



Industrie Service

Validation Report

Usina Cerradinho Açúcar e Alcool S/A

**Validation of the
Cerradinho Bagasse Cogeneration Project
(CBCP)**

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Report Title:		Cerradinho Bagasse Cogeneration Project (CBCP)		
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Summary: <p>The Certification Body "Climate and Energy" has been ordered by Usina Cerradinho Açúcar e Álcool S/A (Cerrandinho) to perform a validation of the above mentioned project.</p> <p>Using a risk based approach the validation of this project has been performed by document reviews and on-site inspection, audits at the locations of the project and interviews at the offices of the project developer and the project owner.</p> <p>In summary, it is TÜV SÜD´s opinion that the "Cerradinho Bagasse Cogeneration Project (CBCP)", as described in the revised project design document of September 2005, meets all relevant UNFCCC requirements for the CDM, set by the Kyoto Protocol, the Marrakech Accords and relevant guidance by the CDM Executive Board and that the project furthermore meets all relevant host country criteria and correctly applies the baseline and monitoring methodology AM0015</p> <p>Hence, TÜV SÜD will recommend the CBCP for registration as CDM project activity by the CDM Executive Board.</p> <p>Prior to the submission of this validation report to the CDM Executive Board, TÜV SÜD will have to receive the written approval of the DNA of involved parties, including confirmation by the DNA of Brazil that the project assists in achieving sustainable development.</p> <p>Additionally the assessment team reviewed the estimation of the projected emission reductions. We can confirm that the indicated amount of emission reductions of 226,204 tonnes CO_{2e} over a crediting period of seven years, resulting in a calculated annual average of 32,315 tonnes CO_{2e}, represent a reasonable estimation using the assumptions given by the project documents.</p>				
Work carried out by:		Werner Betzenbichler (project manager, ghg lead auditor) Wilson Tomao (ghg auditor, local auditor) Markus Knödseder (ghg auditor)		Internal Quality Control by: Michael Rumberg



Abbreviations

AE	Applicant Operational Entity
CAR	Corrective Action Request
CBCP	Cerradinho Bagasse Cogeneration Project
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
Cerradinho	Usina Cerradinho Açúcar e Álcool S/A
CR	Clarification Request
DNA	Designated National Authority
DOE	Designated Operational Entity
EB	Executive Board
EIA / EA	Environmental Impact Assessment / Environmental Assessment
ER	Emission reduction
GHG	Greenhouse gas(es)
KP	Kyoto Protocol
MP	Monitoring Plan
NGO	Non Governmental Organisation
PDD	Project Design Document
PPA	Power purchase agreement
TÜV SÜD	TÜV Industrie Service GmbH TÜV SÜD Group
UNFCCC	United Nations Framework Convention on Climate Change
VVM	Validation and Verification Manual



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1 INTRODUCTION

1.1 Objective

The Certification Body "Climate and Energy" has been ordered by Usina Cerradinho Açúcar e Álcool S/A (Cerradinho) to perform a validation of the Validation of the Cerradinho Bagasse Cogeneration Project (CBCP). The validation serves as design verification and is a requirement of all CDM projects. The purpose of a validation is to have an independent third party assess the project design. In particular, the project's baseline, the monitoring plan (MP), and the project's compliance with relevant UNFCCC and host country criteria are validated in order to confirm that the project design as documented is sound and reasonable and meets the stated requirements and identified criteria. Validation is a requirement for all CDM projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of certified emission reductions (CERs).

UNFCCC criteria refer to the Kyoto Protocol criteria and the CDM rules and modalities as agreed in the Bonn Agreement and the Marrakech Accords.

1.2 Scope

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.

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.

The audit team has been provided with an early draft PDD in 2002. 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 according to established regulations, an approved methodology and the CARs and CRs indicated in the first audit process also has taken into account new developments on the regulatory side (as for example the new PDD format). That revised PDD version was submitted for publishing in the global stakeholder process in February 2005. It serves as the basis for the assessment presented herewith. In September 2005 a revised final PDD has been submitted in which the 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.

