

Re Carbon Gözetim Denetim ve
Belgelendirme Ltd. Şti.

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Standard Operation Procedure



Validation


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1. Purpose

The purpose of this Standard Operation Procedure is to explain the procedures used for planning, executing and reporting of the validation activities in line with the Clean Development Mechanism (CDM) criteria and requirements and to define the duties and responsibilities in this process.

2. Summary of method

- 2.1. A validation plan is prepared by the Team Leader using the “**Assessment Planning Form**” and saved on the company’s main server.
- 2.2. The “**Assessment Planning Form**” is approved by the Certification Manager.
- 2.3. The “**Assessment Planning Form**” is sent to the project participant(s) for comments and further arrangements.
- 2.4. In case the project participant(s) do not have any objections, the validation commences in accordance with the defined plan.
- 2.5. Validation is executed in line with the “**CDM Validation Report Template**” and other reference documents.
- 2.6. Upon completion of the validation process, validation report including the validation protocol and opinion is prepared and Team Leader informs the Certification Manager (CM) and previously assigned Independent Technical Reviewer (ITR), who shall then conduct the technical review.
- 2.7. ITR shall inform CM when validation is finalized and the required corrections are applied to the report by the Team Leader in line with the independent technical review.
- 2.8. In case of a positive validation opinion, request for registration is submitted by Certification Manager to the CDM Executive Board (CDM EB).

3. Definitions and abbreviations

Please see DOE Glossary of Terms.


4. Health and safety warnings

All health and safety rules and procedures shall be followed at the project site during the validation on-site visit.

5. Application

5.1. Planning of validation activities

Upon signing of the contractual agreement with the project participants (PPs), the Team Leader shall conduct a preliminary assessment of the available project documentation and prepare the “**Assessment Planning Form**” with detailed indication of the man/hours required for different tasks assigned to each team member in line with his professional experience and judgement, potential complications and/or number of sites/units.

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Timeline identified in the contractual agreement and submitted to PPs by the Sales Manager-Carbon is included into the “**Assessment Planning Form**” by the Team Leader and the required man-hours are allocated among the team members.

Timeline in the contract is identified in line with the “**Generic Service Timeline Procedure**” and the details are given in this procedure.

If the Team Leader and other team members require more or less time than the one defined in this time line, Team Leader shall provide justification for all differences in the “**Assessment Planning Form**”.

5.1.1.Sampling

If there is a need for validation of a sampling plan or sampling approach is applied independently by the validation team as one means of validation when PPs have not applied a sampling approach, “**Sampling Guidance**” can be utilized and determined by the Team Leader through “**Assessment Planning Form**”.

The sample cases available in the “**Sampling Guidance**” for verification activities can also be adapted to the validation activities.

The required confidence interval for small scale project activities and CPAs is 90%, whereas that of large scale project activities and CPAs is 95% in line with the latest versions of “Standard for Sampling and Surveys for CDM Project Activities and Programme of Activities” and “Guidelines for Sampling and Surveys for CDM Project Activities And Programme of Activities”.

In this case, the following needs to be taken into consideration by the validation team:

5.1.1.1. Simple random sampling approach

If the units and/or records in the population being sampled are homogenous, the simple random sampling approach can be followed by the validation team and the following formula 1 can be used by the team for the small scale project activities and formula 2 for the large scale project activities, respectively.

$$n \geq \frac{1.645^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.645^2 \times V)} \quad (1)$$

$$V = \frac{p(1 - p)}{p^2}$$

n: Sample size

N: Total number of units/records in the population


p: Estimated proportion of available units/records¹

1.645: Represents the 90% confidence required

0.1: Represents the 10% relative precision (Görece %10 kesinliği temsil eder)

¹ If it is expected that almost all units/records are available at the time of validation, the proportion should be taken as 90%.

If the proportion of units/records that are available can't be estimated by the validation team, then 50% value should be used to be in the safe side.

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$$n \geq \frac{1.96^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.96^2 \times V)} \quad (2)$$

$$V = \frac{p(1 - p)}{p^2}$$

n: Sample size

N: Total number of units/records in the population

p: Estimated proportion of available units/records ²

1.96: Represents the 95% confidence required

0.1: Represents the 10% relative precision

5.1.1.2. Stratified random sampling approach

If the units and/or records in the population being sampled are heterogenous, the stratified random sampling approach can be followed by the validation team and the following formula 3 can be used by the team for the small scale project activities and formula 4 for the large scale project activities, respectively.

$$n \geq \frac{1.645^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.645^2 \times V)} \quad (3)$$

$$V = \frac{SD^2}{\bar{p}^2}$$

$$SD^2 = \frac{(g_a \times p_a (1 - p_a)) + (g_b \times p_b (1 - p_b)) + (g_c \times p_c (1 - p_c)) + \dots + (g_k \times p_k (1 - p_k))}{N}$$

$$\bar{p} = \frac{(g_a \times p_a) + (g_b \times p_b) + (g_c \times p_c) + \dots + (g_k \times p_k)}{N}$$

n: Sample size

g_i: Size of the ith group (district) where i=1,...,k

N: Total number of units/records

SD: Overall variance of the units/records in the population

\bar{p} : Expected overall proportion of the available number of units/records to the total number of units/records


p_i: Expected proportion of the ith group (district) in the total group (district), where i=a,...,k

$$n \geq \frac{1.96^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.96^2 \times V)} \quad (4)$$

$$V = \frac{SD^2}{\bar{p}^2}$$

² If it is expected that almost all units/records are available at the time of validation, the proportion should be taken as 90%.

If the proportion of units/records that are available can't be estimated by the validation team, then 50% value should be used to be in the safe side.

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$$SD^2 = \frac{(g_a \times p_a (1 - p_a)) + (g_b \times p_b (1 - p_b)) + (g_c \times p_c (1 - p_c)) + \dots + (g_k \times p_k (1 - p_k))}{N}$$

$$\bar{p} = \frac{(g_a \times p_a) + (g_b \times p_b) + (g_c \times p_c) + \dots + (g_k \times p_k)}{N}$$

n: Sample size

g_i: Size of the ith group (district) where i=1,...,k

N: Total number of units/records

SD: Overall variance of the units/records in the population

\bar{p} : Expected overall proportion of the available number of units/records to the total number of units/records

p_i: Expected proportion of the ith group (district) in the total group (district), where i=a,...,k

5.1.1.3. Cluster sampling approach

If the units and/or records in the population being sampled are available in the different geographical locations, the cluster sampling approach can also be followed by the validation team and the following formula 5 can be used by the team for the small scale project activities and formula 6 for the large scale project activities, respectively.

$$n \geq \frac{1.645^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.645^2 \times V)} \quad (5)$$

$$V = \frac{SD^2}{\bar{p}^2}$$

$$\bar{p} = \frac{\sum_{i=1}^n p_i}{n}$$

$$SD^2 = \frac{1}{n - 1} \sum_{i=1}^n (p_i - \bar{p})^2$$

c: Cluster size for sampling

n: Number of clusters examined

N: Total number of units/records in the population

1.645: Represents the 90% confidence required

0.1: Represents the 10% relative precision


SD: Overall variance of the units/records

\bar{p} : Expected overall proportion of the available units/records to the total number of units/records

p_i: Expected proportion of the ith group (district) in the total group (district), where i=a,...,k

$$n \geq \frac{1.96^2 \times N \times V}{((N - 1) \times 0.1^2) + (1.96^2 \times V)} \quad (6)$$

$$V = \frac{SD^2}{\bar{p}^2}$$

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$$\bar{p} = \frac{\sum_{i=1}^n p_i}{n}$$

$$SD^2 = \frac{1}{n-1} \sum_{i=1}^n (p_i - \bar{p})^2$$

c: Cluster size for sampling

n: Number of clusters examined

N: Total number of units/records in the population

1.96: Represents the 95% confidence required

0.1: Represents the 10% relative precision

SD: Overall variance of the units/records

\bar{p} : Expected overall proportion of the available units/records to the total number of units/records

p_i : Expected proportion of the *i*th group (district) in the total group (district), where *i*=a,...,k

In case of cluster sampling, every record in a sample of *n* clusters from the population shall be examined by the validation team.

