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Gold Standard Validation Report

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Gold Standard Validation Audit/Assessment: 12/07/2010 - 12/07/2011 Audit/Assessment beginning/end:

Project name: National Biodigester Programme, Cambodia

GBZ/Report-No.: 321048/P29850.33

Project ID: GS751 Project Stream: VER

Project Type: Biogas - Heat Project Size: Large-Scale

Baseline Methodology: Indicative programme, baseline, and monitoring methodology

for Small Scale Biodigester, Voluntary Gold Standard

Team of auditors/assessors Mr Rudolf Brodbeck

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1. Introduction

1.1 Objective

National Biodigester Programme (NBP), Department of Animal Health and Production Cambodia have commissioned SQS to perform a validation of the "National Biodigester Programme, Cambodia" project (hereafter called "the project").

The validation is an independent evaluation by a Designated Operational Entity (DOE) that a project fulfils Gold Standard validation requirements. Validation is part of the Gold Standard project cycle and will finally result in a conclusion by the executing DOE whether a project activity is valid and should be submitted for registration to the Gold Standard. The ultimate decision on the registration of a proposed project activity rests at the Gold Standard and the Parties involved.

1.2 Scope

The validation scope is defined as an independent and objective review of the project design and project documentation. The documents are reviewed against the criteria stated in

- ➤ The Kyoto Protocol, in particular § 12 and modalities and procedures for the CDM
- ➤ Decision 2/CMP1 and Decision 3/CMP.1 (Marrakech Accords)
- CLEAN DEVELOPMENT MECHANISM VALIDATION AND VERIFICATION MANUAL, version 1.2
- Gold Standard Requirements
- Gold Standard Toolkit
- Decisions and specific guidance by the Gold Standard published under http://www.cdmgoldstandard.org/
- A comprehensive list of the normative references is given in the validation protocol (appendix F).

The validation team has used a risk-based approach focusing on the identification of significant risks for project implementation and the generation of VERs.

1.3 Project description

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National Biodigester Programme (NBP) is a joint development between the Cambodia Ministry of Agriculture Forestry and Fisheries (MAFF) and the Netherlands Development Organisation (SNV) aimed to disseminate domestic biodigesters as an indigenous, sustainable energy source through the development of a commercial, market oriented, biodigester sector in eight selected provinces of Cambodia. The biodigesters will treat animal and human waste to produce a clean renewable cooking and lighting fuel, biogas, whereas the treated waste is to be used as a potent and safe organic fertilizer. Continued maintenance and operation of all biodigesters through technical and promotional capacity development and the establishment of support institutions for wide scale deployment and sustained development of the biodigester sector are also some of the objectives of the program.

The starting date of the project activity is 13 March 2006.

The starting date of the first retroactive Gold Standard crediting period is 1 January 2009.

Expected operational lifetime of the project is 20 years.

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A renewable crediting period of 7 years was chosen, with an estimated annual amount of emission reductions of 34,757 tonnes CO2e.

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1.4 Methodology of validation

The SQS auditors apply standard auditing techniques to assess the correctness of the information provided by the project participants, including, where appropriate, but not limited to:

- (a) Document review, involving: review of data and information to verify the correctness, credibility and interpretation of presented information and cross checks between information provided in the project design and project documentation and information from sources other than that used, if available, and if necessary independent background investigations
- (b) Follow-up actions (on-site visit, telephone, email interviews), including: interviews with relevant stakeholders in the host country, personnel with knowledge of the project design and implementation and cross-check of information provided by interviewed personnel to ensure that no relevant information has been omitted from the validation
- (c) Reference to available information relating to projects or technologies similar to the proposed Gold Standard project activity under validation
- (d) Review, based on the approved methodology being applied, of the appropriateness of formulae and correctness of calculations.

If, during the validation of a project activity, the auditor identifies issues that need to be further elaborated upon, researched or added to in order to confirm that the project activity meets the Gold Standard requirements and can achieve credible emission reductions, the auditor shall ensure that these issues are correctly identified, discussed and concluded in the validation report.

The auditor shall raise a corrective action request (CAR) if one of the following occurs:

- (a) The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions;
- (b) The Gold Standard requirements have not been met;
- (c) There is a risk that emission reductions cannot be monitored or calculated.

The auditor shall raise a clarification request (CL) if information is insufficient or not clear enough to determine whether the applicable Gold Standard requirements have been met.

The auditor shall raise a forward action request (FAR) during validation to highlight issues related to project implementation that require review during the first verification of the project activity. FARs shall not relate to the Gold Standard requirements for registration.

The auditor shall resolve or "close out" CARs and CLs only if the project participants modify the project design, rectify the project design and project documentation or provide adequate additional explanations or evidence that satisfy the SQS's concerns. If this is not done, the SQS shall not recommend the project activity for registration.

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

- It organizes, details and clarifies the requirements a Gold Standard 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 two tables. The different columns in these tables are described in below Figure.

The completed validation protocol is enclosed in appendix F to this report.

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Validation Protocol 1: Requirement Checklist				
Requirement	The requirements the project must meet.			
Ref.	Reference to the PDD or documents.			
MoV	Explains how conformance with the requirements is investigated.			
(Means of Validation)	DR = Document Review, I = Interview, N/A = Not Applicable			
Comment / Cross Reference	The section is used to elaborate and discuss the conformance to the requirement.			
Draft Concl. / Final Concl. (Draft and/or Final Conclusion)	OK = Conform, CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request			

Validation Protocol 2: Summary of Requests				
No.:	The requests (CAR, CL, FAR) are numbered and listed in this section.			
Reference:	Reference to the checklist question number in Protocol 1 where the request is explained.			
Validator findings / request:	The section is used to elaborate and discuss the request. May give reference to the PDD or documents.			
Project proponent response:	The responses given by the client or other project participants during the communications with the validation team should be summarised in this section.			
Validator conclusion: This section should summarise the validation team's res final conclusions. The conclusions should also be included in under "Final Conclusion".				
Date:	Date when request was closed.			

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2 Validation Opinion

2.1 Summary of the validation conclusions

It is SQS' opinion, that the project meets all relevant criteria of the listed references and correctly applies the approved methodology and therefore SQS request the registration of given Gold Standard project.

2.2 Summary of the validation methodology and process used and the validation criteria applied

National Biodigester Programme (NBP), Department of Animal Health and Production Cambodia contracted SQS to validate the "National Biodigester Programme, Cambodia" project with regard to the relevant requirements of the Gold Standard project activities, as well as criteria for consistent project operations, monitoring and reporting. In addition to the general criteria described above, the validation was conducted against the specific criteria defined by the following documents:

- Gold Standard Requirements, version 2.1
- Gold Standard Toolkit, version 2.1
- ➤ Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0
- > Tool for the demonstration and assessment of additionality, version 05.2.

The review of the project design documentation and additional documents related to baseline and monitoring methodology; the subsequent background investigation, follow-up interviews and review of comments by stakeholders and NGOs have provided SQS with sufficient evidence to validate the fulfilment of the stated criteria.

In the course of the validation, 7 Corrective Action Requests (CARs), 4 Corrective Action Requests ex Technical Review (TR_CARs) and 26 Clarification Requests (CLs) were raised and successfully closed. One Forward Action Request (FAR) was also raised.

The final PDD version 16 <PDD - NBP Cambodia - PDD V16 12july2011_word 2003 public version>, Gold Standard Passport version 8 <June 2011 GSPP - NBP Cambodia V8> and CER-Spreadsheet <National Biodigester Programme Cambodia - ex-ante baseline project and emission reduction calculations 24june2011>, that included all corrections/clarifications requested by SQS and all corrections/requests by the Gold Standard registration review <GS751 NBP Cambodia 8WR_2nd round_12072011>, were found to fulfil all stated criteria.

2.3 Description of project components or issues not covered by the validation process

The validation has covered the entirety of the project and, therefore, the validation process covered every project components or issues.

2.4 Statement on the validation of the expected emission reductions

The calculation of the project emission reductions is carried out in a transparent and conservative manner, so that the calculated

Total estimated emission reductions of 243,301 tCO2e

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- Average estimated emission reduction of 34,757 tCO2e /year
- Average estimated emission reduction per biodigester of 4.79 tCO2e /year are most likely to be achieved within the seven years renewable crediting period (13 March 2006 to 12 March 2013).

The starting date for retroactive Gold Standard application is 1 January 2009.



3 Validation Findings

3.1 Project description

3.1.1 Documentation

The PDD is compliant with the latest template and guidance of the CDM EB available on the UNFCCC website. Main changes between the PDD version 7 [1] and the final version 15 [45] is issues related to the CARs, CLs and FARs identified during validation (refer to Protocol in appendix F). The key PDD change between version 12 (26 September 2010) published for the stakeholder commenting period and version 13 (27 October 2010) is the shorter crediting period.

The GS Passport [27] is compliant with the latest template Toolkit Annex R available on the Gold Standard website. Main changes between the GS Passport version 3 (24 May 2010) and the final version 7 (26 September 2010) [27] are issues related to the CARs, CLs and FARs identified during validation (refer to Protocol in appendix F).

SQS' lead auditor Rudolf Brodbeck conducted an on-site visit (16 to 18 August 2010). The description of the project was assessed in situ and by interviews (refer to the list of interviewees in appendix B) confirming the project development status. During the on-site visit, technical drawings were shown to the auditor confirming the description of the project scenario. The documents listed in the Information Reference List section were reviewed by SQS to assess accuracy and completeness of the project description.

On the basis of the documents referred to in the PDD and GS Passport, all further documents reviewed as mentioned above, on-site visit and interviews with key persons, SQS formed the opinion that the description of the project activities in the PDD and GS Passport is accurate and correct.

3.1.2 Registration requirement

Referring to Part C.5. of the GS Passport [27].

In accordance with "applicable project cycle" it concerns a Retroactive Registration.

The Project Proponent submitted a project activity for retroactive registration. The Project Proponent submitted the documents on 03.12.2009 to Gold Standard. The GS has reviewed the submitted project [36].

3.1.3 Applicable project cycle

Referring to Part C and A.4.3. of the PDD [45] and C.5. of the GS Passport [27].

The starting date of the project corresponds to the date when the programme arrangement and implementation document for the National Biodigester Programme in Cambodia was signed. This has been appropriately documented [21]. The starting date of project activities is 13 March 2006. Additional the first Biodigester under NBP was built in March 2006.

The first submission of a document to Gold Standard was on 30 October 2009 (Stakeholder consultation report), additional documents were Gold Standard Passport (3 November 2009) and PDD (3 November 2009). Thus the conditions for a retroactive project cycle are given.

3.1.4 Crediting Period

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Referring to Part C and A.4.3. of the PDD [45].

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With PDD version 13 the credit period changed from 10 to 7 years.

The starting date of the project corresponds to the date when the programme arrangement and implementation document for the National Biodigester Programme in Cambodia was signed. The starting date of project activities is 13 March 2006. A renewable crediting period of 7 years is chosen.

Thus the credit period lasts from 13 March 2006 to 12 March 2013.



Between 13 March 2006 and 31 December 2008 credits are sold to HIVOS Climate fund. Evidence of this is provided in Annex 5 PDD, which shows an accountant declaration of the credits bought by and exclusive buyer (the INGO HIVOS) of the generated credits. These credits, pre-GS credits, were voluntary credits without a standard; the quality relied on the trust and the name that HIVOS and SNV have in the Netherlands.

The starting date for retroactive Gold Standard application is 1 January 2009.

3.2 Baseline and monitoring methodology

3.2.1 General requirement

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The project applies the approved consolidated Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0. This methodology also refers to the latest approved versions of:

• "Tool for the demonstration and assessment of additionality", version 05.2.

3.2.2 Applicability of the selected methodology to the project activity Referring to Part B of the PDD [45].

The Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 is applicable to the "National Biodigester Programme, Cambodia" (NBP) and its project activities. Through the on-site visit it was confirmed that the situation is a programme of activities involving the implementation of biodigesters in households within the project's boundaries. The project activity is implemented by a project coordinator (NBP) which acts as the project participant. The individual households will not act as project participants. The consumption of biogas from the biodigesters replaces the consumption of fossil fuel and biomass.

SQS checked each of the four applicability conditions for the Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 and established the following:

Applicability Criterion 1 "The biodigester programme promotes the wide-scale use of biogas as substitute for wood, agricultural residues, animal dung and fossil fuels that are presently used for the cooking, space heating and lighting needs of most rural households".

The project plans to disseminate small-scale household biodigesters where the use of biogas will replace kerosene for lighting, wood and charcoal for cooking purposes. The activities of NBP are described in the "Programme Arrangement and Implementation Document National Biodigester Programme in Cambodia" [21; 22]. The first arrangement [21] was signed in March 2006.

Applicability Criterion 2: "The methodology applies to project with biodigesters with a maximum total biodigester volume of 20 m³".

The biodigesters constructed under the NBP are smaller than 20 m³, only 4/6/8/10 & 15m³ [45].

Applicability Criterion 3: "The biodigesters in the programme are not included in another CDM or voluntary market project, (i.e. no double counting takes place)".

The biodigesters constructed under the NBP are not part of another CDM or voluntary market project. The mechanism to prevent any risk of double counting is not described transparent. Therefore, CAR 6 was raised. A contract is signed with every plant. Through the text in the contract double counting to another CDM or voluntary market project is not allowed. Every plant is upon completion but before commissioning

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inspected by a PBPO supervisor. This is a structured inspection [45] with the use of a Plant Completion Report Form (form no.9). Further controls are carried out through the Biogas User Survey, with a random sample of plants, and through the follow-up of the bioslurry extension staff [45]. This was checked during the on-site visit. Therefore, CAR 6 was closed.

Applicability Criterion 4: "If more than one climate zone is included in the project, the project should make a distinction per climate zone".

The project includes one climate zone. It is located at 8 provinces in Cambodia.

SQS confirms that the applicability criteria of the selected Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 is met in an appropriate manner.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.2.3 Project boundary

Referring to Part B and A of the PDD [45].

The project boundaries encompass biodigesters constructed under the NBP at 8 provinces (Kampong Cham, Kampong Chang, Kampong Speu, Takeo, Svay Rieng, Kandal, Prey Veng, Kampot) in Cambodia. The boundary of the individual biodigester includes animal waste production and storage system, biodigester [45] and thermal energy services (biogas stove, lighting).

NBP has developed a spatial mapping tool, whereby the location of the biodigesters are real time linked with a spatial map. The map is made available online, see: http://www.nbp.org.kh/html/nbpmap_full.html.

In accordance with the methodology, CO₂ and CH₄ is included in the baseline and CH₄ in the project activity.

The observations during the on-site visit showed that the PDD described statements were accurate.

The identified boundary and the selected sources and gases are justified for the project activity. No emission sources that will be affected by the project activity and that are not addressed by the selected approved methodology were identified by SQS and, therefore, the boundary is correct.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.2.4 Baseline identification

Referring to Part A and Annex 8 of the PDD [45].

The Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 allows two options for the baseline scenario:

- a. The situation before implementation of the biodigesters (i.e. pre-project situation).
- b. The situation where fossil fuels are used to meet energy service needs (even if they are not currently being used).

Options a) (pre-project situation) where used.

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The pre-project situation was thoroughly studied and described in PDD appendix 8 and "REVISED CDM BASELINE STUDY ON FUEL USE AND MANURE MANAGEMENT AT HOUSEHOLD LEVEL" [32].

The assumptions and data used are listed in the PDD, including their references and sources. The documentation used is correctly quoted and interpreted in the PDD. Assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence and can be



deemed reasonable. The approved baseline methodology has been correctly applied to identify the most reasonable baseline scenario and the identified baseline scenario reasonably represents what would occur in the absence of the proposed project activity.

In summary, the baseline is as follows:

Households (farmers) use wood and charcoal for cooking and kerosene for lighting. The reliance on these fuels cause substantial indoor air pollution (with related health hazards) and are predominantly of non-renewable origin. A substantial part of wood is collected, which is drudgery and significant time expenditure, especially for women. Bought wood, on the other hand, is a burden on the limited household's revenues. No animal waste management result in pollution, foul odour and methane emissions.

The observations during on-site visit showed that the PDD described statements were accurate.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.3 Project eligibility

3.3.1 Eligible project activity location

Referring to Part C.2. of the GS Passport [27] and Part A.3. and appendix 1 of the PDD [45].

The participants were checked and discussed at the onsite-visit. Therefore, CAR 1 was raised.

National Biodigester Programme (NBP) is a joint venture intervention of the Cambodian Ministry of Agriculture, Forestry and Fisheries (MAFF) and the Netherland Development Organization (SNV). According to [EMU] page 3 Ministry of Agriculture, Forestry and Fisheries will take the ownership of the National Biodigester Programme. The contract [EMU] is signed by Ministry of Agriculture, Forestry and Fisheries Kingdom of Cambodia and Netherland Development Organization Cambodia. Therefore, CAR 1 is closed. The party that is identified for the project activity is Cambodia. Cambodia ratified the Kyoto Protocol on 22 August 2002.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.3.2 Eligible project activity gases

Referring to Part C.4. of the GS Passport [27].

In accordance with the methodology, CO₂ and CH₄ is included in the baseline and CH₄ in the project activity.

3.3.3 Eligible project types

Referring to Part C.3. of the GS Passport [27].

In accordance with Toolkit Annex C the project is "Renewable Energy Supply" project activity.

3.3.4 Eligible project scale

Referring to Part C.1. of the GS Passport [27] and Part B.1. of the PDD [45].

The project scale were checked and discussed at the onsite-visit. Therefore, CL 1 was raised.

It is a large-scale project with methodology for small scale Biodigesters. Therefore, CL 1 is closed.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.3.5 Eligible methodologies for project activities

Referring to Part B of the PDD [45].

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The project applies the approved consolidated Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0.

SQS confirms that the applicability criteria of the selected Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 is met in an appropriate manner.

3.3.6 Ineligible project activity finance
Referring to Annex 1 of the GS Passport [27]
The sign ODA Declaration Form is present.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

- 3.3.7 Relationship between GS CDM/JI submissions and GS VER submissions Not applicable
- 3.3.8 Project activity involvement in other certification or emissions trading schemes Referring to Part C and A.4.3. of the PDD [45].

Between 13 March 2006 and 31 December 2008 credits are sold to HIVOS Climate fund. Evidence of this is provided in Annex 5 PDD, which shows an accountant declaration of the credits bought by and exclusive buyer (the INGO HIVOS) of the generated credits. These credits, pre-GS credits, were voluntary credits without a standard; the quality relied on the trust and the name that HIVOS and SNV have in the Netherlands.

3.4 Additionality of project activity

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3.4.1 The prior consideration of the necessity of carbon finance Referring to Part B.5. of the PDD [45].

In May 2005, still before a MoU [40] was signed between SNV (Netherlands Development Organisation) and MAFF (Ministry of Agriculture, Fisheries and Forestry), contacts were made with the World Bank on possible emission credit sales. A PIN (Project Idea Note) [42] was developed in July 2005 and submitted to the Ministry of Environment (DNA) for approval and to the WB (available upon request). Based on this PIN, the WB came up with a draft Letter of Intent (LoI) on carbon trade collaboration with NBP in March 2006. A letter of No Objection from the DNA [35] was obtained in September 2005. However, since the methodology for non-renewable biomass claims (NRB) had recently changed and was on hold, a CER project for domestic biogas became less attractive.

On 13 March 2006, MAFF and SNV Cambodia signed the "Programme Arrangement and Implementation Document National Biodigester Programme in Cambodia" [21] on the joint development of a National Biodigester Programme (NBP) as a way to create an indigenous, sustainable energy source in Cambodia and to utilize the potential of biogas in the country.

GERES Cambodia was contracted in May 2006 to conduct a carbon baseline study (title: CDM Baseline study on fuel use and manure management at household level) [31]. After extensive discussion, a postponement of the carbon contract with the WB was decided untill there is more clarity on the production achievement of NBP and the emission reductions that can be claimed per plant (methodologies). Also, it was decided to explore other, less costly, carbon trading opportunities, i.e. through VER sales. From the onset, it has been the intention to seek carbon financing to ensure the long-term (financial) sustainability of the programme.

Between 13 March 2006 and 31 December 2008 credits are sold to HIVOS Climate fund. Evidence of this



is provided in Annex 5 PDD, which shows an accountant declaration of the credits bought by and exclusive buyer (the INGO HIVOS) of the generated credits. These credits, pre-GS credits, were voluntary credits without a standard; the quality relied on the trust and the name that HIVOS and SNV have in the Netherlands. However, in 2008 it was decided to pursue accreditation of a premium standard from 1-1-2009: voluntary Gold Standard. The first Biodigester under NBP was built in March 2006.

