




**Validation report form for GS project activities
(Version 4.0)**

Complete this form in accordance with the instructions attached at the end of this form.

BASIC INFORMATION

Title of the project activity	Aluminum Recycling – A Solution for CO2 Emission Reduction by AS METAL, Romania GS ID: 10878 listed on 12 th November 2020
Version number of the validation report	Version 2.0
Completion date of the validation report	16 th December 2023
Version number of the PDD to which this report applies	PDD: Version 4.0 dated 11 th October 2023
Project participants	AS Metal COM SRL
Host Party	Romania
Applied methodologies and standardized baselines	Sectoral Scope 13. Waste Handling and Disposal Methodology: AMS-III.AJ. Recovery and recycling of materials from solid wastes version 9.0
Sectoral scopes linked to the applied methodologies	Sectoral Scope 13. Waste Handling and Disposal Note: As per CDM Standard- Applicability of sectoral scope v1.0, AMS.III.AJ falls under sector 13 only. https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20160314113213746/accr_stan03.pdf
Estimated amount of annual average GHG emission reductions or GHG removals by sinks	56,282 tCO ₂ e per year
Name and reference number of the VVB	EPIC Sustainability Services Private Limited (Report no: ESSPL/GS/2021/084) Scope of DOE: GS validation
Name, position and signature of the approver of the validation report	R. B. Venkataramanaiah Director (approver of this report) 

SECTION A. Executive summary

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AS metal COM SRL had contracted EPIC Sustainability Services Private Limited (hereinafter referred to as EPIC) to perform GS validation of the project titled “Aluminum Recycling – A Solution for CO2 Emission Reduction by AS METAL, Romania” (hereinafter called “the project activity”), contract dated 4th August 2021. The purpose of project activity is recycling Aluminium Waste, reducing energy consumption that would otherwise be required for the production of virgin inputs for the production of Aluminium products, and consequently reducing greenhouse gases emissions. As per the PDD, the output capacity of the Aluminium recycling plant is given by the types of processed Aluminium waste is between 49,000 up to 77,500 tons/year. The project is located in Buzau county, in the city of Bucharest-Ilfov, Romania.

The scope of the GS-VVB is GS Validation which includes independent assessment of the project against GS Validation requirements. This report summarizes the findings of the validation of the project, performed on the basis of, GS requirements as well as criteria given to provide for consistent project operations, monitoring and reporting.. The validation team has, based on the recommendations in the GS Principles & requirements v1.2, GS Product Requirements v2.2, GS Safeguarding Principles & Requirements v1.2 and employed a risk-based approach in the validation, focusing on the identification of significant risks and reliability of project monitoring and generations of GS-VERs. The validation has confirmed that applicable version of methodology (AMS.III.AJ version 9.0) was valid at the time of registration of the project under GS. EPIC has employed a risk-based approach in the validation based on the recommendations in the requirements focusing on validity of applied methodology, baseline, monitoring plan and emission reduction calculations as documented in the PDD version 4.0. The request for GS registration corresponds to version 4.0 of the PDD (hereinafter referred to as final PDD). The validation is not meant to provide any consulting towards the client. However, the stated requests for clarifications and/or corrective actions may provide input for improvement of the project design.

SECTION B. Validation team, technical reviewer and approver**B.1. Validation team member**

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of DOE or outsourced entity)	Involvement in			
						Desk/document review	On-site inspection	Interviews	Validation findings
1.	Lead Auditor	IR	Radhamadha van	Vijayaraghavan	EPIC	√	x	√	√
2.	Technical Expert - Romania	E R	Bogdan	Seto Constantin	External expert of EPIC	√	x	√	√

B.2. Technical reviewer and approver of the validation report

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of DOE or outsourced entity)
1.	Technical reviewer (till June 2023)	IR	M.P	Prasanna	EPIC
2.	Technical reviewer (From July 2023)	IR	Lakshman	Karthik	EPIC
3.	Approver	IR	R. B	Venkataramanaiah	EPIC

SECTION C. Means of validation**C.1. Desk/document review**

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As a first step, the validation team has reviewed the PDD (version 1.0) (hereinafter referred to as initial PDD), and additional background documents submitted by the project participant. As a result of these findings, the PP has submitted the final PDD) addressing the issues.

