PROJECT REVIEW REPORT

This project review report includes findings raised during Verra's review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

Project ID	4564
Project Name	*7.5 MW Waste-to-Energy Power Plant by Goodwatts WTE Jamnagar Private Limited in Gujarat, India*
Review Type	Registration
Program(s)	VCS Program
Project Proponent	Goodwats WTE Jamnagar Private Limited
Methodology	AMS-III.E, ¨*Avoidance of methane production from decay of biomass through controlled combustion, gasification or mechanical/thermal treatment*¨, Version 17.0 AMS-I.D, ¨*Methane recovery in animal manure management systems*", Version 18.0
VVB	LGAI Technological Center, S.A. (Applus+ Certification)
Assessment Criteria	*VCS Standard Version 4.5*
Date of First Issue	21 June 2024
Review Conclusion	Closed
Date of Final Issue	07 November 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	**Further clarification on Project start date**		
	Issue Section 1.8 of the project description (PD) states that the project start date is defined as per the date of commissioning. However, it remains unclear which activity started on that date. Action item 1. The VVB must ensure that the JPD-MR provides a detailed description on the dates on which the project started generating GHG ERRs, specific to an activity (e.g., MSW collection, RDF production, incinerator start and generator start.) 2. The VVB must further elaborate how it validated that the earliest date when the project began generating emission reductions is 15/11/2021. Program Rule(s) Section 3.8 *of the VSC Standard v4.5*	**Round 1** VVB Response The start date of the project activity is the commercial operation date (COD), which is the date when the project began generating GHG emission reductions. 1. As discussed during on-site visit, the project started on 15-November- 2021, with the commissioning of the MSW processing facility, where the MSW was collected, processed to produce RDF and started generating electricity through combustion. Therefore, the COD is considered the start date of the project activity. The same has been updated in section 1.8 of the PD which is checked and confirmed. 2. VVB during on-site visit, interviews and through document review has confirmed that, The project start date is 15-November-2021. VVB through on-site visit and interviews has confirmed that on this day MSW was collected, processed to produce RDF and started generating electricity through combustion. Thus, VVB confirmed that the earliest date when the project began generating emission reductions is 15-November-2021. Verra Response Section 1.8 of the PD has been updated to clarify that the project started generating GHG ERRs on 15 November 2021. This finding is now closed.	Closed

2	**Incorrect start date of crediting period**		
	Issue	**Round 1** VVB Response	Closed

	Section 1.9 of the PD defines the start date of the crediting period as 15/01/2024 which is not in line with the VCS Program Definitions v.4.4 ´Crediting period start date´. Action item 1. The VVB must ensure that the project proponent corrects the start date of the crediting period as per the VCS Program Definitions v.4.4 ´Crediting period start date´. Program Rule(s) *VCS Program Definitions, v4.4* ´Crediting period start date´.	As per the VCS project standard version 4.5, section 3.8 "The project start date of a non-AFOLU project is the date on which the project began generating GHG emission reductions or carbon dioxide removals" which is also written in the VCS program definitions, version 4.4. The same document mentions crediting period start date as - The start date of a non-AFOLU project is the date on which the project began generating GHG emission reductions or removals which his accepted. The project started on 15-November-2021, with the commissioning of the MSW processing facility, where the MSW was collected, processed to produce RDF and started generating electricity through combustion. Accordingly, the project proponent has considered the project start date as the commissioning date of the project activity i.e. 15-November-2021, which is in line with the above requirement and accepted. PP has now revised the crediting period start date and made it consistent with the project start date. The revised sections 1.9, 1.10 and 4.4 of PD were checked to confirm the same. VR sections 1.4, 3.1 and 3.3.6 are now revised accordingly. Verra Response Sections 1.9, 1.10 and 4.4 of the PD and Sections 1.4, 3.1 and 3.3.6 of the VR have been updated to align the crediting period start date with the *VCS Program Definitions, v4.4*. This finding is now closed.	

3	No information on project lifetime		
	Issue Section 1.11 of the PD does not include information about the project and equipment lifetime. Action item 1. The VVB must ensure Section 1.11 of the PD is updated to include information on the project and equipment lifetime.	**Round 1** VVB Response 1. The project lifetime and equipment lifetime have been provided in section 1.11 of the revised PD. The equipment details were cross checked during on-site visit and desk review of the submitted documents and were confirmed. 2. VVB has assessed and confirmed the same in section 3.1 of VR.	Closed

	2. The VVB must assess the update. Program Rule(s) *VCS Project Description Template v.4.2,* Section 1.11	 Verra Response Section 1.11 of the PD has been updated to state the project lifetime of 25 years. This finding is now closed.	

