

Call for public input on the "Monitoring Guidelines"

LRQA would like to submit the following inputs in relation to the call for a Monitoring Guideline. It is highly appreciated the efforts from the Board and the Secretariat to help PPs in the development of good quality Monitoring Reports that address the most relevant issues detected during the completeness and review stages.

LRQA would like to share with the Secretariat the internal document use for Technical Reviews that include some of the reasons we have detected in the last time and that could be included in the Monitoring Guidelines. Find it as annex to this document. In addition we would like to send the following comments and practical examples of monitoring problems:

- 1) The document may provide examples of approved precedent cases through deviation and revision plus indication of why those were acceptable and what other similar alternative methods would be acceptable.
- 2) This indications would help the PP not only when they actually need to Propose a deviation or revision, but also when they consider back-up methods in their monitoring procedures that may or may not be included in the monitoring plan to be registered prior to implementation of the monitoring activities as preventive measures (not mandatory).
- 3) The Guidelines would need to be kept updated to include new cases proposed for deviation and revision.
- 4) Sometimes, mainly in the first verification period, a declaration of conformity from the manufacturer is provided, instead of a calibration certificate. Currently it is not clear if the use of a declaration of conformity (or assumption that delivered/installed instrument was calibrated at factory) is justified for assessing validity of calibration
- 5) The installed equipment/instruments serial numbers cannot be visually verified (for instance, hydro turbines submerged);

ANNEX

Issues that have caused problems during verification

- 1) Consistency in the values provided in the cells of the spreadsheet for a certain parameter: all values shall be calculated or all values shall be fixed.
- 2) Consistency of the calibration dates in the MR and in the VR: the calibration dates shall be the same in both documents.
- 3) Parameters in the formulae in the MR and in the VR: The MR shall contain information on each parameter and the options to determine it, including parameters not applicable.
- 4) Calibration consistency and completeness: calibration shall cover the whole Monitoring Period, calibration requirements shall be specified for all equipment even if such equipment is not defined in the methodology. Evidence shall be provided about the calibration requirement for such equipment.
- 5) All the parameters are monitored as per the methodology requirements: If any one is monitored according to a new version of the methodology, this shall be explained and evidence provided about the need to do so.
- 6) The dates of the crediting period, the dates of the monitoring period and the type of Monitoring period (2nd, 3rd, and 4th) shall be consistent throughout the documentation.
- 7) The dates of the final readings of a meter for a specific parameter shall be within the Monitoring period. In case readings of the meter are outside the control of the PPs and the last date of the reading period is out of range, the total amount of ERs shall be discounted by the values corresponding to the data out of the MP.
- 8) Information on when each equipment was installed and started operation shall be included in the MR.
- 9) Landfill projects:
 - a) Consistency in the option used for determining the flare efficiency: the option selected in the registered PDD shall be used in the MR to calculate ERs.
 - b) The ERs calculation spreadsheet shall contain information on how the default value for the flare efficiency has been adopted, taking into account manufacturer's specifications and temperature values.
 - c) If the identified flare is a "low-height" flare (height is less than 10 diameters), justifications shall be provided on how the methane composition through the sampling section has been confirmed to be uniform, as explained by the clarification AM_CLA_047.
 - d) The manufacturers' specification shall be checked on a minute basis. To check it on an hourly aggregated basis can lead you into error.
 - e) To apply the default efficiency of 90%, the manufacturer's specifications on proper operation of the flare shall be met continuously during the hour h as per the tool for Project emissions from flaring. This information shall not only be specified in the MR but also the spreadsheet shall include the temperature, flow, CH4 data and a description of the situation for each month.
 - f) The monitoring report must include information on when each of the flares and other installed equipment was installed and started operation.
- 10) Other Methodologies.
 - a) ACM0012: The parameter NCVwg shall be sourced from laboratory and appropriate measurement methods and procedures shall be applied along with the QA/QC procedure appropriate to the monitored parameter. This should be monitored once in a month.
 - b) AM0055: The uncertainty associated with each parameter shall be validated. A global uncertainty is not acceptable.
 - c) AMS III.F: To ensure aerobic conditions in the windrows, the Verification Report shall include the assessment on:
 - (1) Compliance with temperature monitoring requirements as per the PDD;

- (2) Compliance with turning of compost piles as required by the monitoring plan;
- (3) Values reported for Oxygen levels in the MR.