

Choose certainty. Add value.

Validation Report

AGCERT INTERNATIONAL LIMITED, IRELAND

Validation of the AWMS Methane Recovery Project BR06- S -28, Santa Catarina, Brazil

Report No.869372, rev. 0

January 08, 2007

TÜV SÜD Industrie Service GmbH Carbon Management Service Westendstr. 199 - 80686 Munich – GERMANY Document: Validation Report BR 06-S-28_06022007.doc Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.



Page 1 of 17

Report No.	Date of first issue	Revision No.	Date of this revision	Certificate No.		
869372	January 08, 2007.	0				
Subject:		Validation of a	Validation of a CDM Project			
Executing Operational Unit:		TÜV SÜD Industrie Service GmbH Carbon Management Service Westendstr. 199 - 80686 Munich Federal Republic of Germany				
Contact:		www.tuev-sued.de				
Client:		AgCert International PLC, Ireland Sandyford Business Park The Apex Building Dublin 18, Ireland				
Contract approved by:		Werner Betzenbichler				
Report Title:		Validation of the AWMS Methane Recovery Project BR06-S– 28, Santa Catarina, Brazil				
Number of pages		17 (excluding annexes and cover page)				

Summary:

The Certification Body "Climate and Energy" has been ordered by AgCert International LLC, Ireland (AgCert International) to perform a validation of the above mentioned project.

In summary, it is TÜV SÜD's opinion that the project "AWMS Methane Recovery Project BR06-S– 28, Santa Catarina, Brazil", as described in the revised project design document of January 30, 2007 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 Type III, Other Project Activities, Category III.D., Methane Recovery, version 11 for small-scale projects.

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

Additionally the assessment team reviewed the estimation of the projected emission reductions. TÜD SÜD confirms that the indicated amount of emission reductions of 29,594 tonnes CO_{2e} over a crediting period of seven years, resulting in a calculated annual average of 4,228 tonnes CO_{2e} represents a reasonable estimation using the assumptions given by the project documents.

Document: Validation Report BR 06-S-28_06022007.doc Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil. Page 2 of 17



Abbreviations

AgCert Brazil	AgCert Do Brasil Solucoes Ambientais Ltda.
AgCert International	AgCert International PLC, Ireland
AWMS	Animal Waste Management Systems
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CR	Clarification Request
DOE	Designated Operational Entity
EIA / EA	Environmental Impact Assessment / Environmental Assessment
ER	Emission reduction
GHG	Greenhouse gas(es)
KP	Kyoto Protocol
MP	Monitoring Plan
PDD	Project Design Document
SSC	Small Scale Project
TÜV SÜD	TÜV SÜD Industrie Service GmbH
UNFCCC	United Nations Framework Convention on Climate Change
VVM	Validation and Verification Manual



Table of Contents

Page

1	INTRODUCTION	4
1.1	Objective	4
1.2	Scope	4
1.3	GHG Project Description	5
2	METHODOLOGY	6
2.1	Review of Documents	7
2.2	Follow-up Interviews	7
2.3	Resolution of Clarification and Corrective Action Requests	8
3	VALIDATION FINDINGS	9
3.1	General Description of Project Activity	9
3.2	Baseline Methodology	112
3.3	Duration of the Project / Crediting Period	124
3.4	Monitoring Plan	134
3.5	Calculation of GHG Emissions by Source	16
3.6	Environmental Impacts	17
3.7	Comments by Local Stakeholders	18
4	COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS	19
5	VALIDATION OPINION	170

Annex 1: Validation Protocol

Annex 2: Information Reference List

Page 4 of 17



1 INTRODUCTION

1.1 Objective

AgCert International PLC, Ireland (AgCert International) has commissioned TÜV Industrie Service GmbH TÜV SÜD Gruppe (TÜV SÜD) to validate the AWMS Methane Recovery Project BR06-S–28, Santa Catarina, Brazil. 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 of 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 audit team has been provided with the first PDD-version in August 2006. Based on this documentation a document review and a fact finding mission in form of an on site audit has taken place. The demanded additional information is addressed in annex 1. Requested information was given and the PDD was updated accordingly. That final PDD version 3 was submitted on 30 Jan. 2007 and serves as the basis for the final assessment presented herewith. The changes were not significant as only some information was added and adapted to the final PDD, thus the global stakeholder process was not repeated.

Studying the existing project documentation, 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
- Agricultural operations especially regarding manure management
- Technical aspects of gas flaring and bio digester operation
- Monitoring concepts
- Political, economical and technical random conditions in host country

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.



