




**Validation report form for post-registration changes for
CDM project activities
(Version 03.0)**

Title and UNFCCC reference number of the project activity	Proactiva CGA Iperó Landfill Gas to Energy Project (UNFCCC reference number 8751)
Process track	<input type="checkbox"/> Prior approval <input checked="" type="checkbox"/> Issuance <input type="checkbox"/> Renewal of crediting period
Version number of the validation report	1.0
Completion date of the validation report	15/07/2021
Type(s) of PRCs	<input type="checkbox"/> Temporary deviations from the registered monitoring plan, applied methodologies, standardized baselines or other methodological regulatory documents ¹ <input checked="" type="checkbox"/> Corrections <input type="checkbox"/> Changes to the start date of the crediting period <input type="checkbox"/> Inclusion of a monitoring plan <input type="checkbox"/> Permanent changes to the registered monitoring plan, or permanent deviation of monitoring from the applied methodologies, standardized baselines or other methodological regulatory documents <input type="checkbox"/> Changes to the project design <input type="checkbox"/> Changes specific to afforestation and reforestation project activities
Version number of PDD to which this report applies	PDD Version 6.0, dated 25/05/2021
Project participants	Proactiva Meio Ambiente Brasil Ltda. Firat Climate (Switzerland) AG
Host Party	Brazil
Applied methodologies and standardized baselines	ACM0001 - "Flaring or use of landfill gas" (version 12.0.0)
Mandatory sectoral scopes	13 - Waste handling and disposal
Conditional sectoral scopes, if applicable	Not applicable.
Name and UNFCCC reference number of the DOE	EPIC Sustainability Services Pvt. Ltd. (EPIC); UNFCCC reference number: E-0062

¹ Other standards, methodologies, methodological tools and guidelines (to be) applied in accordance with the applied(selected) methodologies are collectively referred to as the other (applied) methodological regulatory documents).

Name, position and signature of the approver of the validation report



G.T.Kumar (Director)

SECTION A. Executive summary

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Background and summary of the post-registration changes:

EPIC Sustainability Services Pvt. Ltd. (EPIC) was commissioned by the project participant Proactiva Meio Ambiente Brasil Ltda. to perform a validation assessment of post-registration change (PRC) applicable for the registered CDM project activity “Proactiva CGA Iperó Landfill Gas to Energy Project” (UNFCCC Project no. 8751) as part of the performance of an also previously commissioned verification assessment for the 1st periodic verification of the same project activity. The post-registration changes for the project activity were assessed by EPIC under the “Issuance” process track and encompass the following type/category and description of PRC (as correctly summarized in Appendix 7 of the revised PDD for the 1st 7-year crediting period of the project activity):

“(…)

- *Corrections in information (that do not affect the project design):*
 - *Inclusion of references and details about the previously defined ex-ante determined parameters “Weighting of operating margin emissions factor” (w_{OM}) and “Weighting of build margin emissions factor” (w_{BM}) in Section B.6.2.*
 - *Consideration in Section B.6.1 of Option C of the methodological tool “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0.0) as one of the alternative approaches for the determination ex-post of stream of methane in collected LFG (in addition to the previously defined Option A and Option B of such tool). Such additional alternative approach is considered by taking into account typical characteristics of both collected LFG (in terms of moisture and temperature) and normally applied related monitoring instruments/equipment (i.e. LFG flow meter and continuous CH₄ content gas analyzer)). Related details for the monitoring parameters $V_{t,db}$, $V_{t,wb}$, $V_{i,t,wb}$ and $V_{i,t,db}$ are also adjusted accordingly in Sections B.7.1.*
 - *Section A.6 (History of the project activity) is completed as required by applicable guidelines for completing the applied latest version of the CDM-PDD form.*
 - *Previously existent minor typo mistakes were corrected and texts were improved in different sections.*
 - *Information details for the project participants are updated in the cover (first page), Section A.4 and Appendix 1.”*

The above-summarized corrections were addressed through the compilation of a revised version of the PDD valid for the 1st 7-year renewable crediting period of the project activity (PDD version 6.0, dated 25/05/2021) ^{/2/}. This Validation Opinion Report includes the EPIC assessment and the validation opinion for the addressed PRC as per this latest version of the revised PDD ^{/2/}. This Validation Opinion Report and the revised version of the PDD ^{/2/} will be submitted to UNFCCC for approval under the “Issuance” process track.

In accordance with applicable CDM requirements, the revised version of the PDD ^{/2/} correctly applies the latest version of the CDM-PDD form (version 11.0) ^{/11/}. Moreover, the revised version of the PDD ^{/2/} was completed by correctly taking into account all applicable guidance/requirements for completing the CDM-PDD form (version 11.0) (as established by the Attachment to the CDM-PDD form (version 11.0) - Instructions for completing this form”). For the completion of the revised version of the PDD ^{/2/}, besides of addressing the PRCs encompassed by this Validation Opinion Report, previously existent project description information (as per the previous version of the

registered PDD (version 5.1, dated 26/07/2012)^{/3/}) were fully and correctly considered in the completion of the revised PDD as also required by applicable CDM rules.

Brief summary of the project activity:

The project activity was initially conceived, implemented and has operated since year 2019 as a project-based initiative implemented at the CGA Iperó landfill that promotes efficient collection and destruction (through combustion in a high temperature enclosed flare) of landfill gas (LFG) that has been historically generated at this landfill site. LFG (which is rich in CH₄) has been historically generated at the project site as result of the anaerobic decomposition of municipal solid waste (MSW) disposed in the landfill site for which appropriate MSW landfilling techniques and procedures has been continuously applied. The landfill where the project activity is implemented serves as a Municipal Solid Waste (MSW) disposal site serving several municipalities in the region of the Municipality of Iperó and it is named CGA Iperó landfill. The landfill's address is at the Benedito de Paula Leite Junior road, municipality of Iperó, Brazil. The geographical coordinates of the project site are as follows:

- 23° 25' 42" S (-23.4284)
- 47° 32' 46" W (-47.5463)

Summary of the assessed (validated) PRCs:

The PRC addressed in the revised version of the PDD^{/2/} and assessed/validated by EPIC is summarized above in a quotation from summarized description of the PRC that is appropriately included in Appendix 7 of the revised version of the PDD^{/2/}.