The starting date of the project corresponds to the date when the programme arrangement and implementation document for the National Biodigester Programme in Cambodia was signed. This has been appropriately documented [21]. The line of argumentation is thoroughly substantiated with copies of authentic documents as referenced above.

The starting date of project activities is 13 March 2006.

The starting date for retroactive Gold Standard application is 1 January 2009.

In compliance with the Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0 the project applies the latest version of the "Tool for the demonstration and assessment of additionality", version 05.2 approved by the CDM-EB.

3.4.2 Identification of alternatives

Referring to Part B.5. of the PDD [45].

The following alternatives were identified according to the methodology for the purposes of baseline selection; in brackets the PDD conclusion and the basis for and the results of its validation is indicated:

- 1) Continued use of unsustainable fuel wood for cooking and kerosene for lighting;
- 2) Continuation of the project activities without carbon finance;
- 3) Switch to fossil fuels;
- 4) Development of NBP based on donor and/or public funding.

Alternative 1: Continued use of unsustainable fuel wood for cooking and kerosene for lighting.

"The business as usual scenario of using unsustainable fuel wood for cooking and kerosene for lighting. In terms of thermal energy output for cooking this scenario would deliver similar output compared to the biogas stove and for most users a lower output for lighting with kerosene compared to biogas lamps. The procurement of wood for cooking is in full compliance with applicable laws and regulations; unless firewood originates from logging activities in national and protected forests, which is illegal. However, the Cambodian government lacks the recourses to enforce the law to combat illegal logging activities. The procurement of kerosene for lighting is conforming national regulations."

The on-site visit confirmed that the livelihood of the poor and the household costs are substantially better, if a household operates a Biodigester in agreement with NBP. The statement is confirmed by the interviews accomplished with the farmers.

Alternative 2: Continuation of the project activities without carbon finance.

"Option 2 is not applicable because it is foreseen in the initial plan that revenue from carbon offsets are needed to implement the NBP, without the projected income from carbon offsets the NBP would not have started. The main reason is that without the income from carbon offsets, biodigesters would have been more expensive (up to \$150), and since the majority of the households with the technical potential for a biodigester have a very low income, around \$99/month, most households would be unable to purchase a biodigester directly through a non-subsidized market mechanism. For these reasons, carbon finance was part of the business model of NBP before the start of the activities.

The NBP activities without carbon finance are consistent with mandatory rules and regulations."

Project activities without carbon finance is not realistic; see "Barrier analysis".

Alternative 3: Switch to fossil fuels.

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"The most credible alternative fossil fuel would be LPG for cooking, which costs around \$14 for a 15 kg cylinder (September 2009). It is estimated that households relying on LPG will consume at least 1 bottle per month. Spending \$14 per month on LPG would be a very high expenditure for the rural households, even for the households which have a slightly higher income and which have the technical potential for biogas. The average rural income is \$82.4 (Statistical Yearbook of Cambodia 2005) and for the households with the technical potential \$99/month. Spending \$14 per month on LPG would represent almost 14% of the average household's income, which is, obviously, neither feasible nor affordable. Furthermore, the LPG infrastructure is limited to the capital cities of the provinces and it is consequently difficult to obtain LPG cylinders for the rural households next to the high costs. A far more likely alternative is the continued use of fuel wood, which comes at much lower costs (around \$0.07 per kg in rural areas) or is collected; in that case the fuel is free.

A switch to LPG is in compliance with all mandatory applicable legal and regulatory requirements."

The on-site visit confirmed that the household costs are substantially better if a household operates a Biodigester in agreement with NBP. The statement is confirmed by the interviews conducted with the farmers.

Alternative 4: Development of NBP based on donor and/or public funding.

"Alternative 4 is not applicable as the Cambodian government does not have the funds to finance the subsidy component and, therefore, the same obstacle as described in alternative 2 remains. Cambodia is one of the least developed countries in Asia, ranked number 124 out of 169 on the Human Development Index. Therefore, the government budget is limited and relies heavenly on foreign assistance. In addition, in Cambodia, there are no laws promoting or subsidizing biogas plants."

The list of alternatives describes the realistic and credible alternatives.

Therefore, the credible alternative for the project is "continuation of the project activities with carbon finance". However, alternative 1-3 are possible but they bring no improvement.

3.4.3 Investment analysis

Referring to Part B.5. of the PDD [45].

The programme does not seek returns on its investment and is financed by a mix of ODA, government contribution and carbon finance. In accordance with the methodology as the project is at least partially public financed concerning investment, no investment analysis is made and the barrier analysis is applied. As no investment analysis is applied no cost-benefit analysis is applied.

3.4.4 Barrier analysis

Report-No.:

3.4.4.1 Investment barrier National Biodigester Programme (NBP)

Referring to Part B.5. of the PDD [45].

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During the onsite-visit, the crediting period was 10 years; so CAR 2 was raised. The somewhat uncommon statement of the costs accepted because the situation is clear; project owner response: without this income the programme would no longer be in existence. Therefore, CAR 2 is closed.

The NBP program costs were checked [41] and discussed during the onsite-visit and were found realistic and reasonable in the historic context. Hereinafter, a summery overview of the costs.

Date:



Overview without VER (€):	2009	2010	2011	2012	2013	2014	2015
Total program costs	688,590	1,168,300	1,432,400	1,551,500	1,581,000	1,576,300	1,579,956
Donor contribution (DGIS, BMZ SNV)	567,180	919,900	1,184,000	1,303,100	not secured		
Net income VER	-					-	-
Total income	567,180	919,900	1,184,000	1,303,100		ı	I
Total overall	-121,410	-248,400	-248,400	-248,400	-1,581,000	-1,576,300	-1,579,956
Overview with VER (€):	2009	2010	2011	2012	2013	2014	2015
Total program costs	688,590	1,168,300	1,432,400	1,551,500	1,581,000	1,576,300	1,579,956
Donor contribution (DGIS, BMZ, SNV)	567,180	919,900	1,184,000	1,303,100	not secured		
Net income VER	121,410	248,400	247,101	333,819	429,949	541,866	664,154
Total income	688,590	1,168,300	1,431,101	1,636,919	429,949	541,866	664,154
Total overall	0	0	-1,299	85,419	-1,151,051	-1,034,434	-915,803

Therefore, SQS is able to confirm that the input parameters used in the financial analysis are reasonable and adequately represent the economic situation of the project.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.4.4.2 Investment barrier at individual household level

Referring to Part B.5. of the PDD [45].

The high investment cost of a biodigester is a barrier for households in the project area. Financing a biodigester completely from the farmer's income would pose an undesirable high burden on the household income rendering the investment unviable to alleviate this burden an investment subsidy is provided by NBP. The investment subsidy also gives NBP a tool to enforce quality standards on material, workmanship, appliances and after-sales service as it is only provided after the technical inspection of the completed biodigester before commissioning.

The investment costs of a biodigester were checked and discussed during the onsite-visit and were found realistic and reasonable. Also IRR calculations were checked and discussed. The payback time without subsidy is 3.5 to 6.5 years; too long for farmers in the project area. The IRR analyses were found realistic and reasonable.

The correct use of the word "subsidy" was not clear. Therefore CAR 5 and CL 14 was raised.

The farmer invests the costs of the biodigester and so he is owner of the biodigester and the emission rights. The transfer of the emission rights from the owner of the biodigester to NBP is settled with this subsidy. The transfer of the emission rights (VER credits) from the owner of the biodigester to NBP is described in a Biodigester Construction Contract [17]. The owner rejected a change of the word subsidy. Therefore, CAR 5 and CL 14 is closed.

Therefore, SQS is able to confirm that the parameters used in the investment analysis at household level are reasonable and adequately represent the economic situation of the households.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) could be successfully resolved and are summarized in appendix F (Validation Protocol).

3.4.4.3 Technological barriers

Report-No.:

Referring to Part B.5. of the PDD [45].

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Based on experience with biogas in Cambodia. However, a large proportion of these biogas plants are out of operation due to leakages, unsuitable designs, lack of maintenance, training and support. Experience and the knowledge are missing in Cambodia.

13/07/2011

Date:



Training and support are core elements of the NBP program. NBP initiated a great number of workforce training, construction quality training, owner training, and maintenance training, after sales service training and trained masons and licensed enterprises to construct the biodigesters. They are defined in the "Programme Arrangement and Implementation Document National Biodigester Programme in Cambodia" [21].

The described barrier is plausible and was observed during the on-site visit and during interviews. Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.4.5 Common practice analysis

Referring to Part B.5. of the PDD [45].

The region for the common practice analysis was defined by the project proponent as 8 provinces (Kampong Cham, Kampong Chnang, Kampong Speu, Takeo, Svay Rieng, Kandal, Prey Veng, Kampot) in Cambodia.

The validation team has reviewed sources such as the Gold Standard Website and the UNFCCC Website for projects of similar technology in Cambodia and came to the conclusion that besides the proposed project activity no other similar project is under implementation in Cambodia.

Similar biogas programs were developed in Vietnam and Nepal.

Other biogas projects in Cambodia were scattered, small, had no focus on sector development but merely on the construction of a certain number and relied on a technology that was neither suitable nor sustainable. They were made of plastic, which typically breaks after 9-24 months. The approach of NBP contrasts the other projects as it aims to developed a sustainable biogas sector which is ultimately ran by the private sector using a biodigester model that is durable (lifespan of 15-20 years), indigenized and adapted to the Cambodian condition.

Therefore, SQS confirms that the proposed CDM project activity is not common practice in Cambodia.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

Summery of additionality of project activity

On the basis of the above assessment of the PDD argumentation and supporting evidence, it is sufficiently demonstrated that the project is not a likely baseline scenario, and that the emission reductions resulting from the project are additional.

3.5 GHG emission reduction

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Report-No.:

Referring to Part B.6. and Annex 7 of the PDD [45].

Emission reductions of the project activity are calculated on the basis of emission reductions due to displacement of thermal energy demand (BE_{th}) for cooking and lighting and animal waste handling (BE_{aw}) from cow's, pig's and buffalo's used IPCC 2006 Tier 2 approach in the pre-project situation.

The project emission is calculated from continued reliance on cooking and lighting fuels (kerosene) (PE_{th}) and leakage emission from incomplete combustion of methane (PE_{aw}). Displacements of other lighting fuels, such as electricity from either batteries or the grid, are not considered, which is conservative.

All calculations [11] and the results reflected in the PDD were checked and SQS concludes that calculations were done appropriately. For the calculations, data [43], [32] and the methodology was used. The survey reports [3] and [4] confirms the statements.

For charcoal the calculation expressed in wood equivalent whereby the emission factor and NVC of wood is used: 1 kg wood is 6 kg charcoal. This was stipulated by IPCC 1996. During the on-site visit, different points were not transparent. CL 5, CL 23, CL 24, CL 25, CL 26, CAR 3 was expressed. Relevant Corrective



Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

All calculations are listed in an excel sheet with many digits. The data in the report are rounded numbers and might slightly deviate.

It is to be noticed that the credit period for the project was defined as 10 years and was shortened to 7 years at the end of the assessment.

The annual average emission reduction per household is calculated as 4,79 tCO₂.

The estimated average number of credits per year is calculated as 34,757 tCO₂.

Note that credits are calculated on a monthly interval, that is conservative.

The resulting annual and total emission reductions of the project activity as presented in the PDD were correctly calculated in conformity with the Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0. The calculations estimates presented in the PDD are complete, transparent and derived from reasonable assumptions.

3.6 Monitoring requirements and monitoring plan

3.6.1 Emission reductions

Referring to Part B.7. of the PDD [45].

SQS has validated the monitoring plan by using the Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester," Version 1.0, and concluded that the project proponent developed its monitoring plan according to the methodology.

The parameters that are monitored according to the methodology during the project activity's operations are as follows:

- ID 1: Project area (the project area is fixed and delineated by the 8 provinces).
- ID 2: Number of households in the baseline sample group (from the CDM baseline study [32]).
- ID 3: Number of households in project sample group (biennial monitoring survey).
- ID 5: Total number of households participating in the program in year y (database of NBP).
- ID 6: Cooking and lighting fuel consumption (biennial monitoring survey).
- ID 9: Annual biomass increment on the project area (biennial literature study).
- ID 10: Annual biomass harvest on the project area (biennial literature study).
- ID 11: Fraction of livestock's category T's manure fed into the biodigester (biennial monitoring survey).
- ID 12: Physical leakage of the biodigester (Gold Standard methodology "Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester")
- ID 13: Number of livestock of category K (biennial monitoring survey).
- ID 16: Global Warming Potential (GWP) of methane (most recent IPCC guidelines).

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.6.2 Sustainability

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Report-No.:

Referring to Part G. of the Gold Standard Passport [27].

SQS has validated the monitoring plan by using the Gold Standard Requirements, Version 2.1, and Gold Standard Toolkit, Version 2.1 and concluded that the project proponent developed its monitoring plan according to these documents.

The parameters that are monitored according to the Gold Standard Requirements during the project activity's operations are as follows:

Date:



- Air quality: Reduction in wood and charcoal consumption for cooking and kerosene consumption for lighting in the project compared to the baseline (biennial monitoring survey).
- Water quality and quantity: Number of toilets built (database of NBP).
- Soil condition: Reduction of using chemical fertilizers as fertilizer in the project compared to the baseline (biennial monitoring survey).
- Biodiversity: Reduction in firewood and charcoal consumption for cooking compared to the baseline (biennial monitoring survey).
- Quality of Employment: Number of trained masons and supervisors (quality inspectors of biodigesters) and number of companies working of marketing, construction and after sale services (NBP keeps track of the number biennial).
- Livelihood of the poor: Increase in access to basic sanitation by the installation of a toilet to the biodigester (biennial monitoring survey).
- Livelihood of the poor: Reliance on biogas as lighting fuel (biennial monitoring survey).
- Livelihood of the poor: Percentage of biodigesters household that use biogas as their main cooking fuel (biennial monitoring survey).
- Access to affordable and clean energy services: Reduction in cooking and lighting fuel expenditure compared to the baseline (biennial monitoring survey).
- Balance of payments and investments: Net cash inflow: sum of cash inflows cash outflows (reported biennially in the regular NBP progress reports).
- Technology transfer and technological self-reliance: Number of biodigesters built (database of NBP).

During the on-site visit, different points were not transparent. CL 11, CL 12, CL 13, CL 15 was expressed. Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.6.3 Monitoring plan

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Referring to Part B.7.2. of the PDD [45].

The monitoring team and its responsibilities were appropriately described. The responsibility for user survey and monitoring report lies with NBP.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.7 Sustainable development

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Referring to Part F. of the Gold Standard Passport [27].

SQS has validated the "Do No Harm" Assessment by using the Gold Standard Requirements, Version 2.1, and Gold Standard Toolkit, Version 2.1 and discussed it during the on-site visit. Not all of the 11 principles in accordance with Annex H of the Toolkit were specified. Therefore, CAR 4 was raised. For all 11 principles, the risk is estimated as low. The assessment is not described very detailed, it is, however, appropriate. Therefore, CAR 4 is closed.

The described "Do No Harm" Assessment is accurate and was observed during on-site visit and during interviews.

SQS also validated the Sustainable Development matrix by using the Gold Standard Requirements, Version 2.1, and Gold Standard Toolkit, Version 2.1 and discussed it during the on-site visit. The 12 Sustainable Development Indicators in accordance with Annex I of the Toolkit were specified. The SDM is not the blind sustainability assessment as required under the Gold Standard, but sustainable development was discussed in every workshop. The SDM is the sustainability assessment conducted by NBP in collaboration with an independent consultant. The points were checked during the on-site visit on behalf of

Date:



stakeholder interviews and the same result was found.

The three categories are positively scored. No negative scoring had to be made. The project demonstrates clear benefit to a sustainable development.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.8 Stakeholder consultation

Referring to Part E of the PDD [45], Part E. of the Gold Standard Passport [27] and the Gold Standard Stakeholder Report [7].

The Project Proponents submitted a project activity for retroactive registration. A Local Stakeholder Consultation is not conducted.

As described in the stakeholder report, NBP held a great number of stakeholder consultation meetings, both at national, provincial and at village level. Feedback from stakeholders was sought during these meetings. They invited end users, government representatives, official NGO supporters and other groups relevant to the Gold Standard. During the on-site visit, SQS checked the meeting documents. Invitation and/or participant lists were available, also minutes of the meetings.

The invitation of Save the Earth Cambodia, REEEP, WWF, Greenpeace, Mercy Corps and HELIO International could not be verified. [PFA] point 5. Therefore, CL 16 was raised. On 13 September, an email is sent to all the supporters mentioned and others that were deemed relevant [44]. By the end of October, no feedback had been received. Therefore, CL 16 is closed.

NBP has a very extensive home page on which all information is clearly available: www.nbp.org.kh
There are sites "Contact us", "Publications" and new "Comments, please give us your comments and suggestion". Comments received by email or other means are processed professionally. Those are open lines to stakeholders.

Annually, Mr Jan Lam (SNV Senior Biogas Advisor) is invited from the University of Oldenburg to hold a presentation with the topic "Technology and Mass-Dissemination Experiences from Asia" at the "Domestic Biogas Compact Course". In September 2010, NBP signed a Memorandum of Understanding between Cambodian Rural Development Team (CRDT), NBP, myclimate, WWF Cambodia and WWF Switzerland concerning a Biodigester Programme in other provinces of Cambodia. This shows that the program is accepted.

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).

3.9 Pre-feasibility assessment

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Referring to [36].

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The Project Proponent submitted a project activity for retroactive registration. The Project Proponent submitted the documents on 3 December 2009 to Gold Standard. The GS reviewed the submitted project and identified a number of areas where additional information is necessary for the project to be in line with the Gold Standard requirements. The following points were identified in the report [36].

Date:



VER upgrade. Please make sure to provide a statement in the PDD confirming that post-2008 credits will not be claimed under any other voluntary standard than the Gold Standard.

Statement in Part A.4.3 of the PDD [45].

Consideration of carbon revenues. Please discuss in detail how early consideration of carbon revenues has been decisive in the decision for the project to go ahead and provide evidences to support this claim. The DOE shall explain in the Validation Report how it has verified that prior consideration of carbon revenues has taken place and that the evidence of actions taken by the PP to secure carbon revenues for the project activity along with its implementation is demonstrated.

It is discussed in Part A.4.3. and B.5. of the PDD [45].

There is no evidence that the consideration of carbon revenues has been decisive in the decision for the project to go ahead as requested by GS. However, SQS considers the argumentation line stated and documented in the PDD as sufficient to the fact that traditional ODA projects will be phased out after a initial implementation phase. To ensure that the NBP will be successful after the phasing out of ODA the Carbon Revenues have been decisive in the whole process and the overall set up of the NBP programme. Therefore, SQS considers the response of the PP as sufficient.

See TR CAR 2 in this report.

Barrier Analysis – Investment Barrier. On Table 3, Breakdown of NBP costs, please clarify what DGIS funding refers to, as this is the first time that this is mentioned in the project documentation, and on what basis the subsidy was calculated (the understanding is that the subsidy is \$150/biodigester).

The Barrier Analysis is completely revised in Part B.5. of the PDD [45].

Common practice analysis. This section should include a discussion not only on similar programmes but also on the current use of biodigesters in Cambodia, confirming that without such a subsidised programme, these have remained marginally used. The information now provided in the first paragraph under the section on technological barriers (the discussion on the CCRD study and the limited number of biodigester installed since 1986) should for example rather be provided in the section on common practice.

The current use of biodigesters is included in Part B.5. of the PDD [45].

Additional points were discussed at the onsite audit and are descriptive under "Common practice analysis" in this report.

SQS has cross checked the information provided in the PDD with the report Progress of CRDT Biogas Installation by the Mekong Project (Sun Mao, 2008) and considers the statement as appropriate and sufficient.

See TR CAR 4 in this report.

Baseline options. Please remove or revise the discussion on Baseline option 2 and Baseline option 3 as these have not been interpreted appropriately. These options refer to the situation of suppressed demand. If pps wish to claim for suppressed demand and opt for these options, then they are required to demonstrate that there is indeed a situation of suppressed demand. The choice of option 1 does not require a demonstration that option 2 or option 3 are not suitable.

The baseline development is briefly and clearly descripts in Part B.4. of the PDD [45].