4	No description of socioeconomic net harm		
	Issue Section 2.1 of the PD does not include description of not demonstrate the absence of socioeconomic net harm. Action item 1. The VVB must ensure Section 2.1 of the PD is updated to demonstrate and discuss no net socioeconomic harm. 2. The VVB must assess the update. Program Rule(s) *VCS Project Description Template v.4.2,* Section 2.1 *VCS Standard, v4.5*, Section 3.19.2	**Round 1** VVB Response 1. The description for the absence of socioeconomic net harm has been updated in the section 2.1 of the PD which is checked and confirmed. 2. VVB has provided the assessment now in section 3.2.1 of VR. Verra Response Section 2.1 of the PD and Section 3.2.1 of the VR have been updated to demonstrate and assess the absence of socioeconomic net harm. This finding is closed.	Closed

5	Further information and assessment on applicability conditions		
	Issue Section 3.2 of the PD lacks the following information: (a) For condition 1: the location and characteristics of the disposal site in the baseline. (b) For condition 4: the evidence in order to demonstrate that no GHG emissions occur, other than biogenic CO2, due to chemical reactions during the thermal treatment process. (c) For condition 6: description of how further moisture absorption is prevented. (d) For condition 9: how the bottom ash and fly ash are stored before sent to brick manufacturers. Action item	**Round 1** VVB Response (a) The location and characteristics of the disposal sites have been updated in section 3.2 of the PD as Gulabnagar and Theba land site with anaerobic conditions during the baseline scenario. During on-site visit and based on desk review, VVB has confirmed that existing waste disposal site i. e. Gulabnagar and Theba landfill sites are with anaerobic conditions (with low porosity and waste stored was found to be moist) and volume to which was confirmed to be more than 1.5 through visual inspection during on-site visit. (b) During incineration of MSW, GHG emissions such as nitrous oxide, methane shall be emitted in negligible amount due to its presence in waste. However, the project activity involves	Closed

	1. The VVB must ensure that the project proponent includes the missing information as per points a to d above under Section 3.2 of the PD. 2. The VVB must assess this information and update the validation report (VR) as needed. Program Rule(s) *AMS-III.E, v.17.0,* Section 2.2	processing of MSW pre-dominantly with organic content which is supported by waste characterization report submitted to VVB. The RDF for the current project activity is prepared through mechanical processing and does not involve thermal/chemical process as confirmed during the on-site visit and evident from project boundary diagram in the PD. Thus, it was confirmed that the project activity majorly involves biogenic CO_2. However, as per the methodology AMS. III. E, version 17.0, the emissions from fossil carbon content have been accounted in the project emissions from combustion of RDF by PP which is appropriate. Revision in condition 4 in the submitted PD section 3.2 is checked and found appropriate. (c) During on-site visit, the PP confirmed that the entire waste received in a day is processed and treated on the same day ensuring that the waste received in the plant is treated on a FIFO basis. Handling and storage of the collected RDF in the bunker does not undergo anaerobic condition as the continuous mixing of waste takes place to avoid moisture absorption and maintain homogeneity. In case of plant breakdown, the accumulated waste will be stored in enclosed bunker provided with adequate ventilation to promote aerobic conditions and the accumulated waste prior to current operation day will be scheduled for incineration to further avoid any anaerobic degradation. This ensures produced RDF/SB does not result in anaerobic conditions and do not lead to further absorption of moisture. The same is now added by PP in the revised PD section 3.2 condition 6. The VR section 3.3.2 , applicability of methodology – point 6 is revised accordingly. (d) On-site visit and interviews have confirmed that the bottom ash and fly ash are being stored in two silos which were visually confirmed during the on-site visit. VVB has confirmed that it is not subjected to anaerobic storage before being given to brick manufactures. Revision in condition 9 in the submitted PD section 3.2 is checked and found appropriate. The VR section 3.3.2 , applicability of methodology – point 9 is revised accordingly. 1. PP has revised the PD section 3.2 which his checked and confirmed.	