Scope and objective of the validation assessment for post-registration changes:

The objective of the validation assessment for PRCs is to have an independent evaluation (validation opinion) being performed by a Designated Operational Entity (DOE) for project related documents (including, if applicable, a revised version of the PDD of a project activity) in order to validate occurred or yet to occur (planned) post-registration changes of a registered CDM project activity, with such independent evaluation being performed as per applicable CDM rules and requirements for addressing and validating/assessing PRCs. The validation assessment for PRCs aims to confirm whether occurred or planned PRCs applicable for a registered CDM project activity are correctly addressed by the project participant(s) and whether such changes are under compliance with all applicable CDM rules and requirements. In summary, the objective of the validation assessment for PRCs of a CDM project activity is thus, by following applicable guidance and requirements from the CDM Validation and Verification Standard for Project Activities (CDM-VVS-PA)^{/1/}, performing an independent third party assessment in order to determine whether the project participant(s) has/have *inter alia* correctly revised the PDD (if applicable) as per the latest guidance from the CDM-EB as required in the CDM Project Standard for Project Activities (CDM-PS-PA)^{/8/}, CDM Project Cycle Procedure for Project Activities (CDM-PCP-PA)^{/9/} and other relevant applicable guidance/standard. Furthermore, the use of complementary standard auditing techniques for validation assessments (as referred to in section 7.1.3.1 of the CDM-VVS-PA^{/1/}) was systematically applied/considered as part of the performed validation assessment in light of the decision agreed by the CDM Executive Board (CDM-EB) (in March/2020) to relax mandatory site visits by DOEs for a 3-month period (from 23/03/2020 to 23/06/2020) because of COVID-19 pandemic (+ decisions also agreed by the CDM-EB to extend the relaxation of mandatory site visits until 31/12/2021)^{/13/}.

The outcome/result of a validation assessment for PRCs is a positive or negative validation opinion regarding its/their compliance with all applicable criteria/requirements and recommending or not its/their later approval by the CDM-EB.

In the particular case of the assessed/validated PRCs, its validation assessment was carried out on the basis of the following rules and requirements that are applicable for the particular case of the PRC for the project activity:

- Article 12 of the Kyoto Protocol ^{/5/},
- Guidelines for the implementation of Article 12 of the Kyoto Protocol as presented in the Marrakech Accords under decision 3/CMP.1 ^{/6/} and subsequent decisions made by the Executive Board and COP/MOP,
- Other relevant rules, including applicable and valid host country legislation/regulations,
- The CDM Validation and Verification Standard for Project Activities (CDM-VVS-PA) version 02.0^{/1/}.
- The CDM baseline and monitoring methodology ACM0001 “Flaring or use of landfill gas” (version 12.0.0) ^{/4/},
- The CDM methodological tool “Tool to determine project emissions from flaring gases containing methane” (version 1) ^{/7/}
- The CDM methodological tool “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0) ^{/12/}
- The CDM methodological tool “Tool to calculate the emission factor for an electricity system” (version 02.2.1) ^{/15/}
- The previous version of the registered PDD ^{/3/} (version 5.1, dated 26/07/2012) that is valid for the 1st 7-year crediting period of the project activity.
- The revised version of the PDD ^{/2/} for the 1st 7-year crediting period of the project activity (version 6.0, dated 25/05/2021) that addresses the assessed/validated PRCs.
- Decision agreed by the CDM Executive Board (CDM-EB) (in March/2020) to relax mandatory site visits by DOEs for a 3-month period (from 23/03/2020 to 23/06/2020) because of COVID-19 pandemic (+ decisions also agreed by the CDM-EB to extend the relaxation of mandatory site visits until 31/12/2021) ^{/13/}.
- Monitoring Report for the 1st periodic verification of the project activity ^{/14/},

Process of validation opinion for PRCs:

The process for validation opinion for PRCs is an independent assessment performed by a DOE that is based on applicable and valid guidelines described in the latest version of the CDM-VVS-PA^{/1/}. In addition to that, standard auditing techniques have been systematically applied by the assessment team appointed by EPIC as part of the performed validation assessment. EPIC assessment team initially performed a desk review on related documents, followed by interviews with representative of the project participants in order to confirm the correctness and appropriateness of information added and/or editing's in the revised version of the PDD^{/2/}. For all identified inconsistencies and lack of clarity, related findings (list of outstanding issues) are raised. The next steps of the performed assessment is closing out the findings through direct communication with the representatives of the project participant and receipt of updated version of the PDD^{/2/} and/or supporting documents (if applicable) and finally preparing the Validation Opinion Report. The draft version of the Validation Opinion Report undergoes a technical review by EPIC prior to its approval and submission to the CDM-EB.

Validation opinion assessment conclusion and summary of its validation opinion:

As part of the conducted validation assessment, while no outstanding issues (findings) were identified by the EPIC assessment team, it is the opinion of EPIC that the revised version of the PDD ^{/2/} for the CDM project activity “Proactiva CGA Iperó Landfill Gas to Energy Project” appropriately and correctly addresses the PRCs that are summarized and assessed in this Validation Opinion Report. All applicable CDM rules and requirements for addressing the assessed/validated PRC were sufficiently met.

The EPIC assessment team also confirms that, *inter alia* other relevant requirements, the previously assessed and demonstrated additionality for the project activity is not undermined by the assessed/validated PRC. Furthermore, the assessed/validated PRC does not adversely affects the application of the CDM baseline and monitoring methodology ACM0001 (version 12.0.0) + applicable methodological tools either.

Finally, the previously defined scale of the project activity (registered as large-scale project activity) is not adversely impacted by the assessed/validated PRC either. Thus, in accordance with applicable rules as per the latest version of the CDM-PS-PA ^{/8/}, the PRC is correctly addressed and it is assessed under the so-called “*Issuance*” process track. EPIC thus recommends the CDM-EB to approve the PRCs addressed for the project activity.

SECTION B. Validation team, technical reviewer and approver

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B.1. Validation team member

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of DOE or outsourced entity)	Involvement in			
						Desk/document review	On-site inspection	Interviews	Validation findings
1.	Team Leader / Technical Expert	EI	Ratton	Marco	EPIC - Central Office	X	N/A	X	X

Note: IR: Internal Resources, EI: External Individuals, OR: Outsourced Resource.