Baseline study. Sections B.4 and B.5 refer on several occasion to the 2006 CDM baseline study. Please make sure to provide this study and clarify in

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In Part B. of the PDD [45] they refer to the "REVISED CDM BASELINE STUDY ON FUEL USE AND MANURE MANAGEMENT AT HOUSEHOLD

Date: 13/07/2011



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what context this study had been undertaken (e.g. why is this called CDM baseline study). Sampling data. Please kindly upload as separate annexes in the registry the 2008 and 2009 survey studies, the sampling database, as well as the questionnaire used for collecting data and the spread sheets used for the processing of the survey data (baseline and biogas users). Also, please discuss the process followed to select the households for the sampling and how this ensured a representative sample of the overall targeted population.	LEVEL" [32]. This revised study is based on Gold Standard. The process followed to select the households for the sampling is integrated in [32] point 1.4. Due to the fact that the survey study 2008 has been uploaded 21 May 2010 and SQS was able to validate all relevant issues regarding GS 2.1 requirements (additionality, baseline, project scenario, monitoring plan etc.) it was accepted that the survey study 2009 will be uploaded once the survey study 2009 is conducted. See FAR 1.
Project database. Please make sure to upload the project database in the GS registry (name, location, baseline fuel, date of installation of biodigester, etc.)	Uploaded 21 May 2010.
Non-renewable biomass fraction. Please make sure to provide a detailed discussion on the evaluation of the non-renewable biomass fraction of the wood fuel used in the baseline. Please also provide a sensitivity analysis showing in the form of a summary table the impact of a variation of the main parameters used to derive the NRB, on the resulting emission reductions, and briefly discuss in the table why the chosen values are conservative enough. Please try to sense-check the computed NRB fraction with potentially available studies that looked into the renewable nature of biomass resources in the considered region or neighbouring regions with similar boundary conditions, and with FAO national data.	It is described in the "REVISED CDM BASELINE STUDY ON FUEL USE AND MANURE MANAGEMENT AT HOUSEHOLD LEVEL" [32].
Calculation of Emission Reduction. Please upload the complete and detailed spreadsheet used for the calculation of the baseline emissions, project emissions and emission reductions. Note that emission reductions are increasing from year 8 to 10 although the cumulative number of biodigesters is not.	Uploaded 24 May 2010.
Methane GWP. Please revise the methane GWP in line with the IPCC 2006 guidelines, i.e. 21 instead of 25, and revise the calculation of the baseline and emission reductions accordingly.	The calculations are corrected. See CAR 3 in this report.
Standard deviation – Please clarify the discrepancy between the calculated standard deviation under step 2 (3.68) and the value used in Step 3 to determine BEth (3.85).	This point is revised.
Do no harm assessment. The DNHA must be easily reproducible by readers, and when possible must refer to publicly available and easily accessible reference sources. Please therefore include the exact reference sources (inc. page numbers) for	The Do no harm assessment is completely revised in the Gold Standard Passport [27]. See CAR 4 in this report.



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all relevant safeguarding principles and when a	
safeguarding principle is not considered relevant,	
please provide a reference source to justify the	
statement unless objectively obvious.	T
Labor Standards. Considering that there is wide-	The process is described In Part B.7.2. of the PDD
scale deployment of the bio-digester technology in 8	[45].
provinces and that several construction contractors	
are involved, proper labor practices (i.e. appropriate	
attire, protective gear, proper compensation of work	
hazards) should be ensured by the contractors and	
must be checked by the PBPO supervisors who go	
around checking construction sites. Please	
therefore provide an update regarding this process	
in the revised documentation.	This coefficient and
SP 11 Corruption. Since spare parts will be sold	This section is revised.
through local shops (assumed private institutions	
and not run by NBP), please provide more	
information about how corruption will be avoided in	
the next few years of project implementation, i.e.,	
the avoidance of unreasonable increase in prices of	
spare parts or after-sales services.	The DNA is informed by small on 24 Contember
DNA notification. Please provide evidence that the	The DNA is informed by email on 24 September 2010.
DNA was notified (by email or letter) of this project	
going forward as a voluntary project. Projects going for the GS- VER stream do not require a letter of	See CL 20 in this report.
approval; however, it is necessary to inform the	
relevant national authority of the project's existence.	
Assessment of comments. In the GS Passport	This section is revised.
and LSC report, the explanation to the 5th	This section is revised.
stakeholder comment is the same as the 6th	
stakeholder comment. The 7th comment and its	
explanation are not consistent in thought. Please	
revise this section to reflect the accurate exchange	
of comments.	
Stakeholder Feedback Round. Considering that	NBP has a very extensive home page on which all
NBP has conducted several national, provincial, and	information is clearly available: www.nbp.org.kh
local workshops, a feedback round was deemed as	There are sites "Contact us", "Publications" and new
no longer necessary. However, since Gold Standard	"Comments, please give us your comments and
registration is requested starting January 2009 and	suggestion". Comments received by email or other
most stakeholder consultations were conducted pre-	means are processed professionally. Those are
2008, it is suggested that an online feedback round	open lines to stakeholders.
is conducted, possible stakeholders listed in Table	See CL 16 in this report.
2.10 of the GS Toolkit are informed through national	, , , , , , , , , , , , , , , , , , ,
media and provincial announcements, and that a	
mechanism for collecting stakeholder comments	
during the feedback round is implemented (i.e. there	
is a hotline that stakeholders can call, local officials	
are informed that village stakeholders can come to	
them to report comments, government authorities	
and program personnel have open communication	
lines with the stakeholders). Please also ensure that	



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relevant GS NGO Supporters1 are invited to provide their feedback. Please justify the process taken for the feedback round and clearly explain the rationale behind the decision.	
DOE interviews of local stakeholders. The DOE shall interview relevant local stakeholders during the on-site visit to ensure that the information in the Local Stakeholder Consultation Report indeed reflects adequately stakeholder inputs (concerns, positive and negative feedback) and that stakeholders are able to voice out their concerns now that the program is in full implementation phase. The DOE shall ensure that interviews with local stakeholders cover a representative sample of users, including women, and a representative sample of villages. Please ensure that the DOE has access to village workshop participants' lists in order to facilitate the interview process.	The described information could be observed during on-site visit and during interviews.
Double counting. Please describe the mechanisms to be put in place to prevent any risk of double-counting due to other similar project activities that could potentially claim the same emission reductions, e.g. what are the control procedures in place to make sure that a retailer cannot claim carbon credits from the same biodigester in two different project activities?	The avoidance of double counting is included in Part B.5.7. of the PDD [45]. In addition, double counting to another CDM or voluntary market project is not allowed through the text in the contract between the owner/operator of the biodigester and NBP. See CAR 6 in this report.
Monitoring SD parameters. Please include realistic future targets for the number of households with toilets (future target is 100% but project situation only has 10% of the households with toilets connected to the bio-digester) and the use of bio-slurry by farmers (future target is set to all households will use bio-slurry).	The targets are lower.
Monitoring of SD parameters – net cash inflow. This can be kept confidential but the DOE must include this in the validation.	No demand relative confidential.
Transfer of emission reduction ownerships. Please discuss what mechanism is (or will be) in place to insure a transparent and clear transfer of the ownership of the emission reductions from the users o the project proponent. (e.g. waiver form in exchange of subsidized biodigester, etc).	The transfer of the emission rights (VER credits) from the owner of the biodigester to NBP is described in a Biodigester Construction Contract [17]. See CL 14 and CAR 5 in this report.
Location of the project. Please include the GPS coordinates reflected in Section D.1 of the GS Passport in Section A.4.1.4 of the PDD.	The coordinates are included. See CL 19 in this report.
Small-scale threshold. Please remove the email quote provided in section B2 with regards to the small-scale upper threshold. The PDD should not contain informal communication. This information can however be provided to the DOE if necessary to	It is removed.



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confirm that GS does approve the 60,000 tCO2	
upper threshold for this project activity.	
Editing. Please make sure the finalised PDD	It is included.
includes page numbers and all equations are	
numbered in order to allow for clear referencing in	
the registration review feedback form.	

Relevant Corrective Action Requests (CARs) and Clarification Requests (CLs) were resolved successfully and are summarized in appendix F (Validation Protocol).



3.10 Environmental impacts

Referring to Part D of the PDD [45].

There are no project specific environmental requirements by the authorities issuing the construction of biodigesters. An EIA is not required. Hence, SQS confirms that the project proponent followed all the requirements of the host country regarding the environmental impacts and standards.

3.11 Validation protocol

In order to ensure transparency and organize the corrective or additional information and measures a validation protocol was established for the project (see appendix F). The protocol shows in transparent manner the criteria (requirements), the means of validation and the results from validating the identified criteria including any resulting CAR, FAR and CL.



4 List of Interviewees and Documents Reviewed

The on-site visit and interviews were done according to the on-site visit program (see appendix A), which was communicated, to the project owner in advance of the audit.

The following stakeholders were interviewed during the validation (see appendix B).

The following documents were assessed during the validation (see appendix C).

5 Validation Team and Reviewer

The following matrix shows the names and roles of the members of the validation team and the reviewer. The technical reviewer is not a member of the validation team. Certificates of competence for each validation team member are included in appendix D to this report.

Name	Role (1)	Country	Duties					
			Desk review	On-site audit	Resolution of CAR & CL	Report	Internal review	Technical review
Mr. Rudolf Brodbeck	LA	Switzerland	X	Х	X	X		'
Mr. Michael Gassner	TM	Switzerland	Х				Х	
Mr. Oliver Stankiewitz	TR	Switzerland						Х

⁽¹⁾ LA = Lead auditor/assessor; TM = Team member; TE = Technical expert (if any); TR = Technical reviewer

6 Quality Control

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Cross checks and/or other plausibility checks undertaken during validation are mentioned in the report or in the protocol. The draft validation report, including the initial validation findings, is checked by an internal reviewer (a member of the validation team) before being submitted to the project participants. The final validation report undergoes a technical review before requesting registration of the project activity. The technical reviewer (not a member of the validation team) is qualified in accordance with SQS' qualification scheme for CDM validation and verification.

Date:



7 Appendix A: On-Site Visit Program

Time From to		Topic	Function/ Department	Person(s) to contact
1 10111 10		i Topic	Function/ Department	reison(s) to contact
16.08.2010				
		NBP Office Phnom Penh		
09:00	09:30	Opening meeting / briefing		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
09:30	10:15	Local Stakeholder Consultation		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
10:15	10:45	Stakeholder Feedback Round		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
10:45	11:45	"Do No Harm" Assessment		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
11:45	12:30	Sustainable Development Matrix		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
12:30	14:00	Lunch		
14:00	18:00	PDD review Responsibilities GHG calculations / methods Monitoring plan		Lam Saoleng (NBP) Jan Lam (SNV), Eric Buysman
17.08.2	2010		Plant Code	Plant owner Supervisor
<u> </u>		Site visit		
08:00	09:00	Transport to site		
09:00	19:00	Site tour Stakeholder Interview "Do No Harm" Assessment Sustainable Development Matrix	807100415 807070093 807100450 807100451 807100528 807070090 307090947 307070212 307090946 307090914 307091063 307091029 307091030 307090899	Reth Thy Moch Meth Pang Leng Pich Thuny Seng Kimly Pras Cheang Siem Ngoun Sok Soth Yun Ten Seng Mab Soy Yen Lonh Meng Oun Sokhol Chab Nin Chen Dararith Chab Nin Sreyneang Lok Ny Seng Math Chen Dararith Chhen Dararith
19:00	20:00	Transport to Phnom Penh		

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8 Appendix B: Interviews

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Additional information for local issues		
Name:	Issues	
Tha Chan	Legal, Baseline, Translation	

Date: 16.08.2010					
Name	Position	Issues			
Lam Saoleng	NBP Programme Coordinator	Whole project			
Jan Lam	SNV Senior Biogas Advisor	Whole project			
Eric Buysman	GERES Carbon finance consultant	Whole project			
Meng Chanvibol	NBP Technical Manager	QS/QA system			
Kethkeo Kannitha	NBP MIS Assistant	Data Base			

Date: 17.08.2010		
Name	Position	Issues
Heng Binyik	PDA Director	Project activity, Sustainability
		assessment
Chieng Sarith	NBP Coordinator	Supervisor system, Sustainability
-		assessment
Chen Chett	Supervisor	Training
Keo Chanthon	Farmer's wife	Baseline, Project activity, Training
	Plant code 313090919	Sustainability assessment
Hoem Simoeurn	· · · · · · · · · · · · · · · · · · ·	
	Plant code 313101336	Sustainability assessment
Sorng Saray	Farmer's wife	Baseline, Project activity, Training
	Plant code 301080601	Sustainability assessment
Toem Ton	Farmer, Plant Owner	Baseline, Project activity, Training
	Plant code 301080621	Sustainability assessment
Heng Sokhom	Farmer, Plant Owner	Baseline, Project activity, Training
-	Plant code 301080652	Sustainability assessment
Som Thol Farmer, Plant Owner Baseline, Project ad		Baseline, Project activity, Training
	Plant code 301080614	Sustainability assessment
Poch Hoy	Farmer, Plant Owner	Baseline, Project activity, Training
•	Plant code 313101313	Sustainability assessment
Thong Thon Farmer, Plant Own		Baseline, Project activity, Training
J.	Plant code 301080683	Sustainability assessment

13/07/2011

Date:



9 Appendix C: Documents Reviewed

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Nr.	Title	Version
1	2010 05 24 National Biodigester Programme Cambodia - PDD V7.pdf	24/05/2010
2	PDD - NBP Cambodia - PDD V13.docx	27/10/2010
3	Biodigester User Survey Report	June 2007
4	Report on the Biodigester User Survey 2008	July 2008
5	2010 06 01 ANNEX 1 of the stakeholder consultation report.pdf	
6	2010 06 01 ANNEX 5 of the Stakeholder Consultation report.pdf	January 2006
7	2010 06 01 National Biodigester Programme Cambodia - Stakeholder report.pdf	
8	2010 06 01 National Biodigester Programme Cambodia - Gold Standard	V3
	Passport.pdf	24/05/2010
9	2010 07 30 NBP List of Documents (2).docx	
10	2010 08 11 Plant to be visited on 17_Aug2010_KNLKCM.xlsx	
11	2010 08 13 ex-ante baseline and emission reduction calculations final	
12	Feasibility_study_Cambodia_2005.pdf	January 2005
13	2006 08 17 Invitation letter CDM workshop (3).docx	18 August
		2006
14	2010 09 01 NBP Cambodia - Gold Standard Passport V5.pdf	30/08/2010
15	2010 09 02 LSC report- NBP - 020910 V5.pdf	
16	2010 09 02 NBP Cambodia - PDD V10.pdf	02/09/2010
17	National Biodigester Programme Biodigester Construction Contract	
18	Form 03-Const contract-VER hand over.pdf	
19	NBP-GS Sustainable development feedback form.docx	
20	Revised National Workshop Agenda-28-1-08.pdf	14 February
20	Nevised National Workshop Agenda 20 1 00.pdf	2008
21	Programme Arrangement and Implementation Document National Biodigester Programme in Cambodia	January 2006
22	Extension of Memorandum of Understanding between the Ministry of Agriculture,	29. Jan. 2010
	Forestry and Fisheries and SNV Netherlands Development Organisation on	
	Technical Assistance for a National Biodigester Programme for the period 2010-2012	
23	2010 09 16 Finance Admin Procedure (NBP) revise 2010.docx	September,
	2010 00 10 1 manos / amm 1 1000 acid (1121) 10 100 20 10 acids	2010
24	2010 09 17 LSC report- NBP V6.pdf	
25	2010 09 17 NBP Cambodia - Gold Standard Passport V6.pdf	16/09/2010
26	2010 09 17 NBP Cambodia - PDD V11.pdf	16/09/2010
27	2010 09 27 GSPP - NBP Cambodia V7.docx	26/09/2010
28	2010 09 27 LSCR- NBP Cambodia V7.docx	
29	2010 09 27 NBP FIRR calculations for 3 digester sizes.xlsx	
27	2010 09 27 PDD - NBP Cambodia - PDD V12.docx	26/09/2010
30	LSCR- NBP Cambodia V8.docx	27/10/2010
31	CDM Baseline study on fuel use and manure management at household level	11-08-2006
32	REVISED CDM BASELINE STUDY ON FUEL USE AND MANURE	2010
02	MANAGEMENT AT HOUSEHOLD LEVEL	2010
33	Verification Report YPD	October 2008
34	2009 09 28 ODA statement[1].pdf	28.09.2009
35	2010 05 17 letter of no objection MoE[1].JPG	12.09.2005
36	Pre-feasibility Assessment	09.04.2010
50	ו ופ-ופמאואווונץ האשפאשוויפוונ	U3.U4.ZU IU



Report-No.:

37	Approval on Steering Committee for Biodigester Programme	08. Feb 2006
38	Approval on Steering Committee for Biodigester Programme	26. Nov 2008
39	2010 05 21 Dbase client list(1)	
40	Memorandum of Understanding between SNV Netherlands Development Organisation and The Royal Government of Cambodia	11. August 2005
41	Cambodia National Biodigester Programme Implementation Plan Revision for the period: 2010, 2011 and 2012 with DGIS, BMZ and VER funding	December 2009
42	Carbon Finance Project Idea Note	July 2005
43	IPCC Guidelines for National Greenhouse Gas Inventories, Volume 2 and 4	2006
44	FW Stakeholder feedback	13. September 2010
45	PDD - NBP Cambodia - PDD V15	V 15



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10 Appendix D: Certificates of Competence

Name: Mr Rudolf Brodbeck

Sco	pes of expertise:	V
1	Energy industries (renewable/non-renewable sources) TA 1.1: Thermal energy generation from fossil fuels as well as thermal energy from solar	X
	TA 1.2: Energy generation from renewable energy sources	X
	TA 1.3: Other energy industries	X
	Energy distribution	
2	TA 2.1: Electricity distribution	
_	TA 2.2: Heat distribution	
3	Energy demand	
3	TA 3: Energy demand	
	Manufacturing	X
	TA 4.1: Cement sector	
4	TA 4.2: Aluminium	
•	TA 4.3: Iron and steel	
	TA 4.4: Refinery	
	TA 4.5: Other manufacturing industries	X
5	Chemical production	X
	TA 5.1: Chemical process industries	X
6	Construction TA 6.1: Construction	
	Transport	X
7	TA 7.1: Transport	X
	Mining/mineral production	
8	TA 8.1: Mining and mineral processes, excluding those included in TA 8.2 below	
	TA 8.2: Oil and gas industry, coal mine methane recovery and use	
9	Metal production	
9	TA 9.1: Metal production	
	Fugitive emissions from fuels	
10	TA 10.1: Mining and mineral processes, excluding those included in TA 10.2 below	
	TA 10.2: Oil and gas industry, coal mine methane recovery and use	
	Fugitive emissions from production and consumption of halocarbons and sulphur	
11	hexafluoride	
	TA 11.1: Chemical process industries	
12	Solvent use TA 12.1: Chemical process industries	X
	·	X
13	Waste handling and disposal TA 13.1: Waste handling and disposal	
	Afforestation and reforestation	
14	TA 14.1: Forestry	
4-	Agriculture	X
15	TA 15.1: Agriculture	X



Name: Mr Michael Gassner

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	Energy industries (renewable/non-renewable sources)	X
1	TA 1.1: Thermal energy generation from fossil fuels as well as thermal energy from solar	
	TA 1.2: Energy generation from renewable energy sources	X
	TA 1.3: Other energy industries	
	Energy distribution	
2	TA 2.1: Electricity distribution	
	TA 2.2: Heat distribution	
3	Energy demand TA 3.1: Energy demand	
	•	
	Manufacturing TA 4.1: Cement sector	
	TA 4.2: Aluminum	
4	TA 4.3: Iron and steel	
	TA 4.4: Refinery	
	TA 4.5: Other manufacturing industries	
_	Chemical production	
5	TA 5.1: Chemical process industries	
c	Construction	
6	TA 6.1: Construction	
7	Transport	Χ
′	TA 7.1: Transport	Χ
	Mining/mineral production	
8	TA 8.1: Mining and mineral processes, excluding those included in TA 8.2 below	
	TA 8.2: Oil and gas industry, coal mine methane recovery and use	
9	Metal production	
	TA 9.1: Metal production	
4.0	Fugitive emissions from fuels	
10	TA 10.1: Mining and mineral processes, excluding those included in TA 10.2 below	
	TA 10.2: Oil and gas industry, coal mine methane recovery and use	
11	Fugitive emissions from production and consumption of halocarbons and sulphur	
11	hexafluoride TA 11.1: Chemical process industries	
	Solvent use	
12	TA 12.1: Chemical process industries	
	Waste handling and disposal	X
13	TA 13.1: Waste handling and disposal	X
	Afforestation and reforestation	X
14	TA 14.1: Forestry	X
45	Agriculture	X
15	TA 15.1: Agriculture	X