		2. VR has provided the assessment in section 3.3.2 of VR. Verra Response Section 3.2 of the PD has been updated to address Issues a – d. The VVB has assessed the updates. This finding is now closed.	

6	Incomplete project boundary and GHG sources identified		
	Issue As per the information provided under Section 3.3 of the PD, the project boundary does not include the site where the MSW would have been disposed (as per para 21-a of AMS-III.E) and the sites where the final residues from combustion process are deposited. Further, the GHG sources table does not include the project emissions from incremental transportation. Action item 1. The VVB must ensure that the project proponent describes the project boundary as per the applied methodology and includes all the applicable GHG sources under Section 3.3 of the PD. 2. The VVB must further verify this information and update the VR as needed. Program Rule(s) *VCS Project Description Template v.4.2,* Section 3.3 *VCS Validation Report Template v.4.2,* Section 3.3.3	**Round 1** VVB Response 1. PP has revised project boundary diagram to include the site where the MSW would have been disposed and the sites where the final residues from combustion process in section 3.3 of the PD which is checked and confirmed. In addition, the project emission from incremental transportation has been included in the GHG sources table in section 3.3 of the PD which is checked and confirmed. 2. VVB has provided the assessment in section 3.3.3 of revised VR. Verra Response The project boundary diagram in Section 3.3 of the PD has been updated to include the site where MSW would have been disposed. This finding is now closed.	Closed

7	Further information on additionality		
	Issue The following information is missing under Section 3.5 of the PD: (a) Why incomes from generated bottom and fly ash sent to the brick manufacturer and fees from the received MSW have not been considered in the investment analysis.	**Round 1** VVB Response (a) On-site interviews and plant records have confirmed that the bottom ash and fly ash are handed to the brick manufacturers free of cost. Thus, no income is generated through fly ash and bottom ash which is evident from interviews, data records to VVB. Hence, same is not considered as a part of investment	Closed

	(b) The breakdown and suitability of each component of the O&M costs. (c) The suitability of considering a fixed tariff with no escalation given that the O&M costs are escalated yearly and the benchmark has been calculated in nominal terms. (d) How the PLF complies with the EB48 Guidelines. (e) Why an increase in the PLF of 11.17% (in order the IRR to reach the benchmark as stated in page 41 of the PD) is unlikely. Further, the IRR spreadsheet has not been submitted. <u>Action item</u> 1. The VVB must ensure that the project proponent further elaborates points a to e above under Section 3.5 of the PD. 2. The VVB must verify this information and update the VR as needed. 3. The IRR calculation spreadsheet must be submitted for further reference in order to allow a third party to replicate the results. <u>Program Rule(s)</u> *VCS Project Descrition Report Template v.4.2,* Section 3.5 *VCS Validation Report Template v.4.2,* Section 3.3.5	analysis which is found appropriate. Thus, no revision in PD / VR is required. (b) The O&M cost has been calculated based on the GERC tariff order considering 6% of the project cost. The O&M cost consists of the statutory charges, spares, employee cost, administrative and general expense, consumables, repairs and maintenance and insurance expenses, etc. which is appropriate. And hence, no breakdown on component level is available at the time of investment decision which is acceptable and found appropriate. Thus, no revision in PD / VR is required. (c) In India, generally the power purchase agreement (PPA) is signed with fixed tariff rates over the lifetime of the project activity. Hence a fixed tariff rate with no escalation has been considered for the investment analysis. This is accepted based on sectoral and regional expertise of the assessment team and actual copy of PPA being submitted and confirmed. The assessment of the same in presented for 'tariff' in section 3.3.5 of the VR. For the project activity, the Jamnagar Municipal Corporation has awarded the project at a fixed tariff of 7.07 INR/kWh. The tariff payable by Gujarat Urja Vikas Nigam Limited (GUVNL) is 6.31 INR/kWh with a differential amount of 0.76 INR/kWh as decided by the State Government which is confirmed based on the desk review. On the other hand, as per the GERC Tariff Order 2016, the O&M cost is subjected to a fixed annual escalation of 5.72%. Hence the same has been considered for the investment analysis. Since, the escalation for the O&M expense has been considered, the benchmark has been converted from real to nominal benchmark by adding the inflation rate in line with the para 16 of the Tool 27: Investment Analysis, version 12.0. Section 3.3.5 of VR already provides that benchmark calculated is on nominal terms.	

