
ANNEX 1

REPORT ON COMMENTS BY PARTIES, STAKEHOLDERS AND NGOS

CAAL Biomass Electricity Generation Project

Project No. CDM.Val0214c

Date: 23/06/2006



1 INTRODUCTION

In accordance with sub-paragraphs 40 (b) and (c) of the CDM modalities and procedures, the project design document of a proposed CDM project activity shall be made publicly available and the DOE shall make invite comments on the validation requirements from Parties, stakeholders and UNFCCC accredited non-governmental organizations and make them publicly available. This report describes this process for this particular project.

2 PROJECT DETAILS

2.1 Project title

CAAL Biomass Electricity Generation Project.

2.2 Description of how and when the PDD was made publicly available

The Project Design Documents and its annexes were made publicly available from 09 Feb 2006 until 11 Mar 2006 on the website

<http://cdm.unfccc.int/Projects/Validation/DB/GHGBI8G9PN3PNU5C620YOY0JICUQ87/view.html> and comments were invited through the UNFCCC CDM homepage.

3 COMMENTS RECEIVED

3.1 Description of how comments were received and made publicly available

Comments could be submitted through a web interface or by email or fax.

As per procedures on public availability of the CDM project design documents and for receiving comments as referred to in paragraphs 40b and 40c of the CDM modalities and procedures, any received comments are displayed from the end of the 30 days commenting period, at the website listed in section 2.2.

3.2 Compilation of all comments received

No comments received to the DOE during the 30 days commenting period.

4 EXPLANATION OF HOW COMMENTS HAVE BEEN TAKEN INTO ACCOUNT

No comments received.

ANNEX 2

LIST OF DOCUMENTS ATTACHED

CAAL Biomass Electricity Generation Project

Project No. CDM.Val0214c

Date: 23/06/2006



- /1/ Annex 1: Report on Comments by Parties, Stakeholders and NGOs
- /2/ Annex 2: Comprehensive list of documents attached
- /3/ Annex 2: List of persons interviewed
- /4/ Annex 4: Validation Protocol (UK.AU4.CDM.Val0214c)
- /5/ Annex 5: Overview of findings (UK.Findings.CDM.VAL0214c)
- /6/ Annex 6: Answers from local assessor
- /7/ Annex 7: Validation Report (UK.AR6.CDM.VAL0214c)
- /8/ Annex 8: Modalities of communication
- /9/ Letter of Approval from the Government of Brazil
- /10/ Letter of Approval from the Government of Netherlands

ANNEX 3

Overview of documentation that has
been reviewed and list of persons
interviewed

CAAL BIOMASS ELECTRICITY GENERATION PROJECT

Project No. CDM.Val0214c

Date: 23/06/2006



This document is an Annex to the validation report for CDM project activity registration. It gives overview of documentation that has been reviewed and names of persons that have been an interviewed as part of the validation.

List of documents reviewed

- /1/ Project Design Document, CAAL Biomass Electricity Generation Project, version 01, 08/02/2006; version 02, 07/06/2006.
- /2/ Simplified baseline and monitoring methodologies for selected small scale CDM project activity – AMS ID Grid connected renewable electricity generation, version 08, 03 March 2006.
- /3/ Simplified baseline and monitoring methodologies for selected small scale CDM project activity – AMS IIIE Avoidance of methane production from biomass decay through controlled combustion, version 08, 03 March 2006.

List of persons interviewed

	Name and position	Company name	Date interviewed
/1/	Diego Machado Silveira / Project developer	PTZ	7-8th June, 2006
/2/	Marie Bertolucci Ehrengerger / Lawyer	PTZ	7-8 th June, 2006
/3/	Luiza Termignoni / Project developer	PTZ	8 th June, 2006
/4/	Teobaldo Grabin / Project developer	PTZ	8 th June, 2006

Annex 4 - Validation Protocol

This validation protocol is designed to ensure that the project meets the requirements for CDM projects that are detailed in paragraph 37 of the CDM modalities and procedures. Each requirement is covered in a separate table. The following requirements are discussed in this protocol:

