

## Session 1.3: Post-registration changes

### Validation and submission of post-registration changes

Training-Workshop on CDM Post-registration Changes (PRCs)  
and Programme of Activities (PoAs)  
12-14 February 2014 - Pretoria, South Africa



# Validation post-registration changes

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- DOE contracted is accredited to the relevant sectoral scope;
  - a) The key work under validation is to determine if prior approval is required or not
- **Temporary deviations** from the registered monitoring plan and/or monitoring methodology
- **Permanent changes**
  - **Corrections** that do not affect project design
    - **Changes to the start date of the crediting period**
    - **Changes to the project or programme design** that do not adversely impact any of :
      - (a) The applicability and application of the applied methodology
      - (b) The additionality of the project activity;
      - (c) The scale of the project activity
    - **Permanent changes to the registered monitoring plan or applied methodology**, including application of latest sampling standard



# PRC with no prior approval – Some examples

a) **Corrections** - that do not affect the design of the project activity

Monitoring Plan	Monitoring Report	PRC
CEFelec is an ex-ante parameter	CEFelec listed as ex-ante and ex-post monitored parameters	CEFelec is removed from the list of ex-post parameter

b) **Temporary deviations** - parameters not monitored temporarily or without evidence of monitoring, provided that value of parameter is adjusted to the most conservative level

Monitoring Plan	Monitoring Report	PRC
COD <sub>y</sub> , ww, runoff (the Chemical Oxygen Demand of wastewater runoff) is to be measured monthly; annual average to be used for CER calculations	Measurements done only for 4 months during the year	Using statistical analysis, sample mean is 63.98 kgCOD/m <sup>3</sup> . The upper boundary and lower boundary of the 90% confidence interval are 68.33 kgCOD/m <sup>3</sup> and 59.62 kgCOD/m <sup>3</sup> respectively. The lower boundary of the 90% confidence interval is chosen as a conservative estimation because it results in lower total emission reductions.



# PRC that do not need prior approval from CDM EB

## c) Permanent changes to the registered monitoring plan or applied methodology

Registered PDD	Monitoring Report	PRC
The Monitoring Plan includes the monitoring parameter EGd (quantity of diesel combusted in the project plant during the year y for the backup diesel generators)	The monitoring parameter EGd is removed	The monitoring parameter EGd is permanently removed from the Monitoring Plan as the diesel generator has never been used and will be removed from the project site

## d) Changes to the project design of a registered CDM project activity

Registered PDD	Monitoring Report	PRC
Use of a diesel generator as a back-up (when there is no on-site electricity generation and no electricity from the grid is available) not described	Use of a diesel generator as a back-up and fuel consumption reported	Update of project boundary , monitoring parameters and calculation of project emission to take account of fossil fuel consumption



# Validation post-registration changes

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- 1. Temporary deviations from registered monitoring plan and/or monitoring methodology**
  - Check if provisions of appendix 1 of PS apply, else seek prior approval from Board
  - Will deviation lead to a reduction in accuracy emission reduction estimate?
    - a) If yes apply conservative assumptions /discount factors to avoid over-estimation of results
  - Scrutinise and determine exact period to which the deviation applies;
  - Report if monitoring report reflects the application of the approved guidance from Board regarding deviation from the provisions of the registered monitoring plan and/or methodology.



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## 2. Corrections

- DOE will check if:
  - (a) corrected information is an accurate reflection of actual project information; and/or
  - (b) The corrected parameters are in accordance with the applied methodology and/or selected monitoring plan.

## 3. Changes to the start date of the crediting period

- DOE checks if the proposed changes result in a less conservative baseline

## 4. Permanent changes from the registered monitoring plan or monitoring methodology

- DOE checks if changes to monitoring plan are in compliance with the applied methodology and do not reduce the level of accuracy of the monitoring compared to registered monitoring plan where change is to apply a later version of the applied methodology does not impact the conservativeness of the monitoring and verification process, including the related emission reduction calculations.



## 4. Permanent changes from the registered monitoring plan or monitoring methodology (contd)

- If DOE identifies that:
  - a) PP is unable to implement the registered monitoring plan; and
  - b) It will not be possible to monitor the registered CDM project activity complying with monitoring requirements of the applied methodology/tools or provisions of appendix 1 of PS, DOE requests guidance from the Board regarding permanent changes as per PCP
- If the changes lead to reduction in accuracy of ER estimates then directs PP to apply conservative assumptions/discount factors to avoid overestimation of ER



# Validation post-registration changes

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## 5. Changes to the project design of a registered project activity

- If DOE identifies that project design in the implementation of project does not conform with registered PDD (or appendix 1 provisions of PS) seeks guidance from the Board as per PCP
- DOE conducts an on-site inspection to assess the impacts of the actual changes on compliance of the monitoring plan, the applied monitoring methodology and tools and/or the level of accuracy of the monitoring activity
- The DOE determines whether the changes adversely affect validation conclusions of the registered PDD with regard to:
  - (a) Additionality of the project activity;
  - (b) Scale of the project activity;
  - (c) Application of methodology under which project was registered;
  - (d) Compliance of monitoring plan with applied monitoring methodology



# Validation post-registration changes

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## 5. Changes to the project design of a registered project activity (contd)

- If changes affect the additionality DOE shall confirm that:
  - (a) In case of investment analysis, PPs have only modified key parameters in the original spreadsheet calculations affected by the proposed/actual changes to the project activity;
  - (b) In the case only barriers have been claimed for additionality, PPs have demonstrated that the barriers are still valid under the new circumstances.
- In cases where changes impact the implementation of the project and:
  - a) where the original methodology is no longer applicable, and
  - b) where the PP applies a later version of the same methodology or another methodology conservativeness of the monitoring and verification process and the related emission reduction calculations are not affected



# Validation post-registration changes

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## 5. Changes to the project design of a registered project activity (contd)

- DOE report provides an assessment on when the changes occurred, reasons for these changes taking place, whether the changes would have been known prior to registration of the project activity, and how the changes would impact the overall operation/ability of the project activity to deliver emission reductions as stated in the PDD;
- If DOE determines that changes to the project comply with requirements in PS DOE submits the documents to the Board following the PCP procedures for PRC
- If the DOE determines that the proposed or actual changes to the project activity do not comply with the requirements established in the Project Standard, the DOE shall issue a negative validation opinion or should request guidance from the Board.



**Thank you for your attention**

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