
VALIDATION OPINION FOR REVISION OF REGISTERED MONITORING PLAN

Zhejiang Juhua Co., Ltd

**HFC23 Decomposition Project of
Zhejiang Juhua Co., Ltd, P.R.China**

UNFCCC Reference Number: 0193

SGS Climate Change Programme

SGS United Kingdom Ltd
SGS House
217-221 London Road
Camberley Surrey
GU15 3EY
United Kingdom

Date of issue:		Project No.:	
09-10-2007		Ver0207	
Project title		Organisational unit:	
HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China		SGS Climate Change Programme	
Revision number		Client:	
0		Zhejiang Juhua Co., Ltd	
Subject:			
Validation of Revised Monitoring Plan		Indexing terms	
Work carried out by			
Qi Yang , Lead Assessor Julian Zhou, Assessor			
Technical review			
Siddharth Yadav Elton Chen Wu(Trainee)		<input checked="" type="checkbox"/> No distribution without permission from the Client or responsible organisational unit	
Authorized signatory			
Siddharth Yadav		<input type="checkbox"/> Limited distribution	
Date of final decision:	Number of pages:		
11/10/07	7	<input type="checkbox"/> Unrestricted distribution	

Table of content

Table of content.....	3
1. Introduction.....	4
1.1 Objective.....	4
1.2 Scope.....	4
1.3 GHG Project Description.....	4
1.4 The names and roles of the validation team members.....	4
2. Methodology.....	5
2.1 Review of documentation.....	5
2.2 Findings.....	5
2.3 Internal quality control.....	5
3. Determination Findings.....	5
4. Validation opinion.....	6
5. Document references.....	7

1. Introduction

1.1 Objective

Paragraph 57 of the modalities and procedures for the CDM allow 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.

Juhua Co., Ltd has commissioned SGS to perform such a validation of the revision of monitoring plan according to the procedure detailed in Annex34 to EB26 meeting report. The original monitoring plan is part of the PDD of the registered CDM project: HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China, UNFCCC reference number 0193. The purpose of this validation is to have an independent third party assessment to 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.

1.2 Scope

The scope of the validation is defined as an independent and objective review of the revision of monitoring plan and other relevant documents. The information in these documents is reviewed against Kyoto Protocol requirements, UNFCCC rules and associated interpretations. SGS has employed a risk-based approach in the validation, focusing on the identification of significant risks for project implementation and the generation of CERs.

According to the request received from RIT team of UNFCCC, the PP and DOE is requested to revise current monitoring plan, details of the request are as below:

The secretariat noted that in the request for issuance for 1,202,283 CERs from 01 May 2007 to 31 Jul 2007 that was issued on 31 August the PP is correctly applying the guidance of the Board on the calibration of meters, however, this should be reflected in a revised monitoring plan. The quantity of calcium hydroxide used by the project, CO2 emission factor for waste transport and CO2 emission factor for the production of calcium hydroxide are not in the registered monitoring plan. In addition, the monitoring of greenhouse gas emissions factor for electricity and steam is not in line with the monitoring plan. These different and additional activities are not included in the current monitoring plan. We would like to request the DOE and PP to revise the monitoring plan taking into account these activities prior to submitting the next request for issuance.

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

1.3 GHG Project Description

HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China was registered on 3 March 2006, UNFCCC Ref number 0193, and the first crediting period is from 1 Aug 2006 to 31 Jul 2013 (Renewable). Till 31 August 2007, there have been 5 issuances of CERs for this project.

1.4 The names and roles of the validation team members

Name	Role
Qi Yang	Lead Assessor
Julian Zhou	Assessor

2. Methodology

2.1 Review of documentation

The validation is performed primarily as a document review of the proposed revision of monitoring plan, registered PDD, approved methodology and relevant EB guidance and meeting reports. The assessment is performed by trained assessors.

2.2 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 **New Information Request (NIR)** 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:

- I. mistakes have been made with a direct influence on project results;
- II. validation protocol requirements have not been met; or
- III. there is a risk that the project would not be accepted as a CDM project or that emission reductions will not be verified.

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

Observations may be raised which are for the benefit of future projects and future verification or validation actors. These have no impact upon the completion of the validation or verification activity.

