
VALIDATION OPINION FOR REVISION OF REGISTERED MONITORING PLAN

GANPATI SUGAR INDUSTRIES LIMITED

**Ganpati co-generation project at
Medak, Andhra Pradesh**

UNFCCC Ref. No. 0370

SGS Climate Change Programme

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Abbreviations

APPCB	Andhra Pradesh Pollution Control Board
APTRANSCO	Andhra Pradesh Transmission Corporation
CAR	Corrective Action Request
CDM	Clean Developed Mechanism
CL	Clarification Request
CO ₂	Carbon Dioxide
COP/MOP	Conference of parties serving as the meeting of parties to Kyoto Protocol
DCS	Distribution Control System
DNA	Designated National Authority
DOE	Designated Operational Entity
DR	Document Review
EB	Executive Board
FAR	Forward Action Request
GHGs	Green House Gas(es)
GSIL	Ganpati Sugar Industries Limited
IPCC	Intergovernmental Panel on Climate Change
kg	Kilogram
kWh	Kilo Watt Hour
MP	Monitoring Plan
MT	Metric Tonne
PDD	Project Design Document
PP	Project Proponent
RMP	Revised Monitoring Plan
UNFCCC	United Nations Framework Convention for Climate Change

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1. Validation Opinion

Paragraph 57 of the modalities and procedures for the CDM allows project participants to revise monitoring plans in order to improve accuracy and/or completeness of information, subject to the revision being validated by a Designated Operational Entity.

SGS United Kingdom Ltd has been contracted by Ganpati Sugar Industries Limited (GSIL) to perform such a validation of the revision of monitoring plan according to the procedure detailed in Annex 28 to EB 49 meeting report; the registered monitoring plan is part of the PDD of registered CDM project Ganpati co-generation project at Medak, Andhra Pradesh (UNFCCC ref. no 0370). The purpose of a validation is to have an independent third party assessment of the revision of monitoring plan. In particular, the level of accuracy and/or completeness in the proposed revision of the monitoring plan, and the conformity with approved monitoring methodology applicable to the project activity.

By applying the proposed revision of monitoring plan, PP will monitor the diesel consumption of DG sets and corresponding electricity generation through DG set. In the project activity, DG set has been kept as standby during emergency purpose. During 3rd verification (25/06/2007 to 24/07/2008), it was recommended by DOE (FAR 1 in 3rd verification) to include the diesel consumption of DG sets and corresponding electricity generation through DG set in the monitoring plan. Also PP has removed the grid emission factor and fossil fuel usage from the registered monitoring plan. If there is any diesel consumption, this will be considered under project emissions. There is no impact on emission reduction due to removal of grid emission factor and fossil fuel from the registered monitoring plan (grid emission factor is fixed ex-ante for first crediting period and also as per the APPCB norms, PP can't use fossil fuel in co generation power plant).

This revision improves the accuracy of information provided and consistency in the registered PDD and the monitoring plan.

Furthermore, we confirm that:

- (a) the proposed revision points have been described, and an assessment has been provided to substantiate the reasons for each of the proposed revision points of the registered monitoring plan, using objective evidence;
- (b) the proposed revision of the monitoring plan ensures that the level of accuracy or completeness in the monitoring and verification process is not reduced as a result of the revisions;
- (c) the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity whilst ensuring the conservativeness of the emission reductions calculation.
- (d) the findings of the previous verification reports have been taken into account

Signed on Behalf of the Validation Body by Authorized Signatory

Signature:



Name: Siddharth Yadav

Date: 18-10-2010

2. Introduction

2.1 Objective

Paragraph 57 of the modalities and procedures for the CDM allows project participants to revise monitoring plans in order to improve accuracy and/or completeness of information, subject to the revision being validated by a Designated Operational Entity.

SGS United Kingdom Ltd has been contracted by Ganpati Sugar Industries Limited to perform such a validation of the revision of monitoring plan according to the procedure detailed in Annex 28 to EB 49 meeting report; the registered monitoring plan is part of the PDD of registered CDM project Ganpati co-generation project at Medak, Andhra Pradesh and UNFCCC ref. no 0370. The purpose of a validation is to have an independent third party assessment of the revision of monitoring plan. In particular, the level of accuracy or completeness in the proposed revision of the monitoring plan, and the conformity with the approved monitoring methodology applicable to the project activity.

The Validation was performed in accordance with the UNFCCC criteria for the Clean Development Mechanism (CDM) and the host country criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

SGS reviewed the project design documentation (revised monitoring plan), using a risk based approach and conducted follow-up interviews.

2.2 Scope

The scope of the validation is defined as an independent and objective review of revision of monitoring plan. The information in these documents is reviewed against the Kyoto Protocol requirements, the UNFCCC rules and associated interpretations.

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

2.3 GHG Project Description

Refer to <http://cdm.unfccc.int/Projects/DB/SGS-UKL1146080365.67/view>, the project web page. There is no change in the project activity description. The project was registered on 29th August 2006 under UNFCCC ref. no. 0370.

3. Methodology

3.1 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.

3.2 Use of the Validation Protocol

The validation protocol used for the assessment is partly based on the templates of the CDM Validation and Verification Manual version 1.1 (EB51 Annex.3):

- 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	Ref ID	Means of Verification (MoV)	Comment	Draft and/or Final Conclusion
The various requirements are linked to checklist questions the project should meet.	Lists any references and sources used in the validation process. Full details are provided in the table at the bottom of the checklist.	Explains how conformance with the checklist question is investigated. Examples of means of verification are document review (DR) or interview (I). N/A means not applicable.	The section is used to elaborate and discuss the checklist question and/or the conformance to the question. It is further used to explain the conclusions reached.	This is either acceptable based on evidence provided (Y/OK), or a Corrective Action Request (CAR) due to non-compliance with the checklist question (See below). A Clarification request (CL) is raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met.