Requirement	Description	
Participation requirements	The participation requirements as set out in Decision 17/CP.7 need to be satisfied	Covered in table 1
Baseline and monitoring methodology	The baseline and monitoring methodology complies with the requirements pertaining to a methodology previously approved by the Executive Board	Baseline methodology is covered in table 2 Monitoring methodology is covered in table 4
Additionality	The project activity is expected to result in a reduction in anthropogenic emissions by sources of greenhouse gases that are additional to any that would occur in the absence of the proposed project activity	Covered in table 3
Monitoring plan	Provisions for monitoring, verification and reporting are in accordance with relevant decisions of the COP/MOP	Covered in table 5
Environmental impacts	Project participants have submitted to the designated operational entity documentation on the analysis of the environmental impacts of the project activity, including transboundary impacts and, if those impacts are considered significant by the project participants or the host Party, have undertaken an environmental impact assessment in accordance with procedures as required by the host Party;	Covered in table 6
Comments by local stakeholders	Comments by local stakeholders have been invited, a summary of the comments received has been provided, and a report to the designated operational entity on how due account was taken of any comments has been received;	Covered in Table 7
Other requirements	The project activity conforms to all other requirements for CDM project activities in relevant decisions by the COP/MOP and the Executive Board.	Covered in Table 8

Small scale projects and AR projects have specific requirements which are covered in Table 9-11. Small scale SSC projects have special requirements which might deviate from the requirements of

other CDM projects. These requirements are tested in table 9. Please note that some questions in table 9 overlap with questions in the other tables. Where the questions in table 9 contradict or overlap questions elsewhere in the checklist, the questions in table 9 shall prevail. For the validation of small scale projects, assessor is required to address the questions in table 9 first before starting with the questions in the other tables.

Further remarks on the use of this document:

- text in *italic blue* is meant as guidance for the assessor
- MoV = Means of Verification, DR= Document Review, I= Interview

This protocol should be adapted as required. For example, if the project is not a small scale project or an AR project, some tables can be deleted.

Table 1 Participation Requirements for Clean Development Mechanism (CDM) Project Activities (Ref PDD, Letters of Approval and UNFCCC website) All CDM project activities

REQUIREMENT	MoV	Ref	Comment	Draft finding	Concl
1.1 The project shall assist Parties included in Annex I in achieving compliance with part of their emission reduction commitment under Art. 3 and be entered into voluntarily.	DR	PDD	No letter of approval from Annex I country, Netherlands was provided to the validator. Letter was received. CAR was closed out.	CAR 1	Ok
1.2 The project shall assist non-Annex I Parties in achieving sustainable development and shall have obtained confirmation by the host country thereof, and be entered into voluntarily	DR	PDD	No letter of approval from non Annex I, Brazil.	Send the validation report to DNA	
1.3 All Parties (listed in Section A3 of the PDD) have ratified the Kyoto protocol and are allowed to participate in CDM projects	DR	UNFCCC website	Yes. Brazil 23 Ago 02 Netherlands 31 May 02	Ok	Ok
1.4 The project results in reductions of GHG emissions or increases in sequestration when compared to the baseline; and the project can be reasonably shown to be different from the baseline scenario	DR	PDD	The project will eliminate the electricity consumption from the grid and will sell the small surplus generated, and will avoid methane emissions due to the decay of unutilized rice	Ok	Ok

REQUIREMENT	MoV	Ref	Comment	Draft finding	Concl
			husks.		
1.5 Parties, stakeholders and UNFCCC accredited NGOs shall have been invited to comment on the validation requirements for minimum 30 days (45 days for AR projects), and the project design document and comments have been made publicly available	DR	PDD / UNFCCC web site	PDD public available: 09 Feb 06 – 11 Mar 06 http://cdm.unfccc.int/Projects/Validation/DB/GHGBI8G9PN3PNU5C620YOY0JICUQ87/view.html No comments received.	Ok	Ok
1.6 The project has correctly completed a Project Design Document, using the current version and exactly following the guidance	DR	PDD	Yes.	Ok	Ok
1.7 The project shall not make use of Official Development Assistance (ODA), nor result in the diversion of such ODA	DR	PDD	No. To be confirmed by local assessor. No ODA was used in this project.	Verify	Ok
1.8 For AR projects, the host country shall have issued a communication providing a single definition of minimum tree cover, minimum land area value and minimum tree height. Has such a letter been issued and are the definitions consistently applied throughout the PDD?			NA		
1.9 Does the project meet the additional requirements detailed in: Table 9 for SSC projects Table 10 for AR projects Table 11 for AR SSC projects	DR	PDD	Yes, see table 9.	Ok	Ok
1.10 Is the current version of the PDD complete and does it clearly reflect all the information presented during the validation assessment.	DR	PDD	Yes, used the current version.	Ok	Ok
1.11 Does the PDD use accurate and reliable information that can be verified in an objective manner?	DR	PDD	Yes. To be confirmed by local assessor. Data, emission factor and applicable values were verified and discussed during site visit	Verify	Ok