Name: Mr Oliver Stankiewitz

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	pes of expertise: Energy industries (renewable/non-renewable sources)	Χ
	TA 1.1: Thermal energy generation from fossil fuels as well as thermal energy from solar	
1	TA 1.2: Energy generation from renewable energy sources	Χ
	TA 1.3: Other energy industries	
	Energy distribution	Χ
2	TA 2.1: Electricity distribution	
	TA 2.2: Heat distribution	Χ
3	Energy demand	Χ
J	TA 3:1 Energy demand	Χ
	Manufacturing	
	TA 4.1: Cement sector	
1	TA 4.2: Aluminum	
4	TA 4.3: Iron and steel	
	TA 4.4: Refinery	
	TA 4.5: Other manufacturing industries	
5	Chemical production	
	TA 5.1: Chemical process industries	
6	Construction	Χ
	TA 6.1: Construction	Χ
7	Transport	
<u>'</u>	TA 7.1: Transport	
	Mining/mineral production	
8	TA 8.1: Mining and mineral processes, excluding those included in TA 8.2 below	
	TA 8.2: Oil and gas industry, coal mine methane recovery and use	
9	Metal production	
	TA 9.1: Metal production	
	Fugitive emissions from fuels	
10	TA 10.1: Mining and mineral processes, excluding those included in TA 10.2 below	
	TA 10.2: Oil and gas industry, coal mine methane recovery and use	
11	Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride	
• •	TA 11.1: Chemical process industries	
12	Solvent use	
	TA 12.1: Chemical process industries	
13	Waste handling and disposal	Х
	TA 13.1: Waste handling and disposal	X
14	Afforestation and reforestation	X
	TA 14.1: Forestry	X
15	Agriculture	X
	TA 15.1: Agriculture	Χ



11 Appendix E: Abbreviations

CAR Corrective Action Request
CDM Clean Development Mechanism

CEF Carbon Emission Factor
CER Certified Emission Reduction

CH4 Methane

CL Clarification Request CO2 Carbon dioxide

CO2e Carbon dioxide equivalent
CPA CDM Programme of Activities
DNA Designated National Authority
ERU Emissions Reduction Unit
FAR Forward Action Request
GHG Greenhouse gas(es)
GWP Global Warming Potential

IEE Initial Environmental Examination

IPCC Intergovernmental Panel on Climate Change

LFG Landfill Gas
MP Monitoring Plan
MSW Municipal Solid Waste

MVP Monitoring and Verification Plan

N2O Nitrous oxide

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NGO Non-governmental Organisation
ODA Official Development Assistance

PDD Project Design Document PoA Programme of Activities

SDM Sustainable Development Matrix

SQS Swiss Association for Quality and Management Systems
UNFCCC United Nations Framework Convention on Climate Change

VER Voluntary Emission Reduction

Date:

Swiss Association for Quality and Management Systems (SQS)

Bernstrasse 103
P.O. Box 686
CH-3052 Zollikofen
Tel. +41 31 910 35 35
Fax. +41 31 910 35 45
headoffice@sqs.ch
w w w . s q s . c h

Appendix F: Gold Standard Validation Protocol

Enterprise

Business account: 321147

Company: National Biodigester Programme (NBP)
Address: Department of Animal Production and Health

Trea village, Sarla street (street 371)

Sangkat Streung Meanchey

PO Box 2590

Phnom Penh, Cambodia

Phone/Fax: +855 23 992 609/+855 23 992 604

E-Mail: saoleng@nbp.org.kh
Contact person: Mrs. Saoleng Lam

Service

Audit/Assessment: Gold Standard Validation Audit/Assessment beginning/end: 12/07/2010 – 12/07/2011

Project name: National Biodigester Programme, Cambodia

GBZ/Report-No.: 321048/P29850.33

Project ID: GS751
Project Stream: VER

Project Type: Biogas - Heat Project Size: Large-Scale

Baseline Methodology: Indicative programme, baseline, and monitoring methodology

for Small Scale Biodigester, Voluntary Gold Standard

Team of auditors/assessors Mr Rudolf Brodbeck

Mr Michael Gassner



Gold Standard Validation Protocol

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THE GOLD STANDARD REQUIREMENTS	3
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Introduction

Objective of validation ([GST] 3.1)

The objective of the validation process is to have an independent third party assess whether the project design fulfils the requirements set out by the Gold Standard. The Validator shall confirm that the project design, as documented in the PDD, Passport and Local Stakeholder Consultation report, is sound and reasonable and meets the relevant criteria.

Requests ([VVM] 35-37)

- The DOE shall raise a corrective action request (CAR) if one of the following occurs:
 - (a) The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions;
 - (b) The CDM requirements have not been met;
 - (c) There is a risk that emission reductions cannot be monitored or calculated.
- The DOE shall raise a clarification request (CL) if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met.
- The DOE shall raise a forward action request (FAR) during validation to highlight issues related to project implementation that require review during the first verification of the project activity. FARs shall not relate to the CDM requirements for registration.

Normative References/Documents

No.	Title	Version
[GSR]	Gold Standard Requirements	2.1
[VVM]	Clean Development Mechanism Validation and Verification Manual	01
[GST]	Gold Standard Toolkit	2.1
[METH]	Indicative programme, baseline, and monitoring methodology for Small Scale Biodigester Voluntary Gold	
	Standard	Internet
[ADD]	Tool for the demonstration and assessment of additionality	05.2
[PDD]	PDD	V7
[GSP]	Gold Standard Passport	V3
[GSSR]	Local Stakeholder Consultation Report	
[VRYPD]	Verification Report YPD	2008
[BUS08]	Report on the Biodigester User Survey 2008	July 2008
[BUS07]	Biodigester User Survey Report	June 2007
[PL]	List of all plants	??
[PFA]	Pre-feasibility Assessment	03.12.2009
[HCNO]	Letter of Host Country No Objection	12.09.2005
[GSDM]	Sustainable development matrix	
[GSMP]	Sustainability Monitoring Plan – table	
[ODA]	ODA declaration	28.09.2009
[PAID]	PROGRAMME ARRANGEMENT and IMPLEMENTATION DOCUMENT	January
	NATIONAL BIODIGESTER PROGRAMME in CAMBODIA	2006
[EMU]	EXTENSION OF MEMORANDUM OF UNDERSTANDING BETWEEN THE MINISTRY OF	29. Jan.
	AGRICULTURE, FORESTRY AND FISHERIES AND SNV NETHERLANDS DEVELOPMENT	2010
	ORGANISATION ON TECHNICAL ASSISTANCE FOR A NATIONAL BIODIGESTER PROGRAMME	
	FOR THE PERIODE 2010 - 2012	

MoV = Means of Validation, DR = Document Review, I = Interview, N/A = Not Applicable CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request



Protocol 1: Requirement Checklist

Requiremer	nt	Ref.	MoV	Draft Concl.	Final Concl.
1	The Gold Standard Requirements				
1.1	START VALIDATION PROCESS				
	 Project documentation. To support the validation stage, Project Proponents shall submit their full set of Gold Standard project activity documentation: the Gold Standard Project Design Document the Gold Standard Passport together with the supporting project documentation necessary for validation of the project activity against the Gold Standard requirements. This documentation shall be submitted via the Gold Standard Registry and Project Administration System. 		DR		OK
	Comment: Title		Versior	n uplo	aded
4.4.4	PDD REVISED CDM BASELINE STUDY ON FUEL USE AND MAI MANAGEMENT AT HOUSEHOLD LEVEL	NURE	V7 2010		5.2010 5.2010
1.1.1 [GSR] VIII.e.3	Gold Standard Passport Local Stakeholder Consultation Report Verification Report YPD Report on the Biodigester User Survey 2008 Biodigester User Survey Report List of all plants Pre-feasibility Assessment Letter of Host Country No Objection Sustainable development matrix Sustainability Monitoring Plan – table		V3 ?? 2008 July 200 June 200 ?? 03.12.20 12.09.20	02.06 21.05 21.05 07 21.05 21.05 09 21.05 05 19.05 Pas	5.2010 5.2010 5.2010 5.2010 5.2010 5.2010 5.2010 5.2010 6.2010 6.2010 6.2010 6.2010 6.2010 6.2010 6.2010
	ODA declaration		28.09.20	09 0	SS sport
1.1.2 [GSR] 0.5	The Toolkit comes with fixed templates which have to be used to report information being passed between project proponents, validators, verifiers and the Gold Standard. • Gold Standard Passport (Annex R) • Local Stakeholder Consultation Report (Annex Q) • Sustainable development matrix (Annex I) • Sustainability Monitoring Plan – table (Annex I) • Cover Letter (Annex S) • ODA declaration (Annex D) • Terms & Conditions (Annex M)	[GSP] [GSSR] [GSP] [GSP]	DR DR DR DR	CL 7	OK OK OK OK
	Emissions Reduction Acquisition Agreement (CDM) (Annex O) Emissions Reduction Acquisition Agreement (JI) (Annex P) Comment:		N/A N/A		
1.2	PROJECT ELIGIBILITY				
1.2.1 [GSR] III.a.1	General requirements. All Gold Standard projects must be additional, contribute to sustainable development and result in real, measurable and verifiable permanent emission reductions.	[PDD] [GSP]	DR I	CAR 5 CL 14	OK

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Requiremen	t		Ref.	MoV	Draft Concl.	Final Concl.
	Comment:	In the PDD and in the passport port "subsidy" is spoken of som If it's a subsidy, then the project is not allowed as climate project. Rather the transfer of the emission rights from the owner/oper with this amount. The transfer of the emission rights (VER credits) from the own described in a contract.	ct. ator of the b	oiodiges	PDD page ter to NBP is	24 -28. s settled
1.2.2 [GSR] III.a.2	registration or credit made previously of credits, unless the p been significantly re statement in the G announcement has sanctions described	ement statement. Project activities are NOT eligible for ing under the Gold Standard if an announcement has been the project going ahead without the revenues from carbon project has subsequently been cancelled or the design has vised. Project Proponents shall provide a pre-announcement Gold Standard Passport, attesting that no such previous been made. The Project Proponent shall be subject to the in Section 10 of the Terms and Conditions for any material in the preannouncement statement. 2006 – 2008 credits before Gold Standard registration by HIVO	[GSP] Page 8 [PDD] Page 15			
	Eligible project acti					
1.2.3 [GSR] III.b.1		I host country. Gold Standard CDM project activities must be ex I country, as defined by the UNFCCC (see section T.1.2.2				N/A
1.2.4 [GSR] III.b.2	Gold Standard JI ho located in an Annex	Dest country. Gold Standard JI project activities must be a country with a commitment inscribed in Annex B, as defined a section T.1.2.2 for references).				N/A
1.2.5 [GSR]	may be located in an states have caps on Proponent has provid assurances that an eGS VERs issued. An will not be issued price	host country or state. Gold Standard VER project activities y host country or state. However, where host countries or GHG emissions, projects shall only be eligible if the Project ded the Gold Standard Foundation with satisfactory quivalent amount of allowances will be retired to back-up the y AAUs may be retired for this purpose. Gold Standard credits or to confirmation by the relevant local authorities that an fallowances has been retired (see section T.1.2.2 for	[GSP] Page 6 [PDD] Page 7	DR I	CAR 1	ОК
III.b.3	Comment:	Cambodia National Biodigester Programme (NBP) is a joint venture into Agriculture, Forestry and Fisheries (MAFF) and the Netherland According to [EMU] page 3 Ministry of Agriculture, Forestry at the National Biodigester Programme. The contract [EMU] is signed by Ministry of Agriculture, Forest and Netherland Development Organisation Cambodia.	Developme ind Fisherie	ent Orga s will ta	nisation (SN ke the owne	IV). ership of
1.2.6 [GSR] III.b.4	caps on GHG emiss country or state prior on relevant greenhou otherdenominated ur from the date any ne	host country or state – post-registration institution of sions. Projects that have been registered in a given host to that country or state's adoption or implementation of a cap use gas emissions shall be required to retire allowances or nits reflecting emission reductions to back-up issued VERs				N/A
	Comment:	eases whive				
1.2.7 [GSR] III.c.1		Carbon Dioxide (CO2), Methane (CH4) and/or Nitrous Oxide Gold Standard crediting, provided project activities comply	[GSP] Page 9	DR		OK



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Requiremen	t	Ref.	MoV	Draft Concl.	Final Concl.
1.2.8 [GSR] III.c.2	Project activities involving both eligible and ineligible gases. Project activities involving the reduction of both eligible and noneligible greenhouse gases shall be eligible under Gold Standard for the crediting of emission reductions associated with eligible gases only. Comment:				N/A
	Eligible project types				
1.2.9 [GSR] III.d.1	Eligible project types. Only two categories of project activities are eligible for Gold Standard registration: Renewable Energy Supply and End-use Energy Efficiency Improvement project activities. Renewable Energy Supply. This category of project activities is defined as the generation and delivery of energy services (e.g. mechanical work, electricity, heat) from non-fossil and non-depletable (Although making use of a depletable source, landfill gas projects are eligible under the Gold Standard.) energy sources. See Toolkit Annex C for additional eligibility criteria applied to specific types of project activities. End-Use Energy Efficiency Improvement. This category of project activities is defined as activities that reduce the amount of energy required for delivering or producing non-energy physical goods or services. See Toolkit Annex C for additional eligibility criteria applied to specific types of project activities. Comment: Renewable Energy	[GSP] Page 7	DR		ОК
1.2.10 [GSR] III.d.4	Specific additional eligibility criteria. Gold Standard project activities in the above two categories must additionally comply with the specific eligibility criteria set out in Annex C of the Gold Standard Toolkit. Comment:	[GSP] Page 7	DR I		OK
1.2.11 [GSR] III.d.5	Project activities involving both eligible and ineligible project types. Unless otherwise specified in the Gold Standard documentation, and in particular in the list of additional eligibility criteria provided in Annex C of the Toolkit, activities making use of a mix of renewable and non-renewable energy sources shall be eligible to claim credits for those emission reductions that are associated with the share of renewable energy sources in the total energy service delivered. Comment:				N/A
1.2.12 [GSR] III.d.6	Bundled project activities. Where project activities are submitted together for Gold Standard registration within a bundle of activities, each project activity shall individually be in compliance with the Gold Standard eligibility criteria. Eligibility criteria with regards to the scale of the project (see III.e.1 and III.e.2) shall apply to the bundle as a whole and not to the individual project activities. Comment:				N/A
1.2.13 [GSR] III.d.7	Programme of Activities. Where a group of project activities is submitted together for Gold Standard registration within a Programme of Activities, each of these activities must be in compliance with the Gold Standard eligibility criteria. Micro-scale project activities cannot apply under a Progamme of Activities. Comment:				OK
	Eligible project scale				
1.2.14 [GSR] III.e.1	Gold Standard CDM and JI project activities. Gold Standard CDM or JI project activities may be 'large-scale' or 'small-scale' project activities, as defined in accordance with UNFCCC rules and as explained in section T.1.2.1. Comment:				N/A
1.2.15 [GSR] III.e.2	Gold Standard VER project activities. Gold Standard VER project activities may be 'large-scale', 'small-scale' or 'micro-scale' project activities. 'Large-scale' and 'small-scale' project activities are defined in accordance with UNFCCC rules, as explained in section T.1.2.1. 'Micro-scale' project activities are those project activities associated with annual emission reductions of less than 5,000 tCO2- eq in each year covered by the Gold Standard crediting period.	[GSP] page 6 [PDD] page 17/18	DR I	CL 1	OK
	Comment: Large-scale project with methodology for Small Scale Biodigest Average number of credits per year: 60'604. Limit for small scale and scale between the comment of		= 60'000	0 tCO2/year	



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	13/0/1/2011 P29000.33			0 01 32	
Requirement		Ref.	MoV	Draft Concl.	Final Concl.
1.2.16 [GSR] III.e.3	Annual emission reductions in excess of selected project scale. Where the maximum level of allowable annual emission reductions for a small-scale or microscale project has been exceeded, that project shall only be eligible for Gold Standard CERs, ERUs or VERs up to the maximum number of allowable credits under that project scale per annum. No GS VERs can be claimed for emission reductions generated over and above what is credited under a small-scale CDM or JI project.	[PDD] page 15	DR I	CL 2 CL 3	OK
	Comment: Average number of credits per year: 60,604 Different numbers on page 15, 3, 75, 57				
1.2.17 [GSR] III.e.4	Annual emission reductions for elements not covered by a CDM project activity. GS VERs may be claimed for separate project elements not covered by a CDM project activity as long as they are validated separately as a VER project activity. See T.4.11. Comment:				N/A
	Eligible methodologies for project activities				
1.2.18 [GSR] III.f.1	CDM and JI project activities. CDM and JI project activities must use an approved UNFCCC CDM methodology to be eligible for Gold Standard registration (see section T.2.2 for applicable methodologies). All Gold Standard project activity documentation must apply the most recent version of this methodology available at the time of first submission of the project activity for Gold Standard registration. Comment:				N/A
1.2.19 [GSR] III.f.2	VER project activities. VER project activities must use either an approved UNFCCC CDM methodology or a GS VER methodology to be eligible for Gold Standard registration (see section T.2.2 for applicable methodologies). All project activity documentation submitted to the Gold Standard must apply the most recent version of the selected methodology available at the time of first submission of the project activity for Gold Standard registration. This methodology and version may be used by the project activity until it is registered under the Gold Standard as long as the project activity is submitted for validation within 3 months after the time of first submission for Gold Standard registration.	[PDD] page 17	DR I		ОК
1.2.20	Comment: GS methodology: Indicative program, baseline, and monitoring Biodigester Bundle. A bundle of micro-scale project activities making use of different	methodolog	gy for Sr	nall Scale	
[GSR] III.f.3	methodologies may be submitted within the same PDD. CDM rules apply for small-scale projects. Comment:				N/A
1.2.21 [GSR] III.f.4	Voluntary Programme of Activities . VER CPAs may use different methodologies under the same VER PoA. Comment:				N/A
1.2.22 [GSR] III.f.5	Baseline methodology and conservativeness. Unless there is a convincing case for an alternative choice of baseline methodology, Project Proponents must use the approved methodology, and the option within this methodology, that results in the lowest baseline emissions. Guidelines are provided in section T.2.2. Comment:	[PDD] page 17	DR I		OK
1.2.22.1 [GST] 3.5.1	Check that the PDD uses the latest version of the methodology and the latest interpretation from the EB at the time of first submission to the Gold Standard (as defined in the Gold Standard Requirements).		DR		OK
1.2.22.2 [GST] 3.5.1	Comment: Current version of the GS portal. No version number. Check that the PDD describes the baseline methodology used.	[PDD] page 19	DR		OK
1.2.22.3 [GST] 3.5.1	Comment: Check that the PDD describes the quantified baseline scenarios.	[PDD] page 34 ff	DR		OK