C.2. On-site inspection

Duration of on-site inspection: 8th December 2021 (Remote)				
No.	Activity performed on-site	Site location	Date	Team member
1.	<ul style="list-style-type: none"> • General information about the project. • Serious consideration of GS revenue. • Chronology of Events/ Implementation cycle of the project activity. • Barriers faced/overcome in the processes (additionality) • Local Stakeholder consultation processes • Legal/ Statutory Clearances and Agreements Signed • Baseline determination • Application of appropriate Methodology • Operation and maintenance Procedures • Technical details of project • Data monitoring and storage practices • Calibration and maintenance requirement of the equipment • Monitoring Methodology • Review of the implementation status of the project activity. • Review of applicability conditions of the applied GS baseline and monitoring methodology and applicable methodological tools. • Check on applicable national policies and regulations and their eventual impacts in terms of changing of the baseline scenario ad baseline emissions. • Validation of the values of ex-ante determined parameters. • Review of the Monitoring plan. • Validation of Stakeholder Consultation by interviewing the stakeholders. • Validation of Safeguarding principles and its indicators/ Sustainable Development Monitoring Plan and mitigation measures. • Validation of Sustainable Development Assessment. • Validation of Sustainable 	Remote	8 th December 2021 (Remote)	Validation team members

	Development indicators with respect to the level of risk associated with the Safeguarding Principles			
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Note: The remote auditing was conducted on 8th December 2021 as an alternative measure. As per para 3.2.1 of Site Visit and Remote Audit Requirements & Procedures, “A physical site visit by VVB is not mandatory at the validation (Design Certification or Design Certification Renewal) of a project”. Moreover, physical onsite was not possible due to travel restriction due to COVID situation. The project developer has requested the validation team to do remote audit due to COVID condition prevailing at that time.

The validation team has determined that remote audit was viable for this project as a physical audit is not mandatory. The validation team has prepared an audit plan that covers all aspects of project design with suitable auditing techniques and risk assessment. From the remote auditing, the validation team was able to achieve reasonable level of assurance. There is no risk on safeguarding principles as validation team has able to check all the relevant principles. There is no reversal of GHG benefits for waste management projects. The validation team has reviewed the methodology requirements and confirmed that the project implementation is in line with the requirements. There is no negative comment from GS stakeholders. The validation team has able to interview the stakeholders. Based on this, the validation team has determined that remote auditing can substitute the physical onsite visit. Appendix 10- “Site Visit and Remote Audit Requirements & Procedures”, Appendix 11- “Applicability of minimum site visit requirements by VVB” and Appendix 12- “Requirements-COVID 19: INTERIM MEASURES” of the validation report is revised accordingly.

C.3. Interviews

No.	Interviewee			Date	Subject	Team member
	Last name	First name	Affiliation			
1.	Apostol,	Constantin	AS Metals	8 th December 2021	AS Metals	Validation team members
2.	Jurca	Mihnea	AS Metals	8 th December 2021	AS Metals	Validation team members
3.	Mirea	Alexandra	AS Metals	8 th December 2021	AS Metals	Validation team members
4.	Fometescu	Casiana	Carbon Expert- CDM/GS Consultant	8 th December 2021	As above	Validation team members
5.	Laibar	Alexandru	Circular Economy- CERC- Executive Director- Bucharest	7 th March 2023	As above	Validation team members
6.	Barrol	Leo	Ecoact	15 th March 2023	As above	Validation team members
7.	-	-	EcoTeca (answers sent on behalf of company)	22 nd January 2023	As above	Validation team members
8.	Dornean	Radu	Local stakeholder - individual	22 nd January 2023	As above	Validation team members
9.	Chestionar	Mihai Butu	Local stakeholder - individual	22 nd January 2023	As above	Validation team members
10.	-	Dumitru Ciutescu	Local stakeholder -individual Popesti-Leordeni	22 nd January 2023	As above	Validation team members
11.	-	Richard MOLNAR	Local stakeholder - individual - Bucuresti	22 nd January 2023	As above	Validation team members
12.	-	-	Circular Economy(answers sent on behalf of company)	22 nd January 2023	As above	Validation team members

C.4. Sampling approach

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No sampling approach is used for this validation scope by the validation team.

