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Index

Sr. No	Title	Author	Subject	Page. No.
1.	Assay Of Triphenylmethane Reductase Enzyme And PCR-Based Identification Of TMR Gene In Enterobacter Asbriae Strain XJUHX-4TM	Tina Mukherjee, Mounita Bhandari, Manas Das	Biotechnology	1-2
2.	An Analysis Of Growth Of Credit Card Industry	Dr. A. Vinayagamoorthy, K. Senthikumar	Commerce	3-5
3.	Impact Of Pre-Merger And Post Merger On Financial Performance (With Reference To Private Sector Banks)	Dr. Shital Vekariya	Commerce	6-8
4.	Relativity On Climate And Competencies In Human Resource Development With Reference To Neyveli Lignite Corporation Ltd,	S. Jayakumar. Dr. R. Ramachandran	Commerce	9-11
5.	Human Resource Outsourcing: A Strategy For Gaining Competitive Advantage	Dr. Santosh M. Singh	Commerce	12-13
6.	Relationship Between EVA And ROI And MVA (A Case Study Of Ten Manufacturing Industries In India)	Dr. Shivani Gupta	Commerce	14-15
7.	Modeling The Traits Of An Effective Teacher At Higher Education	Dr. Haridayal Sharma	Commerce	16-17
8.	Mahatma Gandhi National Rural Employment Guarantee Act (Mgnrega): Issues And Challenges	Dr. Mohd. Ashraf Ali, Mushtaq Ahmad	Commerce	18-20
9.	Standardisation And Grading	Viram. J. Vala, Dr. Vijay Kumar Soni	Commerce	21-22
10.	Profitability Of Selected Information Technology Companies In India	Dr. M. Jegadeeshwaran, C. Udaya	Commerce	23-25
11.	Emerging Trends In The Indian Media And Entertainment Industry	Dr Mahalaxmi Krishnan	Commerce	26-27
12.	Inventory Management Strategies And Control Techniques: An Empirical Investigation Of Small Scale Industries	Vipul Chalotra, Neetu Andotra	Commerce	28-30
13.	A Study On Performance Indicators Of Commercial Banks	Dr. G. Ganesan, P. Parthasarathy	Commerce	31-33
14.	Improved Approaches To Coreference Resolution In Machine Learning	Kuldeep Singh Raghuwanshi, Ashwini Kumar Verma	Computer Science	34-37
15.	Security Issues & Controls In Cloud Computing	V. Naga Lakshmi	Computer Science	38-40
16.	Human Development Index Of De-Notified Nomadic Castes In Maharashtra Division: A Study Of Jalna And Aurangabad Districts	Dr. Ashok Pawar	Economics	41-43
17.	Public Private Partnership In Rural & Urban Projects In India	Dr. Ashok S. Pawar, Dr. Shankar B. Ambhore	Economics	44-45
18.	Populace Insight On Development In Public Health Sector Of India Subsequent To Functioning Of National Rural Health Mission	Krishnakant Sharma	Economics	46-49
19.	Problems Of Rural Women Entrepreneurs In India: A Conceptual Overview	C. Jeyasri Usha N Devi, Dr. A. Sankaran	Economics	50-52
20.	Poverty Of Banjara And Vanjari Communities In India	Tidke Atish S., Dr. Pawar Ashok S.	Economics	53-54
21.	India And China: Economic Reforms And WTO	Dr. Surinder Kumar Singla, Dr. Kulwinder Singh	Economics	55- 56
22.	Implementing Life Skill Education Strategies In Teaching – Learning Process	R. Kalaiselvi, Dr. A. Palanisamy, Dr. A R. Saravanakumar	Education	57-59