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heck that the PDD substantiates the choice of baseline scenario. omment: heck that the PDD includes an overview of the current and known future legally nding regulatory instruments and assesses whether the project would be aplemented anyway because of these. omment: Integrated in different texts heck that the PDD provides evidence so that it can be assessed whether or not the technology used is considered "common practice". omment: heck that the PDD addresses leakage issues as part of the baseline and project bundary. omment: roposed New Gold Standard VER methodologies. Project proponents submitting a new VER methodology to the Gold Standard Foundation for approval nall follow the procedures provided in section T.5.1.	[PDD] page 34 ff [PDD] page 21 ff [PDD] page 41/55	DR DR I DR	Draft Concl.	OK OK OK
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roposed New Gold Standard VER methodologies. Project proponents ubmitting a new VER methodology to the Gold Standard Foundation for approval nall follow the procedures provided in section T.5.1.				
				N/A
eligible project activity finance				
DA Support. Official Development Assistance (ODA) support for any project ctivity located in a country named by the OECD Development Assistance ommittee's ODA recipient list will render that project activity ineligible for carbon rediting under the Gold Standard where the ODA is provided under the condition at the credits generated by the project activity will be transferred, either directly indirectly, to the donor country providing ODA support. ODA is defined in section T.1.2.e.		DR I		OK
DA Declaration Form. All Project Applicants applying for project activities cated in a country named by the OECD Development Assistance Committee's DA recipient list must sign and submit the ODA Declaration Form provided in nnex D of the Toolkit with the Project Design Document in connection with alidation.	[GSP] page 37 [PDD] page 71	DR I	CL 7	OK
	D			
•				
arallel submissions to the Gold Standard CDM/JI and VER streams. A roject activity may be submitted for registration to both the Gold Standard CDM/JI ream and the Gold Standard VER stream in parallel. If the proposed CDM/JI project activity is successfully registered under the UNFCCC, the Gold Standard VER project activity shall be cancelled. If the proposed CDM/JI project activity is rejected by the UNFCCC, in order to continue registration of the project activity under the GS VER stream the project proponent must apply for a Prefeasibility Assessment in accordance with the procedure provided in section T.2.5. The Gold Standard VER project activity shall only be made public and be registered after an official communication with the UNFCCC on rejection of the project has been submitted by the Project Proponent to the Gold Standard Foundation, or after the Project Proponent has formally requested that the Gold Standard cancel registration under the GS CDM/JI stream for the project activity.				N/A
	indirectly, to the donor country providing ODA support. ODA is defined in ction T.1.2.e. DA Declaration Form. All Project Applicants applying for project activities cated in a country named by the OECD Development Assistance Committee's DA recipient list must sign and submit the ODA Declaration Form provided in inex D of the Toolkit with the Project Design Document in connection with lidation. The ODA declaration does not completely comply with annex I plationship between GS CDM/JI submissions and GS VER submissions in all les submissions to the Gold Standard CDM/JI and VER streams. A poject activity may be submitted for registration to both the Gold Standard CDM/JI eam and the Gold Standard VER stream in parallel. If the proposed CDM/JI project activity is successfully registered under the UNFCCC, the Gold Standard VER project activity shall be cancelled. If the proposed CDM/JI project activity is rejected by the UNFCCC, in order to continue registration of the project activity under the GS VER stream the project proponent must apply for a Prefeasibility Assessment in accordance with the procedure provided in section T.2.5. The Gold Standard VER project activity shall only be made public and be registered after an official communication with the UNFCCC on rejection of the project has been submitted by the Project Proponent to the Gold Standard Foundation, or after the Project Proponent has formally requested that the Gold Standard cancel registration under the GS CDM/JI stream for the project	indirectly, to the donor country providing ODA support. ODA is defined in ction T.1.2.e. Imment: DA Declaration Form. All Project Applicants applying for project activities rated in a country named by the OECD Development Assistance Committee's page 37 [PDD] page 37 [PDD] page 71	indirectly, to the donor country providing ODA support. ODA is defined in ction T.1.2.e. Imment: DA Declaration Form. All Project Applicants applying for project activities ated in a country named by the OECD Development Assistance Committee's page 37 [PDD] page 37 [PDD] page 71	indirectly, to the donor country providing ODA support. ODA is defined in ction T.1.2.e. Imment: DA Declaration Form. All Project Applicants applying for project activities cated in a country named by the OECD Development Assistance Committee's DA recipient list must sign and submit the ODA Declaration Form provided in Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Design Document in connection with Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit Innex D. Innex D of the Toolkit with the Project Activity Innex Innex D. Innex D of the Toolkit Inne



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Gold Standard VER submission after UNFCCC rejection. Following the rejection of a project activity by the UNFCCC due to the inapplicability of the methodology considered, a Project Proponent may apply for Gold Standard registration under the VER stream. This process is initiated through application for a Pre-feasibility assessment in accordance with the procedure provided in section T.2.5, if and after a revised methodology has been submitted to and approved by the Gold Standard as a Gold Standard VER methodology.				N/A
Upgrading GS VERs to GS CERs/ERUs during a crediting period. A Project Proponent may seek to upgrade a Gold Standard VER project activity to a Gold Standard CDM/JI project activity at any time during the crediting period with respect to future emission reductions, provided the Project Proponent either applies under the Gold Standard CDM/JI stream before any GS VERs have been issued, or enters into an agreement with the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project in an amount equal to VERs already issued. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P in the Gold Standard Toolkit.				N/A
Project activity involvement in other certification or emissions trading scheme	s			
 Upgrading VERs to GS VERs. VER project activities registered, or to be registered, under another voluntary carbon crediting scheme may seek to upgrade a VER project activity to a GS VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the following: The project activity opts out from the other voluntary project and the emission reductions of a given vintage are claimed only once, under one single scheme; and The total duration of the crediting period does not exceed the standard UNFCCC crediting period (i.e. 10 years, or 7 years renewable a maximum of twice for 21 years in total) when all carbon credits sought by the Project Proponents are aggregated, regardless of the various carbon standards considered (see V.a.5). The project proponent opts in for Gold Standard by delivering the full set of GS specific project documentation, or the project documentation provided under the other voluntary scheme together with a report highlighting and discussing the gaps between the requirements of the other voluntary scheme and the Gold Standard requirements ("Gap Analysis Report"). This report shall be validated by a DOE/AIE in accordance with the Gold Standard validation requirements. See also Toolkit, Chapter 3. Comment: 3 years HIVOS and 7 years GS 	[PDD] page 15	DR I		ОК
Changed (27.10.2010) to 3 years HIVOS and 4 years GS				
Certificate trading schemes. Project activities claiming Green or White Certificates, or equivalent certificates, shall NOT be eligible for Gold Standard registration unless Project Proponents provide a clear and convincing demonstration that no double counting would arise from the issuance of Gold				N/A
	Gold Standard VER submission after UNFCCC rejection. Following the rejection of a project activity by the UNFCCC due to the inapplicability of the methodology considered, a Project Proponent may apply for Gold Standard registration under the VER stream. This process is initiated through application for a Pre-feasibility assessment in accordance with the procedure provided in section T.2.5, if and after a revised methodology has been submitted to and approved by the Gold Standard as a Gold Standard VER methodology. Comment: Upgrading GS VERs to GS CERs/ERUs during a crediting period. A Project Proponent may seek to upgrade a Gold Standard VER project activity to a Gold Standard CDM/II project activity at any time during the crediting period with respect to future emission reductions, provided the Project Proponent either applies under the Gold Standard CDM/II stream before any GS VERs have been issued, or enters into an agreement with the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project in an amount equal to VERs already issued. The agreement shall make use of the Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P in the Gold Standard Toolkit. Comment: Project activity involvement in other certification or emissions trading scheme upgrading VERs to GS VERs. VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the following: • The project activity to a GS VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the following: • The total duration of the crediting period does not exceed the standard UNFCCC crediting period (i.e. 10 years, or 7 years renewable a maximum o	Gold Standard VER submission after UNFCCC rejection. Following the rejection of a project activity by the UNFCCC due to the inapplicability of the methodology considered, a Project Proponent may apply for Gold Standard registration under the VER stream. This process is initiated through application for a Pre-feasibility assessment in accordance with the procedure provided in section T.2.5, if and after a revised methodology has been submitted to and approved by the Gold Standard as a Gold Standard VER methodology. Comment: Upgrading GS VERs to GS CERs/ERUs during a crediting period. A Project Proponent may seek to upgrade a Gold Standard VER project activity to a Gold Standard CDM/JI project activity at any time during the crediting period with respect to future emission reductions, provided the Project Proponent either applies under the Gold Standard CDM/JI stream before any GS VERs have been issued, or enters into an agreement with the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project in an amount equal to VERs already issued. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P in the Gold Standard Tolkit. Comment: Project activity involvement in other certification or emissions trading schemes Upgrading VERs to GS VERs. VER project activities registered, or to be registered, under another voluntary carbon crediting scheme may seek to upgrade a VER project activity of a GS VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the following: The project activity to a GS VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the fol	Gold Standard VER submission after UNFCCC rejection. Following the rejection of a project activity by the UNFCCC due to the inapplicability of the methodology considered, a Project Proponent may apply for Gold Standard registration under the VER stream. This process is initiated through application for a Pre-feasibility assessment in accordance with the procedure provided in section T.2.5, if and after a revised methodology has been submitted to and approved by the Gold Standard as a Gold Standard VER methodology. Comment: Upgrading GS VERs to GS CERs/ERUs during a crediting period. A Project Proponent may seek to upgrade a Gold Standard VER project activity to a Gold Standard VER project activity at any time during the crediting period with respect to future emission reductions, provided the Project Proponent either applies under the Gold Standard CDMJI stream before any GS VERs have been issued, or enters into an agreement with the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Del Emission Reduction Acquisition Agreement template or the 'Gold Standard JI Emission Reduction Acquisition Agreement template or the 'Gold Standard JI Emission Reduction Acquisition Agreement template provided as Annex O and Annex P in the Gold Standard Toolkit. Comment: **Project activity involvement in other certification or emissions trading schemes **Upgrading VERs to GS VERs.** VER project activities registered, or to be registered, under another voluntary carbon crediting scheme may seek to upgrade a VER project activity to a GS VER project activity at any time during the crediting period with respect to future emission reductions, provided proof of the following: **The project activi	Cold Standard VER submission after UNFCCC rejection. Following the rejection of a project activity by the UNFCCC due to the inapplicability of the methodology considered. a Project Proponent may apply for Gold Standard registration under the VER stream. This process is initiated through application for a Pre-feasibility assessment in accordance with the procedure provided in section T.2.5, if and after a revised methodology has been submitted to and approved by the Gold Standard as a Gold Standard VER methodology. Comment: **Upgrading GS VERs to GS CERs/ERUs during a crediting period.** A Project Proponent may seek to upgrade a Gold Standard VER project activity to a Gold Standard CDM/II project activity at any time during the crediting period with respect to future emission reductions, provided the Project Proponent either applies under the Gold Standard CDM/II stream before any GS VERs have been issued, or enters into an agreement with the Gold Standard Foundation according to which the project applicant commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project in an amount equal to VERs already issued. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement template or the 'Gold Standard J Emission Reduction Acquisition Agreement template provided as Annex O and Annex P in the Gold Standard Toolkit. Comment: **Project activity involvement in other certification or emissions trading schemes** **Upgrading VERs to GS VERs.** VER project activities registered, or to be registered, under another voluntary carbon crediting scheme may seek to upgrade a VER project activity opts out from the other voluntary project and the emission reductions of a given vinitage are claimed only once, under uning the crediting period with respect to future emission reductions, provided proof of the following: **The total duration of the crediting period does not exceed the standar



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Requirement		Ref.	MoV	Draft Concl.	Final Concl.
1.2.31 [GSR] III.i.3	European Union Greenhouse Gas Emissions Trading Scheme (EU ETS). Project activities involving facilities under the EU ETS shall NOT be eligible for Gold Standard registration unless the Project Proponent has provided the Gold Standard Foundation with satisfactory assurances that an equivalent number of allowances under the EU ETS (termed 'EUAs') will be retired to back-up the Gold Standard VERs issued. All EUAs may be used for this purpose. Gold Standard credits will not be issued prior to confirmation by the relevant local authorities that an equivalent number of EUAs have been retired to back-up the Gold Standard credits issued. Comment:				N/A
1.3	PROJECT CYCLE FOR GOLD STANDARD REGISTRATION				
	Registration requirement				
1.3.1 [GSR] IV.a.1	Requirement of Registration. Only eligible project activities that have been duly registered with the Gold Standard as GS CDM, GS JI, or GS VER projects and that have complied with all applicable steps set out in the Gold Standard Toolkit are eligible for Gold Standard crediting. Comment:		DR I		OK
1.3.2 [GSR] IV.a.2	Gold Standard Branding. Project Proponents who wish to use the Gold Standard Brand prior to registration should consult the Gold Standard Terms & Conditions, at Annex M to the Gold Standard Toolkit. Comment:				N/A
1.3.3 [GSR] IV.a.3	Retroactive Registration. Project Proponents may seek Gold Standard retroactive registration after the start of construction or implementation, by applying to the Gold Standard for a Pre-feasibility Assessment in accordance with the procedure provided in section T.2.5, which shall, among other things, credibly and transparently demonstrate that the project satisfies Gold Standard criteria for additionality. The pre-feasibility assessment is initiated upon the payment of a fee (see fee schedule in Toolkit, Annex L). A prefeasibility assessment must be conducted for each one of the retroactive CPAs added to a Programme of Activities. Comment:	[GSP] page 9	DR I		ОК
	Applicable project cycle				
1.3.4 [GSR] IV.b.1	Regular project cycle. The regular project cycle applies to project activities that apply for Gold Standard registration (time of first submission) before the start date of construction or implementation. Key elements of the regular project cycle. Key elements of the regular project cycle include: project planning, design and reporting (assessment of project eligibility, initial drafting of Project Design Document (PDD), selection of baseline and monitoring methodology, additionality assessment, sustainability assessment and creation of Sustainable Development Matrix and Sustainability Monitoring Plan, Local Stakeholder Consultation, drafting and submission of Stakeholder Consultation Report, project revisions as necessary, stakeholder feedback, and finalisation and submission of Gold Standard Passport and PDD); validation; Gold Standard registration review; project registration; monitoring; reporting; Gold Standard verification review; project verification; Gold Standard certification; and Gold Standard crediting/issuance.				N/A
1.3.5 [GSR] IV.b.3	Retroactive project cycle. The retroactive project cycle applies to project activities that apply for Gold Standard registration (time of first submission) after the start date of construction or implementation. Key elements of the retroactive project cycle. Key elements of the retroactive project cycle include: project reporting (assessment of project eligibility, initial drafting of Project Design Document (PDD), selection of baseline and monitoring methodology, additionality assessment, sustainability assessment and creation of Sustainable Development Matrix and Sustainability Monitoring Plan); Gold Standard pre-feasibility assessment; stakeholder feedback; project revisions as necessary; validation; Gold Standard registration review; project registration; monitoring; reporting; Gold Standard verification review; project verification; Gold Standard crediting/issuance.	[GSP] page 9	DR I		ОК



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Requiremen		Ref.	MoV	Draft Concl.	Final Concl.
	Comment: Start date: 13 March 2006 Gold Standard registration 1 January 2009	'			
1.4	GOLD STANDARD PROJECT CREDITING PERIOD				
	Crediting Period				
1.4.1 [GSR] V.a.1	Duration of Gold Standard Crediting Period. Gold Standard project activities that generate emission reductions are eligible to claim credits for no more than year period that can be renewed twice, for a total of 21 years, or a one-off 10-yeariod, consistent with the allowable Standard UNFCCC Crediting Period. When 7-year renewable period is chosen, the baseline and sustainability assessment must be renewed and revalidated after each 7-year period.	ear [GSP] page 9 pre a [PDD]	DR I		ОК
	Comment: Crediting Period: 10 years HIVOS from 13 March 2006 to 31 December 2008 Gold Standard from 1 January 2009 to 12 March 2016				
1.4.2 [GSR] V.a.2	 Start of the Gold Standard Crediting Period. For VER project activities proceeding under the regular project cycle, the state of the Gold Standard Crediting Period shall be the date of start of operation or a maximum of two years prior to Gold Standard registration, whichever occurs later. For CDM or JI project activities proceeding under the regular project cycle, start date of the Gold Standard Crediting Period shall be the date of registration under CDM or JI or a maximum of two years prior to Gold Standard registration, whichever occurs later. Project activities proceeding under the retroactive project cycle, may be eligible for retroactive crediting for realised emission reductions prior to Gold Standard registration of a maximum period of two years. The start date of the Gold Standard Crediting Period may be postponed for one year without justification required, or for up to two years if convincing justification is provided. Comment: Start Gold Standard registration 1 January 2009 	, the [GSP] page 9 [PDD] page 15	DR I		OK
1.4.3 [GSR] V.a.3	Total crediting period. With the exception of projects qualifying under Rule V.a.6.1, the total duration of the crediting period for Gold Standard project active cannot exceed the duration of the <i>Standard UNFCCC crediting period</i> , regardles of project cycle and start date. See T.1.2.f.				N/A
1.4.4 [GSR] V.a.4	Comment: Aggregation of crediting periods. Where a Gold Standard project activity has been or is registered under one or more other voluntary carbon standards or certification schemes, the total crediting period under all schemes combined should not exceed the Gold Standard crediting period when all carbon credits sought be Project Proponents under the Gold Standard and under other standards or schemes are aggregated. Gold Standard status shall immediately be withdrawn from any projects that are found to have violated this requirement and the Gold Standard Foundation reserves its right to pursue remedies in accordance with a pursuant to Section 10 of the Gold Standard Terms & Conditions.	nall [GSP] page 9 [PDD] page 15	DR I		ОК



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 ('Pre-CDM VERs' or 'Pre-JI VERs')). Project proponents that are in the process of seeking CDM or JI registration under the UNFCCC are eligible to claim Gold Standard VERs for emissions reductions achieved prior to CDM/JI registration under the following conditions: Projects can claim Gold Standard pre-CDM VERs for a maximum of one year prior to the start of the CDM crediting period (date of registration under the UNFCCC) provided: ➤ The project developer provides proof that the final version of the Project Development Document (PDD) was submitted for CDM validation to the Designated Operating Entity (DOE) and creates a project entry for the pre-CDM VER 'clone' in the Gold Standard Registry prior to 31 December 2009; and ➤ The reasons for the mismatch between the start of project operation and the CDM registration date are provided to the DOE and confirmed by the DOE as part of the Verification Report covering the GS VER period. Projects can claim Gold Standard pre-CDM VERs for a maximum of two years prior to the start of the CDM or JI crediting period (date of registration/determination under UNFCCC) provided the project proponent enters into an agreement with the Gold Standard Foundation according to which the project proponent commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P to the Gold Standard Toolkit, and no delivery is required for a grace period of the initial two years of issuance after CDM registration/JI determination. Until December 31, 2009, Project Prop			COILCI.	N/A
ADDITIONALITY ASSESSMENT				
Additionality Requirement				
additional, meaning that they shall reduce anthropogenic emissions of greenhouse gases below those that would have occurred in the absence of the registered Gold Standard project activity.	[GSP] page 8 [PDD] page 20 ff	DR I		OK
"PROGRAMME ARRANGEMENT and IMPLEMENTATION DO PROGRAMME in CAMBODIA" [PAID]. The document was sign These data serve as a basis for the additionality.	OCUMENT	NATIO	NAL BIODIC	
Additionality tools. Gold Standard CDM and JI project activities, of whatever				
	Gold Standard VERs for project proponents seeking CDM or JI registration ('Pre-CDM VERs' or 'Pre-JI VERs)). Project proponents that are in the process of seeking CDM or JI registration under the UNFCCC are eligible to claim Gold Standard VERs for emissions reductions achieved prior to CDM/JI registration under the following conditions: Projects can claim Gold Standard pre-CDM VERs for a maximum of one year prior to the start of the CDM crediting period (date of registration under the UNFCCC) provided: The project developer provides proof that the final version of the Project Development Document (PDD) was submitted for CDM validation to the Designated Operating Entity (DOE) and creates a project entry for the pre-CDM VER 'clone' in the Gold Standard Registry prior to 31 December 2009; and The reasons for the mismatch between the start of project operation and the CDM registration date are provided to the DOE and confirmed by the DOE as part of the Verification Report covering the GS VER period. Projects can claim Gold Standard pre-CDM VERs for a maximum of two years prior to the start of the CDM or JI crediting period (date of registration/determination under UNFCCC) provided the project proponent enters into an agreement with the Gold Standard Foundation according to which the project proponent commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement template provided as Annex O and Annex P to the Gold Standard Toolkit, and no delivery is required for a grace period of the initial two years of issuance after CDM registration/JI determination. Until December 31, 2009, Project Proponents must notify the Gold Standard project activities mus	Gold Standard VERs for project proponents seeking CDM or JI registration ('Pre-CDM VERs' or 'Pre-JI VERs)). Project proponents that are in the process of seeking CDM or JI registration under the UNF-CCC are eligible to claim Gold Standard VERs for emissions reductions achieved prior to CDM/JI registration under the following conditions: Projects can claim Gold Standard pre-CDM VERs for a maximum of one year prior to the start of the CDM crediting period (date of registration under the UNF-CCC) provided: The project developer provides proof that the final version of the Project Development Document (PDD) was submitted for CDM validation to the Designated Operating Enitity (DOE) and creates a project entry for the pre-CDM VER clone' in the Gold Standard Registry prior to 31 December 2009; and The reasons for the mismatch between the start of project operation and the CDM registration date are provided to the DOE and confirmed by the DOE as part of the Verification Report covering the GS VER period. Projects can claim Gold Standard pre-CDM VERs for a maximum of two years prior to the start of the CDM or JI crediting period (date of registration/determination under UNF-CCC) provided the project proponent enters into an agreement with the Gold Standard Foundation according to which the project proponent commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template or the 'Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P to the Gold Standard Toolkit, and no delivery is required for a grace period of the initial two years of issuance after CDM registration/JI determination. Until December	Gold Standard VERs for project proponents seeking CDM or JI registration ('Pre-CDM VERs' or 'Pre-JI VERs')). Project proponents that are in the process of seeking CDM or JI registration under the UNFCCC are eligible to claim Gold Standard VERs for emissions reductions achieved prior to CDM/JI registration under the following conditions: ■ Projects can claim Gold Standard pre-CDM VERs for a maximum of one year prior to the start of the CDM crediting period (date of registration under the UNFCCC) provided: ■ The project developer provides proof that the final version of the Project Development Document (PDD) was submitted for CDM validation to the Designated Operating Entity (DOE) and creates a project entry for the pre-CDM VER 'clone' in the Gold Standard Registry prior to 31 December 2009; and ■ The reasons for the mismatch between the start of project operation and the CDM registration date are provided to the DOE and confirmed by the DOE as part of the Verification Report covering the GS VER period. ■ Projects can claim Gold Standard pre-CDM VERs for a maximum of two years prior to the start of the CDM or JI crediting period (date of registration/determination under UNFCCC) provided the project proponent enters into an agreement with the Gold Standard Foundation according to which the project proponent commits to surrender to the Gold Standard Foundation, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs. The agreement shall make use of the 'Gold Standard CDM Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P to the Gold Standard Toolkit, and no delivery is required for a grace period of the initial two years of issuance after CDM registration/JI determination. ■ Until December 31, 2009, Project Proponents may choose between the options outlined in Sections V.a.5.1. and V.a.5.2. Project Proponents must notify the Gold	Gold Standard VERs for project proponents seeking CDM or JI registration ('Pre-CDM VERs' or 'Pre-JI VERs'). Project proponents that are in the process of seeking CDM or JI registration under the UNF-CCC are eligible to claim Gold Standard VERs for emissions reductions achieved prior to CDM/JI registration under the following conditions: Projects can claim Gold Standard pre-CDM VERs for a maximum of one year prior to the start of the CDM crediting period (date of registration under the UNF-CCC) provided: The project developer provides proof that the final version of the Project Development Document (PDD) was submitted for CDM validation to the Designated Operating Entity (DOE) and creates a project entry for the pre-CDM VER 'clone in the Gold Standard Registry prior to 31 December 2009; and The reasons for the mismatch between the start of project operation and the CDM registration date are provided to the DOE and confirmed by the DOE as part of the Verification Report covering the GS VER period. Projects can claim Gold Standard pre-CDM VERs for a maximum of two years prior to the start of the CDM or JI crediting period (date of registration/determination under UNF-CCC) provided the project proponent enters into an agreement with the Gold Standard project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs. The agreement shall make use of the 'Gold Standard JI Emission Reduction Acquisition Agreement' template or the Gold Standard JI Emission Reduction Acquisition Agreement' template provided as Annex O and Annex P to the Gold Standard Toolkit, and no delivery is required for a grace period of the initial two years of issuance after CDM registration/JI determination. Until December 31, 2009, Project Proponents must notify the Gold Standard in writing of the chosen approach if the Project proponent intends to use either of these approaches for projects applying for registration. Comment: The decision for the project occurred in 2006. The conditions are in detail desc