Page 5 of 17

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

Markus Knödlseder is an auditor for climate change projects and GHG emission inventories at the department "Carbon Management Service" in the head office of TÜV SÜD in Munich. He has been involved in the topic of environmental auditing, baselining, monitoring and verification due to the requirements of the Kyoto Protocol since Oct. 2001. His main focus lies on renewable energies.

Johann Thaler graduated as Master of environmental Economy at the University of Augsburg. During his study he got first experiences in environmental management systems. His master thesis was about a fuel switch program in Brazil as a CDM project. Based in Brazil he has been working for TÜV SÜD as a GHG auditor on freelance basis since March 2005.

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":

Werner Betzenbichler (Head of Certification Body, GHG lead auditor)

1.3 GHG Project Description

This project proposes to apply to multiple swine Confined Animal Feeding Operations (located in Santa Catarina, Brazil) a GHG mitigation methodology which is applicable to intensive livestock operations. The proposed project activities will mitigate AWMS GHG emissions in an economically sustainable manner, and will result in other environmental benefits, such as improved water quality and reduced odor. The project proposes to move the designated farms from a high-GHG AWMS practice; an open air lagoon, to a lower-GHG AWMS practice; an ambient temperature anaerobic digester with the capture and combustion of the resulting biogas. The concluding purpose of this project is to mitigate animal effluent related GHG by improving AWMS practices. In total 2 farms with 2 sites are contracted in the State of Santa Catarina, Brazil.

Project participant is AgCert Do Brasil Solucoes Ambientais Ltda. Host Party of the project activity is Brazil.

The category of the project activity is in Scope 13 - Waste Handling and Disposal, and Scope 10 – Agriculture. The approved and applied baseline and monitoring methodology is Type III, Other Project Activities, Category III.D Methane Recovery for small scale project activities, version 11. According to the PDD and involved parties the starting date of the project activity is 03/03/2005. The crediting period is committed as a 7 years renewable crediting period and it starts on 01/06/2007.

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.

Page 6 of 17



2 METHODOLOGY

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

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

In order to ensure transparency, a validation protocol was customized 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 organizes 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.

Validation Protocol Table 1: Mandatory Requirements			
Requirement	Reference	Conclusion	Cross reference
The requirements the project must meet.	Gives refer- ence to the legislation or agreement where the requirement is found.	This is either acceptable based on evidence provided (OK), or a Correc- tive Action Request (CAR) of risk or non-compliance with stated require- ments. The corrective action re- quests are numbered and presented to the client in the Validation report.	Used to refer to the relevant checklist questions in Table 2 to show how the specific requirement is vali- dated. This is to en- sure a transparent Validation process.

The completed validation protocol is enclosed in Annex 1 to this report.

Validation Protocol Table 2: Requirement checklist				
Checklist Question	Reference	Means of verifi- cation (MoV)	Comment	Draft and/or Final Conclusion
The various require- ments in Table 1 are linked to checklist questions the project should meet. The checklist is organised in seven different sec- tions. Each section is then further sub- divided. The lowest level constitutes a checklist question.	Gives refer- ence to documents where the answer to the checklist question or item is found.	Explains how con- formance with the checklist question is investigated. Ex- amples of means of verification are document review (DR) or interview (I). N/A means not applicable.	The section is used to elabo- rate and dis- cuss the checklist ques- tion and/or the conformance to the ques- tion. It is fur- ther used to explain the conclusions reached.	This is either accept- able based on evi- dence provided (OK), or a Corrective Action Request (CAR) due to non-compliance with the checklist question (See below). Clarifica- tion is used when the validation team has identified a need for further clarification.



Page 7 of 17

Validation Protocol Table 3: Resolution of Corrective Action and Clarification Requests			
Draft report clarifi- cations and correc- tive action requests	Ref. to checklist question in table 2	Summary of pro- ject owner re- sponse	Validation conclusion
If the conclusions from the draft Validation are either a Corrective Ac- tion Request or a Clari- fication Request, these should be listed in this section.	Reference to the checklist question number in Table 2 where the Corrective Action Request or Clarification Request is explained.	The responses given by the Client or other project participants during the communica- tions with the valida- tion team should be summarized in this section.	This section should sum- marize the validation team's responses and final conclusions. The conclu- sions should also be in- cluded in Table 2, under "Final Conclusion".

