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**Response to Incompleteness Notification regarding the Request for Issuance of project
“India: Himachal Pradesh Reforestation Project – Improving Livelihoods and
Watersheds” (UNFCCC Ref. no. 4174), notification received “22nd January 2015”**

Dear CDM team,

Please find below the point-wise specific response of the TÜV NORD JI/CDM Certification Program to the request for issuance incomplete for the above mentioned project.

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

Yours sincerely,

TÜV NORD JI/CDM Certification Program

Rainer Winter

Request for Registration/Issuance Incomplete Reason (1)			
Scope and	1: Scope: The submitted PRC does not contain a revised PDD (in both clean and		
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Issue raised by the UNFCCC Secretariat:	<p>track-change versions) (PCP v7, para 146 (c)).</p> <p>Issue: The PP/DOE submitted a request for a PRC which includes changes in planted area, species composition, technology applied and number of sample plots. Further, the VR (pg. 48) indicates that during the site visit variations were observed in spacing. EB 66 Annex 24 para 4 indicates these changes “do not require prior approval from the CDM EB”. It is further noted that the PRC assessment opinion (pg.14) has indicated that “A revision of the PDD is not required (in case of temp. Changes and A/R specific changes (defined as minor))”.</p> <p>However, in accordance with paragraph 146(c) of the PCP ver 07.0, a request for approval of post-registration changes shall contain a revised PDD in both clean and track-change version as part of the documentation. The PP/DOE are requested to submit a revised PDD.</p>
Response by DOE:	<p>The requirement is not applicable to A/R project activities.</p> <p>Please refer to the communication given by the Executive Board earlier for the same issue stating that a revised PDD is not required for A/R CDM projects. The Same is attached as file UNFCCC communication.</p>
Request for Registration/Issuance Incomplete Reason (2)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>2: Scope: The monitoring report does not contain information on the sampling plan in accordance with the AR Methodological Tool; EB 58 Annex 15 (PS v7, para 61).</p> <p>Issue: The MR (Section D.3) has described the sampling procedure, sample size, locating of the sample plots, layout of the sample plots and assessment of adequacy of the sample size. A sample size of 152 plots was calculated. The DOE (VR pg. 54) confirmed the calculated sample size (152 sample plots) is correct and has been presented transparently in a spreadsheet.</p> <p>However, the mentioned spreadsheet has not been submitted.</p>

**Response by
DOE:**

The text on sampling plan in MR is suitably revised.

Out of 168 sample plots assessed in the registered PDD for monitoring of the project, 152 sample plots were laid out in the respective strata and biomass measurements were conducted. Subsequent to the measurement of sample plots, the biomass estimate calculated based on the 152 sample plots did not meet the 90/10 precision requirements. Efforts were made to increase the sample size in excess of 152. However, it was not possible to lay out additional sample plots because of the unfavorable weather conditions in the project area. Therefore, the provisions of the paragraphs 19 to 22 of the section 6.2 of the *Methodological Tool (AR Tool 14) Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities, version 04.1.0)* and Appendix 2 were applied to estimate the uncertainty and apply the discount factor to ensure the biomass estimation based on 152 sample plots is conservative. The calculation of the uncertainty and application of the discount factor to the biomass estimation are presented in the "Biomass_AR-Tool 14 V04.1" worksheet of the ER Calculation Spreadsheet submitted along with the issuance request.

The sample size has not been revised in comparison to the sample size calculated in the registered PDD and the guidance of the Methodological tool (AR Tool 14) was used to address the uncertainty related to 90/10 confidence/precision requirements, no sample size spreadsheet has been submitted by the PP along with the MR to the DOE.

