy of the above are enclosed. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] Copy of each documentation provided was checked and found to be OK. This was also verified during site visit by meeting some local stakeholders. This can be accepted | | | |

30/34

| |
|---|
| and NIR16 could be closed out. |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK NIR16 closed out. |

| Date:14-10-2006 | | Raised by: Pankaj Mohan | |
|--|------|--|-----|
| No. | Type | Issue | Ref |
| 17 | CAR | The project correctly applies the older PDD template from page 13 onwards. | 8.1 |
| Date: 12-03-2007 [Comments:CLIENT] The correct template has been applied in the revised PDD. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] The template applied correctly now in revised PDD. This is accepted and hence CAR17 could be closed out. | | | |
| Date: 27-03-2007 [Sanjeev Kumar] [Acceptance and close out] OK CAR17 closed out. | | | |

| Date:14-10-2006 | | Raised by: Pankaj Mohan | |
|---|------|--|-------|
| No. | Type | Issue | Ref |
| 18 | NIR | Initial Training requirement not mentioned in the PDD clearly. | 8.2.4 |
| Date: 12-03-2007 [Comments:CLIENT] The relevant information has been incorporated in the revised PDD. | | | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] The initial training requirement is mentioned in PDD. No Documentary evidence is provided. NIR 18 is still open. | | | |
| Date: 09-04-2007 [Comments: CLIENT] The Operation and Maintenance (O&M) personnel of the project activity were given initial training on the high pressure cogeneration system by the respective equipment suppliers. Certificate of training given by the suppliers has been submitted to the DOE now. | | | |
| Date: 15-04-2007 Sanjeev Kumar [Acceptance and close out] The document is provided and found OK NIR18 closed out | | | |

| Date:14-10-2006 | | Raised by: Pankaj Mohan | |
|--|------|--|-------|
| No. | Type | Issue | Ref |
| 19 | CAR | Project starting date is not mentioned. Operational lifetime is clearly mentioned. | 8.3.1 |
| Date: 12-03-2007 [Comments:CLIENT] Project Starting date: The techno-commercial parameters and supply contract for major equipments of the project activity like boiler and Turbo Generator (TG) were negotiated and finalised on 13.12.2004. The purchase orders for the major equipments were released on 20.12.2004 (Boiler and TG). As prescribed by UNFCCC "The starting date of a CDM project activity is the date at which the implementation or construction or real action of a project activity begins." Since release of | | | |

| | |
|--|--|
| purchase orders was the first major “real” activity, the date of that activity (20.12.2004) has been mentioned as the starting date in the revised PDD. | |
| Date: 26-03-2007 [Pankaj Mohan] [Comment Assessor] The copy of commissioning certificate is provided by the client and same is found to be OK. Mentioned in revised PDD version 2. This cannot be accepted as it is contradicting with NIR02 hence CAR19 is open. | |
| Date: 09-04-2007 [Comments: CLIENT] The necessary corrections have been made in the PDD to clear any contradiction with NIR02. | |
| Date: 15-04-2007 Sanjeev Kumar [Acceptance and close out] The revised PDD version 3 OK CAR19 closed out. | |



Statement of Competence

Name: Sanjeev Kumar

SGS Affiliate: SGS India Pvt. Ltd.

Status

- Product Co-ordinator ☐
- Operations Co-ordinator ☐
- Technical Reviewer ☐
- Expert ☒

Validation

Verification

- Local Assessor ☒
- Lead Assessor ☒
- Assessor ☐
- /Trainee Lead Assessor ☐

Scopes of Expertise

1. Energy Industries (renewable / non-renewable) ☒
2. Energy Distribution ☒
3. Energy Demand ☒
4. Manufacturing ☒
5. Chemical Industry ☐
6. Construction ☐
7. Transport ☐
8. Mining/Mineral Production ☐
9. Metal Production ☐
10. Fugitive Emissions from Fuels (solid,oil and gas) ☐
11. Fugitive Emissions from Production and ☐

Consumption of Halocarbons and Sulphur Hexafluoride

12. Solvent Use ☐
13. Waste Handling and Disposal ☐
14. Afforestation and Reforestation ☐
15. Agriculture ☐

Approved Member of Staff by Siddharth Yadav Date: 16th May 2007



Statement of Competence

Name: Pankaj Mohan

SGS Affiliate: SGS India Pvt. Ltd.

Status

- Product Co-ordinator ☐
- Operations Co-ordinator ☐
- Technical Reviewer ☐
- Expert ☒

Validation**Verification**

- Local Assessor ☒
- Lead Assessor ☒
- Assessor ☒
- / Trainee Lead Assessor

Scopes of Expertise

- | | |
|--|-------------------------------------|
| 1. Energy Industries (renewable / non-renewable) | <input checked="" type="checkbox"/> |
| 2. Energy Distribution | <input checked="" type="checkbox"/> |
| 3. Energy Demand | <input checked="" type="checkbox"/> |
| 4. Manufacturing | <input checked="" type="checkbox"/> |
| 5. Chemical Industry | <input type="checkbox"/> |
| 6. Construction | <input type="checkbox"/> |
| 7. Transport | <input type="checkbox"/> |
| 8. Mining/Mineral Production | <input type="checkbox"/> |
| 9. Metal Production | <input type="checkbox"/> |
| 10. Fugitive Emissions from Fuels (solid,oil and gas) | <input type="checkbox"/> |
| 11. Fugitive Emissions from Production and Consumption of Halocarbons and Sulphur Hexafluoride | <input type="checkbox"/> |
| 12. Solvent Use | <input type="checkbox"/> |
| 13. Waste Handling and Disposal | <input type="checkbox"/> |
| 14. Afforestation and Reforestation | <input type="checkbox"/> |
| 15. Agriculture | <input type="checkbox"/> |

Approved Member of Staff by Marco van der Linden

Date: 03-04-07