Demonstration how the appointed EPIC assessment team meets the competence required for the performance of the validation assessment of renewal of crediting period is included in Appendix 2.

B.2. Technical reviewer and approver of the validation report on PRCs

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of DOE or outsourced entity)
1.	Technical reviewer	IR	H.B.	Muralidhar	EPIC - Central office
2.	Approver	IR	G.T.	Kumar	EPIC - Central office

Note: IR: Internal Resources, EI: External Individuals, OR: Outsourced Resource.

Demonstration how the appointed EPIC technical review and approval team meets the competence required for the performance of the validation assessment of renewal of crediting period is included in Appendix 2.

SECTION C. Means of validation**C.1. Desk/document review**

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A detailed and extensive document review was performed by the EPIC assessment team in order to assess the revised version of the PDD ^{/2/} addressing the assessed/validated PRCs. Besides the revised version of the PDD ^{/2/}, documents such as the applied CDM baseline and monitoring methodology ACM0001 (version 12.0.0) ^{/4/} and the methodological tools “Tool to determine project emissions from flaring gases containing methane” (version 1) ^{/7/}, “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0) ^{/12/} and “Tool to calculate the emission factor for an electricity system” (version 02.2.1) ^{/15/} were also reviewed by the EPIC assessment

team by *inter alia* applying standard auditing techniques in order to assess the quality and relevance of information provided. The performed document review encompassed the following:

- Review of data and information made available in the revised version of the PDD ^{/2/} in order to verify the correctness of its completion, credibility and interpretation of the presented information;
- Confirmation, based on review of the applied CDM baseline and monitoring methodology ACM0001 (version 12.0.0) ^{/4/} + methodological tools “Tool to determine project emissions from flaring gases containing methane” (version 1) ^{/7/}, “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0.0) ^{/12/} and “Tool to calculate the emission factor for an electricity system” (version 02.2.1) ^{/12/} of the appropriateness/correctness of the correction made in the revised version of the PDD ^{/2/}.
- Besides of the revised PDD ^{/2/}, the following documents were *inter alia* assessed:
 - The currently registered version of the PDD valid for the 1st 7-year crediting period (version 5.1, dated 26/07/2012) ^{/3/}.
 - Relevant decisions, clarifications and guidance from the CMP and the CDM-EB

A complete list of all documents reviewed or referred to in the course of the performed validation opinion assessment for the PRC is included in Appendix 3.

C.2. On-site inspection

Duration of on-site inspection: DD/MM/YYYY to DD/MM/YYYY				
No.	Activity performed on-site	Site location	Date	Team member
1.				

It is relevant to note that the validation assessment of post-registration change addressed in this Validation Opinion Report was performed, under the “Issuance” process track, in the context of the performed 1st periodic verification assessment for the project activity (monitoring period from 01/09/2014 to 31/12/2020) for which on-site inspection to the project site was not conducted either. While, the need of correcting information made available in the currently registered version of the PDD for the project activity was identified as part of the performance of desk review, interviews with representatives of the project participants on 03/05/2021 and additional complementary audit measures², all corrections made in information available in the currently registered version of the PDD ^{/3/} through the compilation of a revised version of the PDD (6.0, dated 25/05/2021 ^{/2/}) were verified on the basis of additional desk-review phase (document review) + performed interviews with representatives of the project participant Proactiva Meio Ambiente Brasil Ltda.

² It is relevant to note that, as detailed in the Verification Report for the 1st period verification of the project activity (monitoring period from 01/09/2014 to 31/12/2020), by taking into account the deadline in terms of delivery/forwarding of Certified Emission Reductions (CERs) generated by project activity during the considered monitoring period, by acknowledging that a previously planned physical on-site inspection to the project site could not be performed as part of the verification assessment due to the COVID-19 pandemic, by assuming that such on-site inspection could not be postponed, and by taking into consideration all guidance and requirements of the CDM-EB recently agreed relaxing of the rule requiring mandatory on-site inspection by DOEs for a 3-month period (from 23/03/2020 to 23/06/2020) because of COVID-19 pandemic (+ decisions also agreed by the CDM-EB to extend the relaxation of mandatory site visits until 31/12/2021) ^{/13/}; the verification team appointed by EPIC performed, as part of its verification assessment, document review and interviews with representatives of the project participants by incorporating the following additional checking's/assessments (complementary auditing measures):

- Remote (online) watching by the EPIC verification team of live video (movie) produced by members of project operational staff located on-site (allowing remote complete and comprehensive assessment and observations for the project activity).

Such additional interview with representatives of the project participants was conducted by EPIC on 03/05/2021 by means of remote communication using Google Meet application (with details about such performed interviews presented in the Section C.3).

By taking into account the category and nature of the assessed post-registration change ("Corrections (in information that do not affect the project design)") and by also taking into account the CDM-EB recently agreed relaxing of the rule requiring mandatory on-site inspection by DOEs (valid for the period from 23/03/2020 to 23/06/2020 and because of COVID-19 pandemic (+ decisions also agreed by the CDM-EB to extend the relaxation of mandatory site visits until 31/12/2021)) ^{/13/}, EPIC judged the conduction of an on-site inspection to the project site (as part of its validation opinion assessment) as not necessary.

C.3. Interviews

No.	Interviewee			Date	Subject	Team member
	Last name	First name	Affiliation			
1.	Koji	Alexandre, (Mr.)	Proactiva Meio Ambiente Brasil Ltda..	03/05/2021	Interview through Google Meet application encompassing the following topics: - General technical aspects about details for the correction in information (that do not affect the project design) as per the revised version of the PDD ^{/2/} including correctness and appropriateness of texts added in the revised version of the PDD ^{/2/} and their compliance with applicable CDM rules.	Marco A. Ratton
2.	Freitas	Fernando, (Mr.)	Proactiva Meio Ambiente Brasil Ltda..	03/05/2021		
3.	Barbosa	Nuno, (Mr.)	UniCarbo - Energia e Biogás Ltda.	03/05/2021		

C.4. Sampling approach

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Not applicable.