23.	Utilisation Of Modern Technology By The Teachers In Pupil Processing Organisation	Dr. P.Paul Devanesan, Dr A. Selvan	Education	60-61
24.	Impact Of Vocational Training On Students	K.Sudha Rani, G.Umapathi, Dr. T. Ananda,	Education	62-63
25.	A Study On Emotional Intelligence Of Secondary School Teachers	Dr. Umme Kulsum, Prathima H.P.	Education	64-66
26.	The Efficiency Of Feedback Strategy Of Homework On The Development Of 10th Grade EFL Writing Skill In Al-Karak Educational Directorate	Majid Al- Khataybeh, Areej Al-Shourafa`	noitacudE	67-74
27.	Perspectives Of Stress Management In Education System	M. Meenakshisundaram, G. P. Raja, Dr. A R. Saravanakumar	Education	75-76
28.	Attention Regulation Of Meditators And Non-Meditators Of Class IX	G. Madhavi Kanakadurga, Dr. D. Vasanta Kumari,	Education	77-78
29.	Role Of Psychoeducation In Teaching – Learning Process	Dr. A R. Saravanakumar, Dr. A. Balu, Dr. S. Subbiah	Education	79-80
30.	Microcontroller Driven RGB Led System For Tristimulus Surface Colorimetry	T. N. Ghorude, A. D. Shaligram	Electronics	81-83
31.	Pmgsy And Rural Roads Development In India: Economic, Financial And Maintenance Issues	K.C. Manjunath	Engineering	84-86
32.	Routing Packets On A Chip.	Naren V Tikare	Engineering	87-89
33.	Finding The Nearest Neighbors In Biological Databases	Er. Pankaj Bhambri, Dr. O.P. Gupta, Er. Franky Goyal	Engineering	90-92
34.	Factors Affecting The Sustainability Of The Asphalt Roads: A Case Study Of Irbid Inner Ring Road, Jordan	Eng. Nasr Ahmad Dr. Mihai Iliescu	Engineering	93-94
35.	Physical And Chemical Testing Of Compounded PVC	Sapna Dabade, Dr. Dheeraj Mandloi, Deepak Khare	Engineering	95-96
36.	Impact Of Organic Farming On Yield Of Some Common Crops- A Case Study.	Namrata D. Awandekar	Environmental Science	97
37.	Hydrogeologic Settings Of The North And South Brahmaputra Plains In Upper Assam: A Comparative Study	Dr. Uttam Goswami	Geology	98-100
38.	To Study Staffing Pattern In Rajasthan Public Healthcare Delivery System.	Dr. Ashwin G. Modi, Sushman Sharma	Healthcare	101-105
39.	Work And Health: A Situational Analysis Of Factory Workers	Dr. S. S. Vijayanchali, Dr. E. Arumuga Gandhi	Home Science	106-108
40.	Performance Of Camel Kid Hair: Acrylic Blended Yarn And Knitted Fabric	Suman Pant, Anjali Sharma	Home Science	109-110
41.	Impact Of Holistic Nutrition Education Package On Diabetes Mellitus Control In Middle Aged Women	Dr. Anjali Rajwade	Home Science	111-112
42.	Assessment Of Relationship Between Ida And Personal Hygiene, Nutritional Knowledge And Dietary Practices In Adolescent Girls	Dr. Anjali Rajwade	Home Science	113-114
43.	Employee Attrition And Retention In Private Insurance Sector– A HRM Challenge	Dr. J. Senthil Vel Murugan, S.Bala Murugan	Human Resource Management	115-117
44.	A Study On Impact Of Unionism On Industrial Relations In Manufacturing Sector	Jaya Ahuja	Industrial Relations	118-120