		For better clarity to a third party, description in the section 3.5 of PD and the assessment in the section 3.3.5 of VR is now revised. (d) As per para 3 of EB 48 Guidelines, Annex 11, the plant load factor shall be defined ex-ante in the CDM-PDD according to one of the following three options, (a) The plant load factor provided to banks and/or equity financiers while applying the project activity for project financing, or to the government while applying the project activity for implementation approval; (b) The plant load factor determined by a third party contracted by the project participants (e.g. an engineering company); With reference to the loan application no: G5045001, dated 02.09.2020 to the Power Finance Corporation Ltd, the Detailed Project Report (DPR) consisting of the PLF details had been submitted. Accordingly, the Plant Load Factor (PLF) has been sourced from the Detailed Project Report (DPR) which complies with the EB48 Annex 11 Guidelines which is acceptable and confirmed during the desk review. The same is mentioned in section 3.5 of PD and section 3.3.5 of revised VR. **(e)** As the post tax equity IRR is unlikely to breach the benchmark for the first year PLF, the sensitivity analysis has been performed using the PLF from second year and the IRR Spreadsheet has been updated accordingly. 1. PP has revised section 3.5 of PD with the appropriate changes/corrections which is checked and confirmed. 2. VVB has checked and revised VR section 3.3.5 accordingly. 3. The IRR calculation spreadsheet is submitted for further reference in order to allow a third party to replicate the results.	

		Revised IRR sheet is checked against revised section 3.5 of the PD and found appropriate. Section 3.3.5 of VR is revised accordingly. 1. The VVB has checked and confirmed that PP has elaborated points a to e , if required (as some of the revisions are not needed as not applicable for the current project), under section 3.5 of the PD. Necessary revisions are made to section 3.3.5 of VR. 2. The VVB has verified this information and updated the section 3.3.5 of VR as needed. 3. The IRR calculation spreadsheet is being must submitted for further reference in order to allow a third party to replicate the results.	
		Verra Response Sections 3.5 of the PD and 3.3.5 of the VR have been updated to address Issues (a) through (e) sufficiently. Thus, this finding is closed and no further response is required.	

8	Missing formulas to calculate Wx and Q		
	Issue The PD does not indicate how: (a) Wj,x is calculated as per paras. 27 and 28 of the applied TOOL04. (b) Qy,non-biomass is calculated. Action item 1. The VVB must ensure that the project proponent includes all the related formulas and parameters used (including monitored and ex-ante parameters) in the calculation of the GHG emission reductions in Sections 4.1 and/or 4.4 of the PD 2. The VVB must verify the formulas used and provide an assessment on their correctness and suitability under Section 3.3.6 of the VR.	**Round 1** VVB Response (a) The procedure to estimate the amount of solid waste type j disposed or prevented from disposal in the SWDS (Wj,x) as per paras. 27 and 28 of the applied TOOL04, version 08.1 has been updated in section 4.1 of the PD which is checked and confirmed. VVB has revised VR section 3.3.6 accordingly. (b) The procedure to estimate non-biomass carbon of the RDF combusted ($Q_{y,non\text{-}biomass}$) has been updated in section 5.2 of the PD which is checked and confirmed. This parameter will be measured based on a representative sampling of the waste in pre-processing secton which is acceptable. VVB has revised VR section 3.3.8 accordingly.	Closed

	Program Rule(s) *VCS Project Descrition Report Template v.4.2,* Sections 4 and 5 *VCS Validation Report Template v.4.2,* Sections 3.3.6 and 3.3.8 CDM TOOL04, v8.1, Section 6.3.2	1. PP has now revised PD to include all the related formulas and parameters used (including monitored and ex-ante parameters) in the calculation of the GHG emission reductions in Sections 4.1 and/or 4.4 of the revised PD 2. The VVB has verified the formulas used and an assessment on their correctness and suitability is provided under Section 3.3.6 of the revised VR. Verra Response The PD and VR have been updated. Issue (a) has been addressed appropriately. However, Issue (b) mentions that changes to the project design are still being carried out and will be finalized by the first monitoring period. This will be reported as part of the first monitoring period. This finding is now closed.	