C.5. Clarification requests (CLs), corrective action requests (CARs) and forward action requests (FARs) raised

Areas of validation findings	No. of CL	No. of CAR	No. of FAR
Compliance with PDD form	0	0	0
Temporary deviations from the registered monitoring plan, monitoring methodology or standardized baseline	n/a	n/a	n/a
Corrections	0	0	0
Changes to the start date of the crediting period	n/a	n/a	n/a
Inclusion of a monitoring plan to a registered project activity	n/a	n/a	n/a
Permanent changes from registered monitoring plan, monitoring methodology or standardized baseline	n/a	n/a	n/a
Changes to the project design of a registered project activity	n/a	n/a	n/a
Types of changes specific to afforestation and reforestation project activities	n/a	n/a	n/a
Others (please specify)	0	0	0
Total	0	0	0

SECTION D. Validation findings**D.1. Compliance with PDD form**

Means of validation	<p>In accordance with applicable requirements of the CDM-VVS-PA (version 02.0) ^{/1/}, the EPIC assessment team assessed and evaluated the completion of the revised version of the PDD (version 6.0, dated 25/05/2021) ^{/2/} addressing a PRC in order to <i>inter alia</i> determine whether this PDD was completed by correctly applying a valid version of the CDM-PDD form (and by correctly following all applicable guidance for its completion). In this assessment context, EPIC also assessed whether information transferred from the currently registered version of the PDD ^{/3/} to the revised version of the PDD ^{/2/} is materially the same.</p> <p><i>General assessment for the completion of the revised version of the PDD:</i></p> <p>The EPIC assessment team verified that the revised version of the PDD ^{/2/} (made available in both clean and tracked changes versions) was completed by the project participants by correctly applying the latest version of the CDM-PDD form (version 11.0) ^{/11/} (with all applicable guidance for its completion being sufficiently and appropriately followed). Applicable guidance and requirements for completing the CDM-PDD form (version 11.0) as established by its attachment "Instructions for completing this form" ^{/11/} were confirmed by the EPIC assessment team to be correctly and sufficiently considered for the completion of the revised version of the PDD ^{/2/}.</p> <p>Relevant rules and requirements as per the CDM Project Standard for Project Activities (CDM-PS-PA) (version 02.0) ^{/8/} were also confirmed to be met/followed in the completed revised version of the PDD ^{/2/}.</p> <p>While the currently registered version of the PDD valid for the 1st 7-year crediting period (version 5.1, dated 26/07/2012) ^{/3/} was completed by applying a previous version of the CDM-PDD form (version 04.0), as confirmed by the EPIC assessment team, all information included in the revised version of the PDD ^{/2/} is materially the same as that available in its previous version (with exception of information related to the assessed/validated PRC).</p> <p>In summary, the EPIC assessment team was able to confirm that the revised version of the PDD ^{/2/} is correctly completed and provides clear understanding of</p>
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	the project activity design and monitoring as well as the assessed/validated PRC.
Findings	No CARs and/or CLs were raised regarding the completion of the revised PDD for the 1 st 7-year crediting period ^{/3/} under conformance with application of a valid/latest version of the CDM-PDD form and applicable guidance for its completion.
Conclusion	In summary, the EPIC assessment team was able to confirm that the revised version of the PDD ^{/2/} addressing the assessed/validated PRC (made available in both clean and tracked changes versions) was completed by correctly applying the latest version of the CDM-PDD form (version 11.0) ^{/11/} (with all applicable guidance for its completion being sufficiently followed). It is also the opinion of the EPIC assessment team that the revised version of the PDD ^{/2/} provides clear understanding of the project activity design and its monitoring, including the assessed/validated PRCs.

D.2. Temporary deviations from the registered monitoring plan, applied methodologies, standardized baselines or other methodological regulatory documents

Means of validation	Not applicable. No temporary deviations from the registered monitoring plan are encompassed by the performed validation assessment for PRCs.
Findings	Not applicable. No temporary deviations from the registered monitoring plan are encompassed by the performed validation assessment for PRCs.
Conclusion	Not applicable. No temporary deviations from the registered monitoring plan are encompassed by the performed validation assessment for PRCs.

D.3. Corrections

Means of validation	<p>In accordance with applicable requirements of the CDM-VVS-PA (version 02.0)^{/1/}, the EPIC assessment team assessed and evaluated performed corrections (in information that do not affect the project design) implemented in the revised version of the PDD (version 6.0, dated 25/05/2021) ^{/2/} addressing PRC in order to <i>inter alia</i> determine whether such performed corrections are under compliance with applicable CDM rules and requirements for addressing PRCs.</p> <p><i>D.3.1 - General description of the performed Corrections (that do not affect the project design):</i> As verified by the EPIC assessment team, the performed Corrections (in information that do not affect the project design) are summarized as follows (as correctly outlined in Appendix 7 of the revised version of the PDD^{/2/}):</p> <p><i>“Corrections in information (that do not affect the project design):</i></p> <ul style="list-style-type: none"> - <i>Inclusion of references and details about the previously defined ex-ante determined parameters “Weighting of operating margin emissions factor” (w_{OM}) and “Weighting of build margin emissions factor” (w_{BM}) in Section B.6.2.</i> - <i>Consideration in Section B.6.1 of Option C of the methodological tool “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0.0) as one of the alternative approaches for the determination ex-post of stream of methane in collected LFG (in addition to the previously defined Option A and Option B of such tool). Such additional alternative approach is considered by taking into account typical characteristics of both collected LFG (in terms of moisture and temperature) and normally applied related monitoring instruments/equipment (i.e. LFG flow meter and continuous CH₄ content gas analyzer)). Related details for the monitoring parameters $V_{t,db}$, $V_{t,wb}$, $V_{i,t,wb}$ and $V_{i,t,db}$ are also adjusted accordingly in Sections B.7.1.</i> - <i>Section A.6 (History of the project activity) is completed as required</i>
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by applicable guidelines for completing the applied latest version of the CDM-PDD form.

- Previously existent minor typo mistakes were corrected and texts were improved in different sections.
- Information details for the project participants are updated in the cover (first page), Section A.4 and Appendix 1."