5.1.1.4. Multi stage sampling approach

If the sampling from a number of groups, and then sampling of records within each group are required for the units and/or records in the population being sampled (For example, if the project activity is a cookstove project, if there are 120 villages in which there are records, and there are on average 50 households within each village, 10 records of which it is planned to be sampled for these households), the multi stage sampling approach can also be followed by the validation team and following formula 7 can be used by the team for the small scale project activities and formula 8 for the large scale project activities, respectively.

$$c \geq \frac{\left(SD_B^2 \times \frac{M}{M-1} \right) + \left(\frac{1}{\bar{u}} \times \frac{SD_W^2}{\bar{p}^2} \times \frac{(\bar{N} - \bar{u})}{(\bar{N} - 1)} \right)}{\left(\frac{0.1^2}{1.645^2} \right) + \left(\frac{1}{M-1} \times \frac{SD_B^2}{\bar{p}^2} \right)}$$

(7)

$$\bar{p} = \frac{\sum_{i=1}^n p_i}{n}$$

$$SD_B^2 = \frac{1}{n-1} \sum_{i=1}^n (p_i - \bar{p})^2$$

$$SD_W^2 = \frac{\sum_{i=1}^n SD_{Wi}^2}{n}$$


c: Cluster size for sampling

M: Total number of units/records in the population

\bar{u} : Number of units/records to be sampled within each group

\bar{N} : Average number of units/records per group

SD_B^2 : Unit variance

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SD_W^2 : Average of the group variances

\bar{p} : Expected overall proportion of the available units/records to the total number of units/records

1.645: Represents the 90% confidence required

0.1: Represents the 10% relative precision

$$c \geq \frac{\left(SD_B^2 \times \frac{M}{M-1} \right) + \left(\frac{1}{\bar{u}} \times \frac{SD_W^2}{\bar{p}^2} \times \frac{(\bar{N} - \bar{u})}{(\bar{N} - 1)} \right)}{\left(\frac{0.1^2}{1.96^2} \right) + \left(\frac{1}{M-1} \times \frac{SD_B^2}{\bar{p}^2} \right)} \quad (8)$$

$$\bar{p} = \frac{\sum_{i=1}^n p_i}{n}$$

$$SD_B^2 = \frac{1}{n-1} \sum_{i=1}^n (p_i - \bar{p})^2$$

$$SD_W^2 = \frac{\sum_{i=1}^n SD_{Wi}^2}{n}$$

c: Cluster size for sampling

M: Total number of units/records in the population

\bar{u} : Number of units/records to be sampled within each group

\bar{N} : Average number of units/records per group

SD_B^2 : Unit variance

SD_W^2 : Average of the group variances

\bar{p} : Expected overall proportion of the available units/records to the total number of units/records

1.96: Represents the 95% confidence required

0.1: Represents the 10% relative precision

5.1.1.5. Systematic sampling

If there is a need for sampling of nth unit and/or record in the population (For example, if the project activity is a cookstove project and if there is a need to sample each 100th cookstove's records) the systematic sampling approach can be followed by the validation team and following formula 9 can be used by the team for the small scale project activities and formula 10 for the large scale project activities, respectively.

$$n \geq \frac{1.645^2 \times V}{0.1^2} \quad (9)$$

$$V = \left(\frac{SD}{Mean} \right)^2$$

n: Sample size

SD: Standard deviation (Pre-determined value)

Mean: Average value for the examined item

1.645: Represents the 90% confidence required

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$$n \geq \frac{1.96^2 \times V}{0.1^2} \quad (10)$$

$$V = \left(\frac{SD}{Mean} \right)^2$$

n: Sample size

SD: Standard deviation (Pre-determined value)

Mean: Average value for the examined item

1.96: Represents the 95% confidence required

5.2. Approval of the assessment plan

“**Assessment Planning Form**” prepared by the Team Leader is submitted to the Certification Manager for approval.

Certification Manager shall assess the prepared “**Assessment Planning Form**” by using his/her professional experience and judgement. If the plan is deemed as feasible and reasonable, he/she approves the form or request changes in case team members have not been allocated sufficient time for some of the tasks.

If more time is required during the site visit for any particular task due to the project specific and unforeseeable reasons, the revised “**Assessment Planning Form**” is submitted by the Team Leader to the Certification Manager by providing detailed justification.

In this case, Certification Manager shall consider the provided justification and approve the form or reject the request within 2 working days as soon as possible depending on the urgency of the situation (e.g. being validation team on the site in a remote location is a situation requiring urgent action in a short time), but not later than 2 working days..

The “**Assessment Planning Form**” is sent to the project participant(s) by a team member for comments and further arrangements following its approval process.


5.3. Executing the validation

5.3.1.Subcontracting

The usage of any subcontractor at Re Carbon Ltd. is not planned at current situation regarding to CDM validation activities.

However, if using of subcontractors is in question for the subjects that require specific technical expertise for the validation of CDM projects (e.g. the environmental issues like the settlement of baseline scenario and monitoring of emissions) and if Re Carbon Ltd. subcontracts to supplement internal resources in the future, the following principles will apply:

- Re Carbon Ltd. will be responsible for the outcomes of the subcontracted work to comply with the requirements specified in the CDM Modalities and Procedures, the decisions and clarifications of The Conference of the Parties (COP) and the CDM Executive Board

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- Re Carbon Ltd. will ensure that the subcontracted entity meets the relevant requirements for validation functions in the latest version of “**CDM Accreditation Standard for Operational Entities**” and in other relevant documents.

5.3.2. Delegation of functions to the other sites

None of the CDM validation functions are delegated by Re Carbon Ltd. to any site. This is also confirmed in the “**Validation & Verification Policy**” available in Annex-1.

However an agreement is signed with Natural Power Consultants Ltd. for the provision of technical expert support, if needed.

5.3.3. General principles for the execution of validation


During the validation there are three types of evidences collected:

- Physical evidence (refers to any evidence that can be seen or touched during the audit, e.g., emission monitoring equipment, calibration equipment),
- Documentary evidence (refers to any evidence that is written on paper or recorded electronically) and
- Testimonial evidence (refers to any evidence gathered from interviews with technical, operating, administrative or managerial personnel or other stakeholders and external experts by in-person or by telephone)

The validation activities are carried out adhering to the principles listed below and impartiality and confidentiality principles are pledged in all agreements:

- Impartiality (decisions are based on objective evidence obtained through the validation processes and not influenced by other interests or parties)
- Competence (to employ personnel with the necessary skills, experience, training and capacity to effectively complete validation activities)
- Independence (not to have a conflict of interest and/or organic relationship with the project being validated and/or the project proponent)
- Factual approach (validation statement is based on objective evidence and findings)
- Openness (sharing of current and correct information regarding the validation activities with the project proponent, stakeholders and intended user)
- Confidentiality (confidential information obtained during validation activities is safeguarded and not inappropriately disclosed)

The validation team assesses the correctness of the information provided by the CDM PPs.

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5.3.4. Principles for validating information provided by the project participants

5.3.4.1. Accurate

Checking for accuracy of information provided by the project participants requires the following:

- Minimizing bias and uncertainty in the measurement process and the processing of data for quantitative data and information
- Minimizing bias in favour of a particular result for non-quantitative information

5.3.4.2. Conservative

Information can be considered as conservative if the GHG emission reductions or removal enhancements of a project activity are not overestimated.

5.3.4.3. Relevant

Information can be considered relevant if it ensures compliance with the CDM requirements and the quantification and reporting of emission reductions achieved by a project activity. Unnecessary data and assumptions that do not have an impact on the emission reductions are not considered as relevant.

5.3.4.4. Credible

Information can be considered credible if it is authentic and is able to inspire trust.

