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CDM team
UNFCCC Secretariat

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Response to Incompleteness Notification regarding the Request for renewal of crediting period "Biogas Support Program - Nepal Activity-4" (UNFCCC Ref. no. 5416), notification received "e.g. 11th September 2019"

Dear CDM team,

Please find below the response of the TÜV NORD JI/CDM Certification Program to the Incompleteness Notification regarding the request for renewal of crediting period for the above mentioned project.

With regard to this response, we would kindly request you to continue with the request for registration process. If you have any questions do not hesitate to contact us.

Yours sincerely,



Stefan Winter
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Request for Registration/Issuance Incomplete Reason (1)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>1. The PP shall provide the correct reference of sampling standard in the PDD as per para.279 (a) of CDM project standard for project activities version 2.</p> <p>The PP is requested to provide correct reference of sampling standard in the PDD as per para.279 (a) of CDM project standard for project activities version 2. , in particular: the sampling standard (v4) is mentioned in the PDD p.22, p.28, p.29, whereas version 7 is the latest one.</p>
Response by PP	<p>The reference to Guideline for Sampling and Surveys for CDM Project Activities and Programme of Activities (Version 04) is given in p.22 of PDD. Hence it is corrected accordingly in the PDD while version no of the sampling standard and correction from standard to guideline is appropriately done in p. 28 and p.29 of revised PDD.</p>
Response by DOE:	<p>The typo has been revised. The latest version of the Sampling and surveys for CDM project activities and programmes of activities (version 7) is correctly stated in the revised PDD.</p> <p>The Guidelines for sampling and surveys for CDM project activities and programmes of activities (version 4) is correctly stated in the PDD.</p> <p>The PDD has been checked against the UNFCCC website.</p>
Request for Registration/Issuance Incomplete Reason (2)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>2. The PP shall provide the description of leakage as per para.79 of the CDM project standard for project activities.</p> <p>The PP is requested to provide the description of leakage as per para 110 of VVS-PA ver 2. The PDD does not describe what type of leakage to be considered as per the Tool 16: Project and leakage emissions from biomass.</p>
Response by PP:	<p>As per para 24 of the AMS I.E (Version 9), PP has opted to use the default adjustment factor of 0.95 to account the leakage. Same is mentioned in section B.6.1 of the revised PDD</p> <p>The usage of Tool 16 as per meth 23 paragraph is not applicable as the biomass is not cultivated or procured or it not the by products from agro industrial bi products. The PDD is revised accordingly</p>
Response by DOE	<p>The alternative as presented in §24 of the applied methodology has been correctly adopted by PP.</p> <p>The mentioned tool 16 is applicable only when the biomass is cultivated or it procured by the project proponents or results from agro industrial process. However as the biomass of this project activity it is not cultivated, tool 16 is not applicable.</p> <p>Also no efficient charcoal is used, therefore §25 and §26 of the methodology are not applicable.</p> <p>Hence leakage is considered by applying the adjustment factor of 0.95, as per applicable methodology. This is in line with the methodology and VVS §110. Leakage has been correctly taken into account. A gross adjustment factor of 0.95 is multiplied with B_y. Thus no surveys is required.</p>

	The revised PDD is checked against the methodology.
Request for Registration/Issuance Incomplete Reason (3)	
Scope and Issue raised by the UNFCCC Secretariat:	3. The PP shall confirm the measurement intervals of BC,pj,HH,y as per para 79-80 of CDM project standard for project activities version 02.0. The PP shall confirm the measurement intervals of BC,pj,HH,y as per para 79 of CDM project standard for project activities version 02.0. In the monitoring frequency section, it states at least once every two years (biennial) whereas in the QA/QC procedure PDD states "biannually"..
Response by PP	The methodology AMS I.E version 9 (Section 6.1 table 11) allows the monitoring of BC,pj,HH,y, biennially (at-least once in a two year). So, the PP will comply the monitoring frequency with at least once in two year. But in general, PP opt for the annual monitoring. So, QA/QC section clearly mentioned that though at-least biennial monitoring is allowed, pp will conduct it annually. PP is in the opinion that this is in-line with the applied methodology.
Response by DOE:	The PP will conduct the user survey annually. This is conservative. The frequency is described in detail in the PDD. The monitoring frequency / procedure is in line with the applied methodology. PDD and AMS-I.E. have been checked, interviews have been conducted in this regards during the site visit.
Request for Registration/Issuance Incomplete Reason (4)	
Scope and Issue raised by the UNFCCC Secretariat:	4. The validation report shall contain an assessment of how each applicability condition of the selected methodologies and standardized baselines is fulfilled by the project activity as per para. 402, 68 of the CDM VVS-PA. The DOE is requested to provide in the validation report an assessment of how "each" applicability condition of the selected methodology is fulfilled by the project activity as per para. 402, 68 of the CDM VVS-PA.
Response by PP	All the applicability conditions of the project are met and clearly described in the PDD.
Response by DOE:	The Applicability conditions as required by the applied methodology version 05 applicable at the time of intial registration and the version 09 applicable for the renewal of this project is same. The assessment for AMS-I.E. version 09 is given in section D.2 of the FVR. The FVR has been checked against the PDD and the methodology and it is found the applicability criteria are met. However to add clarity to the EB query, the section is updated.
Request for Registration/Issuance Incomplete Reason (5)	
Scope and Issue raised by the UNFCCC Secretariat:	5. The DOE shall verify the justification given in the PDD for the choice of parameters used in the equations as per para 115, 117-119 of VVS-PA ver 2. The DOE is requested to verify the justification given in the PDD for the choice of parameters used in the equations as per para 115,117-119 of VVS ver 2, in particular: a)For parameter Fnrb, the link