D.3.2 - Assessment of the performed Corrections (that do not affect the project design):

D.3.2.1 - Assessment of the inclusion of references and details about the previously defined ex-ante determined parameters "Weighting of operating margin emissions factor" (w_{OM}) and "Weighting of build margin emissions factor" (w_{BM}) in Section B.6.2 of the PDD:

The EPIC assessment team confirmed that tables with relevant and correct details about the ex-ante determined parameters "Weighting of operating margin emissions factor" (w_{OM}) and "Weighting of build margin emissions factor" (w_{BM}) were appropriately included in Section B.6.2 of the revised PDD ^{/2/}. Such tables are missing in Section B.6.2 of the currently registered version of the PDD ^{/3/}. It is relevant to note that such inclusion of previously missing information in Section B.6.2 of the PDD *per se* does not represent the definition of new ex-ante determined parameters for the project activity since the currently registered version of the PDD ^{/3/} already refers to parameters w_{OM} and w_{BM} in its Section B.6.1 with values for such parameters being previously correctly ex-ante defined for the 1st 7-year crediting period of the project activity as being 0.5 (50%) for both parameters.

The previously occurred definition of the applicable values for the ex-ante determined parameters w_{OM} and w_{BM} are confirmed by the EPIC assessment team as being under conformance with applicable guidance of the methodological tool "Tool to calculate the emission factor for an electricity system" (version 02.2.1) ^{/15/} (to which both the registered PDD ^{/3/} and revised PDD ^{/2/} refer to). The performed correction is thus confirmed by the EPIC assessment team as merely addressing the lack of related information for parameters w_{OM} and w_{BM} in Section B.6.2 of the PDD, thus making the revised version of the PDD ^{/2/} under full conformance with applicable guidance for its completion in this particular aspect.

D.3.2.2 - Assessment of the consideration of Option C of the methodological tool "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (version 02.0.0) for the determination of stream of methane in collected LFG (as an additional alternative to previously defined Option A and Option B of the methodological tool):

Based on its experience with similar project-based initiatives promoting collection of destruction/utilization of landfill gas (LFG) under the CDM, the EPIC assessment team is, first of all, of the opinion that applying Option C of the methodological tool "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (version 02.0.0) ^{/12/} for the ex-post determination of stream of methane in collected LFG indeed represents a deemed reasonable methodological approach.

This particular opinion of the EPIC assessment team takes into account the typical technical characteristics of LFG normally collected as part of the operation of the project activity (and also in other landfill sites under conditions similar to the ones observed in the particular case of the project activity). The EPIC assessment team acknowledges that, like in the case of the project activity, initiatives promoting LFG collection and destruction/utilization typically encompass the use of active LFG collection infrastructure with LFG being collected and directed to the project's methane destruction device (i.e. high temperature enclosed flares) through the use of equipment and pipeline operating under negative pressure and with the use of not very advanced techniques for removing excess of moisture/liquids in LFG (i.e.

use of rudimentary gravimetric moisture/condensation traps that do not result of significant moisture removal in stream of LFG that is directed to the project's methane destruction device in question)).

The opinion of the EPIC assessment team in favour of determining the stream of methane in collected LFG by applying Option C of the methodological tool, as proposed by the project participants, is also based on the type of monitoring instruments installed and under operation as part of the assessed project activity (and also normally/commonly used by other similar project activities under the CDM) + the typical temperature range of LFG that is directed to the project's methane destruction device.

In practical operational situations involving LFG collection and destruction/utilization initiatives, from a methodological perspective, it is deemed reasonable to assume that mass or volumetric flow of LFG and fraction of CH₄ in LFG are measured in the same basis (with consideration of wet basis also being regarded as deemed reasonable and acceptable).

The EPIC assessment team also confirmed that, as part of made corrections, references to Option C of the methodological tool "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (version 02.0.0) ^{/12/} and related amendments were correctly and appropriately included in Sections B.6.1 and B.7.1 of the revised PDD ^{/2/}.

D.3.2.3 – Assessment of completion of Section A.6 (History of the project activity) as required by applicable guidelines for completing the applied latest version of the CDM-PDD form:

The EPIC assessment team confirmed that Section A.6 (History of the project activity) was correctly completed in the revised PDD (as required by applicable guidelines for completing the PDD valid for the applied latest version of the CDM-PDD form) as follows:

"The project activity "Proactiva CGA Iperó Landfill Gas to Energy Project" is registered as under the CDM and it (and/or the infrastructure/components it encompasses) was not previously included as a component project activity (CPA) in a registered CDM programme of activities (PoA). Prior of being registered under the CDM, the project activity (and/or the infrastructure/components it encompasses) did not represent any part or a whole previously registered CDM project activity that had been deregistered. Prior of being registered under the CDM, the project activity (and/or the infrastructure/components it encompasses) were not part of a previous CPA that has been excluded from a previously registered CDM PoA either.

The project activity (and/or the infrastructure/components it encompasses) does not represent or part of a previously registered CDM project activity or a CPA under a previously registered CDM PoA whose crediting period has or has not expired (hereinafter referred to as former project) which existed within the same or other geographical location as the CDM project activity."

This Section is not available in the currently registered PDD.

D.3.2.4 – Assessment of performed corrections of previously existent minor typo mistakes and performed minor texts improvements in different sections of the PDD:

The EPIC assessment team confirmed that corrections of previously existent minor typo mistakes and minor texts improvements were appropriately and opportunely performed in different sections of the PDD.

D.3.2.5 – Assessment of performed update in information details for the project participants:

The EPIC assessment team confirmed that information details for the project participants were correctly updated in the revised version of the PDD ^{/2/} as per the

	<p>latest version of the completed Modalities of Communication (MoC) form for the project activity ^{/10/}, which also includes the Project Participant First climate (Switzerland) AG.</p> <p>In summary, as verified by the EPIC assessment team, the performed corrections in information (that do not affect the project design) sufficiently correct previously existent inconsistent project descriptions, thus enhancing the project design description and the operation of the monitoring plan for the project activity. Furthermore, EPIC was also able to confirm that the revised version of the PDD was completed by correctly applying all applicable guidance for the completion of the applied CDM-PDD form (version 11.0).</p>
Findings	No CARs and/or CLs were raised regarding the performed Corrections (in information that do not affect the project design) in the revised version of the PDD for the 1 st 7-year crediting period ^{/3/} .
Conclusion	It is the opinion of the EPIC assessment team that the description of the performed Corrections (in information that do not affect the project design) is correctly and sufficiently described in the revised version of PDD ^{/2/} .