5.3.4.5. Reliable

Information can be considered reliable if the quality of evidence is accurate and credible and able to yield the same results on a repeated basis.

5.3.4.6. Complete


Completeness refers to inclusion of all relevant information for assessment of GHG emissions reductions and the information supporting the methods applied as required.

5.3.4.7. Consistency

Consistency is achieved by the following:

- Applying uniform criteria to the requirements of the applicable approved methodology throughout the crediting period(s),
- Applying uniform criteria among project activities with similar characteristics such as a similar application of the approved methodology, use of technology, time period or region,
- Applying uniform criteria to expert judgements, over time and among projects.

The principle of consistency doesn't prevent validation team from applying the most recent decisions and guidance provided by the CDM Executive Board.

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5.3.4.8. Transparency

Information in the validation reports are presented in an open, clear, factual, neutral and coherent manner based on documentary evidence.

Transparency requires the following:

- Clearly and explicitly state and document all assumptions,
- Clearly reference background material,
- Clearly identify changes made to documentation.

5.3.5. Confidentiality

In accordance with the CDM requirements, Re Carbon Ltd. safeguards the confidentiality of all information obtained or created during validation activities and this is confirmed through “**Validation & Verification Policy**” available in Annex-1.

Similarly, annual risk analysis is carried out to satisfy the confidentiality regarding validation activities and results are recorded with the “**Carbon Department Risk Analysis Form**”.

The confidentiality statements in line with the confidentiality policy of Re Carbon Ltd. are issued in all contracts of personnel (including validation team) involved in validation activities.

Re Carbon Ltd. guarantees that information belonging to PPs will remain strictly confidential as per confidentiality agreement in the validation sales agreements and information will not be disclosed to a third-party without written consent by the project participant(s).

Furthermore, no one is permitted to reproduce or make copies of any project participants’ records, reports or documents without management’s approval. As stated in “**Validation & Verification Policy**” in Annex-1, in case any document belonging to the project participant(s) needs to be published in publicly accessible environment, written permission is obtained from the project participant(s).

Information obtained from the CDM project participants marked as proprietary or confidential isn’t disclosed without the written consent of the provider of the information, except as required by national law.


However, information used to determine additionality as defined in paragraph 43 of Decision 3/CMP.1, to describe the baseline methodology and its application, and to support an environmental impact assessment referred to in paragraph 37 (c) of the same, isn’t considered proprietary or confidential and is made publicly available.

Additionally, all validation records are kept in a restricted accessible companys server and are backed up automatically on a daily basis.

5.3.6. Validation stages

The validation activities include but is not limited to the following:

i. Document review

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- Review of data and information to verify the correctness, credibility and interpretation of presented information
- Cross checks between information provided in the PDD and information from sources other than that used, if available, and if necessary independent background investigations
- ii. Follow-up actions (e.g. on site visit, telephone or email correspondences)**
 - Interviews with relevant stakeholders in the host country, personnel with knowledge of the project design and implementation;
 - Cross check between information provided by interviewed personnel (i.e. by checking sources or other interviews) to ensure that relevant information has not been omitted
- iii. Reference to available information relating to projects or technologies similar to the CDM project under validation**
- iv. Review based on the approved methodology being applied and appropriateness of formulae and correctness of calculations**

The site visit is one of the follow-up actions and the following team members shall participate to the site visit:

- The team leader of the project
- The team member(s) qualified in the technical area(s) of the CDM project activity being validated


If the Team Leader of the project is also qualified in the technical area(s) of the project activity, s(he) can participate to the site visit alone.

Over the course of the validation the Validation Protocol available in the **“CDM Validation Report Template”** is used as guidance and with completion of the validation it is attached to the validation report.

Over the course of the validation, the proper communication is held through emails between the Certification Manager and the Team Leader for the provision of monitoring and supervision.

During the validation, project is checked whether it is in compliance with the following requirements:

- i. Approval
- ii. Participation
- iii. Conformance of the PDD
- iv. Project description
- v. Baseline scenario and monitoring methodology
 - General requirement
 - Applicability of the selected methodology to the project activity
 - Project boundary
 - Baseline identification
 - Algorithms and/or formulae used to determine emission reductions

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- vi. Additionality of a project
 - Prior consideration of the CDM
 - Identification of alternatives
 - Investment analysis
 - Barrier analysis
 - Common practice analysis
- vii. Monitoring plan
- viii. Sustainable development
- ix. Local stakeholder consultation
- x. Environmental impacts
- xi. Modalities of communication
- xii. Modalities of communication statement

5.3.7. Approval

5.3.7.1. Requirement to be validated

CDM project must be approved by the parties to Kyoto Protocol involved in CDM project.

5.3.7.2. Means of validation

Team Leader checks whether the written letter of approval by the Designated National Authority of each party involved is provided, as indicated in Section A.4 of PDD. Each letter of approval must cover the following requirements:

- Related parties are party to the Kyoto Protocol,
- Project participation is voluntary,
- In the case of the host Party, project contributes to the sustainable development of the country,
- It refers to the precise project activity title in the PDD being submitted for registration,
- The letter(s) of approval is unconditional with respect to clauses in above.

If the Team Leader doubts the authenticity of the letter of approval, relevant DNA is contacted regarding the authenticity of the letter of approval by the Team Leader.

If letter of approval contains specific information regarding the project, such as the PDD version number, then the request for registration will be made on the basis of the documents specified in the letter.

If a letter of approval refers to a specific version of the validation report and Re Carbon Ltd. is unable to submit this exact version of the validation report, one of the following options is chosen:

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- A statement is added to the validation report to point out that the final letter of approval has not been received and that a request for registration will not be submitted until it has been received, or
- Validation report is updated to reflect the receipt of the letter of approval. If this option is chosen, validation report major number will remain unchanged and the minor number will be increased. A confirmation to the validation report is added that this is the only change that has been made to the version referred to in the letter of approval.

5.3.8. Authorization

5.3.8.1. Requirement to be validated

All project participants should be listed in a consistent manner in the project documentation and their participation in the project activity should be approved by a party to the Kyoto Protocol.

5.3.8.2. Means of validation

The validation team confirms that the project participants are listed in a tabular form in section A.4 of the PDD and that this information is consistent with the contact details provided in Annex-1 of the PDD.

Similarly, the validation team determines whether the participation of each participant has been approved by at least one Party involved, through a letter of approval and will also confirm that no entities, other than those approved as project participants, are included in these sections of the PDD.

If the Team Leader doubts the authenticity of the letter of approval, relevant DNA is contacted regarding the authenticity of the letter of approval by the Team Leader.

5.3.9. Project Design Document (PDD)

5.3.9.1. Requirement to be validated

The PDD used as a basis for validation must be prepared in accordance with the the latest version of the PDD form appropriate to the type of project activity.

5.3.9.2. Means of validation

The validation team confirms whether the PDD is in accordance with applicable CDM requirements via conducting a cross check between the PDD and CDM requirements.


5.3.10. Project description

5.3.10.1. Requirement to be validated

The PDD must contain a clear description of the project activity that provides the reader with a clear understanding of the exact nature of the project activity and the technical aspects of its implementation.

5.3.10.2. Means of validation

The validation team confirms that the description of the project activity, as contained in the PDD, sufficiently covers all applicable elements in an articulate manner and is accurate.

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For a project activity in an existing facility or utilizing existing equipments, Team Leader and/or validation team conducts a physical site inspection to confirm that the description in the PDD reflects the project activity for the following types of CDM project activities unless other means are specified in the methodology:

- Large scale projects in the energy sector
- Non-bundled small scale projects with emission reductions exceeding 15,000 tonnes per year
- Bundled small scale projects, each with emission reductions not exceeding 15,000 tonnes per year (in this case the number of physical site visits will be based on sampling)

Similarly, if the CDM project activity involves the alteration of an existing installation or process, the validation team will check whether project description clearly describes the differences resulting from the project activity compared to the pre-project situation.