Studying the existing documentation belonging to this project, it was obvious that the competence and capability of the validation team has to cover at least the following aspects:

- Knowledge of Kyoto Protocol and the Marrakech Accords
- Environmental and Social Impact Assessment
- Skills in environmental auditing (ISO 14000, EMAS)
- Quality assurance

- Technical aspects of cogeneration and the use of biomass
- Monitoring concepts
- Political, economical and technical random conditions in host country

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 two experts:

Mr. Werner Betzenbichler	(project manager, GhG lead auditor)	TÜV SÜD
Mr. Markus Knödlseider	(GHG auditor)	TÜV SÜD
Mr. Wilson Tomao	(local expert, ghg auditor)	

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 Knödlseider: After his professional training as chemical assistance Mr. Knödlseider 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. Knödlseider is also an auditor for environmental management systems (ISO 14.000). He interviewed the national Brazilian dispatcher Operação Nacional do Sistema (ONS) about the Brazilian grid.

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/Knödlseider)
- Environmental and Social Impact Assessment (Betzenbichler/ Tomao)
- Skills in environmental auditing (Betzenbichler/ Tomao)
- Quality assurance (Betzenbichler/ Tomao)
- Technical aspects (Betzenbichler/Knödlseider)
- Monitoring concepts (Betzenbichler/Knödlseider)
- 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”)

1.3 GHG Project Description

This project activity consists of increasing the efficiency in the bagasse (a renewable fuel source, residue from sugarcane processing) cogeneration facility at **Cerradinho**, a Brazilian sugar mill. With the implementation of this project, the mill is able to sell electricity to the national grid, avoiding the dispatch of same amount of energy produced by fossil-fuelled thermal plants to that grid. By that, the initiative avoids CO₂ emissions and contributes to the regional and national sustainable development.

By investing to increase in steam efficiency in the sugar and alcohol production and increase in the efficiency of burning the bagasse (more efficient boilers), Cerradinho generates surplus steam and uses it exclusively for electricity production (through turbo-generators).

Using steam-Rankine cycle as the basic technology of its cogeneration system, for achieving an increasing amount of surplus electricity to be generated, Cerradinho began its efforts in two phases, which are:

Phase 1 (2002): Installation of a high efficiency 62 kgf/cm² pressure boiler providing 150 ton of steam per hour at 450 °C therefore consuming less bagasse per ton of steam generated. Installed also a new backpressure 25 MW turbo-generator; CBCP built up also a new powerhouse, a sub-station and a transmission line, increasing the efficiency to exploit biomass energy significantly. A 1,2MW turbo-generator was deactivated when 2002's harvest season ends.

For this first phase there is an intention to annually supply the grid with renewable energy around the amount of 52,000MWh during the harvest season of 2003/2004. For the local utility company it is an advantage to buy energy produced by a sugar mill, as the base load for the utilities in Brazil is supported mainly through hydro generation, and the sugarcane crop season is during the dry period. Eletropaulo is the utility that has signed a ten years contract with Cerradinho.

Phase 2 (2006): By the year 2006, the CBCP is considering to continue the investment from the year 2002, to reach a higher installed capacity and efficiency for exploiting biomass through the acquisition of an additional 30MW condensing type, with steam extraction (21kgf/cm²), turbo generator and another 62 kgf/cm² pressure boiler, operating at 480°C producing 200 tons of steam per hour.

The two old boilers that operate at 21 kgf/cm² are going to be deactivated and the 4MW generator that was installed before Phase 1 will be put into standby position.

Table 1 shows project activity implementation schedule for bagasse cogeneration project.