The validation protocol is attached with the report as Annex 1.

3.3 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 **Clarification Request (CL)** 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:

- Non-conformities with the monitoring plan or methodology are found in monitoring and reporting, or if the evidence provided to prove conformity is insufficient;
- Mistakes have been made in applying assumptions, data or calculations of emission reductions which will impair the estimate of emission reductions;
- Issues identified in a FAR during validation to be verified during verification have not been resolved by the project participants.

A Forward Action Request (FAR) is raised during verification for actions if the monitoring and reporting require attention and/or adjustment for the next verification period.

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

Corrective Action Requests, Clarification Requests and Forward Action Requests are raised in the draft validation protocol and detailed in a separate form (Findings Overview). In this form, the Project Developer is given the opportunity to address and "close" outstanding CARs and respond to CLs and FARs. The detailed Finding Overview is attached with this document as Annex 2.

3.4 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.

4. Validation Findings

4.1 Application of Monitoring Methodology and Monitoring Plan

Type of Revision

The revision of monitoring plan is a result of a recommendation by the PP/DOE as mentioned in section 5 of the 3rd verification report (Ref./5/).

The proposed revision of the monitoring plan ensures that the level of accuracy and completeness in the monitoring and verification process is not reduced as a result of the revisions (details below).

The project activity is using AMS I.D. version 07 dated 28th November 2005. In accordance with the guidance and methodological choice mentioned the monitoring plan of the registered PDD (version 07; dated 31/07/2006) stated the monitoring of following parameters –

1. Electricity supplied to the grid
2. Electricity consumed for captive power purposes
3. CEF of the grid
4. CEF Operating Margin of the grid
5. CEF Build Margin of the grid
6. Fossil fuel usage

To improve the transparency and completeness of monitoring procedure and consistency of the applied Monitoring Methodology AMS I.D version 07, the following monitoring parameters have been revised/ included in section D.3 of registered PDD:

S. No	Data Variable	Changes compared to the registered monitoring plan	Comments
1.	EGy : Net electricity supplied to the grid by the project activity	This parameter was not available in the registered PDD. In the revised monitoring plan this has been included.	The Net electricity supplied to the grid will be calculated by (difference between parameter 2 and 3) $EG_y = (\text{Electricity exported to the grid}) - (\text{Electricity Import from the grid}).$
2.	Electricity exported to the grid	This parameter was not available in the registered PDD. In the revised monitoring plan this has been included.	Earlier this parameter was not available in the monitoring plan. This parameter will be monitored through APTRANSCO energy meter (0.2 class).
3.	Electricity Import from the grid	This parameter was not available in the registered PDD. In the revised monitoring plan this has been included.	Earlier this parameter was not available in the monitoring plan. However, in previous verifications, net power export to the grid has been calculated as difference between the electricity supplied to the grid and import of power. In the revised monitoring plan, PP has included this as a separate parameter. This parameter will be monitored through APTRANSCO energy meter. There is no separate meter to monitor the import of power from the grid and the meter used for electricity supplied to the grid will be used. APTRANSCO

			energy meter is capable of monitor both export and import of power.
4.	Diesel Consumption	This parameter was not available in the registered monitoring plan.	This parameter has been included in the revised monitoring plan based on FAR raised in 3 rd verification. DG Set is kept for emergency purpose and the diesel consumption will be monitored through level measuring gauge and cross checked with diesel issue slips. Diesel consumed in DG sets (for trail run / emergency purpose) will be considered for project emission calculation.
5.	Electricity generation using diesel	This parameter was not available in the registered monitoring plan.	This parameter has been included in the revised monitoring plan based on FAR raised in 3 rd verification. Electricity generated through DG sets during trail run and for emergency purpose will be monitored through energy meters.
6.	Density of diesel	This parameter was not available in the registered monitoring plan.	This parameter has been included in the revised monitoring plan for calculating the project emissions as per the "Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion". National default value will be used and the appropriateness of the value is reviewed annually.
7.	NCV of diesel	This parameter was not available in the registered monitoring plan.	This parameter has been included in the revised monitoring plan for calculating the project emissions as per the "Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion". IPCC default values will be used and any future revision of the IPCC Guidelines should be taken into account.
8.	CO ₂ emission factor of diesel	This parameter was not available in the registered monitoring plan.	This parameter has been included in the revised monitoring plan for calculating the project emissions as per the "Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion". IPCC default values will be used and any future revision of the IPCC Guidelines should be taken into account.
9.	Electricity supplied to the grid	Removed from the registered PDD	This parameter has been removed from the monitoring plan and more transparent way has been incorporated for calculating the net electricity supplied to the grid. In the revised monitoring plan, electricity exported to the grid and imported from the grid will be calculated and net electricity supplied to the grid will be calculated from electricity export and import.
10.	Electricity consumed for captive power purposes	Removed from the registered PDD	Since the parameter is not required for emission reduction calculation and also not required to be monitored as per the applied methodology, removal of this parameter has been accepted.
11.	CEF of the grid	Removed from the registered PDD	Since the grid emission factor has been calculated as combined margin approach and

			fixed for first crediting period, there is no monitoring is required. Hence removal of this parameter has been accepted.
12.	CEF Operating Margin of the grid	Removed from the registered PDD	Since the grid emission factor has been calculated as combined margin approach and fixed for first crediting period, there is no monitoring is required. Hence removal of this parameter has been accepted.
13.	CEF Build Margin of the grid	Removed from the registered PDD	Since the grid emission factor has been calculated as combined margin approach and fixed for first crediting period, there is no monitoring is required. Hence removal of this parameter has been accepted.
14.	Fossil fuel usage	Removed from the registered PDD	Since the boiler can't use the fossil fuel for co firing and for start up, the removal of this parameter has been accepted (Ref./6/ & /7/)