45.	Augmentation Of India's Foreign Exchange Reserve: An Analysis	Dr.S P.Mathiraj, Ar.Annadurai	International Business	121-123
46.	Films – A Techno Literary Art Form	Dr. Dipti Mehta	Literature	124-125
47.	Indirect Models Of Reading To Develop Descriptive Writing	Dr. K. Madhavi	Literature	126-128
48.	Ramkrishna Mishra Ke Upanaso Me Rajnetaik Chetavni	Dr. Sanjay Rathod, Dilip Jhadav	Literature	129
49.	Hindi Kavita Me Nari Jivan Ka Badla Swarup	Dr. Sanjay Rathod	Literature	130
50.	Impact Of IPL Sponsorship On Consumer Buying Behavior With Reference To Nagpur City	Chandrima Das	Management	131-135
51.	Crowd Sourcing –A New Management Mantra	Devi Premnath, Dr. C. Nateson	Management	136-137
52.	Small Scale Industries In India: An Evaluation Of Productivity In The Post-Liberalized Scenario	Dr. Gaurav Lodha,	Management	138-139
53.	Comparative Analysis Of Milk Products With Respect To Its Competitors With Special Reference To Karnataka Milk Federation (KMF) – At Dharwada City, Karnataka, India	Dr. N. Ramanjaneyalu	Management	140-143
54.	A Study On Work Stress In Women Employees In Coimbatore District	R. Maheswari, N. Brindha	Management	144-145
55.	Accounting For Carbon Credits	Dr. Gaurav Lodha	Management	146-148
56.	A Literature Review On The Relationship Between Training (As A Core Responsibility Of HRM) And Firm Performance.	Priya Sharma, Dr. S. L. Gupta	Management	149-152
57.	A Study On Agricultural Marketing Practices And Constraints With Special Reference To Paddy / Rice.	CM Maran, Dr Raja Pranmalai	Management	153-156
58.	Performance Of Share Price Of Indian Public Sector Banks And Private Sector Banks - Comparative Study	V. Prabakaran, D. Lakshmi Prabha	Management	157-158
59.	Intuitionistic Fuzzy Primary And Semiprimary Ideal	Dr. M.Palanivelrajan, S.Nandakumar	Mathematics	159-160
60.	Significance Of Umbilical Artery Velocimetry In Perinatal Outcome Of Fetuses With Intrauterine Growth Retardation.	Dr G S Shekhawat	Medical Science	161-163
61.	Large Adult Sacrococcygeal Teratoma: A Case Report And Review Of Literature.	Dr.Yavalkar Pa, Dr. Naik Am.	Medical Science	164-165
62.	Epidural Steroid In Low Back Ache	Dr. B. L. Khajotia, Dr. Neelam Meena	Medical Science	166-167
63.	A Comparative Study Of Second Trimester MTP With Use Of Vaginal Misoprostol And Extra Amniotic Instillation Of Ethacridine Lactate.	Dr. Ketaki Junnare, Dr. Sameer Darawade, Dr. Priyamvada Shah, Dr. Swati Mali.	Medical Science	168-169
64.	A Novel Surgical Approach For Treatment Of Sui –TVT Obturator Tape	Dr. Ketaki Junnare, Dr. Durga Karne, Dr Neelesh Risbud.	Medical Science	170-171
65.	Advantage Of Fallopian Tube Sperm Perfusion Over Intra-Uterine Insemination When Used In Combination With Ovarian Stimulation For The Treatment Of Unexplained Infertility.	Dr G S Shekhawat, Dr Pushpalata Naphade	Medical Science	172-175