D.4. Changes to the start date of the crediting period

Means of validation	Not applicable. No changes to the start date of the crediting period for the project activity have occurred and/or are encompassed by the performed validation assessment for PRC.
Findings	Not applicable. No changes to the start date of the crediting period for the project activity have occurred and/or are encompassed by the performed validation assessment for PRC.
Conclusion	Not applicable. No changes to the start date of the crediting period for the project activity have occurred and/or are encompassed by the performed validation assessment for PRC.

D.5. Inclusion of a monitoring plan

Means of validation	Not applicable. No inclusion of a monitoring plan are encompassed by the performed validation assessment for PRC.
Findings	Not applicable. No inclusion of a monitoring plan are encompassed by the performed validation assessment for PRC.
Conclusion	Not applicable. No inclusion of a monitoring plan are encompassed by the performed validation assessment for PRC.

D.6. Permanent changes to the registered monitoring plan, or permanent deviation of monitoring from the applied methodologies, standardized baselines or other methodological regulatory documents

Means of validation	Not applicable. No permanent changes to the registered monitoring plan, or permanent deviation from the applied CDM baseline and monitoring methodology and/or methodological tools are encompassed by the performed validation assessment for PRC.
Findings	Not applicable. No permanent changes to the registered monitoring plan, or permanent deviation from the applied CDM baseline and monitoring methodology and/or methodological tools are encompassed by the performed validation assessment for PRC.
Conclusion	Not applicable. No permanent changes to the registered monitoring plan, or permanent deviation from the applied CDM baseline and monitoring methodology

	and/or methodological tools are encompassed by the performed validation assessment for PRC.
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D.7. Changes to the project design

Means of validation	Not applicable. No change to the project design are encompassed by the performed validation assessment for PRC.
Findings	Not applicable. No change to the project design are encompassed by the performed validation assessment for PRC.
Conclusion	Not applicable. No change to the project design are encompassed by the performed validation assessment for PRC.

D.8. Changes specific to afforestation and reforestation project activities

Means of validation	Not applicable. The project activity is not of afforestation and/or reforestation category.
Findings	Not applicable. The project activity is not of afforestation and/or reforestation category.
Conclusion	Not applicable. The project activity is not of afforestation and/or reforestation category.

SECTION E. Internal quality control

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The Validation Opinion Report underwent a Technical Review (TR) prior of being approved and submitted to UNFCCC in the context of the request for approval of post-registration changes (PRCs) of the registered CDM project activity. The TR is an independent process that is performed by an internal technical review team (a qualified technical reviewer, with assistance from specialists where necessary) and aims to examine thoroughly that the process of validation assessment for PRCs has been fully performed under conformance with applicable CDM rules and requirements for assessment of PRCs (as established by the latest version of the CDM-VVS-PA (version 02.0) ^{/1/} as well as under conformance with internal working procedures of EPIC.

The Team Leader provides a copy of the draft version of the Validation Opinion Report to the appointed Technical Review Team Leader (including any necessary validation documentation). The Technical Review Team reviews the documentation. It is the role of the Technical Review Team to ensure that all related assessment activities have been performed by the assessment team by exercising utmost diligence and complete adherence to the applicable CDM rules and requirements for assessment of PRCs (including compilation of the Validation Opinion Report). The review encompasses all aspects related to the assessment of the post-registration changes as well as, if applicable, the closure of raised CARs, CLs and/or FARs during the assessment process.

As part of its performed tasks, the technical review team may raise Clarification Requests to the assessment team and/or discuss raised issues with the Team Leader. After the agreement of the responses to the Clarification Requests received from the assessment team (as well as from the project participant(s) if applicable), the final version of the Validation Opinion Report is thus accepted for further processing (such as approval and uploading phases via the UNFCCC interface).

SECTION F. Validation opinion

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EPIC Sustainability Services Pvt. Ltd. (EPIC) was commissioned to perform the 1st periodic verification assessment for CDM project activity titled “Proactiva CGA Iperó Landfill Gas to Energy Project” (UNFCCC reference number 8751) (monitoring period from 01/09/2014 to 31/12/2020). As part of the performance of such verification assessment, it was identified the need of correcting information previously made available in the registered version of the PDD for the project activity. Thus, a validation assessment of post-registration change (PRC) applicable for the project activity was performed by an assessment team appointed by EPIC.

The occurred post-registration change (PRC) valid for the CDM project activity was assessed and addressed by EPIC under the so-called “*Issuance*” process track and such change encompasses the following Corrections:

- *Corrections in information (that do not affect the project design):*
 - *Inclusion of references and details about the previously defined ex-ante determined parameters “Weighting of operating margin emissions factor” (w_{OM}) and “Weighting of build margin emissions factor” (w_{BM}) in Section B.6.2.*
 - *Consideration in Section B.6.1 of Option C of the methodological tool “Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0.0) as one of the alternative approaches for the determination ex-post of stream of methane in collected LFG (in addition to the previously defined Option A and Option B of such tool). Such additional alternative approach is considered by taking into account typical characteristics of both collected LFG (in terms of moisture and temperature) and normally applied related monitoring instruments/equipment (i.e. LFG flow meter and continuous CH₄ content gas analyzer)). Related details for the monitoring parameters $V_{t,db}$, $V_{t,wb}$, $v_{i,t,wb}$ and $v_{i,t,db}$ are also adjusted accordingly in Sections B.7.1.*
 - *Section A.6 (History of the project activity) is completed as required by applicable guidelines for completing the applied latest version of the CDM-PDD form.*
 - *Previously existent minor typo mistakes were corrected and texts were improved in different sections.*
 - *Information details for the project participants are updated in the cover (first page), Section A.4 and Appendix 1.”*

Addressing by the project participants of the above summarized PRC was correctly performed through the compilation of a revised version of the PDD. The revised version of the PDD had its performed changes validated by the appointed EPIC assessment team. The revised version of the PDD was made available and was assessed by the assessment team.