In the registered PDD, electrical parameters were recorded on hourly and source of data is plant records. In the revised monitoring plan, recording frequency has been changed from hourly to monthly and source of data has been changed from plant records to monthly JMR. In RMP, electrical parameters like electricity exported to the grid, electricity import from the grid and net electricity supplied to grid by project activity is continuously monitored at plant level. APTRANSCO will take the joint meter reading at substation which is 10 km away from the plant (there will be line losses). APTRANSCO is an independent third party which is under the control of the Government of Andhra Pradesh. PP will raise the invoice to APTRANSCO on the basis of monthly JMR. Since the APTRANSCO meters are 10 km away from substation and APTRANSCO energy meters are high accuracy meters (0.2 class), Hence reading at substation will be more accurate and conservative for emission reduction calculations, Hence change in monitoring frequency has been accepted. In the registered PDD, there are some additional parameters in Annex 4 compared to section D.3 of the registered PDD. The following monitoring parameters has been removed from Annex 4 of the registered PDD,

1. Total generation of power
2. Auxiliary power consumption at plant premises
3. Efficiency of the project activity
4. Cane crushing by sugar unit and
5. Quantity of the bagasse fuel

Since the above mentioned parameters are not required for emission reduction calculation and are not required to be monitored as per the applicable methodology, hence the deletion of these operational parameters has been accepted.

As per the revised monitoring plan

Calculation of Baseline Emissions due to displacement of Electricity

$$BE_{\text{Electricity},y} = EG_y \times E_{\text{Electricity},y}$$

EG_y = Net electricity supplied to grid by the project activity during the year y in kWh.
(Difference between the electricity exported to the grid and electricity import from the grid)

$E_{\text{Electricity},y}$ = Grid emission factor (fixed ex-ante for first crediting period) 0.00093741 t CO₂eq / kWh

Calculation of Project Emissions

$$PE_y = FC_{\text{diesel}} \times COEF_{\text{diesel}}$$

$$FC_{\text{diesel}} = \text{Quantity of diesel consumed in process during the year y (tons/yr).} \\ [(\text{Quantity of diesel consumption in liters/year}) \times (\text{Density of diesel in kg/liter})/1000]$$

$$COEF_{\text{diesel}} = \text{CO}_2 \text{ emission coefficient of diesel in year y (tCO}_2\text{/ton)} \\ COEF_{\text{diesel}} \text{ is based on Option B of "Tool to calculate project or leakage CO}_2 \text{ emissions from fossil fuel combustion". } COEF_{\text{diesel}} = NCV_{\text{diesel}} \times EF_{\text{CO}_2, \text{ diesel}}$$

$$PE_y = FC_{\text{diesel}} \times NCV_{\text{diesel}} \times EF_{\text{CO}_2, \text{ diesel}}$$

$$FC_{\text{diesel}} = \text{Quantity of diesel consumed in process during the year y (tons/yr)}$$

$$NCV_{\text{diesel}} = \text{Net calorific value of diesel (GJ/ton)}$$

$$EF_{\text{CO}_2, \text{ i, y}} = \text{carbon emission factor of diesel (tCO}_2\text{/GJ)}$$

Based on the revision in monitoring plan _V01 submitted to SGS for validation,

CAR # 1 was raised due to the following reason.

1. To correct the source of information for the monitoring parameters like electricity supplied to the grid, electricity import from the grid and electricity consumed for the captive purposes
2. explanation of monitoring procedures for diesel consumption for DG sets and corresponding electricity generation from DG set in revised monitoring plan
3. to include the DG set ratings in revised monitoring plan and
4. inclusion of biomass consumption in the monitoring plan

In response, PP has corrected the source of information of all monitoring parameters, monitoring procedures of diesel consumption and DG set rating in the revised monitoring plan _V03.

Since the project activity is not a co-fired plant, PP has not included the biomass consumption and removed the fossil fuel consumption. It is evident from the APPCB consent to operate for co-generation power plant and boiler supplier letter (Ref./ 6/ &/7/), that the project activity can't use fossil fuel and boiler is designed for 100% biomass. Hence same has been accepted. **CAR # 01 was closed out.**

CAR #02 was raised to include the project emission due to diesel consumption (if there is any diesel consumption) as per "Tool to calculate project or leakage CO₂ emissions from fossil fuel combustion". In response PP has included the project emission calculations as per the tool in section E.1.2.1 of the revised monitoring plan _V03. Hence **CAR #02 was closed out.**

CAR #03 was raised to include the QA/QC procedures for all monitoring parameters. In response, PP has included the QA/QC procedures for all monitoring parameters in the revised monitoring plan _V03. Hence **CAR #03 was closed out.**

CAR #04 was raised to include the information of monitoring equipments and its positioning for all monitoring parameters. In response PP has included the information of all monitoring equipments and its positioning in the revised monitoring plan _V03. Hence **CAR#04 was closed out.**

CAR #05 was raised to include the day to day record handling procedures and performance review procedures in the revised monitoring plan. In response, PP has included the day to day record handling

procedures and performance review procedures for all monitoring parameters in the revised monitoring plan_V03. Hence **CAR #05 was closed out.**

The proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity (details below).

The project activity was registered under the methodology AMS. I.D version 07. As per the methodology, electricity generated by renewable technology needs to be monitored. In case of co-fired plants, the amount of biomass and fossil fuel input shall be monitored. The project activity is renewable technology and electricity generated from the project activity has been monitored. There is no co-firing involved in the project activity (Ref./6/) and hence biomass and fossil fuel input has been not monitored. The revised monitoring plan is in accordance with the approved monitoring methodology.

This revision improves the accuracy of information provided and consistency in registered PDD and the monitoring plan.

