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Att: CDM Executive Board

Your ref.:  
UNFCCC Ref 0377

DNV responsible ref.:  
MLEH

Date:  
11 May 2011

QUESTIONS RAISED BY CDM EXECUTIVE BOARD MEMBERS	RESPONSE SUMMARY FROM DNV	ACTION TAKEN ( IF RELEVANT)
1. The DOE is requested to clarify how it verified that the project activity was implemented and operated as described in the PDD as per paragraph 197 of VVM (version 01.2) considering that monitoring report states that project participant will no longer monitor 5 project sites (site ID 10757, 10758, 10759, 10760, and 26942).	<p>This project, an early conceptual approach of the programme of activities, consists of 37 swine production sites owned and operated by different entities. Thirty two of the sites are operational and in use and still contribute the overall project activity. However, five sites, 10757, 10758, 10759, 10760, and 26942, which were implemented and operated according to the PDD, have ceased operation.</p> <p>AgCert International, the project participant, designed, operated, and maintained the project equipment. However, due to the economic downturn and greater than expected operational costs, the business contract was severed for the five sites in question, thus terminating continued operations and maintenance of the anaerobic digester and associated equipment by AgCert International, plc, as well as ending continued monitoring of the five site's contribution to project activity 0337.</p> <p>It is thus DNV's opinion that the project implementation complies with the description in the PDD and advanced waste management systems (AWMS), i.e. anaerobic digesters, were implemented also at sites 10757, 10758, 10759, 10760, and 26942. This was verified by</p>	<p>The monitoring report was revised to further clarify the operational status of the five sites in question.</p> <p>The verification report was revised to include DNV's validation of how it verified that the project activity was implemented and operated as described in the PDD as per paragraph 197 of VVM.</p>

	<p>DNV during the verification of previous monitoring periods.</p> <p>The Guidelines on assessment of different types of changes from the project activity as described in the registered PDD state that changes to the project design to be considered may include “removal or addition of one (or more) site of a project activity registered with multiple-sites”. It is DNV’s understanding that “removal” would apply in case a site in the PDD was never implemented or the measure to reduce greenhouse gases (GHG) emissions is physically removed. Due to this, DNV has not considered it necessary to submit a notification of changes from the project activity as described in the registered PDD.</p> <p>Nonetheless, the project participants are currently in the process of providing DNV with a list of sites included in their AWMS project activities in Brazil and Mexico which are no longer monitored. DNV is in the process of assessing this list and the impact of no longer monitoring selected sites on the additionality, scale of project activity, and the applicability/ application of the approved methodology of the registered CDM project activities by AgCert International. DNV’s preliminary assessment concludes no longer monitoring selected sites does raise no concerns with regard to the additionality, scale of project activity, and the applicability/application of the approved methodology.</p>	
<p>2. If 5 project sites above are still included in the project activity and they were operational during this monitoring period, the DOE is requested to clarify how it verified that the calculation of the emission reductions has been correctly carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology as per paragraph 208 ( c) of VVM (version 01.2) considering</p>	<p>As noted above in the response to item 1, the legal entities of the five sites s have discontinued a contractual arrangement with the Project Participant, AgCert International. At the time of the contract termination, three of the five sites were operational. For the two sites not operational, no electricity would be consumed, and hence no leakage occurs. For the three sites operational, based on historical data, the emissions reductions that would have been generated during the period far exceeded the approximately 5 tCO<sub>2</sub>e of leakage that would have been associated with each site. Thus, assuming no emission reductions from these sites is conservative.</p> <p>For the case that the farmers instead of the Project Participant AgCert International continue to operate the AWMS to treat manure being</p>	<p>The monitoring report was revised to further clarify the operational status of the five sites in question.</p> <p>The verification report was revised to include DNV’s verification that that the calculation of the emission reductions has been correctly carried out and that the leakage related to the electricity consumption from the five sites in question are conservatively considered zero.</p>

<p>that the leakage related to the electricity consumption from 5 project sites are not accounted.</p>	<p>produced by the swine farms connected to the AWMS, it would be appropriate to assume zero emission reductions for these sites. Due to safety reasons, farmers also continue to operate the flares. As shown in the monitoring report, leakage due to the sites electricity consumption for sites in operation is less than 1% of the measured emission reductions from these sites, i.e. the amount of methane being captured and flared. Hence, in case the AWMS is operated and consumes electricity, the operation of the AWMS will result in emission reductions which by far exceed project emissions associated with the electricity consumption due to operating the AWMS. Considering zero emission reductions from these sites would thus be in accordance with paragraph 208 (a) of the VVM (version 01.2), which states that the DOE may opt to make the most conservative assumption theoretically possible in finalizing the verification report in case only partial data are available because activity levels or non-activity parameters have not been monitored in accordance with the registered monitoring plan.</p>	
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