Table 2 Baseline methodology(ies) (Ref: PDD Section B and E and Annex 3 and AM) Normal CDM projects only - NA

Table 3 Additionality (Ref: PDD Section B3 and AM) Normal CDM projects only - NA

Table 4 Monitoring methodology (PDD Section D and AM) Normal CDM projects only - NA

Table 5 Monitoring plan (PDD Annex 4) Normal CDM projects only - NA

Table 6 Environmental Impacts (Ref PDD Section F and relevant local legislation) Normal CDM projects only - NA

Table 7 Comments by local stakeholders (Ref PDD Section G) All CDM projects activities

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
7.1 Have relevant stakeholders been consulted?	PDD	DR	Yes.	Ok	Ok
7.2 Have appropriate media been used to invite comments by local stakeholders?	PDD	DR	Verify letter sent to stakeholders. Letters were sent in local language.	Verify	Ok
7.3 If a stakeholder consultation process is required by regulations/laws in the host country, has the stakeholder consultation process been carried out in accordance with such regulations/laws?	PDD	DR	Verify letters. Verified letters and delivery receipt sent to: (copy was provided) City Hall of Alegrete; Chamber of Alegrete; Environmental agencies from the state and local authority; Brazilian NGO forum; District Attorney; Local communities.	Verify	Ok
7.4 Is a summary of the stakeholder comments received provided?	PDD	DR	To be confirmed by local assessor. The project received 3 comments and a summary was provided in the revised PDD.	Verify	Ok
7.5 Has due account been taken of any stakeholder comments received?	PDD	DR	Comments that solicited new information were answered. See section G.3 of the PDD.	Ok	Ok

Table 8 Other requirements. All CDM project activities

CHECKLIST QUESTION	Ref.	MoV ¹	COMMENTS	Draft Concl	Final Concl
8.1 Project Design Document					
8.1.1 Editorial issues: does the project correctly apply the PDD template and has the document been completed without modifying/adding headings or logo, format or font.	PDD	DR	They used the current version, no changes have been observed.	Ok	Ok
8.1.2 Substantive issues: does the PDD address all the specific requirements under each header. If requirements are not applicable / not relevant, this must be stated and justified	PDD	DR	Yes.	Ok	Ok
8.2 Technology to be employed					
8.2.1 Does the project design engineering reflect current good practices?	PDD	DR	Yes.	Ok	Ok
8.2.2 Does the project use state of the art technology or would the technology result in a significantly better performance than any commonly used technologies in the host country?	PDD	DR	Yes, the project uses state of art convencional Rankine cycle. Combustion of the fuel will be performed with proven technologies as a medium pressured boiler. The power plant control will be supervised by a high standard LPCs and computers.	Ok	Ok
8.3 Is the project technology likely to be substituted by other or more efficient technologies within the project period?	PDD	DR	No.	Ok	Ok
8.2.4 Does the project require extensive initial training and maintenance efforts in order to work as presumed during the project period?	PDD	DR	PTZ is responsible for training to operators if required.	Verify	Ok
8.3 Duration of the Project/ Crediting Period					
8.3.1 Are the project's starting date and operational lifetime clearly defined and reasonable?	PDD	DR	Starting date: 01/09/2006 Lifetime: 30 years	Ok	Ok
8.3.2 Is the assumed crediting time clearly defined and reasonable	PDD	DR	Renewable crediting period, 7 years.	Ok	Ok