For all other CDM project activities not described above, validation is carried out by reviewing available designs and feasibility studies by comparison analysis to equivalent projects, as appropriate, and the physical site visit may be conducted to assess the plan.

5.3.11. Baseline and monitoring methodology

5.3.11.1. General requirement

The validation team checks whether the baseline and monitoring methodologies selected by the project participants conform with the methodologies previously approved by the CDM Executive Board and determine whether the following are met:

- i. The selected methodology is applicable to the project activity
- ii. The project participant has applied the selected methodology correctly.

The following are evaluated to ensure the selected methodology has been applied correctly:

- Project boundary,
- Baseline scenario identification,
- Algorithms and/or formulas used to determine emission reductions,
- Additionality,
- Monitoring methodology,


5.3.11.2. Applicability of the selected methodology to the project activity

5.3.11.2.1. Requirement to be validated

The validation team checks whether the selected baseline and monitoring methodology is previously approved by the CDM Executive Board and is applicable to the proposed CDM project activity, including that the used version is valid.

5.3.11.2.2. Means of validation

The validation team determines whether the methodology is correctly applied by comparing it with the actual text of the applicable version of the methodology available on the CDM website.

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If the PDD of a proposed project activity is based on a previous version of a methodology and was published for global stakeholder consultation but was not submitted for registration to CDM Executive Board within the grace period, the validation team shall request the project participants to provide a revised PDD .

The validation team shall determine whether the project activity meets each of the applicability conditions of the approved methodology or any tool or other methodology component referred to therein. This shall be done by validating the documentation referred to in the PDD and by verifying that the documentation content is correctly quoted and interpreted in the PDD.

If the validation team, based on local and sectoral knowledge, is aware that comparable information is available from credible sources other than that used in the PDD, then the validation team shall cross-check the PDD against other sources to confirm that the project activity meets the applicability conditions of the methodology.

Validation team determines whether the choice of methodology is justified and project participants have shown that project activity meets each of the applicability conditions of the approved methodology or any tool or other methodology component.

5.3.12. Project boundary

5.3.12.1. Requirement to be validated

The validation team shall determine whether all main GHG emission sources, the physical delineation of the proposed project activity and other relevant project and baseline emission sources covered in the methodology are included within the project boundary for the purpose of calculating project and baseline emissions for the proposed project activity.

5.3.12.2. Means of validation

Based on documented evidence and site visit where required, the validation team determines whether the description in the PDD of the project boundary is correct and whether it meets the requirements of the selected baseline methodology by using the Validation Protocol available in the “**CDM Validation Report Template**”.

At the same time, the validation team confirms that all sources and greenhouse gases required by the methodology have been included within the project boundary.


If the methodology allows CDM PPs to choose whether a source or gas is to be included within the project boundary, the validation team shall confirm that PPs have justified the choice by evidences and shall determine whether the justification provided is reasonable, based on an assessment of supporting documented evidence provided by the PPs and corroborated by observations, if required.

5.3.13. Baseline identification

5.3.13.1. Requirement to be validated

PDD must identify the baseline for the project defined as the scenario that reasonably represents the anthropogenic emissions by sources of greenhouse gases that would occur in the absence of the project.

The validation team confirms that any procedure contained in the methodology to identify the most reasonable baseline scenario, is applied correctly. If the selected methodology requires use of tools to

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establish the baseline scenario, the validation team will consult the methodology in terms of application of these tools. In such a case, the guidance in the methodology shall supersede the tool.

5.3.13.2. Means of validation

If the methodology requires several alternative scenarios to be considered in the identification of the most reasonable baseline scenario, the validation team, determines;

- whether all scenarios are considered by the CDM PP and are supplementary to those required by the methodology,
- whether all scenarios are reasonable in the context of the CDM project, and
- that no reasonable alternative scenario has been excluded.

Documents and sources referred to in the PDD, must be correctly quoted and interpreted.


Validation team shall carry out a cross check with the information provided in the PDD with other verifiable and credible sources, such as local expert opinions.

The validation team shall determine whether, by using own sectoral knowledge and/or advice from local experts, that all applicable CDM requirements have been taken into account in the identification of the baseline scenario for the proposed project activity, as well as relevant national and/or sectoral policies and circumstances, such as sectoral reform initiatives, local fuel availability, power sector expansion plans, and the economic situation in the project sector.

In this case, two types of national and/or sectoral policies have to be taken into account:

- National and/or sectoral policies or regulations that give comparative advantages to more emissions-intensive technologies or fuels over less emissions-intensive technologies or fuels, otherwise known as policies that increase GHG emissions, and are called type E+. For this type of national and/or sectoral policies or regulations, only those that have been implemented before adoption of the Kyoto Protocol by the COP (decision 1/CP.3, 11 December 1997) shall be taken into account when identifying a baseline scenario. If such national and/or sectoral policies were implemented since the adoption of the Kyoto Protocol, the baseline scenario shall refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place.
- National and/or sectoral policies or regulations that give comparative advantages to less emissions-intensive technologies over more emissions-intensive technologies (e.g. public subsidies to promote the diffusion of renewable energy or to finance energy efficiency programmes), otherwise known as policies that decrease GHG emissions, are called type E-. For this type of national and/or sectoral policies or regulations, those that have been implemented since the adoption by the COP of the CDM Modalities and Procedures (decision 17/CP.7, 11 November 2001) need not be taken into account in identifying a baseline scenario (i.e. the baseline scenario could refer to a hypothetical situation without the national and/or sectoral policies or regulations being in place).

At the same time, validation team determines whether the PDD involves a verifiable description of the identified baseline scenario, including a description of the technology that would be employed and/or the activities that would take place in the absence of the project.

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5.3.14. Algorithms and/or formulas used to determine emission reductions

5.3.14.1. Requirement to be validated

Steps taken and equations applied to calculate project emissions, baseline emissions, leakage and emission reductions should comply with the requirements of the selected baseline and monitoring methodology including applicable tool(s).

5.3.14.2. Means of validation

The validation team determines by using the Validation Protocol available in the “**CDM Validation Report Template**” and the related methodology whether the equations and parameters in the PDD have been correctly applied by comparing them to those in the selected approved methodology.

If the methodology provides for selection between different options for equations or parameters, the validation team shall confirm that adequate justification has been provided and that the correct equations and parameters are used, in accordance with the methodology selected.

If data and parameters are to be monitored or estimated during implementation and therefore is available **only after** validation of the project activity, the validation team shall confirm that the estimates provided in the PDD for these data and parameters are rational.

If data and parameters **will not be monitored** throughout the crediting period of project activity but have already been determined and will remain fixed, the validation team shall assess that all data sources and assumptions are appropriate and calculations are correct, applicable to the project and will result in a conservative estimate of the emission reductions.

5.3.15. Additionality of the project activity

5.3.15.1. Requirement to be validated

Project participant should describe in the PDD how this specific CDM project activity is additional.

5.3.15.2. Means of validation


Validation team assesses and verifies the reliability and credibility of all data, rationales, assumptions, justifications and documentation provided by project participants in the demonstration of additionality by using the Validation Protocol available in the “**CDM Validation Report Template**” and the related “**CDM Assessment of Additionality Tool**”.

The validation team takes into consideration the tools and documents in the energy sector to demonstrate the additionality of a CDM project, as well as alternative requirements included in the approved CDM methodology.

5.3.16. Prior consideration of CDM

5.3.16.1. Requirement to be validated

If the project activity start date is prior to start of validation (prior to the publication of the PDD for stakeholder comments) it must be demonstrated by the CDM PPs that the CDM benefits were considered in the decision to undertake the project activity as CDM project activity.

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5.3.16.2. Means of validation

The validation team checks that the start date of the project activity that is reported in the PDD to determine whether is in line with the date of implementation, construction or the start date of the project activity, whichever is earlier.

In particular, for a project activity that require construction, retrofit or other modifications, the date of commissioning cannot be considered as the project activity start date.

