

## Validation Protocol

**Table 1 Participation Requirements for Clean Development Mechanism (CDM) Project Activities (Ref PDD, Letters of Approval and UNFCCC website)**

REQUIREMENT	Mo V	Ref	Comment	Draft findi ng	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.	DR	Kyoto Proto col Art 12.2	No Annex I Country has been identified  It is observed that the CDM EB has agreed that the registration of a CDM project activity can take place without an Annex 1 Party being involved at the stage of registration although it should be noted that before CER can be transferred to an Annex I Party, you will need to submit a letter of approval at that stage	Y	Y
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	KP Art 12.2	No Letter of Approval has been provided to the validator although it is noted that the official website of the Indian DNA has indicated that the letter of approval has issued for this project.  <a href="http://www.envfor.nic.in/cdm/index.htm">http://www.envfor.nic.in/cdm/index.htm</a>	CAR 1	Y folowi ng close out
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	Marke sh Accor d CDM Modal ities § 30	India ratified Kyoto Protocol on August 26, 2002.  Source: <a href="http://unfccc.int/parties_and_observers/parties/items/2109.php">http://unfccc.int/parties_and_observers/parties/items/2109.php</a>	Y	Y
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	K P Art 12.2	Pending close out CARs	pendi ng	Y followi ng close out of CARs and

REQUIREMENT	Mo V	Ref	Comment	Draft findi ng	Concl
					NIRs
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	SSC M & P § 23	The project PDD was displayed on web for ISHC for 30 days time from  Start Date: 05/ 05/31 End Date: 05/06/29 Web link:  <a href="http://cdm.unfccc.int/Projects/Validation/view.html?ProjectId=R35PMEJ7RXIKT6W1T37Y7KXNU5PF4M&amp;OE=SGS-UKL">http://cdm.unfccc.int/Projects/Validation/view.html?ProjectId=R35PMEJ7RXIKT6W1T37Y7KXNU5PF4M&amp;OE=SGS-UKL</a>  No comments have been received	Y	Y
1.6 The project has correctly completed a Project Design Document, using the current version and exactly following the guidance	DR	SSC M & P, Appe ndix B	PDD Template not entirely confirms the SSC norms, it exceeds the limit of text (point No. A.2 :Text not to exceed 1 page, where as it contains 6 pages, A.4.1.4: Max. 1 page: whereas it contains 3 pages , Italics, Font & size (Page 5 etc), shaded text etc to be removed	CAR 15  Obse rvatio n 1	Y folowi ng close out
1.7 The project shall not make use of Official Development Assistance (ODA), nor result in the diversion of such ODA	DR	SSC M & P Appe ndix A <sup>1</sup> , A.4.4	No indication that public funding has been sought or that the project has led to the diversion of ODA	Y	Y
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	Y	Y
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		Refer to table 9	pendi ng	Y
1.10 Is the current version of the PDD complete and does it clearly reflect all the information presented during the validation assessment?	DR	SSC M & P Appe ndix	Refer to Observation 1 and CARs	pendi ng	Y folowi ng close

REQUIREMENT	Mo V	Ref	Comment	Draft findi ng	Concl
		A <sup>1</sup>			out
1.11 Does the PDD use accurate and reliable information that can be verified in an objective manner?	DR		<p>Full reference for all data sources (especially URLs) is not provided and therefore the data cannot be</p> <p>The unit MU is used to describe the electricity production. MU is defined as million Units. It is not clearly defined what a "Unit" is. PDD should only use official SI Units</p> <p>Other claims to be verified during local assessment</p>	<p>CAR 2</p> <p>CAR 6</p>	Y folowi ng close out

**Table 2 Baseline methodology (ies) (Ref: PDD Section B and E and Annex 3 and AM)**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
2.1 Does the project meet all the applicability criteria listed in the methodology	DR	App endi x B , Ann ex II to deci sion 21/ CP 8	<p>Yes, the project falls under I. D. Renewable electricity generation for a grid</p> <p>Project is a 7.7 MW power project based on rice husk with the chance that the project will also co-fire coal. The co-firing is not totally transparent</p>	<p>Y</p> <p>NIR 3</p>	Y folowi ng close out
2.2 Is the project boundary consistent with the approved methodology	DR	PDD	Location of description does not provide for unique identification of the project activity	NIR 5	Y folowi ng close out
2.3 Are the baseline emissions determined in accordance with the	DR	PDD	Emission coefficient has been calculated using		Y folowi