CHECKLIST QUESTION	Ref.	MoV ¹	COMMENTS	Draft Concl	Final Concl
(renewable crediting period of max. two x 7 years or fixed crediting period of max. 10 years)?					
8.3.3 Does the project's operational lifetime exceed the crediting period	PDD	DR	Yes.	Ok	Ok

Table 9 Additional requirements for SSC projects

CHECKLIST QUESTION	Ref.	MoV ¹	COMMENTS	Draft Concl	Final Concl
SSC projects use the SSC PDD and simplified baseline and monitoring methodologies as detailed in Appendix B (to the Modalities and Procedures for Small scale CDM projects, Annex II to Decision 21/CP.8) Indicative simplified baseline and monitoring methodologies for selected small scale CDM project activity categories					
9.1 Does the project qualify as a small scale CDM project activity as defined in paragraph 6 (c) of decision 17/CP.7 on the modalities and procedures for the CDM?	PDD	DR	Yes. The project comprises combustion of renewable rice husks in a biomass boiler for electricity generation (3,8MW), which is below the limit for type I projects. The maximum output of heat (7.7 MWh) and power (3.8 MWh) is below the limit of 45 MW _{thermal} required for small scale projects. The project emit less than 15 Kilotonnes of CO ₂ equivalent annually	Ok	Ok
9.2 The project conforms to one of the categories listed in Appendix B to Annex II to Decision 21/CP8	PDD	DR	Yes. Categories ID and IIIE, the project comprises the use of rice husks, renewable biomass to be used to supply electricity to and displace electricity from the Brazilian grid; and the decay is prevented through controlled combustion of rice husks and less methane is produced and emitted to the	Ok	Ok

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
			atmosphere.		
9.3 The small scale project activity is not a debundled component of a larger project activity?	PDD	DR	The project is not debundled of a larger project activity. Project participant does not have any other CDM project activity in the same site and category.	Ok	Ok
9.4 PDD has been prepared in accordance with appendix A of Annex II to Decision 21/CP8	PDD	DR	Yes. The current version was used.	Ok	Ok
9.5 The project uses a simplified baseline and monitoring methodology specified in Appendix B. If not, they may propose changes to the meths or a new SSC project category	PDD	DR	They use simplified baseline and monitoring methodology. The choice of the applicable baseline calculation for the project category is justified on the PDD, section B2. The project complies with the applicability conditions. The monitoring plan presents good monitoring practice appropriate to the circumstances of the project activity. Worksheets with baseline data were verified. See list of documents consulted.	Ok	Ok
9.6 Is there any bundling of SSC activities into one PDD? If so, does the monitoring plan consider sampling of activities? Refer to para 19 of Annex II. Also, note bundling provisions in SSC Briefing Note and SSC meths I C / I D and III D and Para 22e of Appendix B	PDD	DR	No, the proposed project activity is not bundling of small scale activities.	Ok	Ok
9.7 Is EIA required by host party? If not, none is required irrespective of SHC. If yes, has one been performed consistent with local requirements?	PDD	DR	Verify the license issued by State environmental agency. Verified the environmental licenses (installation and operation), and the state environmental agency did not require an EIA. See list of documents consulted.	Verify	Ok