The validation team determines whether it is **a new project activity (a project activity with a start date on or after 02 August 2008) or an existing project activity (a project activity with a start date before 02 August 2008).**

For a new project activity, in which PDD has not been published for global stakeholder consultation or a new methodology is proposed to the CDM Executive Board before the project activity start date, the validation team confirms by referring to the list of prior consideration notifications from the UNFCCC website and communication between the project participants, the host Party DNA and the UNFCCC Secretariat regarding the commencement of a new project activity.

If such notification has not been provided by the project participants within 180 days of the project activity start date, it is concluded by the validation team that the CDM was not seriously considered in the decision to implement the project activity.


For an existing project activity, for which the start date is prior to the date of publication of the PDD for global stakeholder consultation, the validation team assesses the project participant's prior consideration of the CDM through document reviews and the following requirements:

- Proof which must point out that awareness of the CDM prior to the project activity start date and that the benefits of the CDM were a crucial factor in the decision to carry on with the project (The evidence includes inter alia, minutes and/or notes related to the consideration of the decision by the Board of Directors, or equivalent, of the project participants, to undertake the project),
- Dependable evidence from project participants which indicate that continuing and real actions were taken to secure CDM status for the project with its implementation (contracts with consultants for CDM/PDD/methodology services, draft PDDs and letters of approval, ERPA term sheets, ERPAs or other documentation related to the sale of the potential CERs including the correspondences with the multilateral financial institutions or carbon funds, publication in a newspaper, interviews with the DNA, and earlier correspondence on the project with the DNA or the UNFCCC Secretariat, etc.)

Assessment of real and continuing actions is conducted by the validation team and is focused on real documented evidence as indicated in above, including an assessment by the validation team of the authenticity of the evidence.

The validation team assesses letters, e-mail exchanges and other documented communication tools submitted by the project participants and these are considered as evidence only after the validation team has assessed the reliability and authenticity of such communications, inter alia through cross-checking (e.g. interviews).

In this case, if the gap between documented evidence is less than two years, it is concluded by the validation team that continuing and real actions were taken to secure CDM status for the project activity

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If the gap between documented evidence is greater than two years and less than three years, it may be concluded that continuing and real actions were taken to secure CDM status for the project activity and any positive or negative validation opinion is justified by the validation team based on the context of the evidence and information assessed.

If the gap between documented evidence is greater than three years, it is concluded by the validation team that continuing and real actions weren't taken to secure CDM status for the project activity.

In case, evidence as indicated above is not available, it is concluded by the validation team that CDM was not considered in the decision in implementing the project activity.

5.3.17. Identification of alternatives

5.3.17.1. Requirement to be validated

The PDD should identify credible alternatives to the project activity in order to determine the most realistic baseline scenario, unless the approved methodology that is selected by the CDM project activity prescribes the baseline scenario.

Where the baseline scenario is prescribed in the approved methodology, no further analysis is required.

5.3.17.2. Means of validation

The validation team assesses the list of alternatives given in the PDD and ensures that:

- one of the alternatives include project activity to be undertaken without being registered as CDM project,
- the list contains all reasonable alternatives on the basis of team's local and sectoral knowledge, and
- the alternatives comply with all applicable legislation.

5.3.18. Investment analysis


5.3.18.1. Requirement to be validated

If the PP used the investment analysis to demonstrate the additionality for the project activity, the PDD must provide evidence regarding the following:

- CDM project wouldn't be the most economically or financially attractive alternative
- CDM project wouldn't be the economically or financially feasible, without the revenue from CERs

For this, it must be assessed by the validation team and the financial expert, if needed, that whether the following approaches are used by the project participants or not:

- The CDM project would produce no financial or economic benefits other than CDM-related income (document the costs associated with the CDM project and the alternatives identified, and demonstrate that there is at least one alternative which is less costly than the CDM project)

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- The CDM project activity is less economically or financially attractive than at least one other credible and realistic alternative
- The financial returns of the CDM project activity would be insufficient to justify the required investment.

The validation team must use the latest version of the “**Guidance on the Assessment of Investment Analysis**” and other relevant guidance including the “**Guidelines for the Reporting and Validation of Plant Load Factors**” for this assessment.

5.3.18.2. Means of validation

The validation team together with the financial expert, if needed, conduct the following in order to verify the accuracy of financial calculations carried out for any investment analysis:


- assessing all parameters and assumptions used in calculating the relevant financial indicator, and determine the accuracy and suitability of these parameters,
- cross-checking the parameters against third parties or publicly available sources, such as invoices or price indices,
- reviewing feasibility reports, public announcements and annual financial reports related to the CDM project and the CDM PPs,
- assessing the correctness of computations carried out and documented by the CDM PPs, and
- assessing the sensitivity analysis conducted by the CDM PPs.

The validation team together with the financial expert, if needed, conduct the following to confirm the suitability of any benchmark applied in the investment analysis:

- determining whether the type of benchmark applied is the suitable type of financial indicator presented,
- ensuring that any risk premiums applied in determining the benchmark reflect the risks associated with the project type or activity, and
- determining whether it is reasonable to assume that no investment would be made at a rate of return lower than the benchmark by, for example, assessing previous investment decisions by the project participants involved and determining whether the same benchmark has been applied or if there are verifiable circumstances that have led to a change in the benchmark.

In case the project participants relied on values from Feasibility Study Reports (FSR) that are approved by national authorities for the project, the validation team and the financial expert, if needed, confirm the following:

- The FSR has been the basis of the decision to proceed with the investment in the project
- The values used in the PDD and associated annexes are fully consistent with the FSR, and where

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inconsistencies occur the validation team will validate the appropriateness of the values

- By cross-checking or other suitable method, that the input values from the FSR are valid and applicable at the time of the investment decision.

5.3.19. Barrier analysis

5.3.19.1. Requirement to be validated

If the PP used the barrier analysis to demonstrate the additionality of the project, the PDD must demonstrate that project faces barriers as below:

- Prevent the implementation of this type of CDM project, or
- Do not prevent the implementation of at least one of the alternatives

5.3.19.2. Means of validation

Issues that have a clear direct impact on the financial returns of the project activity cannot be considered barriers and will be assessed with the investment analysis by the CDM PPs. This doesn't involve the following:

- Risk related barriers, for example risk of technical failure, that could have negative effects on financial performance of the project,
- Barriers related to the unavailability of sources of finance for the project.

The validation team applies a two-step process to assess the barrier analysis in line with the latest version of **“Guidelines for Objective Demonstration and Assessment of Barriers”**, performed as follows:

Determine whether the barriers are real: The validation team assesses the available evidence and/or undertakes interviews with relevant individuals (including members of industry associations, government officials or local experts if necessary) to determine whether the barriers listed in the PDD exist.


If existence of a barrier is substantiated only by the opinions of the project participants, the validation team does not consider this barrier to be sufficiently substantiated. If the validation team considers, on the basis of their sectoral or local expertise, that a barrier is not real or is not supported by sufficient evidence, a corrective action request will be raised.

Determine whether the barriers prevent the implementation of the project activity but not the implementation of at least one of the possible alternatives: Given that not all barriers present an impossible obstacle for project activity being implemented, the validation team applies their local and sectoral expertise to judge whether a barrier or set of barriers would prevent the implementation of the CDM project and would not equally prevent implementation of at least one of the possible alternatives, in particular the identified baseline scenario.

5.3.20. Common practice analysis

5.3.20.1. Requirement to be validated

For a large-scale CDM project activity, if the project type is not first-of-its kind, common practice analysis

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must be carried out as a credibility check of the other available evidence used by the CDM PP to demonstrate additionality.

