

Internal Validation

Title: GS1247 Improved Kitchen Regimes Multi-Country PoA

ID : PoA ID GS1247 and VPA ID GS1267



INTERNAL VALIDATION FORM: GS VER MICRO-SCALE PROJECTS, GSv2.1 VER

Title: GS1247 Improved Kitchen Regimes Multi-Country PoA
GS PoA - ID: GS1247
GS VPA – ID: GS1267
Submitted by: CO2 Balance UK Ltd
Submitted on: 18/12/ 2012 (date of payment of fees)
Contact: ellie.kowalski@co2balance.com

Summary: The purpose of this Micro-Scale Programme of Activities (mPoA) is to reduce Green House Gas (GHG) emissions from the burning of non-renewable biomass for cooking and water treatment. This mPoA will install energy efficient cook stoves and/or safe water supply and treatment technologies to households/communities across Less Developed Countries (LDCs) and Landlocked Developing Countries (LLDCs).

The efficient cook stoves and/or safe water supply and treatment technologies will be given to households/installed in communities for a nominal installation fee, which will be reinvested into the local community through various community projects. By introducing a small installation fee, it is anticipated that recipients will experience greater levels of ownership, value the technology more and therefore uptake, usage and continued interest in the project will be greater. The only source of revenue for the mPoA is the sale of Voluntary Emission Reductions (VERs).

Users will enter into an agreement with co2balance UK Ltd, transferring rights to the VERs generated by the PoA in return for the installation of the technology, education surrounding its use and its ongoing maintenance over the lifetime of the PoA.

General comments:

The Gold Standard has identified clarification and corrective action requests as outlined in the table below. These issues must be resolved before the project may be submitted for registration as a Gold Standard project. Please provide your responses in the table below along with the revised project documentation and any other supporting documents that may be required to resolve the issues.

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Documents reviewed:

PoA - DD (Version 32, May 20 2013)

Design Consultation Report (19/ 9/ 2012, version 1)

Improved Kitchen Regimes Micro VPA-DD EDK. pdf Version 3 24th May 2013

Ex ante calculations 28th May 2013

GS1267 KPT Results.xlsx

NRB Report 18th January 2013

Specifications and Builder`s Manual 18th January 2013

GS1267 Monitoring Plan.pdf (VPA1)

GS1267 Monitoring Sampling Plan Rwanda.pdf

Decision:

Rejected	<input type="checkbox"/>
Request for clarifications and /or corrective action	<input checked="" type="checkbox"/>
To be submitted for external validation	<input type="checkbox"/>
Validated	<input type="checkbox"/>

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Requests for clarifications and/or corrective actions:

Sections	Clarifications and/or corrective action needed	Reasons for clarification and/or corrective action	Suggestions on how to proceed	Response by Project Proponent
Programme Design Document (PoA-DD)				
A. General description of the micro-scale programme of activities				
A.2	1. It is mentioned that the money earned as the installation fee will be reinvested in for the benefit of the community. CME shall include it as monitoring parameter for all its activities.			The PDD has been updated and this statement removed. The reason being that increased costs mean that the installation fee will cover just that, the installation of the stove. It has also been found that in order for people to really value the stove and use it, there must be some level of payment. Until we find a suitable means to reinvest money directly into the community and monitor this, we will not include it in the documentation. GS: This Comment/Request is closed.
A.3	1. CME shall submit the user agreement copy for all its activities for the transfer of ownership of credits to CO2 Balance.		A sample can be submitted with the inclusion of VPAs under the programme.	An example of the Carbon Transfer Form that will be used at stove installation can be found in the Appendix of the 'Monitoring Plan.' Similar agreements will be used for other technologies. GS: This Comment/Request is closed.