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. The audit team has been provided with the first PDD-version issued on August 19, 2006 which had been made public on <u>www.netinform.de</u>. The project design document was assessed by some revisions addressing changes to the baseline and monitoring methodology requested by the CDM Executive Board and clarification requests issued by TÜV SÜD. The final updated PDD version 3, issued on January 30, 2007 serves as the basis for the assessment presented herewith.

2.2 Follow-up Interviews

In November 2005 and September 2006, see ref. 2, TÜV SÜD performed interviews with project stakeholders to confirm selected information and to resolve issues identified in the document review. Representatives of the farms and AgCert Do Brasil Solucoes Ambientas Ltda were interviewed. The main topics of the interviews are summarized in Table 1.

Interviewed organization	Interview topics
Representatives of the	Project design
farms	Technical equipment
	Sustainable development issues
	Additionality
	Crediting period
	Monitoring plan
	Management system
	Environmental impacts
	Stakeholder process
AgCert Brasil	Project design

Table 1 Interview topics

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.





 Technical equipment
Sustainable development issues
Baseline determination
Additionality
Crediting period
Monitoring plan
Environmental impacts
Stakeholder process
 Approval by the host country

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 (CAR) and Clarification Requests (CR) 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 summarized in chapter 3 below and documented in more detail in the validation protocol in Annex 1.

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.



Page 9 of 17

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 project design documents and the findings from interviews during the follow up visit are summarized. 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 fulfil project objectives, a Clarification Request 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 eight Clarification Requests.
- 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 is summarized.
- 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 General Description of Project Activity

3.1.1 Discussion

The project participant is AgCert Do Brasil Solucoes Ambientais Ltda. The project is developed by AgCert International PLC, Ireland. Brazil as the host Party meets all relevant participation requirements.

The objective of the project "AWMS Methane Recovery Project BR06-S–28, Santa Catarina, Brazil" is to apply to the farm GHG mitigation measures which will mitigate GHG emissions in an economically sustainable manner. The project foresees to replace the open air lagoons by positive pressure covered lagoon cells, creating ambient temperature anaerobic digesters.

The project design does reflect current good practice. The design has been professionally developed. A validation of the compatibility of the single components carried out by the project developer resulted in a positive conclusion. The project does moreover apply state of the art equipment.

The project boundaries are clearly defined. The project bundles 2 farms with installations of digesters at 2 sites being contracted in the State of Santa Catarina, Brazil. During this assessment TÜV SÜD contacted and visited all 2 sites indicated on the Information Reference List. As the project participant is operating/developing several similar CDM projects in the same or neighboring region, the validation process has shown that no farm of this project is included in any other existing PDD.

The project equipment can be expected to run for the whole project period and it can not be expected that it will be replaced by more efficient technologies.

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.



Page 10 of 17

Initial training and maintenance efforts are required. In the PDD and during the visit on site the project developer confirmed that such training has taken place and/or is envisaged. Documentation on executed and/or planned training activities has been submitted.

The project is currently in line with the relevant legislation and plans in the host country. The required environmental licenses are valid and have been submitted to the validation team.

The project is considered to be in line with the sustainable development policies of Brazil as improvements to manure management as well as energy supply are relevant issues in the national Brazilian policy. The final letter of approval by the Brazilian DNA confirms the opinion of the DOE.

It can be expected that the project will create additional environmental benefits by reducing emissions of Volatile Organics Compounds (VOCs). The project does moreover improve the quality of the fertilizer produced as a by-product to the farming activities.

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 project starting date and the operational lifetime are clearly defined. The crediting period is clearly defined.

3.1.2 Findings

Clarification Request 1:

Chapter A.4.2. of the PDD does mention the use of an "efficient flare". The validation team asks for more detailed information if the project uses an open or enclosed flare. The type of flare is fundamental for the flare efficiency and hence calculation of the amount of CER credits.

<u>Answer:</u>

The enclosed flaring combustion system is automated to ensure that all biogas that exits the digester and passes through the flare (and flow meter) is combusted. Pressure control devices within the gas handling system maintain proper biogas flow to the combustion system. A continuous ignition system ensures methane combustion whenever biogas is present at the flare. Two (2) sparking electrodes provide operational redundancy. If biogas is present in the flare, it is immediately ignited by the sparking system. If biogas is not present, the igniter sparks harmlessly. This continuous ignition system is powered by a robust solar module (solar-charged battery system) that operates independently from the power grid. The component parts are tested and verified functional on a periodic basis in accordance with manufacturer and other technical specifications.