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1.5.3 [GSR] VI.c.1	Additionality tools. Gold Standard VER project activities, of whatever scale and type, are required to use either a UNFCCC-approved or a Gold Standard-approved additionality tool to demonstrate project additionality. Additionality tools currently available are provided in section T.2.3.	[PDD] page 20 ff	DR I		OK
1.5.4	Comment: Tool for the demonstration and assessment of additionality	IDDDI	I		ī
1.5.4 [GSR] VI.b.2	Version of tool. Project Proponents must use the latest version of the additionality tool that is available at the <i>time of first submission</i> to the Gold Standard.	[PDD] page 20 ff	DR I		OK
VI.c.2	Comment: Version 05.2				
1.5.5 [GSR] VI.c.3	Proposals for new additionality tools. Proposals may be made for new Gold Standard VER additionality tools, following the procedures detailed in section T.5.2. The Gold Standard reserves the right to require changes to proposed additionality tools, seek clarification, or reject proposed additionality tools if insufficient progress is made on requested changes. Comment:				N/A
1.5.6 [GST]	Check that the project proponent has selected and applied the correct tool for the demonstration of additionality.		DR I		OK
3.5.1	Comment: "Tool for the demonstration and assessment of additionality" (V	ersion 05.2			
1.5.7 [GST]	Identify the main arguments that have been used by the project proponent to demonstrate additionality.	[PDD] page 20	DR I		OK
3.5.1	Comment:				
	Assess the correctness of the line of argumentation.	[PDD] page 23 ff	DR I	CAR 2	OK
1.5.8 [GST] 3.5.1	 The used numbers [PDD] Table 6 do not agree with the num The analysis [PDD] Table 6 occurs only via 3 years, not over 2016). It is not shown transparently why the project VER's needs; for built without Vers and how much Biodigester is built with Ver Farmers The used numbers [PDD] Table 5, 8, 9 do not agree with the The IRR analysis for one biodigester size (6 m³) should be contained. 	r the whole of or example has. • numbers in	crediting now much	period (200 th Biodigest	er is
1.5.9 [GST]	biggest biodigester size. The argumentation shall also be addressed during the interviews with project stakeholders.		I		ОК
3.5.1	Comment:	1	I		1
1.5.10 [GST]	References; check that the references used to demonstrate additionality are up-to-date and reliable.				OK
3.5.1	Comment:	1	1		
1.5.11 [GST] 3.5.1	Normal practice in the region; check that the project proponent has compared the proposed project activity to normal practice in the region. This is particularly relevant if similar projects have already been implemented on a commercial basis in the region.		I		OK
	Comment: On-site visits	I			1
1.5.12	Comment: GWPcv4 value applied 23 or 25. Please change to 21	[PDD] page 44	DR I	CAR 3	OK
[GST] 3.5.1	Comment: GWP _{CH4} value applied 23 or 25. Please change to 21				



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1.6	SUSTAINABILITY ASSESSMENT				
	Projects risks and benefits for sustainable development				
1.6.1 [GSR] VII.a.1	Risk of harmful impacts. All Project Proponents are required to assess the risk that their project activities will have severe negative environmental, social and/or economic impacts through a 'Do No Harm' Assessment, to be completed in the project's Gold Standard Passport. See T.2.4.1.	[GSP] page 16	DR		OK
1.6.2 [GSR] VII.a.2	Comment: Sustainable development benefits. All Project Proponents are required to demonstrate that their project activities will have clear sustainable development benefits through a Detailed Impact Assessment, to be completed in the project's Gold Standard Passport. See T.2.4.2. Comment:	[GSP] page 19	DR		OK
1.6.3 [GSR] VII.a.3	Monitoring project impacts on sustainable development. All Project Proponents are required to elaborate a Sustainability Monitoring Plan to assist in monitoring the impact of project activities on sustainable development and in verifying that the project has indeed contributed to sustainable development. See T.2.4.3. Comment:	[GSP] Page 26	DR		OK
1.6.4 [GSR] VII.a.4	Local, regional and national Environmental Impact Assessment (EIA) Requirements. All Projects must fulfill host country requirements on environmental impact assessments at the local, regional and national levels. For micro-scale projects, a declaration must be submitted by the Project Proponent warranting that the project complies with local environmental regulations. See T.2.4.4. Comment:				N/A
1.6.4.1 [GST] 3.5.1	Check that the project activity conforms to host country (local, regional or national) requirements concerning environmental impact assessment (all sizes of projects). Comment:		I		OK
1.6.4.2 [GST] 3.5.1	For micro-scale projects, check that an owner declaration in the form of a letter or statement has been provided that guarantees that the project complies with local environmental regulations.				N/A
	Comment: 'Do No Harm' Assessment				
1.6.5	Compliance with safeguarding principles. Gold Standard project activities shall be in compliance with the list of safeguarding principles provided in section T.2.4.1. Project proponents shall assess their project against these safeguarding principles in accordance with the guidelines provided in Annex H.	[GSP] Page 16	DR I	CAR 4	OK
[GSR] VII.b.1	Comment: Titles: Labor standards, Environmental protection, Corruption Concerning principle 8: in the Biodigester methane is produced small. The customers are trained for the secure dealing and dif Missing all 11 principles according Annex H				wever,
1.6.6 [GSR] VII.b.2	Adaptation and mitigation measures. Project activities that violate or risk violating any of the safeguarding principles shall NOT be eligible for Gold Standard registration unless the design of the project is adapted to restore compliance with these principles or convincing mitigation measures are put in place to ensure the harmful effect will not occur. The Project Proponent is required to ensure that appropriate mitigation measures are implemented and monitored over the crediting period of the project activity. Comment:				



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1.6.7 [GSR] VII.b.3	Bundle of project activities. Project proponents shall conduct the 'Do No Harm' Assessment at the project activity level, unless convincing argumentation validated by a DOE is provided as to why this should not be required for the particular bundle.			30.00	N/A
Ī	Comment:	l .			l .
1.6.8 [GSR] VII.b.4	Programme of Activities. Coordinating entities submitting a Programme of Activities for Gold Standard registration shall conduct the 'Do No Harm' Assessment at the CPA-equivalent or VER-CPAequivalent level, unless convincing argumentation validated by a DOE is provided as to why this should not be required for the particular Programme of Activities. Comment:				
	Detailed Impact Assessment – Sustainable Development Matrix ('SD Matrix')			[GST]	Annex I
1.6.9 [GSR] VII.c.1	Benefits to Sustainable Development. All Gold Standard projects must demonstrate clear benefits to sustainable development through completion of a Detailed Impact Assessment. See T.2.4.2.	[GSP] page 19	DR I		OK
1.6.10 [GSR] VII.c.2	Comment: Sustainable Development Indicators. Gold Standard project applicants shall assess their project activities against a series of twelve Sustainable Development Indicators in three categories: Environment, Social Development and Economic and Technological Development, in accordance with the guidelines provided in section T.2.4.2 and T.2.6. The results of this assessment are referred to as the 'SD Matrix'. The list of the indicators is provided in Annex I of the Toolkit. Comment:	[GSP] Page 19	DR I	CL 10	OK
1.6.11 [GSR] VII.c.3	Minimum scoring for eligibility. Gold Standard Project Proponents shall score each of the Sustainable Development Indicators either negative (-1), neutral (0), or positive (+1) in close collaboration with the local stakeholders, and against the baseline situation, i.e. the most likely situation if the project were not implemented. All indicators shall be given the same weight. In order to qualify for Gold Standard registration, project activities must at a minimum contribute positively to two of the three categories and be neutral to the third category. Guidelines are provided in section T.2.4.2 and T.2.6.	[GSP] Page 25	DR I		ОК
1.6.11.1 [GST]	Check whether 'Do no harm' assessment has been based on accurate information, see Ch. 2.4.1, and that reference sources are included.	[GSP] Page 23-24	DR I		OK
3.5.1	Comment:	l .			
1.6.11.2	Scoring; are at least two of the sub-totals (categories) positive? Is the third sub-total at least neutral?	[GSP] Page 25	DR I		OK
[GST] 3.5.1	Comment: Category Environment: 4=+, 1=0 Category Social development: 4=+ Category Economic and technological development: 3=+				
4 0 44 0	Stakeholder consultation: check that the matrix has been completed together with the stakeholders, see Ch. 2.6.	[GSP] Page 19	DR I		OK
1.6.11.3 [GST] 3.5.1	Comment: The SDM is not the blind sustainability assessment as required sustainable development was discussed in every workshop. The conducted by NBP in collaboration with an independent consul The points were checked during the on-site visit with stakehold found.	ne SDM is th tant.	ne sustai	nability asse	
1.6.12 [GSR] VII.c.4	Reproducibility. The scoring of the <i>Sustainable Development Indicators</i> must be easily reproducible. Scoring shall be supported by convincing argumentation for each indicator, and shall systematically refer to publicly available information sources or to expert opinions. Guidelines are provided in section T.2.4.2 and T.2.6. Comment: Source is referenced	[GSP] Page 23	DR I		OK

MoV = Means of Validation, DR = Document Review, I = Interview, N/A = Not Applicable

CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request



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1.6.13 [GSR] VII.c.5	Mitigation measures. Project activities that do not comply with the minimum scoring requirements shall NOT be eligible unless the project design is altered to result in compliance, or mitigation measures are put in place to 'neutralise' some of the indicators scoring negatively. These mitigation measures shall be monitored over the crediting period of the project activity. Guidelines are provided in section T.2.4.2 and T.2.6.	[GSP] Page 25	DR I		OK	
1.6.14 [GSR] VII.c.6	In-depth Sustainability Assessment. Where a project's SD Matrix continues to reflect negative scores in comparison to the baseline situation after the Local Stakeholder Consultation, and where no change in design or mitigation measures are planned to be implemented, these indicator(s) shall be subject to a dedicated discussion with local stakeholders on whether a more In-depth Sustainability Assessment must be conducted by a third party on issues related to such indicators. This discussion and any subsequent In-depth Assessment shall be conducted in accordance with the guidelines provided in sections T.2.6.1 and T.2.7. Comment:				N/A	
1.6.15 [GSR] VII.c.7	Bundle of project activities. Project proponents shall conduct the Detailed Impact Assessment at the project activity level, unless convincing argumentation validated by a DOE is provided as to why this should not be required for the particular bundle.				N/A	
1.6.16 [GSR] VII.c.8	Comment: Programme of Activities. Coordinating entities submitting a Programme of Activities for Gold Standard registration shall conduct the Detailed Impact Assessment at the CDM Programme Activity (CPA) level or VER CPA equivalent level, unless convincing argumentation validated by a DOE is provided as to why this should not be required for the particular Programme of Activities. Comment:					
				ICST1	Annovi	
	Sustainability Monitoring Plan	1000	I	[GS1]	Annex I	
1.6.17 [GSR]	Monitoring Plan. All Gold Standard Project Proponents must develop a Sustainability Monitoring Plan to monitor the impact of project activities on sustainable development and verify if the project has indeed contributed to sustainable development, in order to assess eligibility for Gold Standard certification. See T.2.4.3.	[GSP] Page 26 ff [PDD] page 62-64	DR I	CL 15	OK	
VII.d.1						
1.6.18 [GSR] VII.d.2	Monitoring parameters. Project Proponents shall identify parameters that can be used to properly monitor each non-neutral Sustainable Development Indicator according to section T.2.4.3 and Annex I of the Toolkit. Comment:	[GSP] Page 26 ff	DR I		OK	
1.6.19 [GSR] VII.d.2	Project Proponents shall monitor these parameters over the <i>crediting period</i> and on a recurrent basis to measure the impact of their Gold Standard project activities on these <i>Sustainable Development Indicators</i> . The monitoring of <i>Sustainable Development Indicators</i> shall be verified for each verification period, as well as during each mandatory Verification site-visit. Comment:	[GSP] page	DR I	CL 11 CL 12 CL 13	ОК	
1.6.20 [GSR]	Non-neutral indicators. All non-neutral indicators shall be monitored.	[GSP] Page 25	DR I		OK	
VII.d.3	Comment: No negative scoring	, 0	•		1	



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1.6.21 [GSR] VII.d.4	Mitigation and compensation measures. All mitigation and compensation measures put in place to prevent violation or the risk of violating a safeguarding principle of the 'Do No Harm' Assessment or to 'neutralise' a Sustainable Development Indicator shall be monitored. Comment: No negative scoring	[GSP] Page 25	DR I		OK		
1.6.22 [GSR] VII.d.5	Sustainability Monitoring Plan. Project Proponents shall submit their Sustainability Monitoring Plans to the Gold Standard Foundation, describing how and with what frequency they monitor the monitored parameters and associated indicators on a quantitative and/or qualitative basis, in accordance with the guidelines are provided in section T.2.4.3.		DR I		OK		
1.7	Comment: In the passport GOLD STANDARD PROJECT MANAGEMENT						
	Local Stakeholder Consultation			[GST]	Annex J		
1.7.1 [GSR] VIII.b.1	Local stakeholder inputs. Project proponents shall proactively invite the Gold Standard Foundation and the local stakeholders, including all Gold Standard supporter NGOs active in the host country of the project activity, to provide comments on proposed project activities in accordance with the guidelines provided in section T.2.6.	[GSSR]	DR I		OK		
	Comment: They invited end users, government representatives, official No relevant to the Gold Standard.	GO supporte	ers, and	other group	S		
1.7.2 [GSR]	Notice to DNA and National Focal Point. Project Proponent are required to notify the DNA or the National Focal Point about the existence of the project activity. Comment: The DNA is informed	[GSSR] page 73	DR I		OK		
VIII.b.2	 LONO of DNA Cambodia from 12 September 2005 (CDM Regular contact (Mail 28 July 2008) 	Project)					
1.7.3 [GSR] VIII.b.3	Local Stakeholder Consultation timeline. Gold Standard Project Proponents proceeding under the regular project cycle shall conduct a Local Stakeholder Consultation at the design phase of their project activities. The consultation must take place prior to the date of start of construction or implementation of the project activity. Local stakeholders must be actively invited for comments.				N/A		
	Comment: Retroactive project cycle; they shall NOT conduct a Local Stakeholder Consultation.						
1.7.4 [GSR] VIII.b.4	Retroactive project cycle. Project Proponents submitting a project activity for retroactive registration shall NOT conduct a Local Stakeholder Consultation but instead must apply for a <i>Pre-feasibility Assessment</i> in accordance with the procedure provided in section T.2.5.	[PFA]	DR		OK		
VIII.D.4	Comment: Date of submission: 3 December 2009 Date of feedback: 9 April 2010						
475	Public consultation meeting. The Local Stakeholder Consultation shall include at least one public meeting, which shall be open to anyone willing to attend and which shall be conducted in accordance with the guidelines provided in section T.2.6.	[GSSR] page 23	DR I		OK		
1.7.5 [GSR] VIII.b.5	Comment: Retroactive project cycle; they shall NOT conduct a Local Stak Participants were not publically invited. NBP has a very extensive home page on which all information There are sites "Contact us", "Publications" and new "Commen suggestion". Comments received by email or other mean are p open lines to stakeholders.	is clearly av ts, please gi	ailable: v	www.nbp.or	nts and		



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1.7.6 [GSR] VIII.b.6	Report on Local Stakeholder Consultation Meeting. Project proponents must prepare a report on the Local Stakeholder Consultation meeting in accordance with the guidelines provided in section T.2.6. The report must be uploaded into the Gold Standard Registry within one month after the date of the meeting (or date of the last meeting if a series of meetings are held). Project Proponents must use the template provided in Annex J of the Toolkit in reporting on the meeting.	ne [GSSR]	DR		ОК
	Comment: Retroactive project cycle; they shall NOT conduct a Local S Uploaded on 2 June 2010	Stakeholder Cor	nsultation	1.	
1.7.6.1	For checking that the requirements are met, please contact the most relevant loc or national Gold Standard NGO supporters for additional information.	[GSSR] page 18	DR I	CL 16	OK
[GST] 3.5.1	Comment: All 53 NGOs were invited. The invitation of Save the Earth Cambodia, REEEP, WWF, International could not be verified. [PFA] 5.	, Greenpeace, M	Mercy Co	rps and HE	ELIO
	Check that: A Invitation tracking table has been filled out	[GSSR] page 16	DR I		OK
1.7.6.2 [GST] 3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S A lot of different workshops. Attendance list available. National workshop 6 December 2005, National workshop 2 2006, Village workshops e.g. 16 February 2006, Bioslurry v 17	008, Provincial	worksho	ps e.g.14 F	
1.7.6.3 [GST]	Check that: Copies of invitations published/sent out are available	[GSSR] page 20-23	DR I		OK
3.5.1	Comment:				
1.7.6.4 [GST] 3.5.1	Check that: A non-technical summary in local language has been included in the Local Stakeholder Consultation report, as well as an English summary.	[GSSR] Annex 5	DR I		OK
-	Comment:	100001			1
1.7.6.5 [GST]	Check that: A participants list is present	[GSSR] Annex 1	DR I		OK
3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S	Stakeholder Cor	nsultation	١.	1
1.7.6.6 [GST]	Check that: Stakeholder evaluation forms are available				N/A
3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S		nsultation	١.	
1.7.6.7 [GST]	Check that: Minutes of the meeting(s) are available	[GSSR] page 38-55	DR I	CL 17	OK
3.5.1	Comment:				
1.7.6.8 [GST]	Check that: Due account has been made on comments received	[GSSR] page 56-57	DR I		OK
3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S	Stakeholder Cor	nsultation	١.	
1.7.6.9	Check that: If stakeholders required a revisit of the sustainable development assessment, this has been done	[GSSR] page 58	DR I		OK
[GST] 3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S The scoring of the sustainability assessment did not result of the programme is very positive.				outcome
1.7.6.10 [GST]	Check that: If the consolidated sustainable development matrix is presented base on own 'preliminary' scoring and the matrix from the outcome of the blind stakeholder exercise.	ed			N/A
3.5.1	Comment: Retroactive project cycle; they shall NOT conduct a Local S Not available. This was not part of the original stakeholder				