5.3.20.2. Means of validation

The validation team conducts the following in line with the latest version of “**Guidelines on Common Practice**”:

- Assessment as to whether the geographical scope (e.g. the defined region) of the common practice analysis is suitable for the assessment of common practice related to the project
- Determining, using official sources and local and industry expertise, to what extent similar and operational projects (e.g. using similar technology or practice), other than registered CDM project activities and CDM project activities that have been published on the UNFCCC website for global stakeholder consultation as part of the validation processes have been undertaken in the defined region
- Determining if similar and operational projects, other than registered CDM project activities and CDM project activities that have been published on the UNFCCC website for global stakeholder consultation as part of the validation processes, are already widely observed and commonly carried out in the defined region, if so assessing whether there are essential distinctions between the CDM project and the other similar activities.

5.3.21. Monitoring plan

5.3.21.1. Requirement to be validated

There must be a monitoring plan in the PDD which is based on the approved monitoring methodology applied to the CDM project.

5.3.21.2. Means of validation


The validation team applies a two-step process to assess compliance, as indicated below:

i. Compliance of the monitoring plan with the approved methodology and applicable tool(s)

- Document review to identify the list of parameters required by the selected approved methodology
- Confirming that the monitoring plan contains all necessary parameters (the parameters are clearly described and that the means of monitoring described in the plan complies with the requirements of the methodology)

ii. Implementation of the plan: The validation team, by means of reviewing of the documented procedures, interviews with relevant personnel, project plans and any physical inspection of the CDM project site, to assess the following:

- monitoring arrangements described in the monitoring plan are feasible within the project design
- reviewing the means of implementation of the monitoring plan including data management and quality assurance and quality control procedures in terms of its sufficiency to ensure emission reduction will be achieved by the project activity.

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5.3.22. Contribution to sustainable development

5.3.22.1. Requirement to be validated

CDM project activities shall assist parties not included in Annex 1 to the UNFCCC in achieving sustainable development.

5.3.22.2. Means of validation

The validation team shall determine whether the letter of approval by the DNA of the host party confirms the contribution of the CDM project activity to the sustainable development of the host party.

5.3.23. Local stakeholder consultation

5.3.23.1. Requirement to be validated

Local stakeholders must be invited by the project participants to comment on the CDM project prior to the publication of the PDD on the CDM website.

5.3.23.2. Means of validation

The validation team, through document review and interviews with local stakeholders, determines the following:

- If comments by local stakeholders that can reasonably be considered relevant for the CDM project activity are included in the PDD
- If the summary of the comments received as provided in the PDD is complete
- If project participants have taken due account of any comments received and has described this process in the PDD

5.3.24. Environmental impacts

5.3.24.1. Requirement to be validated

CDM PPs must submit documentation to the validation team for analysis of the environmental impacts of the CDM project activity.


5.3.24.2. Means of validation

The validation team shall confirm, via document review and/or using local official sources and expertise, whether CDM PPs have undertaken an analysis of environmental impacts and, if required by the host party, an environmental impact assessment.

5.3.25. Modalities of communication

5.3.25.1. Requirement to be validated

The validation team shall validate the corporate identity of all project participants and focal points included in the Modalities of Communication (MoC) statement, as well as the personal identities, including specimen

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signatures and employment status, of their authorized signatories.

5.3.25.2. Means of validation

The validation team validates the Modalities of Communication (MoC) through the following:

- Directly checking evidence for corporate, personal identity and other relevant documentation;
- Checking the notarized documentation;
- Requesting written confirmation from the project participant that submits the MoC statement that all corporate and personal details, including specimen signatures, are valid and accurate

If the written confirmation is requested, the validation team must ensure that the MoC statement is received from a project participant with whom Re Carbon Ltd. has a contractual relationship.

Similarly, the validation team must ensure that the person who submits the MoC statement to Re Carbon Ltd. and the person who signed the written confirmation (if they are different persons) is/are duly authorized to do so on behalf of the respective PP.

5.3.26. Modalities of communication statement

5.3.26.1. Requirement to be validated

The validation team shall validate that the MoC statement has been correctly completed and duly authorized.

5.3.26.2. Means of validation

The validation team shall check whether the following are completed:


- The latest version of the Form Modalities of Communication Statement (F-CDM-MOC) has been used;
- The information required as per the F-CDM-MOC, including its Annex 1, is correctly completed;
- The project participant's authorized signatories signing the F-CDM-MOC correspond to the project participant's authorized signatories included in F-CDM-MOC, Annex 1.

5.4. Specific validation requirements

5.4.1. Small scale project activities

All requirements mentioned in Section 5.3 are also valid for small scale project activities.

Additionally, the validation team shall determine whether the small-scale CDM project meets the requirements detailed in the latest versions of “**CDM: Simplified Modalities and Procedures for Small-Scale CDM Project Activities**” and “**General Guidelines for SSC CDM Methodologies**” and shall use the Validation Protocol available in the Annex-1 of “**CDM Small Scale Validation Report Template**” or “**CDM Validation Report Template**” depending on the PDD template used by PPs.

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5.4.1.1. Project activity eligibility

5.4.1.1.1. Requirement to be validated

The validation team shall determine whether the proposed project activity meets the small-scale project eligibility requirements.

5.4.1.1.2. Means of validation

For a project activity that is within the small-scale project activity threshold but applies a large-scale approved methodology, the validation team shall determine whether this project activity follows the requirements in the **“Modalities and Procedures for Large-Scale Project Activities”**.

During validation of a small-scale project activity, the validation team shall confirm the following:

- project is eligible within the identified thresholds
 - Type I: Renewable energy project activities with a maximum output capacity of 15 MW (or an appropriate equivalent);
 - Type II: Energy efficiency improvement project activities that reduce energy consumption, on the supply and/or demand side, with a maximum output of 60 GWh per year (or an appropriate equivalent) in any year of the crediting period; or
 - Type III: Other project activities not included in Type I or Type II that result in GHG emission reductions not exceeding 60 kt CO₂e per year in any year of the crediting period
- project conforms to one of the approved small-scale categories and applies the relevant tool or small scale methodology in line with the latest version of **“General Guidelines to SSC CDM Methodologies”**
- project is not a debundled component of a large-scale project and

5.4.1.2. Debundling


5.4.1.2.1. Requirement to be validated

The validation team shall determine whether the proposed small-scale project activity is not a debundled component of a large-scale project activity in accordance with the latest version of **“Guidelines on Assessment of Debundling for SSC Project Activities”**.

The validation shall also determine whether the proposed small-scale project activity is a debundled component of a large-scale project activity if there is a registered small-scale project activity or an application to register another small-scale project activity.

5.4.1.2.2. Means of validation

The validation team shall, where appropriate, take into account specific debundling requirements for Type I project activities by using the Validation Protocol available in the Annex-1 of **“CDM Small Scale Validation Report Template”** or **“CDM Validation Report Template”** depending on the PDD template used by PPs.

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5.4.1.3. Additionality

5.4.1.3.1. Requirement to be validated

The validation shall determine whether the proposed small scale project activity is additional in accordance with applicable CDM requirements.

5.4.1.3.2. Means of validation

The validation team shall determine whether the proposed SSC project activity is additional in accordance with following relevant additionality approach applied by PPs:

- **“Guidelines for Demonstrating Additionality of Microscale Project Activities”**, if the proposed project activity meets one of the following criteria:
 - Type I: Project activities up to 5 MW that employ renewable energy as their primary technology;
 - Type II: Energy efficiency project activities that aim to achieve energy savings at a scale of no more than 20 GWh per year; or
 - Type III: Other project activities not included in Type I or Type II that aim to achieve GHG emissions reductions no more than 20 kt CO₂e per year.
- **“Guidelines on the Demonstration of Additionality of Small-Scale Project Activities” (Attachment A of Appendix B) and “Non-Binding Practice Examples to Demonstrate Additionality for SSC Project Activities”**
- The applicable additionality tool for the related large scale methodology;

5.5. Reporting non-conformities


Detected non-conformities are indicated in the validation report by the Team Leader through corrective action, clarification, forward action depending on the nature of the missing data and information.