4.2 Findings of Previous Verification Reports

FAR has been raised in the 3rd verification (Ref./5/) to include the diesel consumption for DG set and corresponding electricity generation in the monitoring plan. Same has been included in the revised monitoring plan. Since, the DG set has been kept for emergency purpose; there will be no power generation from the DG sets in normal operation. The revision in monitoring plan is not affecting the issuance of the previous verification. Revision in monitoring plan has been suggested for more transparency in the monitoring plan.

5. List of Persons Interviewed

Site visit was not carried out for revision in monitoring plan. Validation of revision in monitoring plan is based on the 3rd verification site visit and document submitted for revision in monitoring plan.

Date of site visit	Name	Position	Short description of subject discussed
-	-	-	-

6. 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/ Revised Monitoring Plan Version 05 dated, 31st August 2010

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):

- /2/ Registered PDD version 07 dated 31st July 2006
- /3/ Validation protocol
<http://cdm.unfccc.int/UserManagement/FileStorage/GW8074FSOVUHP4C7R87AEYG4PBL00Q>
- /4/ Methodology (AMS. I.D version 07)
- /5/ 3rd Verification report dated 25/06/2009
<http://cdm.unfccc.int/UserManagement/FileStorage/AJXF12MWLQBZUDCG3NOKVIPR90E785>
- /6/ APPCB consent to operate the co-generation power plant dated 05/06/2007
- /7/ Letter from the boiler supplier (Thermax Limited) dated 28/04/2010
- /8/ Test certificate of DG set energy meter



Annex 1: Validation Protocols

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
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Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.1. General Requirements (Note that the sections A.1.1- A.1.4 may be completed after the other sections are completed)				
A.1.1. Is the revision in the monitoring plan based on a decision by the CDM EB	EB49, Annex 28	DR	Revision in monitoring plan is not based on the EB decision. During 3 rd verification (25 Jun 2007 - 24 Jul 2008), FAR has been raised to monitor the diesel consumption and corresponding electricity generation through DG sets.	Y
A.1.2. Is the revision based on a decision by CDM EB but also additional revisions are proposed by the PP/DOE	EB49, Annex 28	DR	Revision in monitoring plan is based on the FAR raised in the 3 rd verification Apart from the DOE suggestion, PP has made the following changes in the revised monitoring plan 1. Import of power from the grid has been included 2. Recording frequency of the monitoring parameters for electricity supplied to the grid has been changed.	Y
A.1.3. Is the need for revision in monitoring plan spotted during the first monitoring period?	EB49, Annex 28 Project page on UNFCCC website	DR	Revision in monitoring plan has been suggested in the 3 rd verification. Till now we have carried our three verifications.	Y
A.1.4. Is the revised monitoring plan complete and does the revised monitoring plan follow the registered PDD template?	Registered PDD	DR	The revised monitoring plan submitted is complete and follows the PDD template.	Y
A.1.5. Has the revised monitoring plan submitted in track change mode for each of the revision point (issue)?	Revised monitoring plan	DR	Revised monitoring plan submitted is in track change mode.	Y
A.1.6. Is there an objective evidence for each of the proposed revision point (issue)?	Previous verification reports, registered PDD	DR	Objective evidence has been provided for each of the proposed revisions.	Y

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.1.7. Does the revised monitoring plan also include the Annex 4?	Registered PDD	DR	revised monitoring plan contains Annex 4 of the PDD	Y
A.1.8. Does the revised monitoring plan lead/associate to any kind of change in the project registered design?	Registered PDD & EB48 Annex 66-67	DR	Revision in monitoring plan doesn't lead any kind of change in the registered project design. Revision has been suggested to include the monitoring parameters related to the DG sets.	Y
A.2. Data and Parameters Monitored				
A.2.1. Does the revised monitoring plan in the PDD comply with the approved methodology provided for the collection and archiving of all relevant data necessary for estimation or measuring the emission reductions within the project boundary during the crediting period?	VVM Para. 91a/91d/121 Revised MP Section B.7 EB49, annex 2, para 9	DR	<ol style="list-style-type: none"> 1. Project activity is using the methodology AMS I. D_V07. As per the the methodology, electricity generation by the renewable energy technology needs to be monitored. In case of co fired plants, biomass and fossil fuel input needs to be monitored. 2. In the monitoring plan amount of fossil fuel consumption is monitored, but the amount of biomass consumption is not monitored. Please clarify 3. In the comments provided for the net electricity supplied to the grid, electricity import from the grid, it is mentioned that the readings will be taken on every 24th day of the month. Please ensure it. 4. The source of data for the the monitoring parameters net electricity supplied to the grid, electricity import from the grid and electricity consumed for captive power purposes needs to be corrected. 5. Comments provided for the fossil fuel usage is not clear. 6. Grid emission factor the project activity is fixed ex-ante for the first crediting period. In that case, please remove the grid emission factor parameters in the monitoring plan. 7. Monitoring procedure of diesel consumption for DG sets and the corresponding Electricity generation from DG set is not clearly explained. 8. Please include the rating of the DG sets used in the project activity 	CAR #01 CAR # 01 was closed out. Y