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A.4.	1. CME shall note that deemed additionality for activities located in LDC or LLDCs can only be claimed if it is a regular cycle activity. Please revise the eligibility criteria to demonstrate the additionality of retroactive VPAs.			The Eligibility Criteria have been updated. GS: This Comment/Request is closed.
	2. Conducting a LSC or an EIA for an activity cannot be considered as an eligibility criteria since it is a requirement of the micro-programme rules. CME shall please remove it.			These criteria have now been removed. GS: This Comment/Request is closed.
	3. CME shall also include installation of boreholes for communities as a criteria under technology and target group.			The Eligibility Criteria have now been updated. GS: This Comment/Request is closed.

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	4. CME shall include SD eligibility criteria for all the technologies implemented as a part of the programme.		These can be improvement of indoor air quality for women and children or reduction in frequency of diseases/ailments due to access to clean drinking water etc.	An SD eligibility criterion has been added. GS: This Comment/Request is closed.
A.4.3	1. CME shall note that deemed additionality for activities located in LDC or LLDCs can be claimed only if it is a regular cycle activity. CME may include retroactive projects in future and hence may want to revise the section to demonstrate the additionality of retroactive VPAs also.			This section has been updated to include retroactive projects. GS: This Comment/Request is closed.

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A.4.4	1. CME shall explain how the help of community leaders in identifying the households for the distribution of the technology will not result in a biased selection.			Households are identified based on their suitability for project technologies. For example, one criterion for those receiving efficient cook stoves is that they are currently cooking on traditional three-stone fires. Using local community leaders allows us to identify those households that are best suited to the technologies, and most in need, as they have first hand experience within the area. The resulting selection is therefore households that are in need and will make use of the technology. GS: This Comment/Request is closed.
	2. Under point 5. CME shall also include details about the maintenance of the technology.			This section has now been amended. GS: This Comment/Request is closed.
<i>B. Duration of the micro-scale programme of activities</i>				

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B.1	<p>CME shall revise the start date of the PoA in line with the GS guidelines.</p> <p>PoA start date doesn't match with the start date in VPA1.</p>			<p>The Start Date has now been amended to be in accordance with the GS Requirements.</p> <p>This Comment/Request is open.</p> <p>Because we have 2 VPAs being developed simultaneously, "real action" has actually begun in VPA 2 before VPA 1. For this reason, the start date of the PoA has to be 1/05/2013 as this when the first activity took place (the first borehole has been repaired to full working order in VPA 2). The start date of VPA 1 has been set as 1/08/13 as this is when the first action in VPA1 is expected to take place. Section B.1 has been updated in the PoA-DD to explain this.</p> <p>GS: This Comment/Request is closed.</p>
<i>D. Application of Baseline and Monitoring Methodology</i>				
D.1.2	2. CME shall also include the explanation for the justification of the methodology to water treatment technologies.			<p>Section D.1.1 has been updated and includes the justification for both cook stoves and water technologies.</p> <p>GS: This Comment/Request is closed.</p>
D.5	1. CME shall also include the additionality criteria			<p>This section has now been updated.</p> <p>GS: This Comment/Request is closed.</p>

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	for retroactive projects, if any.			
D.7	1. CME shall also explain discuss the approach for sampling verification in the PoA-DD.		Please refer Annex F, section 13 for more guidance.	Details of the approach taken have been added to Section D.7 GS: This Comment/Request is closed.
	2. CME shall refer to Annex 5 in the methodology for completing section D.7.2 and D.7.2.1.			These sections had been completed in accordance with Section III of the methodology. There seems to be some inconsistencies between Section III Monitoring Methodology and Annex 5 in the methodology. Could you please clarify what should be included here and which section we should follow? GS: This Comment/Request is closed.
	3. The Installation Record shall also include the device ID or a serial number.			The details of the Installation Record have been updated. GS: This Comment/Request is closed.
	4. CME is requested to provide a sample sales record.			An Installation Record is going to be used in place of the Sales Record, in accordance with the methodology. A template of how this will be presented has been uploaded, titled 'Sample Installation Record.'

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				GS: This Comment/Request is closed.