	<p>https://nam03.safelinks.protection.outlook.com/?url=www.dfrs.gov.np&amp;data=02%7C01%7CIBRDcarbonfinance%40worldbank.org%7C21add405c48e4b639df508d736e85afb%7C31a2fec0266b4c67b56e2796d8f59c36%7C0%7C0%7C637038243900244253&amp;sdata=BTi6DAAylhNbPeDQb527LOHTdCc8iXjcgzRn6fOJT%2Bw%3D&amp;reserved=0 provided in the validation report is not accessible.</p> <p>Please kindly provide the calculation of Fnrb in spreadsheet and authorization from the DNA of Nepal, the ministry of forests and Environment, Government of Nepal dated 25/11/2018</p>
Response by PP:	<p>Since the link is temporarily down, the report is attached for the reference. The report is also available in the website of Forest Research and Training Centre under Ministry of Forest and Environment, Government of Nepal: http://frtc.gov.np/downloadfile/state%20of%20forest_1470140234.pdf</p> <p>The Fnrb calculation spreadsheet and the letter from Ministry of Forest and Environment is provided with this response.</p>
Response by DoE:	<p>The revised website of Forest Research and Training Centre under Government of Nepal, Ministry of Forests and Environment http://frtc.gov.np is added in the FVR. The latest data from the website, published in December 2015, is used for the calculation of f_{NRB}. The forest report, the calculation sheets and the Government of Nepal Auhtorisation has been checked and is attached to this incomplete reply.</p> <p>a) As per the tool 11: Assessment of validity of the original/current baseline and update of the baseline at the renewal of a crediting period (Version 3.0.1)" step 1.4</p> <p>" If any of the data and parameters that were only determined at the start of the crediting period and not monitored during the crediting period are not valid anymore, the current baseline needs to be updated for the subsequent crediting period.</p> <p>If the application of Steps 1.1, 1.2, 1.3 and 1.4 confirmed that the current baseline as well as data and parameters are still valid for the subsequent crediting period, then this baseline, data and parameters can be used for the renewed crediting period. Otherwise, proceed to Step 2".</p> <p>Thus the value of $BC_{bl,HH,y}$ is "average annual consumption of woody biomass per household before the start of the project activity" which is determined before the start of this project activity which is determined by the PP though surveys before the start of the second crediting period is applicable as mentioned in the submitted PDD. Thus no further change is required.</p>
Request for Registration/Issuance Incomplete Reason (6)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>6. The DOE shall assess and provide a verification opinion on the project participant's ability to implement the monitoring plan as per para. 119, 242 of the CDM VVS-PA version 02.0.</p> <p>The DOE is requested to provide its verification opinion in the Validation Report on the project participants have the ability to implement the monitoring plan as per para. 119, 242 of the CDM VVS-PA version 02.0.</p>
Response by PP	<p>The Montioring plan is given in the revised PDD and it is inline with the methodology.</p>

**Response by
DOE:**

The assessment on the project participants ability to implement the monitoring plan is given in the Section D,5 of the FVR. In the RCP, the Parameter, $BC_{PJ,HH,y}$ If it is found that pre-project devices were not completely displaced but continue to be used to some extent, average annual consumption of woody biomass per household in the pre-project devices during the project activity and tonnes/household/year is the new parameter required to be monitored as per the methodology. The PP has already estimated the parameter using sampling survey for Ex ante purpose. So the ability of the PP to implement the monitoring plan is deemed adequate.

The section D,5 is further strengthened to add clarity.