C.5. Clarification requests (CLs), corrective action requests (CARs) and forward action requests (FARs) raised

Areas of validation findings	No. of CL	No. of CAR	No. of FAR
Demonstration of prior consideration of the CDM	0	0	0
Identification of project type	0	0	0
General description of project activity	1 (CL 1)	0	2 (FAR 1 and FAR 6)
Application and selection of methodologies and standardized baselines	0	0	0
- Application of methodologies and	0	1 (CAR 1)	0

standardized baselines			
- Deviation from methodology and/or methodological tool	0	0	0
- Clarification on applicability of methodology, tool and/or standardized baseline	0	0	0
- Project boundary, sources and GHGs	0	0	0
- Baseline scenario	0	0	0
- Demonstration of additionality	0	0	0
- Estimation of emission reductions or net anthropogenic removals	0	1 (CAR 2)	0
- Monitoring plan	0	0	0
Start date, crediting period type and duration	0	0	1 (FAR 7)
Environmental impacts	0	0	0
Local stakeholder consultation	0	0	0
Sustainable development co-benefits	0	0	0
Approval	0	0	0
Authorization	0	0	0
Modalities of communication	0	0	0
Global stakeholder consultation	0	0	0
Others (please specify)- Lifetime	1 (CL 1)	0	0
Others (please specify)- Stakeholder feedback consultation	0	0	2 (FAR 4, FAR 5)
Others (please specify)- SDG			2 (FAR 2, FAR 3)
Total	1	2	7

SECTION D. Validation findings

D.1. Demonstration of prior consideration of the GS

Means of validation	The validation team has determined whether GS benefits were considered necessary in the decision to undertake the project as a proposed project activity if the starting date of the proposed project activity is prior to the start of validation, which is the date of publication of the PDD for global stakeholder consultation.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	The project was listed on 12 th November 2020 by GS after reviewing the prior consideration documents. Refer Appendix 5 of this report for details.

D.2. Identification of project type

Means of validation	The validation team has determined whether the project participants identified the type of project activity they intend to design and implement in accordance with the “CDM project standard for project activities”. The validation team has determined whether the PDD has been completed using the valid version of the PDD form appropriate to the type of the proposed project activity.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	The project design document used the latest version of the template which was active at the time of registration of the project under GS and hence acceptable. All sections of the PDD are verified and found to be filled in accordance with the instructions provided in the PDD template.

D.3. General description of project activity

Means of validation	The validation team has determined whether the description of the proposed project activity in the PDD is accurate, complete, and provides an understanding of the proposed project activity.
Findings	One CL (CL 1) and two FARs (FAR 1 and FAR 6) were raised in this section.
Conclusion	The purpose of the project is recycle post-consumer obsolete waste mainly Aluminum waste. The output capacity of the project is 49,500 to 77,500 tonnes per year. In the absence of the project, the same waste would be sent to landfill only. In the absence of the project, equivalent energy use would be consumed in the production of virgin Al materials. Hence this project as treated as waste management projects. Based on the onsite observation, the validation team has

	confirmed correctness and accuracy of site location, project design, envisaged installed capacities of the major equipments, processes, power requirements of the project activity
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D.4. Application and selection of methodologies and standardized baselines

D.4.1. Application of methodologies and standardized baselines

Means of validation	The validation team has validated whether the selected methodologies and, where applicable, the selected standardized baselines are applicable to the proposed project activity and that the selected versions are valid at the time of submission of the proposed project activity for registration.
Findings	One CAR (CAR 1) was raised in this section.
Conclusion	The validation has confirmed that applicable version of methodology (AMS.III.AJ v9.0 latest and valid since 8 th Sep 2022) was valid at the time of registration of the project under GS (Date of registration = 9 th Aug 2023, pending GS design certification review) and project activity satisfied all the applicable conditions of the applied methodology. Refer Appendix 14 of this report for details.