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
<p>9.8 The project results in emission reductions that are additional in accordance with the following requirements:</p> <p>(para 26) The project is additional if emissions are reduced below those in the absence of the project</p> <p>(Para 27) Simplified baseline can be used; if not, baseline proposed shall cover all gases, sectors and sources listed in Annex A to the KP</p> <p>Para 28) One or more barriers as detailed in attachment A to Appendix B to Annex II will be used to demonstrate that the project would not proceed without the CDM</p>	PDD	DR	<p>Yes, emissions are reduced below in the absence of the project.</p> <p>They use simplified baseline.</p> <p>They use attachment A to appendix B.</p> <p>The investment barrier would prevent that the project would have occurred. During validation assessment the worksheets with investment analysis were verified and it was concluded that the project is additional. See list of documents consulted.</p>	Ok	Ok
<p>9.9 Leakage is calculated according to the provisions of the SSC methodologies in Appendix B (http://cdm.unfccc.int/Projects/pac/ssclistmeth.pdf)</p>	PDD	DR	Leakage is not applicable.	Ok	Ok
<p>9.10 The project boundary shall be constructed in accordance with the requirements of the SSC methods in Appendix B</p>	PDD	DR	The project boundary encompasses the physical, geographical sites of the rice mills.	Ok	Ok
<p>9.11 The Monitoring plan shall be consistent with the requirements of the SSC methodology in Appendix B and shall provide for the collection and archiving of data needed to determine project emissions, baseline emissions and leakage.</p>	PDD	DR	Yes. The monitoring plan presents the necessary requirements to collect, record, archive, QA/QC for project emissions and baseline emissions.	Ok	Ok
<p>9.12 The monitoring plan shall present good monitoring practice appropriate to the circumstances of the project activity (para 33)</p>	PDD	DR	Yes. Section D.4 of the PDD presents the QA/QC and section D.5 presents the management structure. Procedures were verified. See list of documents consulted.	Ok	Ok
<p>9.13 If project activities are bundled, separate monitoring plan shall be prepared for each of the activities or an overall plan reflecting good monitoring practice will be prepared, consistent with the above</p>	PDD	DR	Not bundled.	Ok	Ok

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
requirements					

Table 10 Additional requirements for AR projects - NA

Table 11 Additional requirements for SSC AR projects - NA

Table 12 Additional information to be verified by local assessors / site visit

CHECKLIST QUESTION	Ref.	MoV*	COMMENTS	Draft Concl	Final Concl
Verify calibration certificate.	Site visit	DR	Verified "Laudo de Exames de Balança 523314, verification 1.454.680-2, 15/08/2005 issued by INMETRO".	Ok	Ok
Investment barrier: verify financial analysis.	Site visit	DR/I	NIR 2 was raised: To correct the NPV and discount tax in the PDD according to the financial analysis worksheet verified during site visit. The PDD was revised and copy of the worksheet was provided. NIR 2 was closed out.	NIR 2	Ok
Verify emission factor document: "Fator de Redução de Emissões no Grid Interconectado do Sistema Sul-Sudeste-Centro-Oeste".	Site visit	DR/I	CAR 3 was raised: To correct the emission factor using the most recent value available (until 2004). The PDD was revised and calculation of the new emission factor was verified, copy was provided. CAR 3 was closed out.	CAR 3	Ok
Verify ANEEL license.	Site visit	DR	Verified the Resolution number 75, 14/02/2005 that authorize CAAL to produce 3,825 kW to the grid, issued by ANEEL.	Ok	Ok

References consulted during Ground Truthing and brief summary of content / significance
[please try to obtain a hard copy where ever possible]:

Ref no.	Title (full bibliographic reference if possible)	Brief note on content / significance	Hard copy (Y/n)
1	Laudo de Exames de Balança 523314, verification 1.454.680-2, 15/08/2005 issued by INMETRO.	Calibration certificate.	Y
2	Rice husks worksheet 2003-2005.	Worksheet with quantity of rice husks generated and consumed.	Y
3	Resolution number 75, 14/02/2005 issued by ANEEL.	Authorize CAAL to produce 3,825 kW to the grid.	Y
4	LI 833/2004-DL, LO 07175/2005-DL, issued by Fepam.	Installation and operation license.	Y
5	CAAL BEGP, June 2006.	CDM project management planning.	Y
6	Financial analysis.	Worksheets with financial analysis.	Y
7	Invoices October/2005, November/2005, December/2005.	Energy invoices for the year 2005.	Y
8	CERs CAAL project.	Worksheets with data of biomass decay parameters, project emissions, electricity displace, baseline emissions.	Y
9	Emission factor 2002-2004.	Emission factor data, ONS data (National Operator of the electricity system).	N
10	“Ensaio em casca de arroz”, number 17136/55654, 13/01/2006 issued by Cientec.	Rice husk analysis to determine the ash content, humidity.	N

Individuals interviewed during Validation and Ground Truthing [name, position and contact details, plus a brief summary of points discussed]

Date met	Name	Position	Contact details	Brief note on subject of interview
7-8 th June, 2006	Diego Machado Silveira	Project developer	PTZ ptz@ptz.com.br	Technical issues, operational issues, findings, monitoring plan, baseline, quality procedures, licenses.
7-8 th June, 2006	Marie Bertolucci Ehrengerger	Lawyer	PTZ ptz@ptz.com.br	Licenses, stakeholder consultation process, findings.
8 th June, 2006	Luiza Termignoni	Project developer	PTZ ptz@ptz.com.br	Validation process and findings.
8 th June, 2006	Teobaldo Grabin	Project developer	PTZ ptz@ptz.com.br	Validation process and findings.