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Activity Design Document (VPA-DD)				
A. General description of the micro-scale activity				
A.2	1. PP shall discuss how many stoves are going to be distributed in this VPA and the implementation plan of the project.			Approximately 1,650 stoves will be distributed. The implementation plan has been discussed in section A.2. GS: This Comment/Request is closed.
	2. PP is requested to provide more information about the technical specifications of the technology.			The 'Specification and Builders Manual' for the technology had been uploaded. This contains all the information about the technical specifications of the technology. GS: This Comment/Request is closed.
A.3	1. PP shall submit sample user agreement copies for the activity for the transfer of ownership of credits to CO2 Balance.			A sample of the Carbon Transfer Form that will be used at stove installation can be found in the Annex of the 'Monitoring Plan.' GS: This Comment/Request is closed.

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A.4.	1. PP shall submit evidence for the operational lifetime of the cook-stove.			The operational lifetime of the cook stove is based on the financing of any repair and maintenance that is necessary to keep it operational for at least 7 years. The CTF confirms that co2balance will be maintaining the stove. GS: This Comment/Request is closed.
	2. The map in the VPA DD indicates very little information about the geographic location.		PP shall use a better map and at least indicate the name of the continent, country and district.	A new map has been included. Details of the country and district had already been included. GS: This Comment/Request is closed.
	3. The end date of each crediting year shall also be indicated in Table A.4.4.			The Table has now been updated. GS: This Comment/Request is closed.
<i>B. Eligibility of the micro-scale VPA and estimation of emission reductions</i>				
B.2	1. Under Table B.2, PP shall clarify if household level water technology will also be distributed as a part of the project activity.			This VPA will just involve the distribution of stoves, and the table has been updated to clarify this. GS: This Comment/Request is closed.

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	2. PP shall elaborate on how it intends to avoid double counting of technology ie. Technologies will have a unique serial number or a customer name etc.			This information has now been included. GS: This Comment/Request is closed.
	3. PP shall consider the revised SD eligibility criteria in the PoA-DD to justify how the VPA is eligible.	Conducting a LSC or an EIA are not considered suitable indicators to justify the SD inclusion criteria for an activity, since they are requirements of the rules.		This criterion has been updated. GS: This Comment/Request is closed.

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B.3	<p>1. PP shall refer to the relevant section of the micro-programme rules to demonstrate the additionality in B.3.2.</p> <p>Please include a description on the prior consideration of carbon revenue for the VPA ie the project would not have commenced without the consideration of carbon benefits.</p> <p>The prior consideration of carbon shall be demonstrated in line with EB 62 guidelines. PP shall provide evidence to show that consideration of VER revenue was a decisive factor to proceed with the VPA.</p>		<p>An internal Board note or a copy of the ERPA etc can be submitted as evidence.</p>	<p>The rules in Annex U have been followed to demonstrate why VPA 1 is automatically additional.</p> <p>GS: This Comment/Request is open.</p> <p>A statement on prior consideration has been added to Section B.3.2.</p> <p>GS: This Comment/Request is open.</p>

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B.5	<p>1. PP shall include a description of the approach given in the methodology to arrive at the emission reductions from the project.</p> <p>CME shall update the GWP values of CH4 and N2O and their EFs accordingly.</p>		<p>http://www.cdmgoldstandard.org/wp-content/uploads/2011/09/Global-Warming-Potentials-for-Gold-Standard-Project-Activities-2013.pdf</p>	<p>Section B.5.2 has now been updated to include this. GS: This Comment/Request is open.</p> <p>The PP has updated the values for non-CO2 EF based on the figures provided by the Gold Standard in the review of GS 1359 (GS1247) VPA 2 Kole Boreholes: http://www.cdmgoldstandard.org/project-certification/tac-update Wood: CH4: 7.5 tCO2/TJ N2O: 1.192 tCO2/TJ</p> <p>Non-CO2 EF must therefore be 8.692 and this figure has now been applied. GS: This Comment/Request is closed.</p>
	<p>2. PP shall submit the baseline survey and the baseline performance field test results.</p>			<p>The surveys have been uploaded in the document 'Kitchen Survey Results' GS: This Comment/Request is closed.</p>