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
methodology described			<p>methodology however</p> <ul style="list-style-type: none"> <li>- calculation of OM is not transparent</li> <li>- calculation of BM is not transparent</li> </ul> <p>Choice of calculation method was changed</p> <p>Use of default number is not clear</p> <p>Choice of grid boundary and treatment of imports from other grids not transparent</p>	<p>CAR 7</p> <p>CAR 8</p> <p>NIR 19</p> <p>NIR 20</p> <p>NIR 21</p> <p>NIR 22</p>	ng close out
2.4 Are the project emissions determined in accordance with the methodology described	DR	PDD	<p>Emissions due to co-firing of coal are calculated as stoichiometric releases. This is a very general approach while data on NCV are available</p> <p>Data source for carbon content of coal not clear</p> <p>Calculations and formulas are not transparent</p>	<p>NIR 4</p> <p>CAR 16</p> <p>CAR 17</p>	Y folowi ng close out
2.5 Is the leakage of the project activity determined in accordance with the methodology described	DR	SSC M & P App endi x B	<p>No leakages considered for construction, transportation of fuel as they are small, if compared with transportation of coal/ fossil fuel to thermal power plant (s). [PDD Page: 40, 49]. No other leakage effects expected from the use of this type of biomass</p> <p>However leakages on account of transfer of</p>	Y	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			equipment are not applicable for this project as there is no transfer of equipment.		
2.6 Are the emission reductions determined in accordance with the methodology described	DR	PDD	Pending CARs  Formula for power generation and export not transparent	Pending  CAR 18	Y following close out

**Table 3 Additionality (Ref: PDD Section B3 and AM)**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
3.1 Does the PDD follow all the steps required in the methodology to determine the additionality	DR	SSC Appendix A1, B.3	PDD uses barrier approach but does not compare the project activity with alternatives	CAR 9	Y following close out
3.2 Is the discussion on the additionality clear and have all assumptions been supported by transparent and documented evidence	DR	PDD	No supporting documents provided with the PDD	CAR 9	Y following close out
3.3 Does the selected baseline represent the most likely scenario among other possible and/or discussed scenarios?	DR	SSC M & P Appendix A & B	Pending CARs	pending	Y following close out
3.4 Is it demonstrated/justified that the project activity itself is not a likely baseline scenario	DR		Pending CARs	pending	Y following close out

**Table 4 Monitoring methodology (PDD Section D and AM)**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
4.1 Does the project meet all the applicability criteria listed in the monitoring methodology	DR	SSC M & P Appendix B	It is noted that under section D.1 that actual text of paragraph 9 says "Monitoring shall consist	Y	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			of metering the electricity generated by the renewable technology. In the case of co-fired plants, the amount of biomass and fossil fuel input shall be monitored.” (different text in PDD) . Table D3 provides for monitoring of both the quantity and the quality of the fuels used and the electricity generated		
4.2 Does the PDD provide for the monitoring of the baseline emissions as required in the monitoring methodology			No requirement to monitor baseline emissions	Y	Y
4.3 Does the PDD provide for the monitoring of the project emissions as required in the monitoring methodology			Uncertainty around the monitored fuel quantities could be significant but is considered low	NIR 10	Y following close out
4.4 Does the PDD provide for the monitoring of the leakage as required in the monitoring methodology	DR	PDD SSC M & P Appendix A <sup>1</sup>	No leakage expected and therefore not included in the monitoring plan	Y	Y
4.5 Does the PDD provide for Quality Control (QC) and Quality Assurance (QA) Procedures as required in the monitoring methodology	DR	PDD	Pending CAR 11 and NIR 10	pending	Y following close out

**Table 5 Monitoring plan (PDD Annex 4)**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
5.1 Monitoring of Sustainable Development Indicators/ Environmental Impacts	DR	PDD, SSC M & P Appendix A <sup>1</sup> & B <sup>1</sup>			