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ANNEX 5 - FINDINGS OVERVIEW

FINDINGS FROM VALIDATION OF CAAL BIOMASS ELECTRICITY GENERATION PROJECT – CDM.VAL0214C

Each Table below represents a finding from the validation assessment. The findings are numbered consecutively, approximately in the order that they have been identified.

Description of table:

Type	Findings are either New Information Requests (NIR) or Corrective Action Requests (CAR). CARs are items that must be addressed before a project can receive a recommendation for registration. NIRs may lead to the raising of CARs. Observations are included at the end and may or may not be addressed. They are primarily to act as signposts for the verifying DOE.
Issue	Details the content of the finding
Ref	refers to the item number in the Validation Protocol
Response	Please insert response to finding, starting with the date of entry.

Rows for comments and further response will be appended to the table until the Findings has been addressed to the satisfaction of the Lead Assessor.

Please note that this is an open list and more findings may be added as validation progresses.

Date: 03/02/2006

Raised by: Fabian

No.	Type	Issue	Ref
1	CAR	No letter of approval from Annex I country has been proved to the validator.	1.1
Date: [Comments]			
Date: 15/02/2006 – Fabian Gonçalves. [Acceptance and close out] Letter received. CAR 1 was closed out.			

Date: 07/06/2006

Raised by: Fabian

No.	Type	Issue	Ref
2	NIR	To correct the NPV and discount tax in the PDD according to the financial analysis worksheet verified during site visit.	Table 12
Date: [Comments]			
Date: 20/06/2006 – Fabian Gonçalves. [Acceptance and close out] The PDD was revised and copy of the worksheet was provided. NIR 2 was closed out.			

Date: 07/06/2006

Raised by: Fabian

No.	Type	Issue	Ref
3	CAR	To correct the emission factor using the most recent value available (until 2004).	Table 12
Date: [Comments]			
Date: 20/06/2006 – Fabian Gonçalves.			

[Acceptance and close out] The PDD was revised and calculation of the new emission factor was verified, copy was provided. CAR 3 was closed out.

Observations:

1- To insert date and version in the PDD.

Date: 20/06/2006 – Fabian Gonçalves.

[Acceptance and close out] The PDD was revised. Observation was closed.



Annex 6 Local assessment checklist

CAAL Biomass Electricity Generation Project – CDM.Val0214c

This checklist is designed to provide confirmation of in-country data and information provided in the Project Design Document. It serves as a “reality check” on the project. It is to be completed by SGS Brazil.

Issue	Findings	Source /Means of Verification	Further action / clarification / information required?
Verify calibration certificate.	Verified “Laudo de Exames de Balança 523314, verification 1.454.680-2, 15/08/2005 issued by INMETRO”.	Site visit/DR	No
Investment barrier: verify financial analysis.	NIR 3 was raised: To correct the NPV and discount tax in the PDD according to the financial analysis worksheet verified during site visit. The PDD was revised and copy of the worksheet was provided. NIR 3 was closed out.	Site visit/DR/I	NIR 3 was closed out. Ok
Verify emission factor document: “Fator de Redução de Emissões no Grid Interconectado do Sistema Sul-Sudeste-Centro-Oeste”.	NIR 2 was raised: To correct the emission factor using the most recent value available (until 2004). The PDD was revised and calculation of the new emission factor was verified, copy was provided. NIR 2	Site visit/DR/I	NIR 2 was closed out. Ok
Verify ANEEL license.	Verified the Resolution number 75, 14/02/2005 that authorize CAAL to produce 3,825 kW to the grid, issued by ANEEL.	Site visit/DR	No