A corrective action request is issued when:

- CDM PPs have made mistakes that will influence the ability of the project to achieve real, measurable, additional emission reductions,
- The CDM requirements have not been met, or
- There is a risk that emission reductions cannot be monitored or calculated.

A clarification request is issued when:

- Situations where the information and/or data are insufficient, unclear or not transparent enough to establish whether CDM requirements have been met. (for example, the units of measurement are not included with the reported values)

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A forward action request may be raised when:

- Certain issues related to the CDM project implementation are to be reviewed during the first verification

Forward action requests shall not relate to CDM requirements for registration.

If the evidence is appropriate and sufficient to satisfy all requirements, validation team shall mark relevant items as “OK” in the validation report.

Non-conformities are closed out by the validation team only if project participants modify the project design, correct the PDD and/or provide sufficient additional explanations and evidence.

In line with the “**Validation & Verification Policy**” available in Annex-1, validation team bases their findings and conclusions on objective evidence and conducts all activities in connection with the validation in accordance with the CDM Validation and Verification Standard and the rules and procedures of the Conferences of Parties and the CDM Executive Board Rules and Modalities.

All corrective action, clarification and forward action requests are included in the validation report with consistent numbering.

Otherwise, the request of registration will not be submitted to the CDM Executive Board.

5.6. Validation report

Draft final validation report is prepared by the Team Leader after the completion of main validation activities.

This reporting is undertaken in a transparent way that allows the reader to understand the nature of the issue raised, the nature of the responses provided by the project participants, the means of verification of such responses and clear references to any resulting changes in the monitoring report or supporting annexes.

All findings including typographical errors which are detected by the validation team and are corrected immediately by the project participants through verbal conversations and/or interactions to be placed, clearly described and justified in the validation/verification/certification reports as CLs and/or CARs.


All non-conformities determined during the validation activities shall be included in the validation reports as CLs, CARs and/or FARs.

All measures taken for confirmation and crosschecking of the facts and data in documentation provided by the project participants and information on project implementation obtained/witnessed personally during the on-site visit must be placed in the validation reports.


Spelling, numbering and grammar check functions available in Microsoft Word program for the preparation and review of validation reports must be used by both the project Team Leader and Independent Technical Reviewer, respectively.

Validation report includes the following:

- Validation team’s conclusions regarding the CDM project’s conformity with applicable CDM requirements

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- An overview of the validation activities carried out by the validation team, general discussion of questions captured by the Validation Protocol and conclusions related to CDM requirements,
 - To indicate whether a letter of approval has been received, (with clearly referencing the letter itself and any supporting documentation)
 - To indicate whether the approval letter is received from the CDM PP or directly from the DNA
 - To indicate the means of validation employed to assess the authenticity of the approval letter
 - To contain a clear statement regarding the requirements explained in article 5.3.1 of this SOP
 - To indicate whether the participation has been approved by a party to the Kyoto Protocol
 - To describe the means of validation employed to reach the conclusion stated in the previous article
 - To insert a statement regarding the compliance of the PDD with relevant forms and guidance
 - To describe the process undertaken to validate the accuracy and completeness of the project description and contain the validation team's opinion on this issue
 - To clearly describe in the validation report the steps taken to assess the relevant information contained in the PDD against the each applicability condition listed in the approved methodology selected,
 - Information regarding GHG emissions, occurring within the project boundary, as a result of the implementation of the CDM project which are expected to contribute more than 1% of the overall expected average annual emissions reductions, which are not addressed by the applied methodology
 - To describe how the validation of the project boundary has been performed by detailing the documentation assessed (e.g. a commissioning report) and by describing its observations during any site visit (observations of the physical site or equipment used in the process).
 - To insert a statement whether the identified boundary and the selected sources and gases are justified
 - To identify emission sources that will be affected by the project activity (if not addressed by the selected approved methodology, the Certification Manager will request clarification of, revision to or deviation from the methodology, as appropriate)
 - To indicate whether all the assumptions and data used by the CDM PPs are listed in the PDD, including their references and sources
 - To detail all documentation used relevant to establishing the baseline scenario and correctly quoted and interpreted in the PDD
 - To explain assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence and can be deemed reasonable
 - To include relevant national and/or sectoral policies and circumstances which are considered and listed in the PDD
 - To indicate if the approved baseline methodology has been correctly applied to identify the most reasonable baseline scenario and if the identified baseline scenario reasonably represents what would project be in the absence of the CDM project activity
 - To define if all values used in the PDD are considered reasonable in the context of the CDM project
 - Information on how the baseline methodology has been applied to calculate project emissions, baseline emissions, leakage and emission reductions
 - To include all estimates of the baseline emissions that can be replicated using the data and parameter values provided in the PDD
 - To clearly describe all steps taken, and sources of information used to cross-check the information contained in the PDD
 - To indicate validation of the project activity start date provided in the PDD
 - To describe the evidence for prior consideration of the CDM, if necessary and the process of cross-checking the evidence, including the real and continuing actions
 - To state a validation opinion regarding whether the project activity complies with the applicable


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- requirements related to the prior consideration of the CDM
- Opinion in terms of the listed alternatives to be credible and complete
- To describe in detail how the parameters used in any financial calculations have been validated
- To describe how the suitability of any benchmark applied has been assessed
- To confirm whether the underlying assumptions are appropriate and the financial calculations are correct
- To provide an assessment of each barrier listed in the PDD
- An overall determination of the credibility of the barrier analysis performed
- Explanation on how the geographical scope of the common practice analysis is validated
- How the validation team has undertaken an assessment of the existence of similar projects
- How the validation team has assessed the essential distinctions between the project and any similar projects that are widely observed and commonly carried out
- Confirmation that CDM project is not common practice
- To state the validation team's opinion of the compliance of the monitoring plan with the requirements of the methodology
- To describe the steps undertaken to assess the monitoring arrangements described in the monitoring plan are feasible within the project design
- To state the validation team's opinion of the project participant's ability to implement the monitoring plan
- To state if the host party's DNA confirmed the contribution of the project to the sustainable development of the host party
- To describe the steps taken to assess the adequacy of the local stakeholder consultation
- To state the validation team's opinion on the adequacy of the local stakeholder consultation
- To describe whether the CDM PP has undertaken an analysis of environmental impacts and, if required by the host party, an environmental impact assessment in accordance with procedures as required by the host party
- To confirm in writing that that compliance of Modalities of Communication statement with the requirements stated in Section 5.3.20 and all the relevant forms
- The results of the dialogue between the validation team and the CDM PPs, as well as any adjustments made to the project design following stakeholder consultation,
- The responses to corrective action and clarification requests and revisions to project documentation,
- Summary of the validation process and its conclusions,
- All of the applied approaches, findings and conclusions, particularly on baseline selection, additionality, emission factors and monitoring,
- Information on the global stakeholders consultation carried out including dates and how comments received have been taken into consideration,
- A list of interviewees and documents reviewed,
- Details of the validation team,
- Information on quality control within the team and the validation process,
- CVs of the validation team members,
- Final validation opinion.

5.7. Validation opinion

The validation opinion is prepared by the validation team after the validation and will include one of the following two options:

- A positive validation opinion in the validation report that is submitted as a request for registration
- A negative validation opinion in the validation report explaining the reason for its opinion, if the

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validation team determines that the CDM project does not fulfill applicable CDM requirements.

At the same time, validation opinion includes, at a minimum, the following:

- A summary of the validation methodology and process used and the validation criteria applied
- A description of project components or issues not covered by the validation process
- A summary of the validation conclusions
- A statement on the validation of the expected emission reductions
- A statement on whether the CDM project activity meets the stated criteria.

The validation opinion shall be included into the validation report and shall be signed by the Team Leader, Independent Technical Reviewer and the Certification Manager/General Manager.

If such negative opinion is issued, the Certification Manager shall provide this validation report to the CDM PP and also notifies the CDM Executive Board.