D.4.2. Deviation from methodology and/or methodological tool

Means of validation	The validation team has determined whether the PDD deviated from the approved baseline and monitoring methodology and/or methodological tool.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	There is no deviation from the applied methodology.

D.4.3. Clarification on applicability of methodology, tool and/or standardized baseline

Means of validation	The validation team has determined to ensure that the clarification request if any is not submitted with the intention of revising an approved methodology, an approved tool and/or an approved standardized baseline to expand its applicability.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	There is no such request.

D.4.4. Project boundary, sources and GHGs

Means of validation	The validation team has determined 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 selected methodology and, where applicable, the selected standardized baseline are included within the project boundary for the purpose of calculating project and baseline emissions for the proposed project activity.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	All main GHG emission sources, the physical delineation of the proposed project activity and other relevant project and baseline emission sources covered in the selected methodology and, where applicable, the selected standardized baseline are included within the project boundary for the purpose of calculating project and baseline emissions for the proposed GS project activity. According to the methodology, the project boundary includes the physical geographical sites of (a) Waste collection sites (e.g. door-to-door collection), (b) The recycling facility, (c) Processing/manufacturing facility; (d) Virgin material production; and (e) MSW disposal site or treatment plant in the baseline scenario.

D.4.5. Baseline scenario

Means of validation	The validation team has determined whether the baseline identified for the proposed project activity is the scenario that reasonably represents the anthropogenic emissions by sources of GHGs that would occur in the absence of the project activity and determined whether any procedure contained in the methodology to identify the most reasonable baseline scenario has been correctly applied.
Findings	No CAR/CL/FAR raised in this section.
Conclusion	As per para 23of the applied methodology, baseline is associated with energy consumption for the production of AI materials from virgin plastic materials. For the production of metals, emissions associated with energy consumption for the

	<p>production from virgin materials, displacing the production of virgin materials in dedicated facilities, thereby resulting in avoidance of energy use. Hence accepted by the validation team.</p> <p>As per para 23d of the applied methodology, emissions associated with energy consumption for the production from virgin materials. The project is estimated to be recycle 9,370.057 tonnes of Aluminium waste every year. So, in the absence of the project, 56,282 tonnes of CO₂ associated with energy consumption for the production from Virgin Aluminum from bauxite ore (primary Aluminium), would be emitted to the atmosphere every year. In the absence of the project, 9,370.057 tonnes of Aluminium waste would be deposited in the landfill.</p> <p>The validation team has reviewed the document" File 39, 49 List of landfills.pdf". The validation team has observed that there are 46 landfills in Romania and only 3 are from Bucharest-Ifov region. So, there is no chance of diversion of waste from these landfills to this project.</p>
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D.4.6. Demonstration of additionality

Means of validation	The validation team has determined whether the proposed project activity is additional as demonstrated in the PDD; determined whether GS benefits were considered necessary in the decision to undertake the project as a proposed project activity; assessed the list of identified credible alternatives to the proposed project activity in the PDD selected to determine the most realistic baseline scenario; if barrier analysis was used to demonstrate the additionality of the proposed project activity, the validation team has determined whether the proposed project activity faces barriers that prevent the implementation of this type of proposed project activity or that do not prevent the implementation of at least one of the alternatives; For proposed large-scale project activities, unless the proposed project type is a first of its kind as determined in accordance with the relevant guidelines, the validation team has assessed whether the project participants have conducted a common practice analysis.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	<p>The validation team has checked whether PP has demonstrated additionality and identified baseline in line with the latest approved version of the "Tool for the demonstration and assessment of additionality" version 7.0.0 (hereinafter referred to as additionality tool). The validation team checked if all the assumptions and data used by the project participants are listed in the PDD, including their references and sources, all documentation used is relevant for establishing the baseline scenario and correctly quoted and interpreted in the PDD, assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence and can be deemed reasonable, the approved baseline methodology has been correctly applied to identify the most plausible baseline scenario and the identified baseline scenario reasonably represents what would occur in the absence of the proposed project activity.</p> <p>Refer Appendix 15 of this report for details.</p>