Clarification Request 2:

Concerning Fazenda Kapakeffa it has not been presented any evidence to the validation team that training has been taken place, even though the biodigestor had been already in use during the on-site visit. AgCert should provide evidences to the validation team that training has taken place at Faz. Kapakeffa.

Answer:

The training schedule has been posted to the portal.

Clarification Request 3:

It has to be indicated in the PDD date of completion in *DD/MM/YYYY and* contact information and indicate if the person/entity is also a project participant as listed in Annex 1.

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.

Page 11 of 17



Answer:

In Section B.5. of the PDD, it states: The final draft of this baseline section was completed on 19/08/2006. The name of entity determining the baseline is AgCert. AgCert is a project participant, as well as the project developer.

In Annex 1, it says the Project Participant and Developer is Agcert do Brasil Soluções Ambientais Ltda.

Clarification Request 5:

It has to be explained by AgCert why 3rd of December 2004 is considered as project start. The first contract was signed on March 03, 2005. Therefore the validation team considers this date as project start.

Answer:

The project start has been changed according to validation team's observation.

3.1.3 Conclusion

All Clarification Requests are considered to be resolved.

Further details to that conclusion are documented in annex 1 of that validation report.

3.2 Baseline Methodology

3.2.1 Discussion

The project is based on the approved methodology: "Type III, Other Project Activities, Category III.D., Methane Recovery for small-scale projects, version 11". The methodology has been approved by the CDM Executive Board. The selected methodology has been designed for this project and hence the project is part of the methodology on which it is build upon. Therefore the respective baseline methodology is deemed to be the most applicable one for this project. The PDD responds convincingly to each of the applicability criteria which are outlined in the baseline methodology.

The application of the methodology and the discussion and determination of the baseline are transparent. The application follows exactly each of the steps outlined in the methodology and answers the corresponding sections in a proper manner.

The baseline is been determined using reliable assumptions. The parameter "population" as one of the decisive parameters for the quantitative prognosis is determined by using reliable data and is moreover based on date obtained from a year period in the past. During the visit on site the availability of such comprehensive data could be observed predominantly. Hence plausible data has been provided from traceable sources ensuring the reliability of the parameter.

The baseline has been based on project specific data and does sufficiently take into account policies and developments regarding legal, economic and social issues. There is no legal requirement to capture and combust greenhouse gases produced by swine manure in AWMS. There is currently also no planned legislation that is directed towards the emission of GHG as related to AWMS. The open air lagoon is hence considered the common AWMS practice in Brazil.

The project demonstrates via the description of barriers that it is not the baseline scenario. Each step of the respective section of the methodology has hereby been applied in a correct manner. The elaborations in the PDD got substantiated by an external expert review. Concluding it has been made clear that the continuation of the AWMS by operating open air lagoons would be the

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.



Page 12 of 17

most attractive course of action and hence the baseline scenario. During the visit on site the project owner substantiated these arguments by describing the financial result of the operations in the last two years.

The economic performance, the legal constraints and the common practice have been identified as potential risks to the baseline. The subsequent evaluation resulted in the assessment that no major risks to the baseline exist. This assessment is considered as being plausible.

References have been made to all data sources used.

3.2.2 Findings

Clarification Request 4:

a. It is not clear to the validation team, why AgCert does not provide anymore the exact project emission and baseline emission information for each farm in table form (table E2 respectively E3 in former PDDs) in the PDD. AgCert should explain why it is not mentioned anymore such information and/or provide this information into the PDD.

b. Concerning Agropecuaria Barriga Verde it has not been presented any evidence about the use of North-American and/or European swine genetics. This information should be provided to the validation team.

Answer:

- a) The tables are provided in the latest version of the PDD.
- b) As Barriga Verde was taken out of this project activity, it is not relevant anymore for project activity BR 06-S-28.

3.2.3 Conclusion

The Clarification Request is considered to be resolved. Concluding it can be stated that it has been made plausible that the chosen baseline scenario is the one deemed most realistic under the given frame conditions.

Further details to that conclusion are documented in annex 1 of that validation report.

3.3 Duration of the Project / Crediting Period

3.3.1 Discussion

Both the starting date of the project activity and the crediting period are clearly determined as well as the lifetime of the project activity and the length of the renewable crediting period of 7 years.

3.3.2 Findings

Clarification Request 6:

It is almost sure according to information found on-site and given by AgCert staff, that the biodigestor operation at Granja Tome Meurer will only begin in February 2007. The starting date of the crediting period is on December 01, 2006. AgCert has to be aware of the fact that in that case CER credits will be lower than in the PDD predicted.