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.2.2. Are the changes in the monitoring plan inline to the applied methodology and tool?	AMS. I D_V07	DR	<p>The changes in the monitoring plan is inline with the applied methodology (AMS.I D_V07)</p> <p>In the revised monitoring plan, electricity import from the grid, Diesel consumption for DG sets and the corresponding electricity generation from the DG set has been included.</p> <p>The following parameters were removed from the registered monitoring plan.</p> <ol style="list-style-type: none"> 1. CEF of the grid (grid emission factor) 2. CEF operating margin of the grid 3. CEF Build margin of the grid and 4. Fossil fuel usage. 5. Electricity consumed for captive power purposes 	Y
A.2.3. Are the changes affecting the ER calculation (directly/indirectly)?	Revised MP	DR	<p>If the DG sets are used for power generation, same needs to be considered for the project emissions. In this project activity, DG sets are used for emergency purpose. The changes in the revised monitoring plan doesn't affect the ER calculations. For more transparency, same has been included in the revised monitoring plan.</p> <p>The change proposed is to ensure whether DG set is generating the power or not. If it is generating the power same needs to be considered in the project activity emissions. if the diesel consumption is only due to the trial run then the emissions due to the diesel consumption needs to be calculated as per the "Tool to calculate project or leakage CO2 emissions from fossil fuel combustion". Please provide the project emission calculations for diesel consumption.</p>	<p>CAR # 2</p> <p>CAR # 2 was closed out.</p> <p>Y</p>
A.2.4. Is the information given for each monitoring variable by the presented table sufficient to ensure the verification of a proper implementation of the monitoring plan?	RMP Section B.7	DR	<p>Pending CAR #1</p> <p>The appropriateness of the all monitoring parameters in the revised monitoring plan has been checked.</p>	<p>Pending CAR #1</p> <p>CAR # 1 was closed out.</p> <p>Y</p>

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
<p>A.2.5. Has there been an issuance with the original monitoring plan of the registered PDD in the past?</p> <p>A.2.6. if so how did the identified gaps effect the ER calculations for the monitoring periods in the past?</p>	Project page on UNFCCC website	DR	As per the original monitoring plan in the registered PDD there are three issuance happened in past. FAR has been raised in the 3 rd verification. Since the DG sets are kept for emergency purpose and normally there is no power generation from the DG sets. CERs are calculated as per the procedure given in the methodology AMS .I D_V07. Hence there is no risk of over issuance in the past. This revision is proposed for more transparency in the monitoring plan.	Y
A.2.7. Is the information given for each monitoring variable by the presented table sufficient to ensure the delivery of high quality data free of potential for biases or intended or unintended changes in data records?	RMP Section – B.7	DR	<p>Pending closure of all CAR</p> <p>The monitoring information provided in the section D.3 and Annex 4 of the revised monitoring plan is sufficient to deliver the high quality of data.</p>	<p>Pending closure of CARs</p> <p>All CARs were closed. Y</p>
A.2.8. Is the monitoring approach in line with current good practice, i.e. will it deliver data in a reliable and reasonably acceptable accuracy?	RMP Section- B.7	DR	<p>Pending closure of all CAR</p> <p>Monitoring approach provided in the revised monitoring plan is inline with the current good practices followed in the similar type of industries.</p>	<p>Pending closure of CARs.</p> <p>All CARs were closed out. Y</p>
A.2.9. Are all formulae used to determine project emission clearly indicated and in compliance with the monitoring methodology.	Revised MP Section -B.7	DR	<p>Pending CAR #02</p> <p>Project emission calculations are explained in Section E.1.2.1 of the revised monitoring plan.</p> <p>CAR # 02 was closed out.</p>	<p>Pending CAR # 02</p> <p>CAR #02 was closed out. Y</p>
A.3. Quality Control (QC) and Quality Assurance (QA) Procedures				

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.3.1. Is the selection of data undergoing quality control and quality assurance procedures complete?	VVM Para. 121	DR	Revised MP includes the data management and quality assurance and quality control procedures to ensure the delivery of unambiguous data. It is also confirmed by means of review of the documented procedures that project participant has ability to implement the monitoring plan.	Y
A.3.2. in case, a revision is proposed, the impact of the revision should be assessed and it not result in reduced level of accuracy and completeness in the monitoring and verification process	EB49, annex 2, para 9		<ol style="list-style-type: none"> 1. In the revision in monitoring plan, the recording frequency of the parameters, net electricity supplied to the grid, electricity import from the grid and electricity consumed for captive power purposes has been changed. 2. In the registered PDD, net electricity supplied to the grid and electricity consumed for captive power purposes needs to be monitored on hourly basis and plant records are used for this purpose. In the revision, PP would like to change the recording frequency from hourly to monthly and the source of information is Joint meter reading provided by Transmission corporation for Andhra Pradesh Limited instead of plant records. 3. Since the Transmission corporation for Andhra Pradesh Limited is an independent third party Government organization and the payment for power export to the grid will be based on the joint meter reading same has been accepted. Also Transmission corporation for Andhra Pradesh Limited will take the joint meter reading at the substation level which is 10 km away from the plant. Hence the change in the monitoring frequency will leads to conservative approach of calculating the emission reductions from the project activity. 	Y
A.3.3. Are quality control procedures and quality assurance procedures sufficiently described to ensure the delivery of high quality data?	VVM Para 121	DR	<p>Please explain the QA/QC procedure for all monitoring parameters</p> <p>Revised MP includes the data management and quality assurance and quality control procedures to ensure the delivery of unambiguous data.</p>	CAR #03 CAR # 03 was closed out. Y
A.3.4. Is it ensured that data will be bound to national or internal reference standards?	VVM Para. 86d	DR	All the monitoring data are compliance with national and sectoral policies and circumstances are considered and listed in the PDD.	Y

