
VALIDATION OPINION FOR REVISION OF REGISTERED MONITORING PLAN

**Grasim Industries Limited-Cement Division
South (GIL-CDS)**

**Emission reduction through partial
substitution of fossil fuel with alternative
fuels like agricultural by-products, tyres
and municipal solid waste (MSW) in the
manufacturing of portland cement at
Grasim Industries Limited-Cement
Division South (GIL-CDS), Tamilnadu,
India.**

UNFCCC Ref. No. 0339

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Emission reduction through partial substitution of fossil fuel with alternative fuels like agricultural by-products, tyres and municipal solid waste (MSW) in the manufacturing of portland cement at Grasim Industries Limited-Cement Division South (GIL-CDS), Tamilnadu, India				
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Subject:				
Validation opinion for revision of Registered Monitoring Plan				
Validation Team:				
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1. Validation Opinion

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.

SGS United Kingdom Ltd has been contracted by Grasim Industries Limited-Cement Division South (GIL-CDS) to perform such a validation of the revision of monitoring plan according to the procedure detailed in annex 34 to EB 26 meeting report, the original monitoring plan is part of the PDD of registered CDM project: Emission reduction through partial substitution of fossil fuel with alternative fuels like agricultural by-products, tyres and municipal solid waste (MSW) in the manufacturing of portland cement at Grasim Industries Limited-Cement Division South (GIL-CDS), Tamilnadu, India in India; UNFCCC ref. no. 0339. 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 approved monitoring methodology applicable to the project activity.

By applying the proposed revision of monitoring plan, the power consumption for the transportation of alternate fuel will be monitored and thus the emission reductions due to the same will be calculated and will give more conservative estimate as actual motor rating will be used to calculate power consumption, other monitoring parameters in the original monitoring plan remain unchanged. This revision improves the accuracy of information.

Theoretically, there should be no impact on the calculation of the emissions reduction achieved by this project activity because the revision is aiming to address the calculation of power consumption for transportation of emission reductions which during first verification was accepted by DOE as this is the conservative approach for estimation of emission reductions from transportation. Emission factor for coal based CPP is already defined in registered PDD and remains unchanged.

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) This is the second verification for the said project activity. During first verification; emission reductions from transportation of alternate fuel was calculated using the same approach mentioned in revised MP and it was accepted by DOE since it was conservative.

Signed on Behalf of the Validation Body by Authorized Signatory



Signature:

Name: Siddharth Yadav

Date: 14/04/2008

2. Introduction

2.1 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.

SGS United Kingdom Ltd has been contracted by Grasim Industries Limited-Cement Division South (GIL-CDS) to perform such a validation of the revision of monitoring plan according to the procedure detailed in annex 34 to EB 26 meeting report, the original monitoring plan is part of the PDD of registered CDM project: Emission reduction through partial substitution of fossil fuel with alternative fuels like agricultural by-products, tyres and municipal solid waste (MSW) in the manufacturing of portland cement at Grasim Industries Limited-Cement Division South (GIL-CDS), Tamilnadu, India in India; UNFCCC ref. no. 0339. 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 host country criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

SGS reviewed of the project design documentation, 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 the project design document, the project's baseline study and 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.

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.

2.3 GHG Project Description

As per <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view> page validation report dated 16-03-2006. The project was registered on 29th May 2006 with reference number 0339. The first verification for the project activity covering period from 1st April 2005 to 31st March 2006 was conducted in November 2006 and CER's are issued on 18th December 2006.

2.4 The Names and Roles of the Validation Team Members

Name	Role	Affiliate
Vikrant Badve	Lead Assessor	SGS India
Sathis Kumar	Local Assessor	SGS India

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.

A site visit is usually required to verify assumptions in the baseline.

3.2 Use of the Validation Protocol

The validation protocol used for the assessment is partly based on the templates of the IETA / World Bank Validation and Verification Manual and partly on the experience of SGS with the validation of CDM projects. It serves the following purposes:

- 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), or a Corrective Action Request (CAR) due to non-compliance with the checklist question (See below). New Information Request (NIR) is used when the validation team has identified a need for further clarification.

The completed validation protocol for this project is attached as Annex **Error! Reference source not found.** to this report

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 **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:

- mistakes have been made with a direct influence on project results;
- validation protocol requirements have not been met; or
- 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 (Annex **Error! Reference source not found.**). In this form, the Project Developer is given the opportunity to “close” outstanding CARs and respond to NIRs and Observations.

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 Participation Requirements

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.2 Project Design

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.3 Eligibility as a Small Scale Project

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.4 Baseline Selection and Additionality

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.5 Application of Baseline Methodology and Calculation of Emission Factors

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.6 Application of Monitoring Methodology and Monitoring Plan

The project activity is using ACM0003 version 01. The need of revision of monitoring plan is because the Project Proponent at site is not measuring the fuel consumption for the transportation of alternate fuel since the alternate fuel is transported using belt conveyor which uses electricity generated from coal based CPP. Project proponent is measuring the run hours of the belt conveyor and rated capacity of conveyor motor. Based on this data electricity units consumed for transportation of fuel were calculated and thus emission reductions were accounted. This approach was accepted as there is indirect consumption of fossil fuel for transportation. This approach is conservative too. Rest of the monitoring plan remains the same as mentioned in the registered PDD mentioned on UNFCCC website <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> and revised monitoring plan is attached with the revised validation opinion.

There is no other change in the validation report available on UNFCCC website <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>.

4.7 Choice of the Crediting Period

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.8 Environmental Impacts

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.

4.9 Local Stakeholder Comments

As per <http://cdm.unfccc.int/UserManagement/FileStorage/DTLQ9TSUYAF0NLKJU0Y77KXQOBGW08> validation report dated 16-03-2006 available on UNFCCC website <http://cdm.unfccc.int/Projects/DB/DNV-CUK1142971280.51/view>. No Change.



5. List of Persons Interviewed

Date	Name	Position	Short Description of Subject Discussed
04/02/2008	Mr. N. Ravi Kumar	DGM (Mech. & Projects)	Monitoring practice adopted at plant site and requirement under regd. PDD monitoring plan

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 dated 26th March 2008
- /2/ Registered PDD version 02 dated 29th December 2005
- /3/ ACM0003 version 01

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