D.4.7. Estimation of emission reductions or net anthropogenic removals

Means of validation	The validation team has determined whether the steps taken and the equations and parameters applied in the PDD to calculate project emissions, baseline emissions, leakage and emission reductions comply with the requirements of the selected methodology including applicable tool(s) and, where applicable, the selected standardized baseline and the "Standard for sampling and surveys for GS project activities and programme of activities."
Findings	One CAR (CAR 3) was raised in this section.
Conclusion	Refer Appendix 14 of this report for details.

D.4.8. Monitoring plan

Means of validation	The validation team has determined whether the description of the monitoring plan included in the PDD complies with the approved monitoring methodology including applicable tools and, where applicable, the "Standard for sampling and surveys for
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	GS project activities and programme of activities"; confirmed whether the PPs have chosen to delay the submission of the monitoring plan for the proposed project activity.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	Refer Appendix 14 of this report for details.

D.5. Start date, crediting period type and duration

Means of validation	The validation team has determined whether the PPs defined the Start date of the proposed project activity, expected operational lifetime; type and duration of the crediting period and start date of the crediting period of the proposed project activity in accordance with relevant requirements in the Project standard.
Findings	One FAR (FAR 7) was raised in this section.
Conclusion	The validation team has verified the Start date of the proposed project activity, expected operational lifetime; type and duration of the crediting period and start date of the crediting period of the proposed project activity in accordance with relevant requirements in the Project standard. The validation team, based on the site visit and document review, was able to conclude that the project activity has been commissioned and implemented as per the registered PDD. The Gold Standard requirements allows that the project proceeding under the retroactive project cycle, is eligible for retroactive crediting for realized emission reductions prior to Gold Standard registration of a maximum period of two years.

D.6. Environmental impacts

Means of validation	he validation team has determined whether the PPs conducted an analysis of the environmental impacts of the proposed project activity including transboundary impacts, and whether those impacts are considered significant by them.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	The validation team has reviewed the environmental permits received for this project and hence accepted the same. Refer Appendix 5 of this report for details.

D.7. Local stakeholder consultation

Means of validation	The validation team has determined whether the PPs completed a local stakeholder consultation process and that due steps were taken to engage stakeholders and solicit comments for the proposed project activity.
Findings	Two FARs (FAR 4 and FAR 5) were raised in this section.
Conclusion	Refer Appendix 7 of this report for details.

D.8. Sustainable development co-benefits

Means of validation	The validation team has determined how the PP intends to monitor sustainable development co-benefits of the proposed project activity was developed by the project participants separately from the monitoring plan.
Findings	Two FARs (FAR 2 and FAR 3) were raised in this section.
Conclusion	Refer Appendix 14 of this report for details.

D.9. Approval

Means of validation	The validation team has determined whether (DNA) of each Party indicated as being involved in the proposed project activity has provided a written letter of approval.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	This requirement is not applicable for a GS-VER project.

D.10. Authorization

Means of validation	The validation team has determined whether each project participant of the proposed project activity or PoA has been authorized by at least one Party involved in a letter of approval.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	This requirement is not applicable for a GS-VER project.

D.11. Modalities of communication

Means of validation	The validation team has checked the corporate identity of all PPs, and focal points included in the MoC statement, as well as the personal identities, including specimen signatures and employment status, of their authorized signatories and has checked that the MoC statement has been correctly completed and duly authorized.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	This requirement is not applicable for a GS project.