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.4. Operational and Management Structure				
A.4.1. Is the authority and responsibility of project management clearly described?	PDD Section B.7.2 /Annex 4	DR	Pending CAR #03 Authority and responsibility of project management is described in transparent manner in section D.5 of the revised monitoring plan	Pending CAR #03 CAR #03 was closed out. Y
A.4.2. Is the authority and responsibility for registration, monitoring, measurement and reporting clearly described?	PDD Section B.7.2/Annex 4	DR	Pending CAR #03 Authority and responsibility of project management is described in transparent manner in section D.5 of the revised monitoring plan	Pending CAR #03 CAR #03 was closed out. Y
A.5. Monitoring Plan (Annex 4)				
A.5.1. Does the monitoring plan completely describe all measures to be implemented for monitoring all parameter required, including measures to be implemented for ensuring data quality?	VVM Para. 122b	DR	Pending CAR #01 Revised monitoring plan describe the measures to be implemented for monitoring all parameter clearly and QA/QC procedure to ensure delivery of quality data.	Pending CAR #01 CAR #01 was closed out. Y
A.5.2. Does the monitoring plan provide information on monitoring equipment and respective positioning in order to safeguard a proper installation?	VVM Para. 122b	DR	Information of Monitoring equipments positioning for electricity consumed for all monitoring parameters are not available. CAR # 4 has been raised. All monitoring equipments positioning has been provided in the revised monitoring plan.	CAR #04 CAR #04 was closed out. Y

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.5.3. Is there any change proposed in the specifications of the monitoring equipment or their positioning or installation then the impact of the change due to revision should be assessed and it not result in reduced level of accuracy and completeness in the monitoring and verification process	EB49, annex 2, para 9	DR	Change in position of the energy meters to monitor the electricity exported to the grid. In the registered PDD, energy meters provided in the plant side was used to monitor the parameter. In the revised monitoring plan, energy meters provided by the APTRANSCO at substation will be used. Since the sub station is 10 km away from the plant, the energy meter readings provided by the substation meter will be on conservative side. Hence the change in positioning of the monitoring equipment has been accepted.	Y
A.5.4. Are procedures identified for calibration of monitoring equipment?	VVM Para. 122a-c	DR	Pending CAR #04. Procedure for calibration has been identified for all monitoring equipments.	Pending CAR #04 CAR #04 was closed out. Y
A.5.5. Is there any change proposed in the calibration procedures, if yes then the impact of the change due to revision should not result in reduced level of accuracy and completeness in the monitoring and verification process	EB49, annex 2, para 9		There is no change in the calibration procedures in the revised monitoring plan.	Y
A.5.6. Are procedures identified for day-to-day records handling (including what records to keep, storage area of records and how to process performance documentation)	VVM Para. 122a-c	DR	CAR has been raised to include the procedures for day to day record handling and performance review procedures of monitoring parameters Day to day record handling procedure has been included in the revised monitoring plan.	CAR #05 CAR # 05 was closed out. Y

Checklist Question	Reference	MoV*	Comments	Conclusion/ CARs/CLs
A.5.7. Are procedures identified for project performance reviews before data is submitted for verification, internally or externally?	VVM Para. 122a-c	DR	Pending CAR #05 Internal audit procedures and record handling procedures have been clearly defined. Hence CAR # 5 was closed out.	Pending CAR #05 CAR #05 was closed out. Y

Annex 2: Overview of Findings

Findings Overview Summary

	CARs	CLs	FARs
Total Number raised	5	0	0

Date:	12/03/2010		Raised by:	B. Senthil Kumar /K. Sanjay Kumar	
Type:	CAR	Number:	/1/		Reference: A 2.1

Lead Assessor Comment:

1. As per the methodology AMS. I.D_V07, electricity generation by the renewable energy technology needs to be monitored. In case of co fired plants, biomass and fossil fuel input needs to be monitored. In the monitoring plan amount of fossil fuel consumption is monitored, but the amount of biomass consumption is not monitored. Please clarify
2. In the comments provided for the electricity supplied to the grid, electricity import from the grid, it is mentioned that the readings will be taken on every 24th day of the month. Please ensure it.
3. The source of data for the monitoring parameters electricity supplied to the grid, electricity import from the grid and electricity consumed for captive power purposes needs to be corrected.
4. Comments provided for the fossil fuel usage is not clear.
5. Grid emission factor the project activity is fixed ex-ante for the first crediting period. In that case, please remove the grid emission factor parameters in the monitoring plan.
6. Monitoring procedure of diesel consumption for DG sets and the corresponding Electricity generation from DG set is not clearly explained.
7. Please include the rating of the DG sets used in the project activity

Project Participant Response:

Date: 31/03/2010

1. As per para 9 of AMS I.D_V07, Monitoring shall consist of metering the electricity generated by the renewable technology. So as said in the methodology, PP is monitoring the electricity generated by renewable fuel since the project activity is solely on renewable component and doesn't co-fire any fossil fuel (Project activity don't have provision for co-firing fossil fuel). The project activity can only fire bagasse as fuel (The local regulation also constraint use of fossil fuels for the bagasse based co-gen system implemented in sugar industry), and the emission reductions are calculated based on the net electricity supplied to the grid. Since it is not a co-fired plant, the amount of fossil fuel input to the project activity need not to be monitored as mentioned in the same phrase of the methodology. Fossil fuel combustion (diesel) in standby DG sets during trial runs and maintenance activities only (not for power generation) is included as a monitoring parameter. This can be seconded based on the outcomes of the last three monitoring periods covering more than five years of plant operation and trace of co-firing in the project activity boiler is noticed.
2. Power exported to the grid and imported from the grid is measured by energy meters installed at plant and APTRANSCO sub station on 2^{4th} day of every month. A Joint Meter Reading (JMR) for the energy exported to the Grid is recorded by representatives of APTRANSCO and Company and the readings are jointly signed by both the parties as a proof of export of Power to the grid from power plant and import of Power from grid by the power plant. Billing is based on meter readings provided at substation (which is verified by APTRANSCO and jointly signed with PP).
3. As explained in the above paragraph, the source of data for net electricity supplied to the grid, electricity import from the grid and electricity consumed for captive power purposes is corrected to Joint meter readings.
4. The project activity is solely on renewable component and doesn't co-fire any fossil fuel (Project activity don't have provision for co-firing fossil fuel) and the emission reductions are calculated based on the net electricity supplied to the grid. From the past monitoring periods it is ensured that there is no usage of fossil fuel for power generation. Since it is not a co-fired plant, the amount of