	Active / Activating			Stand by / Deactivated	
Before the Expansion Plan 2001	One 1,2 MW backpressure turbo generator	One 4 MW backpressure turbo generator			
	Two 21 kgf/cm ² pressure boilers				
Phase 1 2002	One 25 MW backpressure turbo generator	One 4 MW backpressure turbo generator		One 1,2 MW backpressure turbo generator	
	One 62 kgf/cm ² pressure boiler	Two 21 kgf/cm ² pressure boilers			
Phase 2 2006	One 30 MW condensing type turbo generator	One 25 MW backpressure turbo generator		One 4 MW backpressure turbo generator	One 1,2 MW backpressure turbo generator
	One 62 kgf/cm ² pressure boiler	One 62 kgf/cm ² pressure boiler		Two 21 kgf/cm ² pressure boilers	

Table 1: Project activity implementation schedule

Sectorial Scope: 1-Energy industries (renewable - / non-renewable sources)

The project is located in the municipality of Catanduva is located in northeastern State of São Paulo, about 378 kilometers (km) far from the state capital, São Paulo, in the agricultural region of Catanduva.

Project participants are:

- Usina Cerradinho Açúcar e Alcool S/A (Cerradinho), a Brazilian private company.
- Econergy Brasil Ltda., a Brazilian private company

2 METHODOLOGY

The project assessment aims at being a risk based approach and is based on the methodology developed in the Validation and Verification Manual (for further information see www.vvmanual.info), an initiative of all Applicant Entities, which aims to harmonize the approach and quality of all such assessments.

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.

The validation protocol consists of three tables. The different columns in these tables are described in Figure 1.

The completed validation protocol is enclosed in Appendix A to this report.



Validation Protocol Table 1: Mandatory Requirements			
Requirement	Reference	Conclusion	Cross reference
<i>The requirements the project must meet.</i>	<i>Gives reference to the legislation or agreement where the requirement is found.</i>	<i>This is either acceptable based on evidence provided (OK), or a Corrective Action Request (CAR) of risk or non-compliance with stated requirements. The corrective action requests are numbered and presented to the client in the Validation report.</i>	<i>Used to refer to the relevant checklist questions in Table 2 to show how the specific requirement is validated. This is to ensure a transparent Validation process.</i>

Validation Protocol Table 2: Requirement checklist				
Checklist Question	Reference	Means of verification (MoV)	Comment	Draft and/or Final Conclusion
<i>The various requirements in Table 1 are linked to checklist questions the project should meet. The checklist is organised in seven different sections. Each section is then further sub-divided. The lowest level constitutes a checklist question.</i>	<i>Gives reference to documents where the answer to the checklist question or item is found.</i>	<i>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.</i>	<i>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.</i>	<i>This is either acceptable based on evidence provided (OK), or a Corrective Action Request (CAR) due to non-compliance with the checklist question (See below). Clarification is used when the validation team has identified a need for further clarification.</i>

Validation Protocol Table 3: Resolution of Corrective Action and Clarification Requests			
Draft report clarifications and corrective action requests	Ref. to checklist question in table 2	Summary of project owner response	Validation conclusion
<i>If the conclusions from the draft Validation are either a Corrective Action Request or a Clarification Request, these should be listed in this section.</i>	<i>Reference to the checklist question number in Table 2 where the Corrective Action Request or Clarification Request is explained.</i>	<i>The responses given by the Client or other project participants during the communications with the validation team should be summarised in this section.</i>	<i>This section should summarise the validation team's responses and final conclusions. The conclusions should also be included in Table 2, under "Final Conclusion".</i>

Figure 1 Validation Protocol Tables

2.1 Review of Documents

The project design document submitted by the client and additional background documents related to the project design and baseline were reviewed. A complete list of all documents reviewed is attached as Appendix B to this report.

2.2 Follow-up Interviews

In the period of Feb 17th 2003 – May 30th, 2005, TÜV SÜD performed interviews with project stakeholders to confirm selected information and to resolve issues identified in the first document review. Representatives of

- Cerradinho, State of Sao Paulo, Brazil, on Feb. 19th, 2003
- Econergy International Corporation in Sao Paulo, State of Sao Paulo, Brazil, on Feb. 17th 2003
- Operação Nacional do Sistema (ONS), the national dispatcher of Brazilian grid in Brasilia, State of Brasilia, Brazil, on 30th May 2005

were interviewed. The main topics of the interviews are summarised in Table 1.