66.	"Bilateral Sertoli-Leydig Cell Tumor In Postmenopausal Female" A Case Report	Dr. Priyamvada Shah, Dr. Ketakijunnare, Dr. DurgaKarne	Medical Science	176-178
67.	Pretreatment With Ephedrine For Prevention Of Pain Associated With Propofol Injection.	Dr. Kavita U Adate, Dr. Jyoti A. Solanki	Medical Science	179-181
68.	Does The Structured Teaching Programme Influence The Knowledge About Physical Wellbeing Of School Children? A Quasi Experimental Study.	Dr. S. Valliammal, Dr. Ramachandra, Raja Sudhakar	Nursing	182-184
69.	An Approach For Information Retrieval For Bookstores Using Formal Ontology	Sumit Jain, C.S.Bhatia	Ontology	185-187
70.	Analgesic Activity Of Anacardium Occidentale	A. Devadoss, C. Aparna, K. Parimala, D. Sukumar	Organic Chemistry	188-190
71.	Behaviourism : Science Or Metaphysics	Dr. Jatinder Kumar Sharma	Philosophy	191-193
72.	Multi-Dimensional Perspectives Of Obesity And Its Management	S. Dhanaraj, Dr. A. Palanisamy	Physical Education	194-196
73.	Refractive Index, Density, Excess Molar Volume, Excess Molar Refraction For Liquid Mixtures (Ethyl Ethanoate + Benzene Derivatives) At Different Temperatures	Sheeraz Akbar, Mahendra Kumar	Physics	197-199
74.	Refractive Indices, Densities And Excess Properties For Liquid Mixtures (Cetane + Alkanols) At Different Temperatures	Sheeraz Akbar, Mahendra Kumar	Physics	200-202
75.	Capacity Building For Effective Local Governance: Indian Perspectives	Dr. Pralhad Chengte	Political Science	203-205
76.	Psychological Well-Being: A Study Of Non-Institutionalized Aged	Dr. Pankaj S. Suvera	Psychology	206-208
77.	Women Empowerment Through N R E G S (With Reference To State Of West Bengal)	Dilip Kumar Karak	Social Sciences	209-211
78.	Effect Of Selected Yogic, Aerobic And Laughter Exercises On Blood Pressure Of High School Boys	Dr.Manjappa.P, Dr.Shivarama Reddy. M	Sports	212-216
79.	Association Study Between Lead And Copper Accumulation At Different Physiological Systems Of Goat By Application Of Canonical Correlation And Canonical Correspondence Analyses	Partha Karmakar, Debasis Mazumdar, Seema Sarkar (Mondal), Sougata Karmakar	Statistics	217-219
80.	Development Of Silver -Silica Nanocomposite For Novel Humidity Sensing Application	Surender Duhan	Technology	220-221



Accounting For Carbon Credits

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ABSTRACT

A number of Indian companies generate carbon credit under the Clean Development Mechanism (CDM). The amount involved is material enough to the overall viability of a project.

Under IFRS, most entities generating CERs treat the same as government grant covered under IAS 20 (Accounting for Government Grants and Disclosure of Government Assistance). This is because an international agency grants the same. Accordingly, based on IAS 20 requirements, a generating entity recognises CERs as asset once there is a reasonable assurance that it will comply with conditions attached and CERs will be received.

Keywords : Carbon Credit, India

Carbon Credits in India

Our earth is undoubtedly warming. This warming is largely the result of emissions of carbon dioxide and other Greenhouse Gases (GHG's) from human activities including industrial processes, fossil fuel combustion, and changes in land use, such as deforestation etc. Addressing climate change is not a simple task. To protect ourselves, our economy, and our land from the adverse effects of climate change, we must reduce emissions of carbon dioxide and other greenhouse gases. To achieve this goal the concept of Clean Development Mechanism (CDM) has come into vogue as a part of Kyoto Protocol.

Indian scenario:

India comes under the third category of signatories to UNFCCC. India signed and ratified the Protocol in August, 2002 and has emerged as a world leader in reduction of greenhouse gases

by adopting Clean Development Mechanisms (CDMs) in the past few years.

According to Report on National Action Plan for operationalising Clean Development Mechanism (CDM) by Planning Commission, Govt. of India, the total CO₂-equivalent emissions in 1990 were 10, 01, 352 Gg (Gigagrams), which was approximately 3% of global emissions. If India can capture a 10% share of the global CDM market, annual CER revenues to the country could range from US\$ 10 million to 300 million (assuming that CDM is used to meet 10-50% of the global demand for GHG emission reduction of roughly 1 billion tonnes CO₂, and prices range from US\$ 3.5-5.5 per tonne of CO₂). As the deadline for meeting the

Kyoto Protocol targets draws nearer, prices can be expected to rise, as countries/companies save carbon credits to meet strict targets in the future.

India is well ahead in establishing a full-fledged system in operationalising CDM, through the

Designated National Authority (DNA). Other than Industries and transportation, the major sources of GHG's emission in India are as follows:

- Paddy fields
- Enteric fermentation from cattle and buffaloes
- Municipal Solid Waste

Of the above three sources the emissions from the paddy fields can be reduced through special irrigation strategy and appropriate choice of cultivars; whereas enteric fermentation emission can also be reduced through proper feed management.

In recent days the third source of emission i.e. Municipal Solid Waste Dumping Grounds are emerging as a potential CDM activity despite being provided least attention till date.