9	**Missing and incorrect information for selection of data/parameters**		
	Issue Section 5.1 of the PD: a) The default data/parameters are sourced from the 2006 IPCC Guidelines and not the 2019 IPCC Refinements. b) Lacks information on why the MCF ex-ante value has been defined as 1, also considering the requirements under para. 30 of the applied AMS-III.E. c) Does not indicate the climate conditions in order to define the default values for the model correction factor to account for model uncertainties and kj. d) EFgrid values were sourced from version 18 instead of latest version 19. Action item 1. The VVB must ensure that Section 5.1 of the PD is updated to address the issues listed (a – d).	**Round 1** VVB Response a) The default data/parameters are sourced from the tool 04, version 08.1, which are further referred to 2006 IPCC Guidelines. Due to the non-availability of the referred data/parameters in the 2019 IPCC Guidelines (Source), the default values are sourced from 2006 IPCC Guidelines which is found correct. b) As per para 30 of AMS. III. E, version 17.0, the project activity does not account for the existence of a suppressed demand situation. In addition, as per section 6.3.4, para 33 of tool 04, version 08.1, the project activity does not have a water table above the bottom of the SWDS as confirmed during the on-site visit. Hence, the methane conversion factor has been considered as 1 for anaerobic managed solid waste disposal sites from table 5 of tool 04, version 08.1 which is acceptable.	Closed

	2. The VVB must verify this information and update the VR as needed. Program Rule(s) CDM TOOL04, v8.1, Sections 6.3.4 and 6.4 *VCS Standard, v4.5*, Section 3.15.5	c) The project site falls under tropical climatic condition, where, the mean annual temperature is 26.4°C greater than 20°C and the mean annual precipitation is 1100 mm greater than 1000 mm. Hence the relevant default values for the model correction factor to account for model uncertainties and decay rate has been taken from table 1 and table 7 of tool 04, version 08.1. The references to the climate conditions have been updated in section 5.1 of the PD which is checked and confirmed. d) The latest Operating Margin (OM) and Build Margin (BM) emission factors available at the time of validation and registration is version 19 of CO_2 Baseline Database, Central Electricity Authority dated November-2023. The same has been updated in the ER Sheet and section 4.2 of the PD. 1. PP has revised Section 5.1 of the PD to address the issues listed (a – d) and confirmed as above. 2. VVB has revised and updated VR section 3.3.8 accordingly. Verra Response Sections 4.2, 5.1 and 5.2 of the PD, the VR and the GHG ERR spreadsheet have been updated to include more justification to address Issues (a) – (d). These issues have been addressed sufficiently. Thus, this finding is now closed.	

10	**Missing information on project emissions from incremental transportation**		
	Issue (a) As per the information under page 72 of the PD, it remains unclear how it has been considered that there is no incremental transport distance from the baseline landfill to the project site, in order to exclude such project emissions. (b) The project emissions from incremental transport do not consider the transport of ash and inert waste.	**Round 1** VVB Response (a) The collection and transportation of MSW is under the scope of Jamnagar Municipal Corporation. The average distance between the project site and waste collection point (households) is equal to the distance between waste collection point (households) and the landfill site in the baseline which was cross checked and confirmed during the on-site visit. Hence the project emissions from freight transportation for	Closed

	Action item 1. The VVB must ensure that the project proponent accounts for the project emissions from incremental transportation distances. 2. The VVB must verify this information and update the VR as needed. Program Rule(s) *VCS Project Descrition Report Template v.4.2,* Section 4.2 *VCS Validation Report Template v.4.2,* Section 3.3.6	collection of MSW is considered as zero which is acceptable. However, for the bottom ash/fly ash and inert waste transportation, project emissions are now considered by PP which is checked and confirmed. Thus, VVB confirms that project emissions for incremental transportation in baseline and project scenario is not applicable however, the same for inert waste/ash is now considered by PP and assessed/confirmed by VVB. (b) The project emission from incremental transportation for the disposal of ash and inert waste has been calculated. The same is updated in the PD section 4.4 and 5.2 and the ER Sheet. 1. PP has revised PD and description/monitoring for the project emissions from incremental transportation distances for inert waste/ash is now added in section 5.2 and ER sheet. 2. VVB has assessed and the revised/updated VR section 3.3.6/3.3.8 accordingly. Verra Response Sections 4.4, 5.2 and the GHG ERR spreadsheet have been updated to clarify freight transport distance is equivalent to the distance between households to landfill site, and now includes project emissions from transportation for disposal of ash and inert waste. This finding is now closed.	