As also verified by the EPIC assessment team, the revised version of the PDD (version 6.0, dated 25/05/2021) is completed on the basis of its previous version (currently registered version of the PDD (version 5.1, dated 26/07/2012) by correctly applying the previously selected CDM baseline and monitoring methodology ACM0001 (version 12.0.0) – “Flaring or use of landfill gas” + all the methodological tools the previous version of the PDD refers to (including the methodological tools “Tool to determine project emissions from flaring gases containing methane” (version 1), Tool to determine the mass flow of a greenhouse gas in a gaseous stream” (version 02.0) and the “Tool to calculate the emission factor for an electricity system” (version 02.2.1)).

Moreover, the EPIC assessment team was also able to confirm that the revised version of the PDD was completed by correctly applying the latest version of the CDM-PDD form (version 11.0) with applicable guidance for its completion being appropriately and systematically followed by the project participants.

As an outcome of its performed validation opinion assessment, it is the opinion of EPIC that the revised version of the PDD sufficiently addresses and incorporates the above summarized eligible PRC. Furthermore, all explanations and justifications provided to EPIC by the representatives of the project participants regarding related information and assumptions for the assessed PRC, as outlined in the revised version of the PDD, are deemed reasonable, trustful, and under conformance with applicable general CDM rules and procedures for addressing PRCs.

In summary, applied corrections (in information that do not affect the project design) correctly reflect the application of the applicable CDM guidance and procedures regarding this particular category of PRC as per the latest version of the Clean Development Mechanism Project Standard for Project Activities (CDM-PS-PA). EPIC thus recommends approval of the revised version of the PDD for the CDM project activity titled “Proactiva CGA Iperó Landfill Gas to Energy Project” (UNFCCC reference number 8751) (PDD version 6.0, dated 25/05/2021) which correctly and appropriately addresses the PRC of the category “Corrections (in information that do not affect the project design)” under the so-called “*Issuance*” process track.

Note: EPIC hereby highlights that, as part of its performed validation opinion assessment of post-registration changes valid for the CDM project activity “Proactiva CGA Iperó Landfill Gas to Energy Project” (as reflected in the revised version of the PDD), the appointed EPIC assessment team did not perform any re-assessment of CDM requirements and criteria other than the ones specifically applicable/required for the validation opinion assessment of the PRCs in question (which are summarized in Appendix 7 of such revised version of the PDD and are also listed in this validation opinion statement). Thus, assessments which were to be previously performed as part of the previously occurred CDM validation assessment of the project activity and/or its CDM renewal of crediting period were not re-assessed by EPIC. Such limited scope of the validation opinion assessment performed by EPIC for the assessed/validated PRCs is under full compliance with applicable assessment requirements and rules as per the latest version of the CDM Validation and Verification Standard for Project Activities (CDM-VVS-PA).

Prepared and submitted by
 (Marco A. Ratton) Verification Team Leader

Appendix 1. Abbreviations

Abbreviations	Full texts
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CDM-EB	Clean Development Mechanism Executive Board
CDM-M&P	Modalities and Procedures for Clean Development Mechanism
CDM-PCP-PA	Clean Development Mechanism Project Cycle Procedures for Project Activities
CDM-PS-PA	Clean Development Mechanism Project Standard for Project Activities
CDM-VVS-PA	Clean Development Mechanism Validation and Verification Standard for Project Activities
CER	Certified Emission Reduction
CH ₄	Methane
CL	Clarification Request
CMP	Meeting of Parties to the Kyoto Protocol
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
COP/MOP	The Conference of the Parties to the United Nations Framework Convention on Climate Change serving as the Meeting of the Parties to the Kyoto Protocol
COVID-19	Coronavirus-19 disease (infectious disease caused by a new virus that caused a worldwide pandemic in year 2020).
DOE	Designated Operational Entity
ER	Emission Reduction
GHG	Greenhouse Gas
LFG	Landfill gas
IPCC	Intergovernmental Panel on Climate Change
MSW	Municipals solid waste
PDD	Project Design Document
PP	Project Participant
PRC	Post-registration change
QA/QC	Quality Assurance / Quality Control
UNFCCC	United Nations Framework Convention for Climate Change

Appendix 2. Competence of team members and technical reviewers

All personnel being engaged in CDM validation opinion assessments performed by EPIC are qualified based on the established procedures of EPIC to assure the resource requirements that satisfy all the requirements of competence criteria of the CDM Accreditation Standard for operational entities. EPIC is accredited as a DOE and holds the full responsibility on decision-making regarding the validation opinion assessment in accordance with the accreditation requirements of the CDM-EB.

The following assessment team has been assigned to carry out the validation opinion assessment of post-registration changes (PRCs) for the assessed project activity.

Name	Mr Marco A. Ratton	Mr. H.B.Muralidhar
Role	Lead Auditor	Technical Reviewer
Competence in relevant sectoral scope(s):	Sectors 1 and 13	Sectors 1 and 13
Responsibility	Performance of document review, performance of interviews with project participants representatives, preparation of initial list of findings, assessment of responses from the project participants for all list of findings and assessment of updated/corrected documents, preparation of the and draft Validation Opinion Report, addressing comments from the performed technical review and preparation of final Validation Opinion Report.	Performance of Technical review

Mr. Marco A. Ratton is based in Brazil and has acted as a CDM auditor since 2007. He holds vast experience with independent assessments of CDM project activities within the area of solid waste management and effluent treatment implemented in Latin America and other regions. He also has previous working experience with planning of municipal waste management as well as educational background in mechanical fabrication & manufacturing technologies, economics and environmental management & policy. He has undergone extensive training on CDM validation and verification and is a qualified Lead Auditor for Sectoral Scope 13 under Technical Area “Waste handling and disposal” and Sector Scope 1 in accordance with procedures of EPIC sustainability services Pvt. Ltd. He also has previous experience on conducting ISO 9001/14001 assessments.

Mr H.B. Muralidhar holds a bachelor’s degree in Engineering and PG Diploma in Health and Safety and is an EHS professional with global experience in Corporate, Manufacturing, Construction and start-ups. He is Involved in the development of cost-effective EHS programs that align with business goals and implementing sustainable cultural/ organizational change through creating partnerships & acquisitions. His recent experience in climate change was as Regional Head for BVQI, Bengaluru in which he has participated in various roles such as lead auditor, technical expert and technical reviewer in CDM and other GHG projects. He has more than 20 years of Credible track record of building and leading effective cross-functional, multisite, and multi-business teams, driving change initiatives and implementing EHS strategies and conducting trainings. He has undergone extensive training on CDM validation and verification and is a qualified technical reviewer for Sectoral Scope 13 under Technical Area “Waste handling and disposal” and Sector Scope 1 in accordance with procedures of EPIC sustainability services Pvt. Ltd.