Accounting for carbon credits

A number of Indian companies generate carbon credit under the Clean Development Mechanism (CDM). The amount involved is material enough to the overall viability of a project. Under the International Financial Reporting Standards (IFRS), the International Accounting Standards Board (IASB) had issued an interpretation IFRIC 3 (Emission Rights), which was withdrawn in June 2005. Thus, the IASB is still debating on an appropriate treatment for Carbon Emission Reductions (CERs)

Under IFRS, most entities generating CERs treat the same as government grant covered under IAS 20 (Accounting for Government Grants and Disclosure of Government Assistance). This is because an international agency grants the same. Accordingly, based on IAS 20 requirements, a generating entity recognises CERs as asset once there is a reasonable assurance that it will comply with conditions attached and CERs will be received.

IAS 20 gives an option to measure such grants either at fair value or nominal value. Most entities will measure the CERs at fair value to ensure appropriate matching with the costs incurred. They will recognise this in the income statement in the same period as the related cost which the grant is intended to compensate. The corresponding debit will be to intangible assets in accordance with IAS 38 (Intangible Assets).

No guidance is currently available under Indian GAAP (generally accepted accounting principles).

Consequently, various practices exist (a) income from sale of CERs is recognised upon execution of a firm sale contract for the eligible credits, as prior to that there is no certainty of the amount to be realised; (b) income from CERs is recognised at estimated realisable value on their confirmation by the authorities concerned; and (c) income from CER is recognised on an entitlement basis based on reasonable certainty after making adjustments for expected deductions.

The Accounting Standards Board (ASB) of the Institute of Chartered Accountants of India (ICAI) has issued an Exposure Draft (ED) of the Guidance Note on Accounting for Self-generated Certified Emission Reductions. The ED proposes to lay down the manner of applying accounting principles to CERs generated by an entity.

According to the ED, the generating entity should recognise CERs as asset only after receipt of communication for credit from United Nations Framework for Climate Change (UNFCCC) and provided it is probable that future benefits associated with CERs will flow to the entity and costs to generate CERs can be measured reliably.

Further, such assets meet the definition of the term 'inventory' given under AS 2 (Valuation of Inventories) and, hence, are valued at lower cost and net realisable value.

Only the costs incurred for the certification of CERs bring the CERs into existence and, therefore, only those costs should be included in the cost of inventory. According to the prescribed criteria, all other costs are either not directly relevant in bringing the inventory to its present location and condition or they are incurred before CERs come into existence. Thus, those costs cannot be inventorised. The ED will result in significant cost and revenue mismatch in the financial statements. This is because entities would need to expense most of their costs as soon as incurred (with an insignificant amount being capitalised as inventory), but will recognise revenue arising from CERs only when these are actually sold.

Clearly, the accounting recommended by the ICAI is very different from existing practices under Indian GAAP and, hence, every company that has significant revenue from carbon credits will have to consider the impact of the ED carefully.

Key accounting considerations

In relation to accounting for the CERs, there is no definitive accounting literature prescribed under the Indian GAAP. The Institute of Chartered Accountants of India (ICAI) has issued an exposure draft on accounting for self-generated Certified Emission Reductions in June 2009. As per the exposure draft, the following needs to be evaluated while accounting for CERs:

1. Is CER an asset?

An asset is a resource controlled by the enterprise as a result of past events from which future economic benefits are expected to flow to the enterprise. CER can be treated as an asset when

the communication of credit of CER is received by the generating entity since only at this stage the CER becomes a resource controlled by the generating entity and therefore leads to expected future economic benefits in the form of cash and cash equivalent which would arise on the future sale of CER.

2. Can CER be treated as an asset prior to communication of credit of CER is received by the generating entity?

CER cannot be treated as an asset prior to the communication of credit of CER is received by the generating entity, since there is no resource in existence for the generating entity and hence the question of 'resource controlled' and 'expected future economic benefits' does not arise.