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1.7.6.11 [GST] 3.5.1	Check that: Comments accepted and received by email or other means were actually considered. Comment: Comments received by email are processed professionally. Mail 5 August 2010: Regina S. Abesamis, Center for Develo	opment Mar	DR I	ıt, Asian Ins	OK stitute of	
0.0.1	Management Mail 28 July 2010: Felipe Colturato Gold Standard Applicant Status. The Local Stakeholder Consultation Report	· 				
1.7.7 [GSR] VIII.b.7	must be uploaded on the <i>Gold Standard Registry and Administration System</i> for submission (see section T.2.9 and Annex J of the Toolkit), and the report approved, before the project activity can formally refer to itself as a Gold Standard applicant project activity.	[GSSR]	DR		OK	
1.7.8 [GSR] VIII.b.8	Comment: Uploaded on 2 June 2010 Bundle of project activities. The Local Stakeholder Consultation shall take place at the project activity level, and a report per project activity shall be prepared and submitted. However, coordinating entities may organise a single meeting for several project activities for implementation in parallel, as long as they can convincingly demonstrate that this does not compromise fulfillment of the requirements for the Gold Standard stakeholder consultation. Comment:				N/A	
1.7.9 [GSR] VIII.b.9	Programme of Activities. The Local Stakeholder Consultation shall take place at the CPA (CDM Programme of Activities) or VER CPA-equivalent level, and a report per CPA or VER CPA-equivalent shall be prepared and submitted. However, coordinating entities may organise a single meeting for several CPAs or VER CPA equivalents for implementation in parallel, as long as they can convincingly demonstrate that this does not compromise fulfillment of the requirements for the Gold Standard stakeholder consultation. Comment:					
1.7.10 [GSR] VIII.b.10	Confidentiality. The Local Stakeholder Consultation report will be made publicly available on the Gold Standard Registry and Administration System once it has been approved. Prior to approval, only the Gold Standard Secretariat and Technical Advisory Committee will be able to access the report. Comment:				N/A	
	Project design documentation					
1.7.11 [GSR] VIII.c.1	Project Design Document (PDD). Project Proponents must submit project activity information fulfilling or relating to UNFCCC requirements to the Gold Standard Foundation. This shall be done using the latest version of the applicable UNFCCC Project Design Document (PDD) template that is available at <i>the time of first submission</i> of the project activities to the Gold Standard Foundation. Section T.2.1 provides a link to the relevant templates as a function of the stream for which Project Proponents apply. The Gold Standard Project Design Document will have to be submitted for the <i>validation</i> process; a revised version will be submitted for the <i>registration</i> process.	[PDD]	DR I		ОК	
	Comment: Uploaded 30 May 2010 A revised version will be submitted for the <i>registration</i> process.					
1.7.12 [GSR] VIII.c.2	Gold Standard Passport. For Gold Standard registration, additional information is required beyond that required by the applicable Project Design Document. Project Proponents are required to submit this additional project activity information (specific to Gold Standard requirements or that deviates from the UNFCCC requirements), to the Gold Standard using the latest version of the Gold Standard Passport template. The Gold Standard Passport will have to be submitted for the validation process; a revised version will be submitted for the registration process. Guidelines are provided in section T.1.5. Comment: See 1.1.1	[GSP]	DR I		OK	



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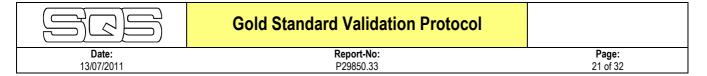
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1.7.13 [GSR] VIII.c.3	 Gold Standard VER Programme of Activities. Coordinating entities shall submit to a DOE the following documentation for validation: A completed VER-POA-DD. Generic information on baseline and monitoring must be provided for each one of the different methodologies (or combination of methodologies) considered. A completed VER-CPA-DD which is to be based on the application of the PoA to one real case, for each one of the different methodologies (or combination of methodologies) considered. A Gold Standard Passport for each one of the VER CPAs equivalent. Comment: 				
	Stakeholder feedback round				
1.7.14 [GSR]	Purpose. The Stakeholder feedback round is the second round of stakeholder consultation necessary to qualify for Gold Standard certification. For project activities applying under the regular project cycle, it is intended to cover all issues raised from the Local Stakeholder Consultation meeting and address how due account was taken of stakeholders' comments. For project activities applying under the retroactive project cycle, it is intended to cover all issues raised from the pre-feasibility assessment. Project Proponents under the retroactive project cycle shall therefore conduct the stakeholder feedback round according to the outcomes of the Pre-feasibility Assessment. Guidelines can be found in section T.2.11.	[PFA] 5.	DR I	CAR 7	OK
VIII.d.1	Comment: [PFA] 5.: However, since Gold Standard registration is requivalent stakeholder consultations were conducted pre-2008, it is suggested conducted, possible stakeholders listed in Table 2.10 of the Gomedia and provincial announcements, and that a mechanism during the feedback round is implemented (i.e. there is a hofficials are informed that village stakeholders can come to authorities and program personnel have open communication In The conversion of this demand could not be shown.	pested that and S Toolkit and for collect other that them to rep	an onling et informeting state stakehoort com	e feedback ned through keholder co lders can co nments, gov	round is national omments all, local
1.7.15 [GSR] VIII.d.2	Documentation to be made available. Stakeholders must have available for comment, at a minimum, the <i>Local Stakeholder Consultation Report</i> , the (revised) <i>Project Design Document</i> , the (revised) <i>Gold Standard Passport</i> and, if applicable, supporting documentation such as Environmental Impact Assessments (EIAs) for projects under the regular project cycle. See T.2.11.			See 1.7.14	
1.7.15.1	The latest version of the complete PDD (including the EIA, if applicable)			See	
[GST]				1.7.14	
3.5.1 1.7.15.2 [GST] 3.5.1	Comment: A non-technical summary of the project (in appropriate local language(s)); and English summary.			See 1.7.14	
1.7.15.3 [GST] 3.5.1	Comment: All relevant supporting information (if available, in appropriate local language(s)); in the case of an EIA, at least a one-page English summary is required.			See 1.7.14	
1.7.15.4 [GST] 3.5.1	Comment: Additional, non-translated information must be made available as well and shall be translated to the local language upon any justified request of a stakeholder.			See 1.7.14	
1.7.16 [GSR] VIII.d.3	Comment: Timing. Project Proponents under the regular project cycle shall upload the above documentation on the Gold Standard Registry and Administration System, making it publicly available and open for comments for at least two months before the validation process can be completed, in accordance with the guidelines provided in section				



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Requiremen	t		Ref.	MoV	Draft Concl.	Final Concl.
1.7.17 [GSR] VIII.d.4	Foundation on the s	Proponents are required to report to the Gold Standard stakeholder feedback round organisation, outcomes and followalised Gold Standard Passport.			See 1.7.14	
1.7.17.1 [GST] 3.5.1	This shall include: A including addressing	A description of the procedure followed to invite comments, g all the details of the oral hearing such as place, date, ge, local or national Gold Standard NGO supporters, etc.			See 1.7.14	
1.7.17.2 [GST] 3.5.1	This shall include: A	All written or oral comments received.			See 1.7.14	
1.7.17.3 [GST] 3.5.1	This shall include: T	The argumentation on whether or not comments are taken into spective changes to the project design.			See 1.7.14	
2	Project specific	requirements				
2.1.		the programme are not included in another CDM or voluntary no double counting takes place).	[PDD] page 65	DR I	CAR 6	OK
[METH] Section	Comment / Cross Reference:	The correct construction of the Biodigester is checked and doc It is not guaranteed yet, however, in this way that Biodiges activities that could potentially claim the same emission reduct In the contract with the owner/operator of the Biodigester contained concerning "double counting".	ster is invol ⁱ ions.			
	Documents and dat	a are kept defined and protected?		DR I	CL 18	OK
2.2.	Comment / Cross Reference:	The storage of IT data is well controlled and described in the d Procedures". Paper documents to become in wood shelves kept, open and r For paper documents lacks a regulation (Where, Safety, How I	not protected	d before	fire etc.	ration
2.3. [GST]	Is the identification	of the site unequivocal (GPS coordinates)?	[GSP] page 10 [PDD] page 9	DR I	CL 19	OK
1.6	Comment / Cross Reference:	The identification of the physical location of the biodigester instand not with the GPS coordinates.		urs with	name and a	ddress
	Are all points of the	[PFA] done?	[PFA]	DR I	CL 20 FAR 1	OK
2.4.	Comment / Cross Reference:	 Following points are still open. Please upload as separate annexes in the registry the 200 Please provide evidence that the DNA was notified (by em as a voluntary project. 			project going	forward



Protocol 2: Summary of Requests

No.:	CL 1	Reference:	1.2.15
Validator request:	[PDD] page 17		
-	Please explain the situation in detail inc	luding clarification	ons with GS
Project owner response:	methodology for small scale biodigest activities, but that the methodology dist scale biodigesters are eligible (up to project activities or emission claims. T	er, does not dis inguishes betwe 20 m3 digester he maximum b e eligible under	GS proofing that the methodology used, the stinguish between small scale and large scale een the scale of technology, whereby only small volume). The methodology has no ceiling for iodigester size that NBP installs is 15 m3 and the methodology and an unlimited amount of during the on-site visit.
Validator conclusion:	In PDD V11 the text is adapted OK	Date:	15/09/2010

No.:	CL 2	Reference	nce: 1.2.16
Validator request:	Different numbers on - page 15, 3: estimated u - page 15, 75: annual em - page 15, 57: estimated - page 15, 24: estimated Please correct it.	nission reductions annual emission	
Project owner response:	Is corrected, see the new PDD		
Validator conclusion:	In PDD V11 corrected OK	Date:	21/09/2010

No.:	CL 3	Reference:	1.2.16
Validator request:	Exclusive buyer HIVOS. Please explain	the situation in d	etail.
Project owner response:	2009 until 12 March 2016. Retroactive 2009 is not sought since these credits at this is provided in Annex 5, which shexclusive buyer (the INGO HIVOS) of December 2008. These credits, pre-GS relied on the trust and the name that HI's candalous practices became apparent were controversial and in some cases market in the Netherlands and led to standard with third party audits. Althor	registration of the real ready sold to lows an account the generated cross credits, were vovos and SNV hat of other carbo additionality coul a demand for cough HIVOS has om NBP and their	of the credits is sought from the 1st of January the credits generated before the 1st of January to HIVOS Climate fund and retired. Evidence of ant declaration of the credits bought by and edits between 13 March 2006 and the 31st of coluntary credits without a standard; the quality the in the Netherlands. However, in 2008 some in brokers that sold credits from projects that d not be proved. This transformed the carbon credits with a standard, preferably a premium a good name in the Netherlands, it became refore it was decided to pursue accreditation of dard
Validator conclusion:	In PDD V11 corrected OK	Date:	21/09/2010

No.:	CL 4	Reference:	PDD
Validator request:	Literature should be referenced in detai page 21: line 6 "carbon baseline st page 22: line 5 "statistical yearbool page 23: footer 8 page 27: (Blok, 2007) page 29: study 2004 by CCRD	(exact title, versudy" and footer	
	 page 58: ID 1, ID 2 		

	Gold Standard Val	idation Pro	tocol	
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	 page 59: ID 3, ID 4, ID 5 page 60: ID 6, ID 10, ID 11 page 61: ID 13 page 77: "revised CDM baseline s 	study"		
Project owner response:	Changed, see new PDD	,		
Validator conclusion:	In PDD V11 corrected OK	Date:	21/09/2010	

No.:	CL 5 Reference: PDD
Validator request:	Literature should be referenced in detail (exact title, version, source) + page page 26: footer 11 page 43: NCV, MS, LF, VS page 44: Bo, MCF, GWP page 45: nT, 0.67, Fuel page 46: NCV, EF, ŋ page 47: ŋ page 52: line 13 Atlas of Cambodia 2006 page 54: Table 20 page 61: ID 12, ID 16
Project owner response:	All the literature is referenced according the APA, the most common used scientific reference method.
Validator request:	Literature should be referenced in detail with page or table NCV, MS, LF, VS, Bo, MCF, nT, 0.67, Fuel, EF, ŋ, Atlas of Cambodia 2006, ID 12
Project owner response:	 page 26: footer 11: footer 11 is on page 23 and consist of personal communication, see PDD v12 page 43: NCV, MS, LF, VS: See PDD V12 page 44: Bo, MCF, GWP. Changed see PDD v12 page 45: nT, 0.67, Fuel, changed see PDD v12 page 46: NCV, EF, ŋ changed see PDD v12 page 47: ŋ, changed page 52: line 13 Atlas of Cambodia 2006: correct web reference is provided, page number cannot be provided as it is a software tool, this is described in PDD version 12 page 54: Table 20: The table is stipulates the calculation, no new values are introduced. LC is referenced in on page 46, however to avoid confusing the source is double referenced. page 61: ID 12, ID 16, changed. ID 16 will be the most recent guidelines and the source cannot be known in advance, this data will be available at verification as stipulated in the PDD
Validator conclusion:	OK Date: 08/10/2010

No.:	CL 6	Reference:	PDD
Validator request:	Please replace "Error! Reference sourc	e not found" by	the numbers
Project owner response:	Changed, see new PDD V11		
Validator request:	Please replace "Error! Reference source not found" by "Table Error" and "Bibliography"		
Project owner response:	Converse of this request was not detected in PDD V11, for additional control the search function was used. It could be that the conversion to PDF was the cause of this. This will checked in the next PDF version of PDD V12.		
Validator conclusion:	OK	Date:	08/10/2010

No.:	CL 7	Reference: 1.2.25
Validator request:	The wording is the same but the section	ns and headings are different.

	Gold Standard Val	lidation Pro	tocol	
Date: 13/07/2011	Report P29850			Page: 23 of 32
1307/2011	Add the headings with the official text [Project Owner] [Authorised Representative:] On behalf of:			25 01 52
Project owner response:	Changed, see new PDD V11			
Validator conclusion:	OK	Date:	21/09/2010	
No.:	CL 8	Reference:	PDD page 32	
Validator request:	"Nepal since 11104" cannot vote. Plea	ase correct.	•	
Project owner response:	Changed, see new PDD V11			
Validator request:	"Nepal since 11104" is changed but th	e same situation	page 91 "Cambo	odia 11104".
Project owner response:	Changed in PDD v12		. •	
Validator conclusion:	OK	Date:	08/10/2010	_
No.:	CL 9	Reference:	PDD page 4	
Validator request:	Emission reduction 488666 tCO2 is di	fferent from page	15. Please corre	ect it.
Project owner response:	Changed, see new PDD V11			
Validator conclusion:	OK	Date:	21/09/2010	
No.:	CL 10	Reference:	1.6.10	
Validator request:	Page 22: Indicator Human and institut "Number of trained people and numbe enterprises." Page 25: Quantitative employment an page 26/27).	er of training center	ers, number of lic	ensed biogas construction
Project owner response:	Changed, see new GS passport V6			
Validator conclusion:	OK	Date:	21/09/2010	
No.:	CL 11	Reference:	1.6.19	
Validator request:	For each parameter please describes			
Project owner response:	Changed in the monitoring plan, see p			
Validator conclusion:	OK	Date:	21/09/2010	
No.:	CL 12	Reference:	1.6.19	
Validator request:	No 2: please deletes "number of bioga			er of biogas plants in total"
Project owner response:	Changed, see Passport V6	a planto troating	p.g,	o. o. biogao pianto in total
Validator request:	It's not changed ad page 27 "Chosen waste, number of biogas plants in total		ease delete "numl	ber of biogas plants treating pig
Project owner response:	Number 2 now only contains number of		e GSPP version 7	7
Validator conclusion:	OK	Date:	08/10/2010	
No.:	CL 13	Reference:	1.6.19	

No 4: what is measured exactly and how calculate does

Changed:

Validator request:

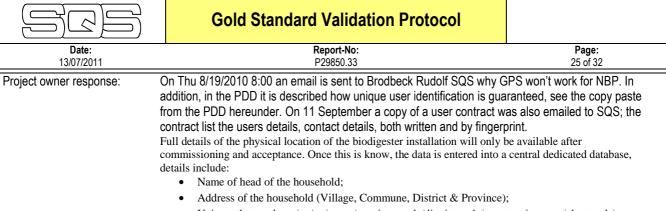
Project owner response:



	Gold Standard Validation Protoc	col
Date: 13/07/2011	Report-No: P29850.33	Page: 24 of 32
13/07/2011	Reduction (RE) in firewood (F _{fw}) and charcoal (F _c) consump	
	to the baseline Calculation is as follows: average consumption of fuelwood per the baseline - average consumption of fuelwood in the project is per average household, that times the number of biodigesters (Nasavings.	household (FW _{baseline+hh}) in sthe reduction of fuelwood
	RE _{fuel} = (∑FW _{baseline,hh} - ∑FW _{project,hh}) x N _{biodigester}	
Validator conclusion:	OK Date: 2	22/09/2010
No.:		1.2.1
Validator request:	The transfer of the emission rights (VER credits) from the should be described in a contract. Please send a contract (original language and English transport of the contract (original language).	
Project owner response:	On 11 September an email is sent to the validator with two scanned original.	attachments, the contract in English and a
Validator conclusion:	OK Date: 1	15/09/2010
No.:	CL 15 Reference: 1	1.6.17
Validator request:	It is not unequivocal which organization is responsible for t	
	who gives the reports free. Please complement this information for more transparency it's helpful to name the single reports.	ation.
Project owner response:	Changed in the PDD V11, please look at page 66	
Validator conclusion:	OK Date: 2	21/09/2010
No.:	CL 16 Reference: 1	1.7.6.1
Validator request:	The invitation of Save the Earth Cambodia, REEEP, WWF International could not be verified. Please explain why these organizations are not invited or second control or second	• •
Project owner response:	On 13 September an email is sent to all the supporters me relevant. The validator has received the email as well at the	entioned and other that were deemed
Validator conclusion:		15/09/2010
No.:	CL 17 Reference: 1	1.7.6.7
Validator request:	[GSSR] page 47 + 48 The data cannot be right. Please correct it. Workshop of 2008 / 05. January 2009 / 24 Dez. 2009	
Project owner response:	Date 5 January 2009 is deleted, the data referred to the poword. The other date, 24 dec 2009 is changed to 24 Decer	
Validator conclusion:		22/09/2010
No.:	CL 18 Reference: 2	2.2
Validator request:	The storage of data shall be documented with "Where, Saf	
· 	The storage of paper documents shall be regulated.	
Project owner response:	The process is documented in the 'NBP Administrative and been updated and the new version has been sent to the December 2015.	
Validator conclusion:		22/09/2010
No.:	CL 19 Reference: 2	2.3
Validator request:	Please explain why is not worked with the GPS coordinate guaranteed.	

MoV = Means of Validation, DR = Document Review, I = Interview, N/A = Not Applicable

CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request



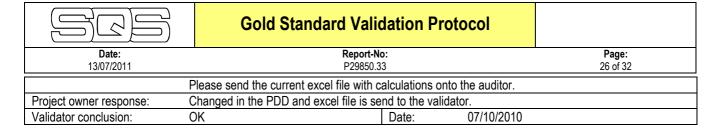
	radioss of the nousehold (+ mage, commune, 2 is the commune),			
	 Unique plant code xx/xx/xx/xxxx 	x (province code/district code/construction year/p	lant code);	
Validator conclusion:	experiences show out of Vietnam (very	coordinates is to be realized only very much he y extensive, inaccurate and expensive). documents and comparison with the identity ca	•	
Validator conclusion:	OK	Date: 22/09/2010		

No.:	CL 20	Reference:	2.4
Validator request:	Please explain the point.		
	 Please upload as separate annexe 	s in the registry	the 2009 survey study.
	 Please provide evidence that the DNA was notified (by email or letter) of this project going forward as a voluntary project. 		
Project owner response:	On 11 September an email is sent to SQS with evidence that NBP is in regular contact with the DNA (example of workshop agenda, invitation to workshop in 2006 on the decision to go ahead or not with CDM) and evidence of email communication, in addition, email exchange between Sum Thy, the head of the climate change office was included. In that email also a request was made on the annexes that shall be uploaded to the registry, as the 2009 survey is not conducted, the other surveys of the previous years were uploaded.		
Validator request:	The last contact with DNA was in August 2008 (mail July 29, 2008). At this time a CDM project spoken. Please inform the DNA the project running now as Gold Standard project.		
Project owner response:	The DNA is informed by email on 24 Sept 2010; the validator was in the CC of the email from NBP to the DNA.		
Validator conclusion:	If the survey study 2009 is conducted, then upload it in the GS registry ⇒ FAR 1		
Validator conclusion:	OK	Date:	08/10/2010

No.:	CL 21	Reference:	PDD V 11
Validator request:	The follow link's don't works		
·	Page 11 footer		
	Page 20 footer		
	Page 24 footer 12		
	Page 30 footer		
	Page 34 footer 18		
	Passport Page 35 footer		
Project owner response:	Changed in PDD V12 and the GS pass	port V7	
Validator conclusion:	OK	Date:	08/10/2010

No.:	CL 22	Reference:	PDD V 11 page 13	
Validator request:	Text is missing at the end of page.			
Project owner response:	Converse of CL 22 not found in PDD	Converse of CL 22 not found in PDD V11, the text continues on the next page		
Validator conclusion:	OK	Date:	08/10/2010	

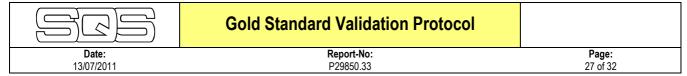
No.:	CL 23	Reference:	PDD V 11 page 26
Validator request:	The calculation in table 8 is with 333.83. Please recalculate with 336 (ex table 7).		
	The calculation in table 9 is with 226.83. Please recalculate with 229 (ex table 7).		