Table 1 Interview topics

Interviewed organisation	Interview topics
Cerradinho	<ul style="list-style-type: none"> ▪ Project design ▪ Technical equipment ▪ Sustainable development issues ▪ Additionality ▪ Crediting period ▪ Monitoring plan ▪ Management system ▪ Environmental impacts ▪ Stakeholder process ▪ Approval by the host country
Econergy International Corporation	<ul style="list-style-type: none"> ▪ Project design ▪ Technical equipment ▪ Sustainable development issues ▪ Baseline determination ▪ Additionality ▪ Crediting period ▪ Monitoring plan ▪ Environmental impacts ▪ Stakeholder process



Operação Nacional do Sistema (ONS)	<ul style="list-style-type: none">▪ Operation of Brazilian grid▪ Objectives and responsibility of ONS▪ Availability of data and their reliability
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2.3 Resolution of Clarification and Corrective Action Requests

The objective of this phase of the validation was to resolve the requests for corrective actions and clarification and any other outstanding issues which needed to be clarified for TÜV SÜD's positive conclusion on the project design. The Corrective Action Requests and Clarification Requests raised by TÜV SÜD were resolved during communication 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 below and documented in more detail in the validation protocol in Appendix A.

3 VALIDATION FINDINGS

In the following sections the findings of the validation are stated. The validation findings for each validation subject are presented as follows:

- 1) The findings from the desk review of the final project design document and the findings from interviews during the follow up visit are summarised. A more detailed record of these findings can be found in the Validation Protocol in annex 1.
- 2) Where TÜV SÜD had identified issues that needed clarification or that represented a risk to the fulfilment of the project objectives, a Clarification or Corrective Action Request, respectively, have been issued. The Clarification and Corrective Action Requests are stated, where applicable, in the following sections and are further documented in the Validation Protocol in annex 1. The validation of the project resulted in three Corrective Action Requests and one Clarification Request.
- 3) Where Clarification or Corrective Action Requests have been issued, the exchanges between the Client and TÜV SÜD to resolve these Clarification or Corrective Action Requests are summarised.
- 4) The final conclusions for validation subject are presented.

The validation findings relate to the project design as documented and described in the final project design documentation.

3.1 Project Design

3.1.1 Discussion

As mentioned above the purpose of the project is to avoid CO₂ emissions from fossil power plants by increasing the efficiency of the existing renewable energy generation. The surplus of electricity being generated by an installed CHP plant is fed into the grid. The whole energy generation is based on renewable biomass, here bagasse from the sugar cane process. Hence, the project contributes to the sustainable development in Brazil, reducing GHG emissions, substituting electricity generated by grid plants through electricity generated from biomass (renewable energy). The project also contributes to the sustainable development by generating new jobs.

The design engineering does reflect current good practices. The design has been professionally developed. Subsequently the project got approval by the relevant authorities. The project itself does apply state of the art equipment. Regarding the employed technology, there is no requirement to change the existing technology as a result of running out of life-time of the existing technical equipment. There are no significant indications that the technology used to implement the project could be substituted during the envisaged operational lifetime of the project activity (25 years) and in particular in the first crediting period.

The first crediting period is 20/05/2001 – 19/05/2008, with the intention for renewal.

The project is in line with relevant legislation of the Brazil. According to the publicly available document renewable energy projects belong to the favoured options under the CDM. Hence, the project can currently be seen as being in line with the host country specific requirements for CDM.

The funding for the project does not lead to a diversion of official development assistance as according to the information obtained by the audit team ODA does not contribute to the financing of the project.

The starting date as well as the operational lifetime are clearly defined and also handled in a reasonable manner. The first crediting period is with 7 years clearly defined.

Moreover it is assured that as the start of the crediting period is before the registration of the project that the project activities starting date falls in the period between 1 January 2000 and the registration of the first clean development mechanism project.

3.1.2 Findings

Outstanding issue:

The project has not obtained a Letter of Approval/ Letter of Authorization from the Brazilian government so far. No documentation has been submitted to the validation team. The issuance of these documents will also demonstrate whether the project is in line with sustainable development policies of the host country

Response:

The response will be given by the issuance of the Letter of Approval. This has not happened so far as the approval of the project depends on the review of the validation report which has to be submitted in advance.