3. When should a CER be recognised as an asset in the financial statements?

An asset is recognised in the balance sheet when it is probable that the future economic benefits associated with it are expected to flow to the enterprise and the asset has a cost

or value that can be measured reliably. Since the market for CERs is relatively new, the future economic benefits may not always be assured. The entity needs to make an assessment of the probability of the future economic benefits and if benefits are considered to be probable because there is a market for the self generated CERs, CERs should be recognised. Further, there are certain costs which are incurred to generate CERs, and therefore the cost of CERs can be measured reliably (see detailed discussion later).

4. What type of asset is a CER i.e. is it a tangible asset or an intangible asset?

An intangible asset is an identifiable non-monetary asset, without physical substance, held for use in the production or supply of goods or services, for rental to others, or for administrative purposes. Further, the intangible asset also includes assets which are development by an entity for sale. CERs are treated as intangible assets since they are non-monetary assets without a physical form held for sale.

5. Are CERs within the scope of AS 26 Intangible Assets?

AS 26 scopes out those intangible assets from its purview which are specifically dealt with in another Accounting Standard and require them to be accounted for in accordance with that Standard. For instance, intangible assets held for the purpose of sale in the ordinary course of business are excluded from the scope of AS 26 and are to be accounted for as per AS 2,

Valuation of Inventories.

Inventories are assets:

- (a) held for sale in the ordinary course of business
- (b) in the process of production for such Sale
- (c) in the form of materials or supplies to be consumed in the production process or in the rendering of services.

CERs are inventories of the generating entity as they are generated and held for the purpose of sale in the ordinary course of business. Even though, CERs are intangible assets, they are not within the scope of AS 26 and hence need to be accounted for as per the requirements of AS 2.

6. How should the CER be measured?

CERs should be measured at cost or net realisable value, whichever is lower. Cost of inventories comprises all costs of purchase, costs of conversion and other costs incurred in bringing the inventories to their present location and condition. Various costs are incurred by

the generating entity to set up a CDM project activity, operate the CDM project and generate CERs. However, not all costs incurred by the generating entity give rise to CERs and therefore not all costs can be considered as the cost of bringing CERs into existence.

The cost incurred by the generating entity and the accounting treatment has been explained in the below table:

Accounting Treatment	Accounting Treatment
Costs incurred in setting up a CDM project activity to generate CERs.	These costs are not directly attributable to the generation of CERs and hence are not included in the cost of CERs. They are treated as intangible assets and accounted for as per AS 26.
Costs incurred in operating the CDM project to generate CERs.	These costs are directly attributable to the generation of CERs and hence are included in the cost of CERs.
Costs incurred in bringing the CERs to their present location and condition.	These costs are directly attributable to the generation of CERs and hence are included in the cost of CERs.
Costs incurred in the ordinary course of business.	These costs are not directly attributable to the generation of CERs and hence are not included in the cost of CERs. They are treated as intangible assets and accounted for as per AS 26.

The net realisable value is the estimated selling price in the ordinary course of business less the estimated costs of completion and the estimated costs necessary to make the sale.

While determining the net realizable value of CERs, one of the most reliable evidence available at the time the estimates must be considered, for example exchange quoted price. The estimated must take into consideration fluctuations of price or cost directly relating to events occurring after the balance sheet date to the extent that such events confirm the conditions existing at the balance sheet date

7. How should the underlying assets related to CERs be measured?

In case the entities use tangible assets for pollution control/reduction of emission such as incinerators, such assets are recorded as per the AS 10 Fixed Assets. Further, in case these assets generate CERs, the depreciation shall not be included in the cost of the inventory of the principal product of the generating entity as they do not contribute to bringing the inventory of the principal product to their present location and condition

For example, if an entity in a chemical business installs incinerators to reduce emissions, the depreciation of the incinerators should not be added in the cost of producing

chemicals. Further, the depreciation of these devices should also not be included in the cost of inventory of CERs as the depreciation is incurred at the stage before CERs come into existence. Also

as discussed in the preceding question, only costs incurred towards the certification are the costs of the inventory of CERs as they bring the CERs into existence. Accordingly, depreciation of the pollution control/emission reduction devices should be expensed in the period to which it relates.

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