 CDM Project Activity Registration and Validation Report Form <i>(By submitting this form, designated operational entity confirms that the proposed CDM project activity meets all validation and registration requirements and thereby requests its registration)</i>	
Section 1: Request for registration	
Name of the designated operational entity (DOE) submitting this form	TÜV Industrie Service GmbH TÜV SÜD Group
Title of the proposed CDM project activity (Section A.2 of the attached CDM-PDD) submitted for registration	Vale do Rosário Bagasse Cogeneration (VRBC)
Project participants (Name(s))	Companhia Açucareira Vale do Rosário Econergy Brasil Ltda. Swedish Energy Agency
Sector in which project activity falls	1-Energy industries (renewable - / non-renewable sources)
Is the proposed project activity a small-scale activity?	<u>No</u> / Yes (<i>underline as applicable</i>)
Section 2: Validation report	
List of documents to be attached to this validation report (please check mark):	
<input checked="" type="checkbox"/> The CDM-PDD of the project activity <input checked="" type="checkbox"/> An explanation by the submitting designated operational entity of how it has taken due account of comments on validation requirements received, in accordance with the CDM modalities and procedures, from Parties, stakeholders and UNFCCC accredited non-governmental organizations. This explanation is included in the Validation Report No. 324115098, <i>rev 03</i> ; <input type="checkbox"/> The written approval of voluntary participation from the designated national authority of each Party involved, including confirmation by the host Party that the project activity assists it in achieving sustainable development: <input checked="" type="checkbox"/> Other documents, including any validation protocol used in the validation <input type="checkbox"/> Validation Report (Validation Report No. 324115098, <i>rev 03</i>), including a validation protocol, an information reference list and a list of persons interviewed by DOE validation team during the validation process. <input type="checkbox"/> Information on when and how the above validation report is made publicly available. <input type="checkbox"/> Banking information on the payment of the non-reimbursable registration fee <input type="checkbox"/> A statement signed by all project participants stipulating the modalities of communicating with the Executive Board and the secretariat in particular with regard to instructions regarding allocations of CERs at issuance	

Executive Summary and Introduction, including

- **Description of the proposed CDM project activity**
- **Scope of validation process (include all documentation that has been reviewed and name persons that have been interviewed as part of the validation, as applicable)**
- **DOE Validation team (list of all persons involved in the validation, describing functions assumed in the validation)**

This project activity consists of increasing efficiency in the bagasse (a renewable fuel source, residue from sugarcane processing) cogeneration facility at **Companhia Açucareira Vale do Rosário** (VR), a Brazilian sugar mill. With the implementation of this project, the mill has been able to sell electricity to the national grid, avoiding that fossil-fuelled thermal plants dispatch the same amount of energy to that grid. By that, the initiative avoids CO₂ emissions, also contributing to the regional and national sustainable development.

By investing to increase steam efficiency in the sugar and alcohol production and also increasing the efficiency in the steam production with more efficient boilers, VR generates surplus steam for using it exclusively on electricity production in its power-house, which also required buying turbo-generators.

The municipality where the project is located is Morro Agudo; it is in the northeast of the State of São Paulo, about 340 kilometers (km) far from the state capital, São Paulo, in the agricultural region of Orlândia. The region holds an ample availability of manpower, and communication and transport infrastructures, and can be accessed through a direct highway from São Paulo, "Rodovia Anhangüera" (SP-330).

The technology in that project for generating megawatt (MW) levels of electricity from biomass is the steam-Rankine cycle, which consists of direct combustion of biomass in a boiler to raise steam, which is then expanded through a turbine. Such combined heat and power (CHP), or cogeneration, systems provide greater levels of energy services per unit of biomass consumed than systems that generate power only.

Using steam-rankine cycle as the basic technology of its cogeneration system, for achieving an increasing amount of surplus electricity to be generated, VR began its energy improvements in four phases, which are:

- **Phase 1 (1990-1994):** involved installation of higher-efficiency steam turbines and a ten-year contract with then state-owned utility, *Companhia Paulista de Força e Luz* (CPFL), to sell 4 MW to the utility's grid.
- **Phase 2 (1995- 1997):** involved acquisition of two new boilers and a 12 MW turbo-generator. Another ten-year contract with CPFL was signed then, in order to sell 15 MW of installed capacity to the utility's grid.
- **Phase 3 (2001):** involves acquisition of a 15 MW turbo-generator and another stand-by one 4 MW turbo-generator in order to increase the surplus electricity available for sale to the grid by 15 MW;
- **Phase 4 (2003):** as an expansion of the Phase 3 and operational in June 2003, it is based on increasing the pressure in the boiler, which increases the total surplus electric power generation capacity, allowing VR to sell an additional 35 MW energy to CPFL. This phase includes acquisition of one 65-bar boiler and two 25 MW turbo-generators, standing-by two 4 MW turbo-generators, and the enhancement of the energy hub from 138 kV to 42 MVA.