3.1.3 Conclusion

Prior to the submission of this validation report to the CDM Executive Board, TÜV SÜD will have to receive the written approval of the DNA of involved parties, including confirmation by the DNA of Brazil that the project assists in achieving sustainable development.

3.2 Baseline and Additionality

3.2.1 Discussion

By dispatching renewable electricity to a grid, electricity that would otherwise be produced using fossil fuel is displaced. This electricity displacement will occur in the system's margin, i.e. this CDM project will displace electricity that is produced by marginal, which have higher electricity dispatching costs and are solicited only over the hours that base load sources (low-cost or must-run sources) cannot supply the grid.

According to the applied and approved methodology AM0015 the project activity follows the steps provided by the methodology taking into account the (b) Simple Adjusted OM calculation for the STEP 1, since there would be no available data for applying to the preferred option – (c) *Dispatch Data Analysis OM*. For STEP 2, the option 1 was chosen.

The physical boundary is the Brazilian grid south-southeast-midwest, controlled by ONS.

The application of the Additionality Tool the project can be confirmed as additional. The economic unattractiveness of enhancing the already existing cogeneration process is indicating the additionality of this project, because the improved operation of the energy processes is not considered as necessary for the operation of Nova America. The project baseline is clearly, retractably and plausibly displayed in the project BLS. Possible project alternatives are discussed,

3.2.2 Findings

Corrective Action Request No 1:

The application of the methodology and the discussion and determination of the chosen baseline is transparent, but not correct. Used data for calculating the emission factors from the OECD study are not are not eligible, as they are too old. Updated data should be applied. If data from ONS will be

used for calculation of new emission factor, the special circumstances and weakness of that approach shall be pointed out.

Response:

Revised PDD and revised baseline calculations were submitted.

Clarification Request No. 1:

In case that an increase of bagasse production was envisaged, the project owner shall demonstrate that the old baseline plant had been able to supply the increased energy demand.

Response:

Reliable and plausible statement of the facility manager confirms that there an increase bagasse production is not envisaged.

3.2.3 Conclusion

The revised baseline calculation is based on latest available data and in line with calculation method of applied and approved Methodology AM0015. Delivered information can be confirmed. However the baseline calculations have according to available data some weaknesses:

- i. The ONS grid includes only 76% of installed capacity and 20% of installed power plants,
- ii. ONS dispatch only power plant bigger than 30 MWel,
- iii. ONS has no control over sub grids below 138 kV.

In spite of those weaknesses the validation team confirms that the chosen baseline determination is transparent and according to approved methodology against the background of available data. Those special circumstances of the project boundary are also described in the final PDD version, which is the base for that conclusion.

The projects baseline and additionality is in line with appropriate requirements.

3.3 Monitoring Plan

3.3.1 Discussion

The monitoring plan is appropriate, traceable and transparent. The generated electricity that is fed into the grid in order to estimate emissions within the project boundary can be measured simply and with an appropriate accuracy. According to the interview with ONS needed data for calculating the combined margin will be made available to the project developer.

As the project is already in operation it can be confirmed that monthly and annual reporting of the collected data at the several monitoring points is working, the responsibilities for registration, monitoring, measurement and reporting are established.

Uncertainty and possibility of monitoring errors are addressed and discussed plausible in the project documents.

3.3.2 Findings

Corrective Action Request No 2:

The stated crediting period (7y-0m) and the prospected emission reductions (table chapter E.6.) do not coincide. The PDD has to be adjusted.

Response: Submission of revised PDD.

Corrective Action Request No 3

According to the 20th EB meeting, the board decided that emission factors have to be adjusted ex-post each year. That is not considered in the Monitoring Plan and tables in chapter D.2.1.3. of the PDD. It has to be adjusted.

Response: Submission of revised PDD.

3.3.3 Conclusion

The validation team confirms the monitoring plan; the projects monitoring plan is in line with approved methodology AM0015.