Appendix 3. Documents reviewed or referenced

No.	Author	Title	References to the document	Provider
/1/	UNFCCC/CDM-EB	Clean Development Mechanism Validation and Verification Standard for Project Activities (CDM-VVS-PA), (version 02.0)	Dated 29/11/2018. Available online: http://cdm.unfccc.int/Reference/Standards/index.html	Others
/2/	Proactiva Meio Ambiente Brasil Ltda.	Revised version of the Project Design Document (PDD) for the 1 st 7-year renewable crediting period for the CDM project activity: "Proactiva CGA Iperó Landfill Gas to Energy Project" (version 6.0) (in both clean and tracked changes versions).	Dated 25/05/2021	Project Participants ³
/3/	Proactiva Meio Ambiente Brasil Ltda.	Project Design Document (PDD) for the 1 st 7-year renewable crediting period for the CDM project activity: "Proactiva CGA Iperó Landfill Gas to Energy Project" (version 5.1).	Dated 26/07/2012 Available online: https://cdm.unfccc.int/Projects/DB/LRQA%20Ltd1355408694.95/view	Project Participants
/4/	UNFCCC/CDM-EB	Consolidated baseline and monitoring methodology ACM0001 - "Flaring or use of landfill gas" (version 12.0.0)	Dated 25/11/2011. Available online: https://cdm.unfccc.int/methodologies/DB/RNAKK7JRFWIKCFT3YSNKGPC1FR2DVA/view.html	Others
/5/	UNFCCC	Kyoto Protocol to the United Nations Framework Convention on Climate Change	Dated 1998. Available online: http://unfccc.int/resource/docs/convkp/kpeng.pdf	Others
/6/	UNFCCC	Decision 3/CMP. 1 (Marrakesh – Accords)	Dated 30/03/2006. Available online: https://cdm.unfccc.int/Reference/COPMOP/08a01.pdf	Others
/7/	UNFCCC/CDM-EB	"Tool to determine project emissions from flaring gases containing methane" (version 1)	Available online: https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-06-v1.pdf	Others
/8/	UNFCCC/CDM-EB	Clean Development Mechanism Project Standard for Project Activities (CDM-PS-PA) (version 02.0)	Dated 29/11/2018. Available online: http://cdm.unfccc.int/Reference/Standards/index.html	Others

³ All document with provider indicated as "Project Participants" were sourced by the host-country project participant and project owner Proactiva Meio Ambiente Brasil Ltda.

/9/	UNFCCC/CDM-EB	Clean Development Mechanism Project Cycle Procedure for Project Activities (CDM-PCP-PA) (version 02.0)	Dated 29/11/2018. Available online: https://cdm.unfccc.int/Reference/Procedures/index.html	Others
/10/	Proactiva Ambiente Ltda. Meio Brasil	Completed Modalities of Communication (MoC) form for the CDM project activity "Proactiva CGA Iperó Landfill Gas to Energy Project".	Available online: https://cdm.unfccc.int/Projects/DB/LRQA%20Ltd1355408694.95/view	Project Participants
/11/	UNFCCC	Project design document form for CDM project activities (incl. the Attachment "Instructions for completing this form", version 11.0.	Dated 31/05/2019. Available online: https://cdm.unfccc.int/Reference/PDDs_Forms/index.html	Others
/12/	CDM-EB	CDM methodological tool "Tool to determine the mass flow of a greenhouse gas in a gaseous stream" (version 02.0)	Dated: 03/06/2011 Available online: https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-08-v2.0.0.pdf	Others
/12/	CDM-EB	Agreed relaxing of the rule requiring mandatory on-site inspection by DOEs (valid for the period from 23/03/2020 to 23/06/2020 and because of COVID-19 pandemic (+ decisions also agreed by the CDM-EB to extend the relaxation of mandatory site visits until 31/12/2021)).	Available online: https://cdm.unfccc.int/newsroom/latestnews/releases/2020/01041_index.html	Others
/14/	Proactiva Ambiente Ltda. Meio Brasil	Monitoring Report for the CDM project activity "Proactiva CGA Iperó Landfill Gas to Energy Project" - monitoring period from 01/09/2014 to 31/12/2020, version 2.0.	Dated 28/06/2021.	Project Participants
/15/	CDM-EB	"Tool to calculate the emission factor for an electricity system" (version 02.2.1)	Dated 29/09/2011. Available online: https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-07-v2.2.1.pdf	Others

Appendix 4. Clarification requests, corrective action requests and forward action requests

Table 1. CLs from this validation

CL ID	xx	Section no.	-	Date: DD/MM/YYYY
Description of CL				
No CLs were raised as part of the performed validation opinion assessment.				
Project participant response				Date: DD/MM/YYYY
-				
Documentation provided by project participant				
-				
DOE assessment				Date: DD/MM/YYYY
-				

Table 2. CARs from this validation

CAR ID	xx	Section no.	-	Date: DD/MM/YYYY
Description of CAR				
No CARs were raised as part of the performed validation opinion assessment.				
Project participant response				Date: DD/MM/YYYY
Documentation provided by project participant				
-				
DOE assessment				Date: DD/MM/YYYY
-				

Table 3. FARs from this validation

FAR ID	xx	Section no.	-	Date: DD/MM/YYYY
Description of FAR				
No FARs were raised as part of the performed validation opinion assessment.				
Project participant response				Date: DD/MM/YYYY
-				
Documentation provided by project participant				
-				
DOE assessment				Date: DD/MM/YYYY
-				

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Document information

Version	Date	Description
03.0	31 May 2019	Revision to: <ul style="list-style-type: none">Ensure consistency with version 02.0 of the “CDM validation and verification standard for project activities” (CDM-EB93-A05-STAN);Make editorial improvements.
02.0	31 October 2017	Revision to align with the requirements in the “CDM validation and verification standard for project activities” (version 01.0).
01.0	23 March 2015	Initial publication.
Decision Class: Regulatory		
Document Type: Form		
Business Function: Registration		
Keywords: post-registration change, project activities, validation report		