D.12. Global stakeholder consultation

Means of validation	The validation team has determined whether authentic and relevant comments in the global stakeholder consultation were taken into due account in the PDD of the proposed project activity.
Findings	No CAR/CL/FAR is raised in this section.
Conclusion	This requirement is not applicable for a GS project.

SECTION E. Internal quality control

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After the completion of assessment by the validation team all the relevant documentation is submitted to a qualified, Independent Technical reviewer as part of EPIC' internal quality control system. A Technical reviewer team is appointed to review the draft final validation report (Draft FVR). The comments made by the Technical reviewer team are taken into consideration and incorporated in the final FVR. The technical reviewer team assesses whether all the reporting requirements have been fulfilled and whether all the issues raised were closed satisfactorily by the validation team with justification. The technical review process can also raise issues in this regard which is resolved further by the validation team to the satisfaction of the technical reviewer. The technical reviewer team either accepts or rejects the report made by the validation team. The final report (after resolutions of all findings) is then submitted to the Head-operations for review and approval.

SECTION F. Validation opinion

>>EPIC has performed the validation of the GS project "Aluminum Recycling – A Solution for CO2 Emission Reduction by AS METAL, Romania" GS ID: 10878. The validation was performed in accordance with the Gold Standard Principles & requirements v1.2 and included the assessment of the following issues:

- Evaluation of the impact of new relevant national and / or sectoral policies and circumstances on the previously determined baseline taking into account relevant guidance from the CDM Executive Board;
- Evaluation of the correctness of the application of the approved methodology for the determination of the baseline, and the estimation of emission reductions of the project activity.
- Evaluation of stakeholder Consultation by interviewing the stakeholders.
- Evaluation of Sustainable Development Monitoring Plan and mitigation measures.
- Validation of Sustainable Development indicators with respect to the level of risk associated with the Safeguarding Principles

The review of the final PDD and the subsequently performed follow-up interviews with representatives of the project participant have provided the validation team with sufficient evidence to determine the validity of the baseline scenario.

The validation team has concluded that final PDD uses the valid version of the PDD template and all the necessary instructions are followed in preparing the PDD. The project activity conforms with all the applicable conditions of the valid version of the applied methodology. The baseline, the estimated GHG emission reductions and the monitoring plan in the final PDD comply with the applicable requirements. The Sustainable Development Monitoring Plan and Sustainable Development indicators comply with the applicable requirements of Gold Standard.

In our opinion, the project activity meets all relevant GS requirements and hence EPIC recommends the registration of the project under GS.

Project title:	Aluminum Recycling – A Solution for CO2 Emission Reduction by AS METAL, Romania
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	(GS id: 10878)
PDD submitted for RFR	PDD: Version 4.0
Sector and applied methodology	Sectoral Scope 13. Waste Handling and Disposal Methodology: AMS-III.AJ. Recovery and recycling of materials from solid wastes version 9.0
Estimated annual GS-VER	56,282 tCO ₂ e per year

Appendix 1. Abbreviations

Abbreviations	Full texts
AAU	Assigned Amount Unit
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CL	Clarification request
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CSR	Corporate Social Responsibility
DNA	Designated National Authority
DNHA	Do-No Harm Assessment
DOE	Designated Operational Entity
EFSA	European Food Safety Authority
EU-ETS	European Union Emission Trading Scheme
FAR	Forward Action Request
FVR	Final Validation Report
GHG	Greenhouse gas(es)
GWP	Global Warming Potential
ILO	International Labour Organisation
IPCC	Intergovernmental Panel on Climate Change
MP	Monitoring Plan
MR	Monitoring Report
MSW	Municipal Solid Waste
NERA	National Energy Regulatory Authority, Romania
OECD	Organisation for Economic Co-operation and Development
OHSAS	Occupational Health and Safety Assessment
PDD	Project Design Document
PP	Project Participant
PPE	Personal protective equipment
RON	Romanian Currency-lew
SEAP	Sustainable Energy Action Plan
SEC	Specific Electricity Consumption
SFC	Specific Fuel Consumption
SFR	Stakeholder Feedback Round
UNFCCC	United Nations Framework Convention on Climate Change
VVS	Clean Development Mechanism Validation and Verification Standard

Appendix 2. Competence of team members and technical reviewers

The following validation team has been assigned to carry out the verification of the project.