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
5.1.1 Does the monitoring plan provide the collection and archiving of relevant data concerning environmental, social and economic impacts?	DR	PDD, SSC M & P Appendix A <sup>1</sup>	Project describes contribution to sustainable development without making clear how the environmental and social performance of the project will be monitored	NIR 12	Y following close out
5.1.2 Is the choice of indicators for sustainability development (social, environmental, economic) reasonable?		PDD, SSC M & P Appendix A <sup>1</sup>	Pending NIR 12	NIR 12	Y following close out
5.1.3 Will it be possible to monitor the specified sustainable development indicators?		PDD, SSC M & P	Pending NIR 12	NIR 12	Y following close out
5.1.4 Are the sustainable development indicators in line with stated national priorities in the Host Country?		PDD, SSC M & P Appendix A <sup>1</sup>	Pending NIR 12	NIR 12	Y following close out
5.2 Project Management Planning					
5.2.1 Is the authority and responsibility of project management clearly described?	DR	PDD	responsibility and name of the authority is not mentioned in the PDD other than over responsibility which lies with Director: Mr. Aggarwal (PDD A.3, Page:3)	CAR 11	Y following close out
5.2.2 Is the authority and responsibility for registration, monitoring, measurement and reporting clearly described?	DR	PDD,	responsibility and name of the authority is not mentioned in the PDD other than over responsibility which lies with Director: Mr. Aggarwal (PDD A.3, Page:3)	CAR 11	Y following close out
5.2.3 Are procedures	DR	PDD	No	CAR	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
identified for training of monitoring personnel?				11	folowi ng close out
5.2.4 Are procedures identified for emergency preparedness for cases where emergencies can cause unintended emissions?	DR	PDD	No	CAR 11	Y folowi ng close out
5.2.5 Are procedures identified for calibration of monitoring equipment?		PDD	Procedures are not defined for calibration, however there is a mention that the calibration is to be done and the instrument / equipment will be provided with tag showing date of calibration and next due calibration (PDD Page: 42-43)	Y	Y
5.2.6 Are procedures identified for maintenance of monitoring equipment and installations?			No clear procedures identified, reference made in the PDD under Socio economic benefits by providing jobs to skilled labour for maintenance of equipment (PDD page 7)	CAR 11	Y folowi ng close out
5.2.7 Are procedures identified for monitoring, measurements and reporting?	DR	PDD	Yes, the data of rice husk and coal will be recorded and the energy supplied to the grid can be obtained from the payment clearance bills	Y	Y
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)	DR	PDD	Yes, the PDD states that the rice husk and coal consumption will be recorded & would be made available for 3 years after the issuance of CER's	Y	Y
5.2.9 Are procedures identified for dealing with possible monitoring data adjustments and uncertainties?			No.	CAR 11	Y folowi ng close out



CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
5.2.10 Are procedures identified for review of reported results/data?			Yes through their plant operational data	Y	Y
5.2.11 Are procedures identified for internal audits of GHG project compliance with operational requirements where applicable?			No	CAR 11	Y following close out
5.2.12 Are procedures identified for project performance reviews before data is submitted for verification, internally or externally?			Yes, through their plant operational data records	Y	Y
5.2.13 Are procedures identified for corrective actions in order to provide for more accurate future monitoring and reporting?			No	CAR 11	Y following close out

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

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
6.1 Has an analysis of the environmental impacts of the project activity been sufficiently described?	DR	PDD	Yes, (PDD Page 59)	Y	Y
6.2 Are there any Host Party requirements for an Environmental Impact Assessment (EIA), and if yes, is an EIA approved?			Yes, EIA has been performed as an host Party requirement.  Confirmation of approval by local assessment  if the project cost is more that 100 Crores INR. The project needs to get an EIA done by a competent agency and evaluated by a competent authority (State Pollution Control Board or Ministry of Environment & Forest).	Y	Y
6.3 Will the project create any adverse environmental effects?			No, no adverse impacts expected	Y	Y
6.4 Are transboundary environmental			no adverse impacts	Y	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
impacts considered in the analysis?			expected		
6.5 Have identified environmental impacts been addressed in the project design?			no adverse impacts expected	Y	Y
6.6 Does the project comply with environmental legislation in the host country?			To be confirmed by local assessor	pending	Y

**Table 7 Comments by local stakeholders (Ref PDD Section G)**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
7.1 Have relevant stakeholders been consulted?			Local stakeholder consultation is not transparent	NIR 13	Y following close out
7.2 Have appropriate media been used to invite comments by local stakeholders?			Local stakeholder consultation is not transparent	NIR 13	Y following close out
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?			Local stakeholder consultation is not transparent	NIR 13	Y following close out
7.4 Is a summary of the stakeholder comments received provided?			Local stakeholder consultation is not transparent	NIR 13	Y following close out
7.5 Has due account been taken of any stakeholder comments received?			Local stakeholder consultation is not transparent	NIR 13	Y following close out