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	<p>3. PP shall submit the kitchen performance test results.</p> <p>GS1267 KPT Results.xlsx: There are HHs with much higher consumption values (the ones with fuel usage higher than 15) than the rest of the group. CME shall explain the reason for it.</p>			<p>The surveys have been uploaded in the document 'KPT Results'</p> <p>GS: The Comment/ Request is open.</p> <p>There are a number of reasons why wood use can vary between households. For example, those with larger families may use more wood. People may store their wood in different places, and hence moisture levels would vary, and families cook different numbers of meals per day. This natural variance in cooking habits has been captured by both the KS and the KPT. Outliers have been identified and removed in order to ensure a conservative result, and 90/10 precision was achieved. The resulting average consumption value was therefore a realistic representation of the activity taking place on the ground in that area.</p> <p>GS: This Comment/Request is closed.</p>

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	4. PP shall submit evidence for baseline and project stove efficiency.			<p>The baseline stove efficiency of 10% is the default value for a three-stone fire outlined in the methodology (Footnote 24, Pg. 18). The 'Specification and Builders Manual' that has been provided gives evidence of the efficiency of the project stove.</p> <p>GS: This Comment/Request is closed.</p>
	<p>5. NRB report – PP shall submit the following survey results:</p> <p>a. Firewood collection habits on p4</p> <p>b. Above and below ground biomass on p5</p> <p>c. NRB qualitative assessment results on p8.</p>			<p>A 'NRB Calculations' spreadsheet has been uploaded to the Registry.</p> <p>GS: This Comment/Request is closed.</p>
	6. PP is requested to elaborate the leakage analysis in a detailed manner.			<p>A leakage assessment has now been included in Section B.5.2.</p> <p>GS: This Comment/Request is closed.</p>

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	<p>7. B.5.2 (Page 15) Description of PE_{py} is incorrect. It is the project value rather than the baseline value.</p> <p>The figure for B_{py} is incorrect. It mistakenly has the same value as baseline.</p>			<p>These typos have now been amended.</p> <p>GS: This Comment/Request is closed.</p>
B.6	<p>PP is requested to provide a detailed Monitoring Plan with carbon parameters. The SD monitoring plan shall be discussed in the SD Appraisal report.</p>			<p>The 'Monitoring Plan' has now been uploaded. A SD Monitoring Plan has been sent to the Objective Observer.</p> <p>GS: This Comment/Request is closed.</p>

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	<p>Ex-ante ER Calculation: Please explain the following:</p> <ul style="list-style-type: none"> - The number of stoves shall be an integer number. - Description of PE_{py} is incorrect. It is the project value rather than the baseline value. (Cell E21) - The non-CO2 EFs shall be updated with the new GWP values. - High value of baseline fuel consumption (13.6 kg/HH.day) - Project stove efficiency test report indicates thermal efficiency higher than regular level - ER higher than regular level. 		<p>The Gold Standard Foundation 79 Avenue Louis-Casai CH-1216 Geneva-Cointrin, Switzerland www.cdmgoldstandard.org</p>	<ul style="list-style-type: none"> - The number of stoves has now been written as an integer - The mistake in the description has now been corrected. - The non-CO2 EFs have been updated using figures provided by Gold Standard - The baseline fuel consumption has been calculated from the KPTs carried out in line with the guidance in the methodology. Please see response to CAR 3 in Section B.5 above. This figure is also inline with results from KPTs that were carried out by co2balance for a CDM project in the neighbouring District of Ngoma, where baseline fuel consumption was found to be 13.29 kg/HH/day. - The stove efficiency was calculated by carrying out WBT in line with Shell Protocol. This was conducted by an independent consultant, and the results shown were averaged to generate the efficiency provided. This efficiency is the figure that has been approved for all our cook stove projects to date. <p>The combination of a high NRB (which was calculated by an independent consultant and has been approved), and the baseline wood consumption derived from surveys has led to the ER value calculated.</p>

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Conclusion – The GS opinion is that the project is validated after the above clarifications and corrective actions have been taken care of in a satisfactory way.