5.8. Finalization of validation activities

All non-conformities shall be closed out and the draft final version of “**validation report**” shall be prepared before submission of the project documentation for the Independent Technical Review (ITR). The details regarding the independent technical review process are given in the “**Independent Technical Review Procedure**”.


The mutual agreement is expected regarding the ITR findings and conclusions between the Independent Technical Reviewer and the Team Leader at the end of ITR process. In case there is no such mutual agreement between them, the final decision regarding the relevant issue(s) and the validation process shall be given collectively by the Certification Manager and General Manager and shall be kept as a record in the form of written protocol or minutes with the signature of General Manager having official signatory rights on behalf of the company. Besides that, in such cases final validation opinion shall also be signed by the General Manager.

Upon completion of the ITR, the Independent Technical Reviewer shall inform the Certification Manager for the submission of project activity’s registration request and the related activity’s Team Leader shall submit to the Certification Manager all required documents for the registration request including the final version of the validation report.

Certification Manager shall submit the registration request to CDM Secretariat within 3 working days. The details regarding the submission of registration request are given in the “**Project Handling Procedure**”.

The details regarding the completeness check procedure and the responsibilities in this process are given in the “**Project Handling Procedure**”.

In case, the outcomes of the completeness check or a request for review are not satisfactory, the validation process shall be considered re-open and all related responsibilities of the validation team shall be assumed as valid once more.

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When submitting a request for registration, all of the CDM PPs with a contractual relationship must be listed in the PDD, unless they have provided a letter of voluntary withdrawal from the project.

There will be a grace period for project submission of small and large scale CDM project activities for registration, when using a revised approved methodology.

In cases where a PDD of a project activity applying the previous version of the approved methodology was published for global stakeholder consultation, but has not been submitted for registration within this grace period, project participants shall revise the PDD using the revised version of the methodology. The revised PDD will not be republished for global stakeholder consultation prior to the submission of a request for registration, unless otherwise stated by the CDM Executive Board.

If any non-conformity is formed or determined during and/or after the validation, due to Re Carbon Ltd.'s activities, then the non-conformity is recorded and handled in line with the **“Control of Non-Confirming Product/Service Procedure”**.

The validation team performance monitoring and evaluation process is handled according to **“Personnel Appointment, Training and Performance Assessment Procedure”**.

5.9. Validation records

Validation records include the following:

- Pre-agreement records (Given in the **“Contract Review Procedure”**)
- Agreement period records (Given in the **“Contract Review Procedure”**)
- Validation planning records
- Execution and completion records of the validation
- Post-validation records

5.9.1. Records pertaining to validation planning


The records for the validation planning phase comprises:

- **“Assessment Planning Form”** records

5.9.2. Records of execution phase of the validation

The records of the execution phase of the validation are as follows:

- Site visit notes
- Site visit attendance list
- Draft validation protocol
- Draft validation report

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- Project related evidence in electronic or paper form;

5.9.3. Records of the completion phase of the validation

The records during the completion phase of the validation are as follows:

- Independent technical review records
- Final validation report and opinion

5.9.4. Post-validation records


The records of post-validation period are as follows:

- Evidence of submission of registration request
- Completeness check response records
- Request of review records, if any
- Records of performance evaluations of the validation team

All records are kept according to the “**Control of Records Procedure**” and are reviewed in internal audits, performed according to the “**Internal Audit Procedure**”. Any non-conformities determined and relevant actions are evaluated in management review meetings, which are held according to the “**Management Review Procedure**”.

6. Records Management

- P-C-015 Control of Records Procedure
- P-C-018 Internal Audit Procedure
- P-C-019 Management Review Procedure
- P-C-002 Personnel Appointment, Training and Performance Assessment Procedure
- P-C-005 Independent Technical Review Procedure
- F-C-008 On-site Attendance Form
- F-C-009 On-site Notes Form
- Validation Report form for CDM Project Activities
- F-C-007 Assessment Planning Form

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7. References

- CDM Modalities and Procedures
- Simplified Modalities and Procedures for Small-Scale Project Activities
- Conference of Parties and CDM Executive Board decisions and clarifications
- CDM Validation and Verification Standard Version 02.0
- CDM Project Standard Version 02.0
- CDM Project Cycle Procedure Version 02.0
- CDM Accreditation Standard Version 07.0 Section 12.3
- Standard for Sampling and Surveys for CDM Project Activities and Programme of Activities" Version 08.0
- Guidelines for Sampling and Surveys for CDM Project Activities And Programme of Activities Version Version 04.0
- Tool for Assessment of Debundling for SSC Project Activities Version 04.0
- Tool for Demonstrating Additionality of Microscale Project Activities Version 09.0

History of the document


Version No.	Date	Summary of the revision	Prepared by	Approved by
00	20.03.2017	Initial version of the document	Anıl Söyler Certification Manager	Christian Johannes General Manager
01	16.07.2018	Revision of report format name in Section 6 Revision of some reference documents' name and version number in Section 7	Anıl Söyler Certification Manager	Christian Johannes General Manager
02	30.09.2020	Address change in the Header Version number update of the CDM Standards, Guides, Procedures and Tools under Clause 7	Aslı Bingöl Quality Manager	Christian Johannes General Manager

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Annex-1 Validation & Verification Policy

Re Carbon Ltd. Company, within the scope of the validation & verification quality management system, acknowledges and confirms the following;

- To execute validation and verification/certification activities in line with impartiality, confidentiality, independence and objectivity principles,
- Not to have any judicial processes for malpractice, fraud and/or other activity incompatible with our functions and in such a case to inform the UNFCCC Secretariat,
- To establish the required structure to prevent any conflict of interest occurrences from either the company and/or the validation/verification team,
- To follow all related national/international standards, CDM requirements, CDM Modalities and Procedures, Conferences of Parties and CDM Executive Board decisions, clarifications and legal regulations,
- Not to plan the usage of any subcontractor for the execution of validation and verification/certification activities at current situation,
- To undertake full financial and technical responsibility in all situations including the outsourcing of human resources regarding to the validation/verification activities and decisions,
- Not to delegate any validation and verification/certification functions to any Party except for acquiring support from technical experts, if needed,
- Not to conduct both the validation and verification/certification of a project activity or PoA, except in the situations allowed by the latest applicable version of the Validation and Verification Standard,
- Not to use for the verification/certification of a project activity or PoA personnel who was involved in the validation team of such project activity or PoA, except in the cases in which a DOE is allowed to conduct both the validation and verification/certification in accordance with latest applicable version of the Validation and Verification Standard,
- Not to use full time or external contracted validation or verification/certification team members, in the validation or verification/certification of a project activity or PoA if:
 - They, or the organization that employs them, have been involved in the development, consultancy or financing of this project activity or PoA; or
 - They have had any professional relationships, other than a third party conformity assessment, with the project participants of this project activity or PoA within the last two years,
- Not to provide, while conducting the validation or verification/certification of a project activity or PoA, any advice, consultancy or recommendation to the project participants by the validation/verification team members on how to address any deficiencies that may be identified in the validation or verification/certification as in their work agreements,
- Not to use any personel with potential conflict of interest known to them and revealed to Re Carbon Ltd. unless any potential conflict of interests has been addressed and the relevant measures taken to address these potential conflicts have been documented and implemented,
- To take out the relevant personnel from the validation and/or verification/certification immediately; if during the course of a validation and/or verification/certification, such potential conflict of interests become known,

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- Not to disclose information about a contracted project participant that is not required to be made publicly available to a third party without the client's prior written consent,
- To coordinate and cooperate with all legal entities, clients, stakeholders and third parties continuously,
- To have sufficient human and financial resources for the validation and verification/certification activities,
- To handle all complaints, disputes and appeals regarding validation and verification/certification activities by an independent committees with utmost care and impartially
- To determine and implement corrective and/or preventive actions regarding non-conformities and/or potential non-conformities regarding validation and verification/certification activities, and
- To act according to continuous improvement principles by means of reviewing the validation & verification quality management system periodically.

Christian JOHANNES
20.03.2017
General Manager