In spite of being unilaterally funded, technology transfer was applied in VRBC project activity, as the steam turbines are Swedish, manufactured by ABB. The boiler technology is domestic (Brazilian), as is much of the small equipment installed to work with the turbine.

Further technical assistance has been incorporated into this CDM project by the Swedish Energy

Agency.

The validation scope 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. TÜV SÜD has, based on the recommendations in the Validation and Verification Manual employed a risk-based approach in the validation, focusing on the identification of significant risks for project implementation and the generation of CERs.

All documentation that has been reviewed and name of persons that have been interviewed as part of the validation are listed in Appendix B to the validation report (Validation Report No. 324115098, *rev 03*).

According to these requirements TÜV SÜD has composed a project team in accordance with the appointment rules of the TÜV certification body "climate and energy":

The validation team was consisting of the following three experts:

Mr. Werner Betzenbichler	(project manager, GhG auditor)	TÜV SÜD
Mr. Markus Knödseder	(GHG auditor)	TÜV SÜD
Mr. Wilson Tomao	(local expert, ISO1400 auditor)	TÜV Bayern Brazil

Mr. Werner Betzenbichler is head of the "Certification Body for Climate and Energy" and expert for conventional energy generation, renewable energy, energy expansion planning and familiar with the recent version of CDM and JI criteria as necessary for the implementation of Art. 6 and Art. 12 of the KP. Since 2000 he has been working in the international climate change and emission trading business as a verifier. He was strong involved in the development of the Validation and Verification Manuals (VVM).

Markus Knödseder: After his professional training as chemical assistance Mr. Knödseder studied environmental engineer at the University of Applied Science in Bingen, Germany. Beside his main focus in studies of environmental technologies, he dealt with environmental management and environmental controlling issues. He has been a staff at the department "Carbon Management Service" located in the head office of TÜV Industrie Service GmbH, TÜV SÜD Group in Munich since Oct. 2001. He has been involved in the topic of environmental auditing, baselining, monitoring and verification due to the requirements of the Kyoto Protocol with special focus on renewable energies. Mr. Knödseder is also an auditor for environmental management systems (ISO 14.000).

Mr. Wilson Tomao is lead auditor and former manager of TÜV Bayern Brazil. He is familiar with local laws and regulations and the assessment of technical installations. He assisted Mr. Betzenbichler during the on-site inspections and by evaluating documents submitting in Portuguese language. Meanwhile he can refer to the participation in the validation process of more than 15 CDM-projects in Brazil.

The audit team covers the above mentioned requirements as follows:

- Knowledge of Kyoto Protocol and the Marrakech Accords (Betzenbichler/Knödseder)
- Environmental and Social Impact Assessment (Betzenbichler/ Tomao)
- Skills in environmental auditing (Betzenbichler/ Tomao)
- Quality assurance (Betzenbichler/ Tomao)
- Technical aspects (Betzenbichler/Knödseder)
- Monitoring concepts (Betzenbichler/Knödseder)
- Political, economical and technical random conditions in host country (Tomao)

In order to have an internal quality control of the project, a team of the following persons has been composed by the certification body “climate and energy”:

- Michael Rumberg (deputy head of certification body “climate and energy”)

For further details, please, refer to the “Introduction” section of the validation report (Validation *Validation Report No. 324115098*, rev 03).

Description of methodology for carrying out validation

- **Review of CDM-PDD and additional documentation attached to it**
- **Assessment against CDM requirements (e.g. by use of a validation protocol)**
- **Report of findings by the DOE, e.g. by use of type of findings (e.g. corrective action requests, clarifications or observations). Please explain the way findings are “labelled” during validation.**
- **Include statements or assessments in the section “Conclusions, final comments and validation opinion” below.**

The validation of the project consists of the following three phases:

- Desk review
- Follow-up interviews
- Resolution of clarification and corrective action requests

The audit team has been provided with an early draft PDD in 2001. Based on this documentation a document review and a fact finding mission in form of an on-site audit has taken place. Afterwards the client decided to revise the PDD several times according to established regulations an approved methodology the CARs and CRs indicated in the first audit process also has been taking into account new developments on the regulatory side (as for example the new PDD format); the changes are documented in the reference list, see bullet point 18), 19), and 21). The final PDD version was submitted for publishing in the global stakeholder process in December 2004. It serves as the basis for the assessment presented herewith. In August 2005 a revised final PDD has been submitted in which all open issues and clarification requests have been solved by the project developer by submitting additional or corrected information. That changes are not considered to be significant with respect to the qualification of the project as a CDM project based on the two main objectives of the CDM to achieve a reduction of anthropogenic GHG emissions by sources and to contribute to sustainable development. Hence no repetition of the public stakeholder process has taken place.