<p>fossil fuel input to the project activity need not to be monitored as the emission reductions are solely related to net power generation from bagasse. However Fossil fuel combustion (diesel) in standby DG sets during trial runs and maintenance activities only (not for power generation) is included as a monitoring parameter.</p> <p>5. Grid emission factors removed from the revised monitoring plan as suggested</p> <p>6. Diesel in DG set is used only for emergency purposes (trial runs to maintain its running condition) and not for the power generation purpose in the project activity. The electricity generation from DG set is zero till date. The consumption records of Diesel in DG set for maintenance purposes can be cross checked with the log books and purchase records. Since DOE suggested (FAR01) to monitor the diesel consumption so that it can be cross checked whether the DG set is used for electricity generation, hence PP included diesel and its corresponding generation as monitoring parameters in the revised monitoring section.</p> <p>The diesel quantity and source are maintained at the point of entry by stores department. Diesel once received by stores department will be issued to DG set department as and when required. Stores department maintains receipt, issue data everyday in excel sheet and takes issue slips from DG set department for the issued Quantity. The amount of diesel consumed by DG set is measured by using a level measuring gauge in the tank and the same is cross verified with the issue slips and same is compiled into monthly reports. The amount of electricity generated (if generated) on using diesel in DG set is recorded by energy meter attached to the set. Hence it is assured that both consumption details of diesel and generation details of DG are monitored.</p> <p>7. Rating of DG set is 750KVA and is included in the revised monitoring plan.</p>	
Documentation Provided by Project Participant:	
Revised monitoring plan	
Information Verified by Lead Assessor:	
The explanation provided by the PP and relevant sections in the RMP version 02.	
Reasoning for not Acceptance or Acceptance and Close Out:	Date: 12/04/2010
<p>CAR # 1 is open.</p> <p>1. Please provide the document proof for the boiler doesn't have the co-firing facility and also provide the local regulation for not to use fossil fuels in the bagasse based cogeneration system in the sugar industry. In response it is mentioned that trace of co firing in the boiler is noticed. It seems boiler is designed to use fossil fuel. Please clarify.</p> <p>2. OK</p> <p>3. OK</p> <p>4. OK</p> <p>5. OK</p> <p>6. OK. Please explain the same in RMP</p> <p>7. DG set rating is not clear</p>	
Project Participant Response:	Date: 16/04/2010
<p>1. The Andhra Pradesh Pollution Control Board clearance valid to the project activity clearly states that the project should fire only bagasse as its fuel in the boilers for energy generation. This document will remain as the supporting evidence to contemplate the argument that there is no possibility of co-firing in the project activity. The copy of the PCB certificate is attached for the perusal of the DOE. Please refer to the Para 6 of Schedule B.</p> <p>In earlier response it is a clerical error "it should be read as "NO co-firing", however we also trust that the same can also be checked from the three previous verification report prepared by yourself (SGS, DOE) where in it has been advocated by yourself that no traces of fossil fuel is observed in the project activity site .</p> <p>6. Revised RMP will reciprocate the same.</p> <p>7. DG set specification is provided clearly in revised RMP under Annex 4.</p>	
Documentation Provided as Evidence by Project Participant:	
ganpati-RMP_V03_20100419 PCB clearance.pdf	
Information Verified by Lead Assessor:	

Andhra Pradesh Pollution control board clearance for the project activity for fissile fuel use in the co generation power plant	
Reasoning for not Acceptance or Acceptance and Close Out: 25/04/2010	
It is evident from the consent to operate for cogeneration power plant (issued by APPCB), that there is no co-firing is involved in the project activity. However during validation, it was mentioned that the amount of fossil fuel used for start up the boiler will be monitored (refer CAR # 9 of findings overview at validation). Please clarify.	
Project Participant Response:	Date: 28/04/2010
As explained earlier there is no possibility of co-firing or use of fossil fuel for start up in the project activity as the project boiler is designed for 100% bagasse. A letter from Boiler supplier (submitted to DOE) supported by clearance from The Andhra Pradesh Pollution Control Board implies that the project can fire only bagasse as its fuel in the boiler for energy generation i.e., No cofiring nor use of fossil fuel for start up is possible for this system.	
Documentation Provided as Evidence by Project Participant:	
Boiler certificate	
Information Verified by Lead Assessor:	
Fossil fuel usage in the boiler	
Reasoning for not Acceptance or Acceptance and Close Out:	
It is evident from the boiler supplier letter (Thermax Limited) and APPCB consent to operate that the boiler is not designed for co-firing. Hence CAR # 1 was closed out.	
Acceptance and Close out by Lead Assessor:	Date: 29/04/2010