Name	Mr. R. Vijayaraghavan	Seto Constantin Bogdan	M.P. Prasanna (till June 2023) Karthik Lakshman (from July 2023)
Role	Lead Auditor	Host country expert (Romania)	Technical Reviewer
Competence in relevant sectors	Sector 1 and 13	Sector 13	Sector 1 and 13
Responsibility	Document review, onsite, DVR preparation, DVR resolution, FVR preparation	Document review, onsite	Technical review

Mr. R. Vijayaraghavan holds BE in Mechanical Engineering, M. Tech in Energy Conservation and Management and MBA in Technology Management. He is certified as Energy Auditor by Bureau of Energy Efficiency (BEE), Government of India. He has 12 years of working experience in energy sector including validation / verification of CDM, VCS and GS projects. He has undergone extensive training on CDM validation and verification and has been qualified as Lead Auditor for sector 1 and sector 13. He has also attended quarterly webinar conducted by GSF on 7th August 2014, 23rd July 2015, 27th January 2016, 8th December 2016, 9th Feb 2017, 27th March 2017, 13th Sep 2017, 23rd Sep 2017 –recorded webinar and 13th February 2018 for eligibility for fast track procedure. He has also involved in validation and verification of GS projects as lead auditor, thus having prior experience in validating the GS projects.

Mr. Seto Constantin Bogdan has a Doctoral studies in the Environmental Protection domain in Technical University “Gheorghe Asachi” Iași, Faculty of Engineering and Environmental Protection “Cristofor Simionescu and has Master’s degree. Study domain- Environment Engineering. Study program – Management, waste treatment and recovery. He has more than 12 years of experience in waste management field. He is based in Romania.. He has excellent communication skills, the ability to multitasking, he is computer literate and good in English and Romanian.

Mr. Prasanna, holds a B.E in Mechanical Engineering. He has around 30 years of industry experience and is qualified as an auditor for various GHG / Energy reduction project audits in various countries under various standards and protocols.

Mr. Karthik Lakshman holds a Bachelor of Engineering degree in Mechanical Engineering. He has been evaluated as a Lead auditor and technical expert for sector 1 in accordance with the accreditation procedures of EPIC.

Appendix 3. Documents reviewed or referenced

No.	Author	Title	References to the document	Provider
1	GS	GS Principles & requirements v1.2 https://globalgoals.goldstandard.org/101-par-principles-requirements/	1	Publicly available
2	GS	GS Product Requirements v2.2 https://globalgoals.goldstandard.org/501-pr-ghg-emissions-reductions-sequestration/	2	Publicly available
3	GS	GS Safeguarding Principles & Requirements v1.2 https://globalgoals.goldstandard.org/103-par-safeguarding-principles-requirements/	3	Publicly available
4	UNFCCC	CDM approved methodology AMS.III.AJ v9.0 https://cdm.unfccc.int/methodologies/DB/LOWIXM9S6DVO7DGXB21DPVLE8N3VB9	4	Publicly available
5	PP	Initial PDD v1.0 and corresponding ER sheet Final PDD v4.0 (Request for Registration) and corresponding ER sheet	5	PP
6	GS/PP	GS Preliminary review report	6	PP
7	UNFCCC	Tool for the demonstration and assessment of additionality” version 7.0.0 https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-01-v7.0.0.pdf Additionality of first-of-its-kind project activities v3.0 https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-23-v1.pdf Tool 21- Demonstration of additionality of small-scale project activities v13.1 https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-21-v13.1.pdf	7	Publicly available

