



Validation Opinion on a Revision in Monitoring Plan

As per “Procedures for Revising Monitoring Plans in Accordance with Paragraph 57 of the Modalities and Procedures for the CDM” (Version 01 – EB26 Report – Annex 34), and “Clarification for Project Participants on When to Request a Revision, Clarification to an Approved Methodology or Deviation” (Version 02 – EB31 Report – Annex 12), Bureau Veritas Certification kindly request the acceptance from the Chair of the Methodology Panel, in consultation with the Chair of the Board, of this request for revision in monitoring plan.

Project Reference: Pandurang SSK RE Project

Project Participant:

1. Shree Pandurang Sahakari Sakhar Karkhana Ltd – Host Country – India.
2. Agrinergy Ltd. - Host Country – U.K

Registration details

Date of Registration: 05/05/2006

Registration No. 0313

Reason for request for revision in monitoring plan:

Shree Pandurang Sahakari Sakhar Karkhana Limited has commissioned Bureau Veritas Certification verify the emissions reductions of its CDM project “Pandurang SSK RE Project” (hereafter called “the project”) at Shreepur, Solapur District, India. During the Initial and first periodic verification, verifiers observed that bagasse was purchased from external sources for the project activity.

As per PDD, Page 9 under section B.4, it has been clearly stated that –

' The proposed project is expected to operate for 160 days in the season and through the generation of surplus bagasse a further 80 days in the off-season, i.e. when the sugar plant is not crushing cane. The bagasse required to run for 80 days has been estimated at 31,000 tonnes, whilst the surplus generated through crushing operations is estimated at 39,000 tonnes, therefore there will be no requirement to use biomass from sources outside the project activity.' -

Methodology AMS I.D used in the registered PDD is applicable only to the projects that displace the grid power. Considering this, Bureau Veritas Certification felt that when the bagasse is procured from external sources, it is possible that the project displaces the

energy that would be generated by bagasse at some other location and not from the grid. AMS I.D would then be applicable only with consideration of leakage. However leakage was not evaluated during validation on account of the project description as above.

Considering this, verification team raised a clarification request to account for leakage emissions due to procurement and transportation of bagasse.

It is to be noted that the 'General guidance on leakage in biomass project activities' was released in EB 25, 19-21 July 2006 (after the registration of subject project) and hence is applicable to projects that are submitted for registration after July 2006 and did not apply to the PSSK project since it was already registered in May 2006.

Now the project participant has revised the monitoring plan to include following

1. Annual evaluation of biomass to demonstrate that there is at least 25% surplus biomass in the region including biomass required for the project activity.
2. Estimation of emissions due to transportation based on distance of procurement and number of trips.

Provision is also evident for estimating leakage in case biomass is not available to the tune of 25% surplus in the region including biomass required for the project activity

Though PSSK expect bagasse to be sufficiently available in the region, to counter any uncertainty (in future) due to factors like cane crushing scenario based on sugar cane crop, future cogeneration plants etc., PSSK has identified two more biomass residues – cane thrash and wheat trash (fine particles after harvesting) and therefore monitoring plan is not limited to bagasse but uses the generic terminology as 'biomass'

How 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;

The revised monitoring plan now includes monitoring of surplus biomass as well as emissions due to transportation. Monitoring of these parameters was not a requirement as per methodology applied to the project activity - AMS – ID, Version 7. Hence proposed revision in monitoring plan will not reduce the verification process. Based on parameters, their frequency, proposed quality control measures the level of accuracy and completeness in monitoring is envisaged.

How the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity

Approved methodology applicable to project activity did not require monitoring of surplus biomass as 'General guidance on leakage in biomass project activities' was released in EB 25, 19-21 July 2006 (after the registration of subject project) and hence is applicable to projects that are submitted for registration after July 2006 and did not apply to the PSSK project since it was already registered in May 2006.

Same document under section 12 also mentions that emissions due to transportation of raw materials and biomass is likely to be less than 10% & can therefore be neglected in the context of SSC project activities. However to be conservative, project proponent has included the same in revised monitoring plan.

Hence parameters under proposed monitoring plan are additional to those, which are part of approved monitoring methodology applicable to the project activity.

How the findings of previous verification reports, if any, have been taken into account
Not applicable since this is the initial verification.

Validation Opinion

Bureau Veritas Certification has validated these revisions in monitoring plan. Monitoring plan is found to be complete and transparent to account for these emissions and therefore can be accepted.

The revised sections in the monitoring plan are attached in the PDD template with this request.