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Your ref.:
CDM Ref 0402

Our ref.:
LAICK/MLEH

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Validation opinion

Request for revision of monitoring plan for project activity 0402 “SEO Biomass Steam and Power Plant in Malaysia”.

Following the request for review of the last issuance request for project 0395 “LDEO Biomass Steam and Power Plant in Malaysia”, the Board at its 38th meeting noted that the monitoring plan should be revised to include the monitoring of the amount of each type of biomass consumed in the boiler prior to the next request for issuance. The project 0402 titled “SEO Biomass Steam and Power Plant in Malaysia” is similar with the project 0395 titled “LDEO Biomass Steam and Power Plant in Malaysia” and as for project activity 0395 a request for deviation with regard to the use of other biomass than originally foreseen in the PDD was in March 2007 submitted also for project activity 0402 and eventually approved by the Board at its 32nd meeting.

We hereby would like to submit the revision request for the monitoring plan for the project activity “SEO Biomass Steam and Power Plant in Malaysia”.

The project applies the approved small scale methodologies AMS-IC (version 7) – “*Thermal energy for user*”, and AMS-III.E (version 7) - “*Avoidance of methane production from biomass decay through controlled combustion*”.

The revision of the monitoring plan is related to the monitoring of biomass. As stated in the registered PDD, the project originally aimed to use Empty Fruit Bunches (EFB) only. However, it has in practice proved to be difficult to combust EFB alone due to technological operational difficulties to maintain steady operation of the boiler to supply steam to the palm oil refinery. Hence, other types of biomass than EFB have to be co-fired. This has been continuing for a period now which is foreseen as a normal practice. The monitoring plan has thus been revised to separately monitor different types of biomass used by the project. The individual biomass types include Empty Fruit Bunches (EFB), Mesocarp fibres, and Palm Kernel Shells (PKS).

The registered PDD for the project considers potential leakage effects due to the use of EFB. Moreover, the additionality of the project was demonstrated in the light of the project using EFB only. Given that also Mesocarp Fibre and PKS are used, DNV thus requested the project participants to describe potential leakage effects due to the use of Mesocarp Fibre and PKS and to discuss the Mesocarp Fibre and PKS use’s impact on the project’s additionality. The project participant demonstrated that the use of Mesocarp Fibre and PKS does not result in any leakage and does not question the project’s additionality. This demonstration was submitted as part of a

request of deviation for project activity 0402 entitled “Use of other biomass than EFB” submitted in March 2007 and approved by the CDM Executive Board.

(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

The monitoring plan of the validated and registered PDD requires the monitoring of the amount of biomass consumed and the energy content of the biomass. With revision of the monitoring plan, the biomass will be monitored according to types which will further give better representation of the consumption of biomass. However, it has also been emphasized that it is only the biomass from EFB which will be taken into account in the calculation of the methane emissions avoided by the project.

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

The proposed revision made to the monitoring plan does not deviate from the methodology applicable to the project activity, where the biomass the consumption and the energy content of each biomass used by the project (EFB, palm kernel shell and mesocarp fibres) is monitored as required by the monitoring methodology. These parameters will continue to be monitored according to the proposed revision.

(c) the findings of previous verification reports, if any, have been taken into account

There is no finding raised in the previous verification report that require additional action to the monitoring plan.

Yours faithfully
for DET NORSKE VERITAS CERTIFICATION AS



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