11	Missing information on ex-ante calculation of ERs		
	Issue (a) The PD does not indicate how the ex-ante values of W,x (%composition) have been estimated. (b) Under the Ex-ante ER spreadsheet submitted, TAB-RDF_Project emission, for the values for the Moisture/Dry matter content the source is not referenced and it is not clear how they have been	**Round 1** VVB Response (a) The data/parameter "weight fraction of the waste type j in the sample n collected during the year x ($p_{n,j,x}$)" is estimated through random samples collected after the pre-processing section (i.e.) from the vibro feeder, out of which representative sample of 25 kg is taken for analysis. The waste composition based on the waste types j are segregated	Closed

	calculated, the PD does not refer to their calculation/monitoring. (c) It is not clear why for the ex-ante calculation, FRf,m is considered as zero. Action item 1. The VVB must ensure that the project proponent includes all the monitoring information as required by paras. 33 and 34 of AMS-III.F, v.12.0. 2. The VVB must verify this information and update the VR as needed. Program Rule(s) *VCS Project Description Template v.4.2,* Section 4.4 *VCS Validation Report Template v.4.2,* Section 3.3.6	and weighed for each waste fraction (measured on wet basis). PP will ensure sampling will be done on quarterly basis with minimum of three samples. The same has been provided in section 5.2 of the PD which is checked and confirmed. Section 3.3.8 of VR is revised . (b) The default dry matter content in % wet waste is sourced from Table 2.4, chapter 2, volume 5 of IPCC 2006 guidelines. The monitoring parameter has been updated in section 5.1 of the PD and the ER sheet. (c) The data for total mass of freight transported in freight transportation for activity f ($FR_{ash,m}$ and $FR_{inert,m}$) has been updated in the PD 4.3 / 5.2 and ER calculation. 1. PD has now included all the monitoring information as required by paras. 33 and 34 of AMS-III.F, v.12.0 in the revised PD 5.2 and ER sheet which is checked and confirmed. 2. VVB has assessed and the revised/updated VR section 3.3.6/3.3.8 accordingly. Verra Response Section 5.2 of the PD, the VR and the GHG ERR spreadsheet have been updated to include further explanation on the values of the ex-ante estimated data/parameters. This finding is now closed.	

12	Missing equipment calibration information		
	Issue The PD does not identify the calibration frequency for the electricity meters and weighbridge used to measure pn,j,x. Action item 1. The VVB must ensure that the project proponent includes the calibration information of the weighbridge used to	**Round 1** VVB Response 1. The calibration frequency for the electricity meters is added for the respective monitoring parameters and weighbridge details have been updated in section 5.2 instead of section 4 of the PD which is found appropriate and checked and confirmed.	Closed

	measure pn,j,x and the electricity meters under Section 4 of the PD. 2. The VVB must verify this information and update the VR as needed. Program Rule(s) *VCS Project Description Template v.4.2,* Section 5 *VCS Validation Report Template v.4.2,* Section 3.3.8	2. VVB has assessed and the revised/updated VR section 3.3.8 accordingly. Verra Response Section 5.2 of the PD has been updated to include calibration frequency information. This finding is now closed.	

13	Further information on closure of CL05		
	Issue As per the information presented in the VR CL05, it is not clear how the finding has closed for point 2 (i.e., how the streams of fly ash and inert waste are being treated). Action item 1. The VVB must clarify how point 2 of CL05 has been closed and update the VR as needed. Program Rule(s) *VCS Validation Report Template v.4.2,* Appendix	**Round 1** VVB Response TO provide better clarity for a 3rd party, the closure of point 2 of CL 05 is now updated. The assessment conclusion in the CL05 in appendix 3 of VR is revised now in line with the revised PD and on-site interviews/observations as below: *"PP has revised project boundary in line with para 21 (c) which is checked and confirmed. PP has also included parameter Q,y,ash as a part of monitoring parameter in section 5.2 of PD which is confirmed. As responded by PP, the generated bottom ash and fly ash will be handed over to brick manufacturers and a quantity of the disposed ash will be recorded. Project emissions for incremental distance for waste disposal will be monitored which is found acceptable. For inert waste, the same will be disposed of in the landfill which was confirmed during on-site interviews. The amount of inert waste and incremental distance will be monitored as mentioned in the revised PD which is checked and confirmed. Hence this part of CL is closed."* Verra Response CL05 of the VR has been updated to provide more detailed description of how bottom ash, fly ash and inert waste are treated. This finding is now closed.	Closed