Corrective Action Requests and New Information Requests are raised in the draft validation protocol and detailed in a separate form to his report if applicable. In this form, the Project Developer is given the opportunity to "close" outstanding CARs and respond to NIRs and Observations.

2.3 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.

3. Determination Findings

The additional activities not included in the registered monitoring plan and SGS opinion to the revised monitoring plan is as below:

3.1 Calibration of the flow meter be conducted every six months and a zero check on a weekly basis

SGS opinion to the revised monitoring plan: The revised monitoring plan is in accordance with the guidance of the Board on the calibration of meters (paragraph 22 of EB 24 report), which also reflects the actual practice of meter calibration implemented in this project.

No findings were raised in this regard.

3.2 Quantity of calcium hydroxide used by the project ($Q_{Ca(OH)_2}$) and CO₂ emission factor for the production of calcium hydroxide ($E_{F_{Ca(OH)_2}}$)

SGS opinion: Leakage caused by calcium hydroxide used in the project is not required in the

methodology AM0001 Ver03. For the sake of conservativeness, PP monitored it and deducted it from the emission reductions for the former 5 monitoring periods as an additional activity. The monitoring results revealed that the emissions from this source only account to 0.016% of the emission reduction (please refer to the attached PP letter for detailed data). Given the fact that this emission source is not required by the methodology and is actually negligible, we agree that PP will not monitor it in the future and back to the registered monitoring plan, the revised monitoring plan does not need to include this activity.

No findings were raised in this regard.

3.3 CO₂ emission factor for waste transport (E_sludge)

SGS opinion to the revised monitoring plan: The CO₂ emission factor for waste transport has been monitored based on annex 3 page 36 of the registered PDD. Now it is included in section D.2.3.1 of the revised monitoring plan as E_sludge as well.

No findings were raised in this regard.

3.4 Emission factor for electricity and steam (E_power and E_steam)

SGS opinion to the revised monitoring plan: In the registered monitoring plan, the recording frequency for these two parameters is monthly, during previous monitoring periods, PP did not update values of these two parameters at monthly frequency because the new emission factors would be less than the one estimated in the PDD (1.209tCO₂/MWh, 0.365tCO₂/t-steam). We agree that the PP will back to the registered monitoring plan to monitor these two parameters at monthly frequency in future, as this ensures the accuracy in the monitoring, hence, no revision to these two parameters is needed.

No findings were raised in this regard.

4. Validation opinion

SGS has performed a validation of the revision of monitoring plan for registered project: "HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China, UNFCCC reference number 0193". The validation was performed following the UNFCCC criteria and in accordance with Annex 34 of EB26 meeting report.

The proposed revision of monitoring plan is now reflecting correct practice of meter calibration and monitoring of CO₂ emission factor for waste transport that was/is being performed by PP. Previous and future monitoring operation/result is thus not impacted by this revision.

Furthermore, we confirm that:

- (a) 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;
- (b) the proposed revision of the monitoring plan is in accordance with the approved monitoring methodology applicable to the project activity;
- (c) no findings regarding the content of this revision were raised in previous verification reports.

The validation is based on the information made available to SGS and the engagement conditions detailed in the report. The validation has been performed using a risk based approach as described above. The only purpose of this report is its use during the approval process detailed in Annex 34 to EB26 meeting report. Hence SGS can not be held liable by any party for decisions made or not made based on the validation opinion, which will go beyond that purpose.

SGS CSTC, 09/10/2007
Qi Yang
Lead Assessor

SGS United Kingdom Limited, 11/10/2007
Siddharth Yadav
Technical Reviewer

5. Document references

Category 1 Documents (documents provided by the Client that relate directly to the revision of monitoring plan):

- /1/ Revised Monitoring Plan (track change version): Section D and Annex4 of PDD of HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China
- /2/ Revised Monitoring Plan (clean version): Section D and Annex4 of PDD of HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China

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):

- /3/ Annex 34 to EB26 meeting report
- /4/ Registered PDD of HFC23 Decomposition Project of Zhejiang Juhua Co., Ltd, P.R.China
- /5/ PP's clarification to this revision of monitoring plan.

- o0o -