Date:	12/03/2010	Raised by:	B. Senthil Kumar /K. Sanjay Kumar		
Type:	CAR	Number:	/2/	Reference:	A 2.3
Lead Assessor Comment:					
Since the DG sets are used for the project activity, power generation from the DG set needs to be considered in the project activity emissions. If the diesel consumption is only due to the trail run then the emissions due to the diesel consumption needs to be calculated as per the “Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion”. Please provide the project emission calculations for diesel consumption.					
Project Participant Response:				Date: 31/03/2010	
The project activity is renewal based electricity generation and PP confirms that DG set is not used for power generation of the project activity. It has also been verified and confirmed in the past monitoring periods consistently. Diesel in DG set is used only for emergency purposes (trail runs to maintain its running condition) and not for the power generation purpose in the project activity. The electricity generation from DG set is zero. The consumption records of Diesel in DG set for maintenance purposes can be cross checked with the log books and purchase records. Since DOE suggested (FAR01) to monitor the diesel consumption so that it can be cross checked whether the DG set is used for electricity generation, hence PP included diesel and its corresponding generation as monitoring parameters in the revised monitoring section. If consumed for the project activity, the project emissions from the same are calculated as below: Project emissions due to diesel consumption for electricity generation: = Diesel consumed in liters x calorific value of diesel (TJ/kg) x density (kg/l) x IPCC emission factor (tCO ₂ e/TJ). Same is provided in the revised monitoring plan under section Annex 4.					
Documentation Provided by Project Participant:					
Revised monitoring plan					
Information Verified by Lead Assessor:					
Project emissions calculation in the RMP version 02.					
Reasoning for not Acceptance or Acceptance and Close Out:				Date: 12/04/2010	
CAR # 2 is Open. Project emission calculation is not as per the “Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion”. Please explain as per the tool. Please incorporate the project emission formula and ER calculations in the RMP as per the registered PDD.					
Project Participant Response:				Date: 16/04/2010	

The applied version of the methodology does not refer to the tools specified by the DOE, nevertheless now the monitoring plan has captured the concept in the tools and revised it in the monitoring plan document to be in lieu with the "Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion" for Project emission calculations. Section E.1.2.1 and Annex 4 of Monitoring Plan will highlight the same.	
Documentation Provided as Evidence by Project Participant:	
ganpati-RMP_V03_20100419	
Information Verified by Lead Assessor:	
Project emissions as per the Tool to calculate project or leakage CO ₂ emissions from fossil fuel combustion	
Reasoning for not Acceptance or Acceptance and Close Out:	
Project emissions calculations have been incorporated in the revised monitoring plan_V03. Hence CAR # 2 was closed out.	
Acceptance and Close out by Lead Assessor:	Date: 25/04/2010

Date:	12/03/2010	Raised by:	B. Senthil Kumar /K. Sanjay Kumar		
Type:	CAR	Number:	/3/	Reference:	A 3.3
Lead Assessor Comment:					
Please explain the QA/QC procedure for all monitoring parameters					
Project Participant Response:				Date: 31/03/2010	
The QA/QC procedures for all monitoring parameters have been provided under section D.4 of revised monitoring plan.					
Documentation Provided by Project Participant:					
Revised monitoring plan					
Information Verified by Lead Assessor:					
QA/QC procedures for all the monitoring parameters have been defined in the RMP.					
Reasoning for not Acceptance or Acceptance and Close Out:				Date: 12/04/2010	
QA/QC procedures for all the monitoring parameters have been defined in the RMP version 02. Hence CAR # 3 was closed out.					
Acceptance and Close out by Lead Assessor:				Date: 12/04/2010	

Date:	12/03/2010	Raised by:	B. Senthil Kumar /K. Sanjay Kumar		
Type:	CAR	Number:	/4/	Reference:	A 5.2
Lead Assessor Comment:					
1. Please provide the information of monitoring equipments and its positioning for all monitoring parameters					
2. Please provide the calibration procedures for all monitoring equipments					
Project Participant Response:				Date: 31/03/2010	
Details of all monitoring equipments and their positioning are provided in the revised monitoring plan					
Calibration procedures are provided in the revised monitoring plan					
Documentation Provided by Project Participant:					
-					
Information Verified by Lead Assessor:					
Details of monitoring equipments positions and calibration procedures in the RMP version 02.					
Reasoning for not Acceptance or Acceptance and Close Out:				Date: 12/04/2010	
CAR# 4 is open.					
Information provided for monitoring equipments in the page no 8 of RMP_V02 is not clear.					
Project Participant Response:				Date: 16/04/2010	
Revised Monitoring plan Annex 4 will now provide the monitoring equipments information clearly					
Documentation Provided as Evidence by Project Participant:					
ganpati-RMP_V03_20100419					
Information Verified by Lead Assessor:					

Accuracy level of monitoring equipments in the revised monitoring plan_V03					
Reasoning for not Acceptance or Acceptance and Close Out:					
Details of all monitoring equipments and their positioning have been clearly mentioned in the revised monitoring plan_V03. Hence CAR # 4 was closed out.					
Acceptance and Close out by Lead Assessor:				Date: 25/04/2010	

Date:	12/03/2010	Raised by:	B. Senthil Kumar /K. Sanjay Kumar		
Type:	CAR	Number:	/5/	Reference:	A 5.6 and A 5.7
Lead Assessor Comment:					
1. Please provide the procedures for day to day record handling procedure					
2. Please provide the performance review procedures of monitoring parameters					
Project Participant Response:				Date: 31/03/2010	
Day to day recording and data review procedures are provided in the revised monitoring plan					
Documentation Provided by Project Participant:					
-					
Information Verified by Lead Assessor:					
Day to day recording and data review procedures that are provided in the RMP version 02.					
Reasoning for not Acceptance or Acceptance and Close Out:				Date: 12/04/2010	
CAR # 5 is Open Internal audit procedures and record handling procedures have been defined in the RMP version 02. However the operational and management structure incorporated in section D.5 of RMP version 02 is not clear. Description provided for "Procedures for detailing with monitored data uncertainties and adjustments" is not clear					
Project Participant Response:				Date: 16/04/2010	
Clear picture of the management structure is represented in the revised Monitoring plan Removed as there is no purpose of the same as highlighted by the DOE.					
Documentation Provided as Evidence by Project Participant:					
ganpati-RMP_V03_20100419.doc					
Information Verified by Lead Assessor:					
Management structure in revised monitoring plan					
Reasoning for not Acceptance or Acceptance and Close Out:					
Internal audit procedures and record handling procedures have been clearly defined. Hence CAR # 5 was closed out.					
Acceptance and Close out by Lead Assessor:				Date: 25/04/2010	