In order to ensure transparency, a validation protocol was customised for the project, according to the Validation and Verification Manual. The protocol shows, in a transparent manner, criteria (requirements), means of verification and the results from validating the identified criteria. The validation protocol serves the following purposes:

- It organises, details and clarifies the requirements a CDM project is expected to meet;
- It ensures a transparent validation process where the validator will document how a particular requirement has been validated and the result of the validation.

Findings established during validation can either be seen as non fulfilment of validation criteria or where a risk to the fulfilment of the project objectives is identified. Such findings are termed Corrective Action Requests. The term “Clarification Request” is used when the validation team has identified a need for further clarification.

The Corrective Action Requests and Clarification Requests raised by TÜV SÜD were resolved during communications between the client and TÜV SÜD. To guarantee the transparency of the

validation process, the concerns raised and responses that have been given are summarised in chapter 3 of the validation report (324115098, *rev 03*) and documented in more detail in the validation protocol in Appendix A to the report. The validation of the project resulted in two Corrective Action Requests and one Clarification Request. For further details, please, refer to the “Methodology” section of the validation report (Validation Report No. 324115098, *rev 03*).

Explanation by the submitting designated operational entity of how it has taken due account of comments on validation requirements received, in accordance with the CDM modalities and procedures, from Parties, stakeholders and UNFCCC accredited non-governmental organizations;

- **Description of how and when the PDD was made publicly available**
- **Description of how comments were received and made publicly available**
- **Explanation of how due account has been taken of comments received**
- **Compilation of all comments received (Identify the submitter)**

TÜV SÜD published the project documents on UNFCCC website and on its own website from **27th of December 2004** for 30 days and invited comments by Parties, stakeholders and non-governmental organisations. No comments were received.

Conclusions, final comments and validation opinion


- **Provide conclusions on each requirement under paragraph 37 of the CDM modalities and procedures, describing how these requirements have been met. This shall include assessments and findings (e.g. corrective action requests, clarifications or observations) in relation to each requirement, including a confirmation that all issues raised have been addressed to the satisfaction of the DOE.**
- **Final comments and validation opinion**

TÜV SÜD has performed a validation of the Validation of the Vale do Rosário Bagasse Cogeneration, Brazil. The validation was performed on the basis of UNFCCC criteria and host country criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting. UNFCCC criteria refer to Article 12 of the Kyoto Protocol, the CDM modalities and procedures and subsequent decisions by the CDM Executive Board.

The review of the project design documentation and the subsequent follow-up interviews have provided TÜV SÜD with sufficient evidence to determine the fulfilment of stated criteria. In our opinion, the project meets all relevant UNFCCC requirements for the CDM under the condition that a written Letter of Approval will be issued by the Brazilian DNA. By the time we will receive the LoA TÜV SÜD will recommend the project for registration by the CDM Executive Board.

By displacing fossil fuel-based electricity in principal with electricity generated from a renewable source, the project results in reductions of CO₂ emissions that are real, measurable and give long-term benefits to the mitigation of climate change. An analysis of the investment and technological barriers demonstrates that the proposed project activity is not a likely baseline scenario. Emission reductions attributable to the project are hence additional to any that would occur in the absence of the project activity. Given that the project is implemented as designed, the project is likely to achieve the estimated amount of emission reductions.

Additionally the assessment team reviewed the estimation of the projected emission reductions. We can confirm that the indicated amount of emission reductions of **164.577 tonnes CO_{2e}** over a crediting period of seven years, resulting in a calculated annual average of 23,511 tonnes CO_{2e}, represent a reasonable estimation using the assumptions given by the project documents.

<p>The validation is based on the information made available to us and the engagement conditions detailed in this 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 registration process as part of the CDM project cycle. Hence, TÜV SÜD 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.</p>		
<p>The DOE declares herewith that in undertaking the validation of this proposed CDM project activity it has no financial interest related to the proposed CDM project activity and that undertaking such a validation does not constitute a conflict of interest which is incompatible with the role of a DOE under the CDM.</p>		
By submitting this validation report, the DOE confirms that all validation requirements are met.		
Name of authorized officer signing for the DOE	Markus Knödlseider	
Date and signature for the DOE	25/08/2005	
Section below to be filled by UNFCCC secretariat		
Date when the form is received at UNFCCC secretariat		
Date at which the registration fee has been received		
Date at which registration shall be deemed final		
Date of request for review, if applicable		
Date and number of registration	Date	Number