<u>Answer:</u>

Page 13 of 17



While AgCert notes TUV's observation, the company has decided to establish a Crediting Period Start Date in order to begin earning credits at the earliest date possible as 2 of the farms' biodigesters in the project have been reducing emissions since 2005.

3.3.3 Conclusion

As the start of the crediting period has been changed to June 01, 2007, the Clarification Request may be considered as resolved.

Further details to that conclusion are documented in annex 1 of that validation report.

3.4 Monitoring Plan

3.4.1 Discussion

The project is based on the approved monitoring methodology "Type III, Other Project Activities, Category III.D., Methane Recovery for small-scale projects, version 11". The methodology has been approved by the CDM Executive Board. The selected methodology has been designed for this project and hence the project is part of the methodology it is build upon. Therefore the respective monitoring methodology is deemed to be the most applicable one for this project. The PDD responds convincingly to each of the applicability criteria which are outlined in the monitoring methodology.

Details of the methodology as parameters to be obtained, recording frequency and archiving methods are considered being reasonable and appropriate.

The methodology and its application are described in detail and in a transparent manner. During the visit on site the implementation of the operations and maintenance manual and the data management system in order to ensure a proper implementation of the monitoring plan could be evidenced.

The monitoring plan does include all relevant parameters to determine baseline and project emissions and it is possible to monitor and/or measure the currently specified GHG indicators. The indicators which are not measured can be obtained from IPCC documents. The parameters defined allow calculating the baseline and projecting emissions in a proper manner.

According to the methodology no leakage calculation is required.

The project is considered to have no negative environmental, social and economic effects and a monitoring of such data is also not required by the applied monitoring methodology. This approach is deemed sufficient.

The PDD in combination with the Operations and Maintenance Manual does clearly indicate the authority and responsibilities within the given project structure. During the visit on site it has been described in detail how the respective organizational structure is already implemented and/ or planned. During the visit on site the validation team moreover realized that the project owner is well aware of the tasks and responsibilities.

The overall management responsibility is with AgCert International, Ireland. The company operates also trained staff in Brazil. The farm owner or representatives supports the AgCert staff during the on site audits and carries out the daily supervision of the project components and their performance. The responsibilities for each task are clearly defined and allocated to the Farm owners, AgCert and the service providers.



Page 14 of 17

The quality and environmental management system (QMS and EMS), currently under implementation within AgCert, will help to support the project participants in operating the respective organizational structure.

3.4.2 Findings

Clarification Request 7:

a. According to information given by AgCert staff during the on-site visit the flow meter has not to be calibrated according to the manufacturer. How does AgCert make sure that accuracy is guaranteed and that high quality data is delivered?

b. During on-site visit the validation team has identified that there is no seal of the flow-meter. How does AgCert guarantee that the farmer or anybody else does not open and manipulate the flow meter?

Answer:

CR7a - Details of the metering equipment have been posted to the PDD supporting documents portal.

CR7b - Agcert has a rigorous QA/QC system that ensures data security and data integrity. Agcert performs spot audits on all data collection activities.

3.4.3 Conclusion

The QA/QC manual for all involved staff and their responsibility regarding monitoring is ruled sufficiently. Signed contracts are submitted to the validation team. The validation team can not identify any risks due to inadequate management structure or quality assurance. The above mentioned requests are answered sufficiently.

The Clarification Request is considered to be resolved.

Further details to that conclusion are documented in annex 1 of that validation report.

3.5 Calculation of GHG Emissions by Source

3.5.1 Discussion

The project spatial boundaries are clearly described and limited to the farm site. An exact and correct description of the project boundaries is included in chapter B.4 of the PDD. The PDD hereby also reflects correctly that emissions from barn systems and barn flushing systems are not considered as these emissions are not affected by the proposed practice change.

The projects components are clearly defined in the PDD and described in figure B1 of the PDD. During the visit on site the given information has been confirmed.

Details of direct and indirect emissions are discussed in the PDD in an appropriate manner. All aspects are covered by the current approach. All methane (CH4) emissions have been considered.

The calculations resulting in the final numbers have been submitted. The formulae used are correctly applied. A leakage calculation is not necessary according to the methodology.

Since most estimates are derived from accepted international sources, it seems reasonable to assume that they are accurate. The project emissions are taking as ex-ante only if the installed equipment is the same as the mention in the PDD; if not the project emissions will be measured and confirmed by the verifier. The approach is deemed sufficient.