**Table 8 Other requirements**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
<b>8.1 Project Design Document</b>					

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	PD D	Yes, the name is given in the PDD page 8, where as the name mentioned on page 8 & Annex (Page 66) are different.	CAR 15	Y folowi ng close out
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	PD D	Yes	Y	Y
<b>8.2 Technology to be employed</b>					
8.2.1 Does the project design engineering reflect current good practices?	DR	PD D	Not mentioned clearly in the PDD	Y	Y
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?	DR	PD D	The technology of using biomass as a fuel in boiler combustion is new but as there are other similar projects already under registration	Y	Y
8.3 Is the project technology likely to be substituted by other or more efficient technologies within the project period?	DR	PD D	Not expected once implemented	Y	Y
8.2.4 Does the project require extensive initial training and maintenance efforts in order to work as presumed during the project period?	DR	PD D	No, the technology is simple and does not necessarily require such staff other than few in managerial and operational areas.	Y	Y
<b>8.3 Duration of the Project/ Crediting Period</b>	DR	PD D			
8.3.1 Are the project's starting date and operational lifetime clearly defined and reasonable?			Project starting date is 1 <sup>st</sup> April 2000. Further information required involving starting date and additionality [PDD Page 36]	NIR 14	Y folowi ng close out
8.3.2 Is the assumed crediting time clearly defined and reasonable (renewable crediting period of max. two x 7 years or fixed			10 years fixed	Y	y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
crediting period of max. 10 years)?					
8.3.3 Does the project's operational lifetime exceed the crediting period			Yes, 20 year which is considered reasonable	Y	Y

**Table 9 Additional requirements for SSC projects**

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
SSC projects use the SSC PDD and simplified baseline and monitoring methodologies as detailed in Appendix B (to the Modalities and Procedures for Small scale CDM projects, Annex II to Decision 21/CP.8) Indicative simplified baseline and monitoring methodologies for selected small scale CDM project activity categories					
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?	DR	PDD	Refer to NIR 3	NIR 3	Y folowi ng close out
9.2 The project conforms to one of the categories listed in Appendix B to Annex II to Decision 21/CP8	DR	App endi x B	1. D (Generation of electricity for a grid)	Y	Y
9.3 The small scale project activity is not a debundled component of a larger project activity?	DR	App endi x A <sup>1</sup> & PDD	Yes, there is no registered project (or project with request for registration) with the same characteristics	Y	Y
9.4 PDD has been prepared in accordance with appendix A of Annex II to Decision 21/CP8	DR	App endi x A <sup>1</sup> & PDD	Refer to CAR 15	CAR 15	Y folowi ng close out
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	DR	App endi x B <sup>1</sup> & PDD	Yes, the project uses 1. D (Renewable Electricity generation for a grid) PDD Page 12 A4.2	Y	Y
9.6 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	DR	& PDD	No.	Y	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
provisions in SSC Briefing Note and SSC meths I C / I D and III D and Para 22e of Appendix B					
9.7 Is EIA required by host party? If not, none is required irrespective of SHC. If yes, has one been performed consistent with local requirements?	DR	PDD	Yes, EIA is required for project cost exceeding 50 crore. (Annexure I, 3 III A) <a href="http://envfor.nic.in/division/s/iass/eia/Annex1.htm">http://envfor.nic.in/division/s/iass/eia/Annex1.htm</a>	Y	Y
9.8 The project results in emission reductions that area 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	DR	PDD & Appendix B <sup>1</sup>	Pending CARs	pending	Y following close out
9.9 Leakage is calculated according to the provisions of the SSC methodologies in Appendix B ( <a href="http://cdm.unfccc.int/Projects/pac/ssclistmeth.pdf">http://cdm.unfccc.int/Projects/pac/ssclistmeth.pdf</a> )	DR	PDD	No leakages considered for construction, transportation of fuel as they are small, if compared with transportation of coal/ fossil fuel to thermal power plant (s). [PDD Page: 40, 49]  Leakages due to transportation are neglected because the transportation emissions are not included in the project boundary as they are very small compared to those occurring during the transportation of fossil fuel from mines to Thermal Power stations	Y	Y

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			However leakages on account of transfer of equipment are not applicable for this project as there is no transfer of equipment.		
9.10 The project boundary shall be constructed in accordance with the requirements of the SSC meths in Appendix B	DR	PDD	Yes, however the developer has given a justification that the transportation emissions are not included in the project boundary as they are very small compared to those occurring during the transportation of fossil fuel from mines to Thermal Power stations	Y	Y
9.11 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.	DR	PDD	Refer to table 4	pendi ng	Y folowi ng close out
9.12 The monitoring plan shall present good monitoring practice appropriate to the circumstances of the project activity (para 33)	DR	PDD	Pending NIR 10 and CAR 11	pendi ng	Y folowi ng close out
9.13 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	DR	PDD	No, the project activity is not from a bundled project.	Y	Y

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<http://www.envfor.nic.in/cdm/>

<http://www.cea.nic.in/>

<http://www.cseeb-powerhub.com/>

<http://www.cea.nic.in/>

<http://chattisgarh.nic.in/opportunities/Power.pdf>

<http://powermin.nic.in/>