No.:	CL 24	Reference:	PDD V 11 page 44 and 50
Validator request:	It's explain NCV Charcoal = 93		
	Please reference the source of this num	ber.	
	Why do you don't calculate with 29.5 (IF	PCC Guidelines	2006, V 2, Ch 1, table 1.2).
	Please explain it under "Any comment".		,
Project owner response:	The values are changed. The emission calculations are based on primary product to avoid double counting. Charcoal is a secondary product. IPCC stipulates that to produce 1 kg charcoal 6 kg wood is used. Hence, 1 kg charcoal equals 6 kg wood, and 6 kg wood has a NCV of 15.6 TJ/Gg *6 =93 TJ/6Gg. That is confusing and hence it is changed. The IPCC source is references in the PDD, the source is IPCC 1996 as IPCC 2006 does not provide guidance on this.		
Validator conclusion:	OK	Date:	07/10/2010

No.:	CL 25	Reference:	PDD V 11 page 47 and 50
Validator request:	It's explain EF Charcoal = 336000		
	Please reference the source of this number.		
	Why do you don't calculate with 112000	(IPCC Guidelin	nes 2006, V 2, Ch 1, table 1.4).
	Is it TJ or GJ?		
	Please explain it under "Any comment".		
Project owner response:	Changed and explained in PDD V12. In CL 24 it was explained why the adapted NCV was used, the same we can do for the EF, to convert it to wood equivalent (15.6/29.5)*112000 is the converted EF of charcoal expressed in wood equivalents, that is 336000. Again, the calculation all is expressed in wood equivalents. So 1 kg charcoal is 6 kg wood (see CL24), 1 kg wood has a NCV of 15.6 TJ/Gg and a EF of 112000 kg/TJ		
Validator conclusion:	OK	Date:	07/10/2010

No.:	CL 26	Reference:	PDD V 11 page 45
Validator request:	It's explain VS Cow = 2.3 and Bo Cow = 0.1		
	Please reference the source of this num	nbers.	
	Why do you don't calculate with		
	VS Cow = 2.8 and Bo Cow = 0.13 (IPC)	C Guidelines 20	06, V4, Ch 10, table 10A-4).
	Please explain it under "Any comment".		
Project owner response:	The values suggested by the validator are for dairy cattle. In Cambodia animals are not held for dairy production, this is also not suggested in any of the project documentations. In the same guidelines as the validator suggests the values are provided for non-dairy cattle, these are VS cow 2.3 and Bo cow 0.1 and for VS dairy cow 2.8 and Bo dairy cow 0.13. Hence, the values are not used as they are not applicable		
Validator conclusion:	OK	Date:	08/10/2010



No.:	CAR 1	Reference: 1.2.5	
Validator request:	 [PDD] Page 7: Project participants should be corrected to MAFF, NBP and SNV Cambodia Organizational structure should be corrected and correspond to the [EMU]. Please exact organizational full name. All project participants should be described in [PDD] Annex 1 		
D. de la constant			
Project owner response:	Is changed in the PDD, see the revised PDD V11		
Validator conclusion:	OK	Date: 21/09/2010	

No.:	CAR 2	Reference:	1.5.8
Validator request:	[GST] 1.3: you must be able to argue in a convincing way that your project would not go ahead carbon revenues.		
	 The used numbers [PDD] Table 6 sh 	all agree with th	ne numbers in the [PAID] Table 11.
	 The analysis [PDD] Table 6 occurs only via 3 years, it shall be over the whole crediting pe least 2009 to 2016). It shall be shown transparently why the project VER's needs; for example how much Biodi built without Ver's and how much Biodigester is built with Ver's. 		
	 The used numbers [PDD] Table 5, 8, 9 shall agree with the numbers in the [PAID]. 		
	 The IRR analysis for one biodigester biodigester size. 	size (6 m³) sha	all be complemented for the smallest and biggest
Project owner response:	All is changed in the PDD. However, it is impossible to show how much would have been built without VERs as NBP has always relied on income from carbon finance. Without this income the		
			erefore it is not logic to speculate of the number
			e tables 5,8 and 9 differ from the implementation
	document as prices of materials have changed and since registration is sought from the 1 of January		
			t reality the most and ensures therefore a
			mentation document referred to in [PAID] is
	outdated and no longer used, the valida	ator has receive	d a copy of the new implementation document.
Validator conclusion:	OK	Date:	22/09/2010

No.:	CAR 3	Reference:	1.5.12	
Validator request:	[PDD] page 44: GWP _{CH4} value applied	[PDD] page 44: GWPcH4 value applied 23. Please change to 21		
	[PDD] page 52: GWP _{CH4} value applied 2	25. Please char	nge to 21	
	[PDD] page 61: GWP _{CH4} not defined. Pl	ease change to	21	
	[GSP] page 36: point 5. Please correct			
Project owner response:	All changed, see new versions, note however, that a request to the GS is made to allow for GWP			
	values that reflect the newest scientific insights endorsed by the IPCC. In case the GS allows using			
	other GWP values, the PDD will be updated subsequently.			
Validator conclusion:	OK	Date:	21/09/2010	

No.:	CAR 4	Reference:	1.6.5
Validator request:	Missing all 11 principles according Anno	ex H. Please exa	act titles.
·	uniqueness of indigenous people. The p	oroject is not cor	
	2 The project does not involve and is no	•	•
	3 The project does not involve and is no cultural heritage	ot complicit in the	e alteration, damage or removal of any critical
	4 The project respects the employees' find and is not complicit in restrictions of the		ciation and their right to collective bargaining d rights
	5 The project does not involve and is not complicit in any form of forced or compulsory labour		
	6 The project does not employ and is no	ot complicit in ar	ny form of child Labour
			y form of discrimination based on gender, race

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	religion, sexual orien	tation or any other basis.		
		es workers with a safe and hea	thy work environme	ent and is not complicit in
		unsafe or unhealthy work envir		
		a precautionary approach in rec		tal challenges and is not
	complicit in practices contrary to the precautionary principle.			
	10 The project does not involve and is not complicit in significant conversion or degradation of critical			
	natural habitats, including those that are (a) legally protected, (b) officially proposed for protection, (c)			
	identified by authoritative sources for their high conservation value, or (d) recognized as protected by			
	traditional local communities.			
	11 The project does	not involve and is not complicit	in corruption.	
Project owner response:	All changed, see nev	v versions passport V6 and LS	R V6	
Validator conclusion:	OK	Date:	22/09/2010	

No.:	CAR 5	Reference: 1.2.1			
Validator request:	The word "subsidy" should be replaced	The word "subsidy" should be replaced in the [PDD] and [GSP] for example through VERSettlement.			
Project owner response:	The term 'Investment subsidy' is used since the beginning by the programme in the communication with all stakeholders varying from donor to farmer. The term is well understood and it expresses the underlying justification, the community co-finances the investment of the individual because the community is profiting from this investment. This logic is used all over the world. Changing the term 'subsidy' to VER settlement would create confusion and is therefore rejected.				
Validator conclusion:	OK	Date: 22/09/2010			

No.:	CAR 6 Reference: 2.1
Validator request:	Please describe the mechanisms to be put in place to prevent any risk of double-counting due to other similar project activities that could potentially claim the same emission reductions, e.g. what are the control procedures in place to make sure that a owner / operator of the Biodigester cannot claim carbon credits from the same biodigester in two different project activities? Please send a contract (original language and English translation) onto the auditor.
Project owner response:	The farmer is officially handing over the VER rights to the programme by signing the construction contract. The programme registers the plants and assigns a unique plant number to each plant, in addition NBP conducts stringent controls to make sure that no phantom plants are listed. The stringent controls are: 1. For all plants there must be a complete paper trail. This consists of a technical feasibility (form no.2), a construction contract and a plant completion form. 2. All plants are registered at the concerned PBPO office before construction. The PBPO will randomly select 40% of these plants for quality control on site during the construction (form no. 6). 3. Of the 40% QC during the construction, 20% is checked by NBP technicians as QC on QC. This checks are also used for coaching of masons and supervisors. 4. 100% of the plants are checked upon completion but before commissioning by the PBPO supervisor (form no.9). This inspection form is also used for the official hand-over of the plant to the owner and for the disbursement of the subsidy. The gathered information is stored in the central Dbase. 5. Of the 100% plant completion check, about 10% is randomly checked by NBP technicians and the date of these checks are compared with the data from the no.9 forms. 6. Randomly 10% of all plants are checked by NBP technicians if the conditions for after-sales service and quality control are observed. 7. After completion, the date of all plants are given to the bio-slurry extension services so follow-up visits can be made to fully integrate the plants in the farm management system.
	 8. Annually a Biogas User Survey is conducted on a representative random sample of all plants constructed by an independent surveyor.
	Over the past 4 years, 3 occurrences of phantom plants have been discovered. All of them in the second year of the programme. The stringent controls by different actors and the severity of the actions



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	when a false plant claim is discovered has eliminated the phantom plants from the programme			
	Note that all the masons, the biogas construction enterprises and the supervisors are known, trained and licensed by NBP. The license is revoked in case a phantom plant is reported and the concerned person will be reported to the police for fraud, this is a standard procedure.			
	There are no similar project operating in the project area, individual farmers claiming credits is unlikely due to the complicated and costly processes involved.			
	The contracts have been sent to SQS,			
	In conclusion, Double counting will not occur due to the stringent controls applied by NBP			
Validator conclusion:	In addition, double counting to another CDM or voluntary market project is not allowed through the text in the contract between the owner/operator of the biodigester and NBP.			
Validator conclusion:	OK Date: 22/09/2010			

No.:	CAR 7	Reference: 1.7.14
Validator request:	Please explain the conversion of this de	emand.
Project owner response:	relevant. The validator has received the comment PFA 5, on the stakeholder fer suggested that a feedback form for confeedback form on the website which is In addition, all the contact details of NB always be contacted (http://www.nbp.c	If the supporters mentioned and other that were deemed be email as well at the same date. Also, during the on site visit the edback round, was discussed in detail and the validator in ments on the website would be sufficient. NBP has included a available 24 hours a day for comments and open to any visitor. Property staff can be found on the website, ensuring that staff can be grant or the stakeholder report details how comments are processed.
Validator conclusion:	OK	Date: 22/09/2010



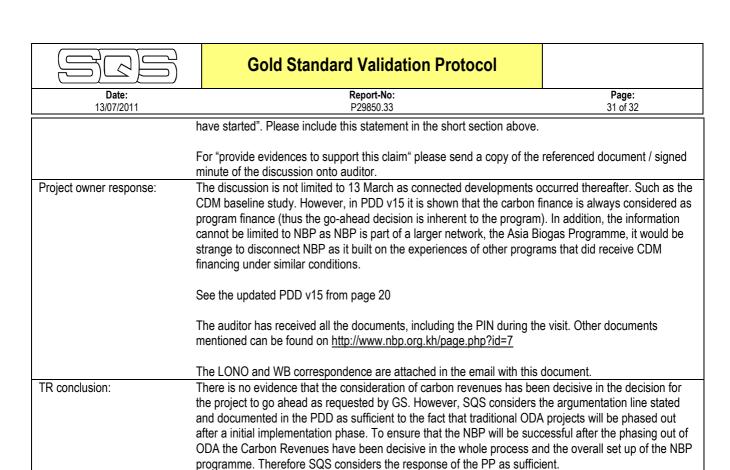
No.:	TR_CAR1	Reference:	GS Pre-feasibility Assessment of the
			retroactive registration request
TR request:	Eligibility: The PDD does not include a s	statement that p	post 2008 credits will not claimed under any
	other voluntary standard than the Gold	Standard.	
	The PDD has to be revised accordingly		
Project owner response:	Statement is added in PDD v14 on page 15.		
	A.4.3 Estimated amount of emission reductions over the chosen <u>crediting period</u> :		
	Credit period: The project applies for a renewable crediting period of 7 years.		
	Retroactive Gold standard certification of the credits is sought from the 1st of January 2009 until 12 March 2016. The credits generated in that period have not and will not, under any condition, be claimed		
	under any other voluntary standard.		
TR conclusion:	OK	Date:	03/02/2011

No.:	TR_CAR2	Reference: GS Pre-feasibility Assessment of the retroactive registration request		
TR request:	and a baseline study (September 2006 revenues has been decisive in the deci as requested by GS.	ect history including the contact to the World Bank (Lol 2006) only. There is no evidence that the consideration of carbon sion for the project to go ahead. The PP shall provide evidence		
Project owner response:	NBP is part of a larger network of SNV supported domestic biogas programs, the Asia Biogas Programme (ABP). Within that framework NBP is connected to programs that achieved carbon finance before NBP, notably the Nepal biogas support program (BSP). NBP considers carbon finance based on success of BSP in 2005 ¹ , as feasible and as financing component that should be mobilized to benefit the users by using it to finance the subsidy regime.			
		The PP has evidenced in the PDD that <i>before</i> the start carbon revenue were considered as project finance and the PDD shows ample evidence that carbon revenue is required to maintain the subsidy regime.		
	The history in the PDD also includes the workshop that was held after the completion of the CDM baseline study. The objective of the workshop was to choose an approach to carbon finance, CDM or voluntary market. NBP decided to pursue voluntary market in the hope it would be a more feasible approach compared to CDM. This is also elaborated upon in the PDD. In conclusion, there was never any doubt at the side of NBP that carbon finance would not be feasible and the CDM baseline study confirmed that. The question that the consideration of carbon revenues has been decisive for the project to go ahead is therefore not relevant. This decision was never taken as NBP never doubted the viability of carbon finance.			
	would have been too long.	vithout carbon finance the investment horizon of the farmers		
Validator request:	consideration of carbon revenues has provide evidences to support this claim Please limit the discussion on focus decision for the project to go ahead". P information should be for the period befor transparency please add in PDD \ finance" a short section (e.g. table) w	as requested by GS "Please discuss in detail how early been decisive in the decision for the project to go ahead and ." " consideration of carbon revenues has been decisive in the lease limit the information on the NBP Project in Cambodia. The fore 13 March 2006 (starting date of the project.) /14 page 20 "The prior consideration oft he necessity of carbon with date, decision and exact reference incl. page with focus "been decisive in the decision for the project to go ahead".		
		reseen in the initial plan that revenue from carbon offsets are t the projected income from carbon offsets the NBP would not		

¹BSP was the first biogas project to become registered worldwide.

MoV = Means of Validation, DR = Document Review, I = Interview, N/A = Not Applicable

CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request



No.:	TR_CAR3	Reference:	PDD cp. B.5.	
			Identification of alternatives to the project	
			activity& Baseline Scenario.	
TR request:	The PDD cp. B.5. has identified three scenarios only. The very key scenario that the Ministry of			
	Agriculture, Forestry and Fisheries (MAFF) would work on a biogas program without Carbon Finance is			
	weather identified nor discussed in the PDD. The baseline scenario that without Carbon Finance not a			
	single biogas digester would have been built seems not to be conservative. The scenario of a biogas			
	program by the Ministry without Carbon Finance (e.g. based on donor contribution, public funding, etc.) shall be discussed.			
Project owner response:	This is discussed on page 21 of the PDD, an extract is provided below:			
	Step 1: Identification of alternatives to the project activity			
	Sub-step 1a: Definitions of alternative scenarios to the proposed project activity.			
	If the NBP would not have been supported with carbon finance, the following scenarios are plausible:			
	Continued use of unsustainable fuel wood for cooking and kerosene for lighting;			
	2) Continuation of the project activities without carbon finance;			
	3) Switch to fossil fuels;			
	NBP request the auditor to substantiate the claim that the scenario was not discussed			
Validator request:	On page 21 of the PDD V14 it's discussed the scenario "continuation of the project activities with or without donor contribution and carbon finance". The possibility of the public financing is not included.			
	Please add the scenario: continuation of the project activities by the Ministry without Carbon Finance,			
	based on donor contribution and/or public funding. Please include in this scenario a statement that not			
	any law or public incentives exists to promote biodigesters in Cambodia.			
	At the audit the alternatives were discussed in detail, partly emotional.			
Project owner response:	Alternative 4 is included in PDD v15.			
TR conclusion:	Alternative 4 as been included and discussed accordingly.			
TR conclusion:	OK	Date:	09/03/2011	

Date:

09/03/2011

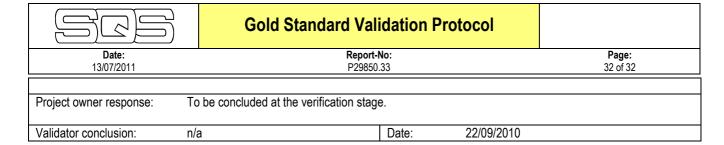
 No.:
 FAR 1
 Reference:
 2.4

 Validator request:
 If the survey study 2009 is conducted, then upload it in the GS registry

MoV = Means of Validation, DR = Document Review, I = Interview, N/A = Not Applicable CAR = Corrective Action Request, CL = Clarification Request, FAR = Forward Action Request

OK

TR conclusion:



No.:	TR_CAR4	Reference: PDD cp. B.5.	
		Common Practice analysis	
TR request:	The common practice analysis makes a statement that there are digesters built in Cambodia but with low quality, i.e. plastic digesters. Therefore the common practice analysis assumes that the ongoing biogas programs have marginally impact only. The PDD shall be revised including facts and figures on the common practice analysis. The PP shall include a discussion of the current use of bio digesters in Cambodia as requested by GS. The conclusion that there are not other relevant programs in Cambodia shall be based on public available references and/or on statements of relevant fully independent organizations.		
Project owner response:	The PDD includes public available references of relevant fully independent organizations to assess the common barrier analysis. The main report used is from Bridget McIntosh, 2004, Review and recommendations for Household biodigester in Cambodia, The Cambodia Research centre for Development. There are hardly any other sources that describe the pilot biogas initiatives in Cambodia. As the PDD includes fact and figures, NBP requests to the auditor to substantiate this CAR.		
Validator request:	PDD V14 page 33 (common practice analysis) has no discussion of the current (2009/2010) use of biodigesters in Cambodia (e.g. other programs, number of other biodigesters then NBP, trend of these other Biodigester with numbers etc.). Bridget McIntosh, 2004, shows the situation before 2004, that's not the current situation. The PP shall include a discussion as requested by GS "This section should include a discussion not only on similar programmes but also on the current use of biodigesters in Cambodia, confirming that without such a subsidised programme, these have remained marginally used." The statements shall be based on public available references and/or on statements of relevant fully independent organizations. Please a copy onto auditor. Please limit the discussion on Cambodia.		
Project owner response:	Added to the PDD on page 35: In 2009 and 2010 there were no other biogas programs active in th NBP project area. Only CRDT (Cambodia Rural Development Team) is sporadically buildin biodigesters in Kratie, outside the NBP project area, digesters which are for 100% subsidized. The have built less than 50 dome digesters; all their plastic digesters are broken and abandoned. CRD cannot be regarded as a similar activity as they work on project basis, do not develop a sustainable biogas sector and their activities are marginal. There are no other available sources describing other biogas programs, because there are no other initiatives. No documents are publically available as evidence. There is simply nothing going on besides NBF However the report GHG mitigation in the agricultural sector for the Second National Communicatio (SNC) to the UNFCCC (not published) does assess the biogas sector. The SNC author is The Ministre		
	mentiong the current status of biogas ir published and cannot be shared befor government document.	ritten by Eric Buysman (ericishier@gmail.com). The SNC does a Cambodia. This source is added as a footnote. But this is not e the SNC is published, which can take years. The SNC is a	
TR conclusion:	mentiong the current status of biogas ir published and cannot be shared befor government document. SQS has cross checked the information	n Cambodia. This source is added as a footnote. But this is not	