Validation of the AWMS Methane Recovery Project BR06-S-28, Santa Catarina, Brazil.



Page 15 of 17

Concluding it can be stated that the project emissions will be reduced compared to the baseline scenario by 29,594 tonnes CO2e over a crediting period of seven years, resulting in a calculated annual average of 4,228 tonnes CO2 over a renewable crediting period of seven years.

3.5.2 Findings

None

3.5.3. Conclusion

The calculation of GHG emissions and used data are according to applied methodology and its requirements. Further details to that conclusion are documented in annex 1 of that validation report.

3.6 Environmental Impacts

3.6.1 Discussion

The environmental impacts can be seen as being low. These low impacts have been sufficiently described in the PDD.

The legislation does not require an EIA for this type of project. But an environmental license for the site is necessary. This requirement for approval has been fulfilled.

Negative environmental effects are not expected to be created by the project. Given the nature of the project design this seems to be reasonable.

Transboundary effects are not expected as the project site is far from the national boundary.

As no significant environmental impacts are expected, such impacts have not influenced the project design.

3.6.2 Findings

Clarification Request 8

a. Concerning Agropecuaria Barriga Verde it has neither been presented a valid environmental licence nor a protocol to the validation team on-site. AgCert should provide one of those documents to the validation team.

b. Concerning Fazenda Kapakeffa it seems that the farm was taken out of PDD 8 due to a missing environmental licence. AgCert should confirm that assumption of the validation team or explain why Fazenda Kapakeffa has been already part of another PDD and taken out of it that time. Besides, AgCert should provide a valid environmental licence or a protocol for Fazenda Kapakeffa.

Answer:

- a) As Agropecuaria Barriga Verde was taken out of the PDD, part a) of the CR is not relevant anymore for this project activity BR 06-S-28.
- b) Environmental protocol has been posted to the PDD supporting documents portal.

3.6.3 Conclusion

The project does comply with the environmental requirements. All environmental licences respectively environmental protocols have been submitted to the validation team.



Page 16 of 17

3.7 Comments by Local Stakeholders

3.7.1 Discussion

A formal consultation process with local stakeholders has taken place and corresponding information has been submitted to the audit team. The stakeholders consulted included people from the local community and also the representatives of the local communities and the states. In addition neighbours to the site have been interviewed.

The stakeholders have been invited to meetings via post and electronic mail and which has also been published in local and regional newspapers.

The comments to the project design have been recorded and provided. As all comments have been positive, the project design has not been changed due to stakeholder comments.

3.7.2 Findings

None

3.7.3 Conclusion

The comments of the stakeholders were without exception positive. The project does comply with the requirements.

Further details to that conclusion are documented in annex 1 of that validation report.

4 COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

TÜV SÜD published the project documents on its website from August 24, 2006 until September 22, 2006 and invited comments within 30 days, by Parties, stakeholders and non-governmental organizations.

Published:

http://www.netinform.de/KE/Wegweiser/Guide2.aspx?ID=1997&Ebene1_ID=26&Ebene2_ID=57 2&mode=1

During the commenting period there have been no comments received.



Page 17 of 17

5 VALIDATION OPINION

The Certification Body "Climate and Energy" has been ordered by AgCert International LLC, Ireland (AgCert International) to validate the project AWMS Methane Recovery Project BR06-S– 28, Santa Catarina, Brazil.

By avoiding GHG emissions from open air lagoons, the project results in reductions of GHG emissions that are real, measurable and give long-term benefits to the mitigation of climate change. An analysis of the investment, technological and legal 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. TÜV SÜD confirms that the indicated amount of emission reductions of 29,594 tonnes CO_{2e} over a renewable crediting period of seven years, resulting in a calculated annual average of 4,228 tonnes CO_{2e} represents a reasonable estimation using the assumptions given by the project documents.

It is opinion of TÜV SÜD that the project as described in the final project design document issued on 30 Jan, 2007 meets all relevant UNFCCC requirements for the CDM, set by the Kyoto Protocol, the Marrakech Accords and relevant guidance by the CDM Executive Board; furthermore that the project meets all relevant host country criteria and correctly applies the baseline and monitoring methodology "Type III, Other Project Activities, Category III.D., Methane Recovery for small-scale projects, version 11".

Hence, TÜV SÜD will recommend the project 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.

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, 05.02.2007

Munich, 05.02.2007

Markus Knödlseder

Head certification body "climate and energy"

Werner Betzenbichler

Project Manager