3.4 Calculation of GHG Emissions

3.4.1 Discussion

The calculation follows the approach of the approved methodology AM0015, using the simple adjusted operational margin in order to calculate the combined margin as a fifty-fifty mix of operational and build margin.

The amount of prospective generated electricity is multiplied with this combined margin in order to calculate the emission reduction in the grid.

The data sources are reliable and the approach of calculating the operational and the build margin is traceable and correct against the background of available data and chosen project boundary.

3.4.2 Findings

None

3.4.3 Conclusion

The project will result in a reduction of GHGs. The calculated estimation of prospective emission reductions, stated with **226,204** tonnes CO₂ totally within the crediting period of seven years seems to be realistic.

3.5 Environmental Impacts

3.5.1 Discussion

An Environmental Impact assessment has to be submitted to the responsible national authorities.

A RAP ("Preliminary Environmental Report") was submitted to the relevant authority (SMA - State Secretary of Environment and CETESB). The RAP was approved by CETESB and an Installation License has been awarded.

3.5.2 Findings

None

3.5.3 Conclusion

The project is in line with national and regional law. No negative environmental effects are to be expected, environmental impacts are sufficiently documented. The project fulfils the requirements of the UNFCCC.

3.6 Comments by Local Stakeholders

3.6.1 Discussion

A local stakeholder process was performed in order to inform about project activity. According to the requirements of the Brazilian DNA the stakeholder were invited to comment the project.

3.6.2 Findings

None

3.6.3 Conclusion

Cerradinho did not receive any comments on the project.

4 COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

TÜV SÜD published the project documents on UNFCCC website and on its own website (<http://www.netinform.de>). The PDD was open for commenting from 17th of February 2005 for 30 days.

One comment was received.

4.1 Content of the comments received

A comment has been submitted on 24.02.2005 by Axel Michaelowa, Hamburger Welt-Wirtschafts-Archiv (HWWA). HWWA is an accredited observer organisation to the United Nations Framework Convention on Climate Change Conference of the Parties.

The comment has the following content:

“The baseline emission factors are from an outdated (three-year old) IEA study and should be updated with more recent data.”

4.2 Response by TÜV SÜD

The comment has been submitted during the 30 days stakeholder period and is submitted by an accredited observer organisation. Hence the comment had to be considered in the validation process.

TÜV SÜD has included the aspects addressed by the comment in the discussions with the project developer (see Corrective Action Request No. 3 in chapter 3.2.2). The project developer investigated a new data base for calculating a most recent grid factor. The data base is provided by the national dispatch centre and the Brazilian Ministry of Energy and Mining.

Due to the rejection of the old data base and the development of a new reliable data base by the project developer the validation team regards as the comment sufficiently considered in its opinion.

5 VALIDATION OPINION

TÜV SÜD has performed the Validation of the Cerradinho Bagasse Cogeneration Project, 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.

In summary, it is TÜV SÜD's opinion that CBCP, as described in the revised project design document of September 2005, meets all relevant UNFCCC requirements for the CDM, set by the Kyoto Protocol, the Marrakech Accords and relevant guidance by the CDM Executive Board and that the project furthermore meets all relevant host country criteria and correctly applies the baseline and monitoring methodology AM0015.

Hence, TÜV SÜD will recommend the CBCP for registration as CDM project activity by the CDM Executive Board.

Prior to the submission of this validation report to the CDM Executive Board, TÜV SÜD will have to receive the written approval of the DNA of involved parties, including confirmation by the DNA of Brazil that the project assists in achieving sustainable development.


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 **226,204** tonnes CO_{2e} over a crediting period of seven years, resulting in a calculated annual average of 32,315 tonnes CO_{2e}, represent a reasonable estimation using the assumptions given by the project documents.

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.

Munich, 14/09/2005

Munich, 14/09/2005



Michael Rumberg
Deputy of certification body
"climate and energy"

Werner Betzenbichler
Project Manager

Appendix A: Validation Protocol

Appendix B: Information Reference List