Table D.1 of the MR provides the details of sample plots estimated by strata in the registered PDD under the ex-ante stratification as well as the sample plots by strata laid out during project implementation and reflected under the ex post stratification in the first monitoring period. The number of sample plots laid out in the restoration forestry and the community forestry strata closely corresponded to the number of sample plots estimated for these strata in the registered PDD. However, due to delay in implementing planting activities by the land owners in the private/farm forestry strata, it was not feasible to lay out the sample plots as per the number of plots estimated for the private land strata in the registered PDD, which is expected to be done subsequent to the completion of planting activities on private land strata. Therefore, the sample size implemented in the project corresponds to the sample size estimated in the registered PDD

Increase in the number of sample plots to address the variability in the biomass estimate was considered during the sample plot measurements and efforts have been made to increase the sample size in excess of 152 sample plots that were already laid out were not successful.

DOE reopened the CL B4 and requested the clarification from the PP. The PP suitably modified the wordings in the MR under sampling and given the above response and the CL is closed by DOE.

	<p>The mentioning of the word “spreadsheet” in the FVR is considered a typo error by the DOE, instead the FVR has been updated accordingly to the corrected description given in the MR.</p> <p>The table D.1 of the MR is crossed by the verification team and found that even though the planted area is less in first 6 strata of the table, the sample plots taken is either equal to the sample plots mentioned in the registered PDD or more than proportion for the land area planted. For the rest of the strata (predominantly in private land) the proportion of sample plots taken is more than the proportionate area of planted area as per the registered PDD. Due to the private nature of land and reasons beyond the control of the PP, the PP could not increase the sample plots. The PP will increase the number of sample plots as per the registered PDD if the entire area is planted. However the estimated sample plots of 152 is 90% of the sample plots as per the registered PDD when compared to only 80% of the planted area.</p> <p>But the PP estimated the uncertainty as 27.43% and applied a discount factor of 75% to the tree biomass to calculate the emission removals as per the AR tool 14. Hence the number of sample plots laid down for this monitoring is appropriate and CL B4 Point 1 has been closed.</p>
Request for Registration/Issuance Incomplete Reason (3)	
Scope and Issue raised by the UNFCCC Secretariat:	<p>3: Scope: The spreadsheet does not contain the formulae of calculation that are shown in the spreadsheet cells whenever possible.</p> <p>Issue: The values listed on columns L, M, N and O (ER calculation spreadsheet worksheet_ “Biomass_AR Tool14, Version 04.1”) are not traceable. These values are related change in tree biomass per hectare and were used for determining the uncertainty factor (27.43%).</p>
Response by DOE:	<p>The work sheet “Biomass_AR-Tool 14 V04.1” of the ER calculation spreadsheet is revised to include formulas in the columns in the columns L, M, N, and O and the revised spreadsheet is submitted.</p> <p>DOE reopened the CL B4 and requested the clarification from the PP. The PP suitably revised the worksheet and submitted to DOE for verification.</p> <p>The work sheet “Biomass_AR-Tool 14 V04.1” of ER calculation spreadsheet is revised to include the formulae transparently in columns L, M, N, and O to determine the uncertainty factor. The revised work sheet is checked and found sufficiently updated. Hence accepted and CL B4 point 2 is closed.</p>
Request for Registration/Issuance Incomplete Reason (4)	
Scope and Issue raised by the UNFCCC	<p>4: Scope: The verification report does not provide a description of the actual operation of the project activity (VVS v7, para 273 (b))</p> <p>Issue: The DOE (PRC assessment opinion pg. 11) has verified a change in species composition as part of the submitted PRC. However, the VR (pgs. 48 and</p>

Secretariat:	52) indicates that the species planted are observed to be consistent with the registered PDD. The DOE is requested to address this inconsistency between the PRC assessment opinion and the verification report.
Response by DOE:	The DOE revised the assessment of the PRC report by splitting the changes and corrected the FVeR. Now both the FVeR and PRC are made consistent. The revised FVeR and PRC reports are submitted. The species planted is changed however the proportion of fast and slow growing trees are not changed. This is transparently given the FVeR and PRC reports.