8	PP	LSC documents and support documents Interview results of Local stakeholders (conducted by EPIC) Agenda Stakeholders Meeting_AS METAL_09.12.2020 GS e-mail answer LSC 26.11.2020 Stakeholders List_As Metal_final	8	PP
9	UNFCCC	CDM Standard Applicability of sectoral scopes v1.0 https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20160314113213746/accr_stan03.pdf	9	Publicly available
10	GS	STAKEHOLDER CONSULTATION AND ENGAGEMENT REQUIREMENTS v2.1 https://globalgoals.goldstandard.org/102-par-stakeholder-consultation-requirements/	10	Publicly available
11	ILO	International Labour Organisation website https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103487	11	Publicly available
12	GS	Gender Equality Requirements and Guidelines v1.1 https://globalgoals.goldstandard.org/104-par-gender-equality-requirements-and-guidelines/	12	Publicly available
13	GS	Site Visit and Remote Audit Requirements & Procedures https://globalgoals.goldstandard.org/112_par_site-visit-and-remote-audit-requirements-and-procedures/	13	Publicly available
14	GS	Applicability of minimum site visit requirements by VVB https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/	14	Publicly available
15	GS	COVID 19: INTERIM MEASURES https://globalgoals.goldstandard.org/ru-2022-covid-19-interim-measures-update/	15	Publicly available
16	GS	GS Validation and Verification Standard V1.0 https://globalgoals.goldstandard.org/113-par-validation-and-verification-standard/	16	Publicly available
17	PP/EPIC	EPIC PP contract for conducting validation dated 4 th Aug 2021	17	PP
18	PP/GS	Date first submission GS 02.10.2020. doc	18	PP
19	PP/GS	Deviation-Request-LSC- AS Metal_31.03.2021	19	PP
20	PP	SDG indicators_year2020_AS Metal_22.09.2021_v2	20	PP
21	PP	Document to support SDG3_1 Number of new health workforce recruited each year	21	PP
22	PP	Document to support SDG4_1 The number of young people with internships at the recycled plant by sex	22	PP
23	PP	Document to support SDG4_2 The number of relevant skilled employed youth under 35	23	PP
24	PP	Document to support SDG4_3 The number of employees trained on recycling vocational skills	24	PP
25	PP	Document to support SDG4_4 The number of people trained on recycling, sustainable development and circular economy	25	PP
26	PP	Document to support SDG4_5 Number of training sessions to promote recycling and sustainable development	26	PP
27	PP	Document to support SDG5_1 Number of women employed by project activity	27	PP
28	PP	Document to support SDG5_2 total employment by the project activity	28	PP
29	PP	Document to support SDG5_3 Number of women in managerial positions	29	PP
30	PP	Document to support SDG5_4 Proportion of women in managerial positions in total management positions	30	PP
31	PP	Document to support SDG7_1 Proportion of renewable energy measured in total consumed energy	31	PP

32	PP	Document to support SDG7_2 Energy saving	32	PP
33	PP	Document to support SDG8_1 Number of people employed by the project activity	33	PP
34	PP	Document to support SDG8_2 Number of training sessions on safety and health at working environment	34	PP
35	PP	Document to support SDG8_3 Number of trainings regarding the technical services required to operate the recycling plant	35	PP
36	PP	Document to support SDG8_4; SDG8_5 Number of technical equipment checks and maintenance interventions	36	PP
37	PP	Document to support SDG9_1 Number of local people employed by the project activity	37	PP
38	PP	Document to support SDG9_2 total employment by the project activity	38	PP
39	PP	Document to support SDG11_1 Quantity of the municipal metal waste collected by the project activity	39	PP
40	PP	Document to support SDG11_2 Project Aluminum waste collected	40	PP
41	PP	Document to support SDG11_3 Project other metal waste collected	41	PP
42	PP	Document to support SDG12_1 Quantity of recycled Aluminum per year	42	PP
43	PP	Document to support SDG12_2 Quantity of recycled metals (other than Aluminum) per year	43	PP
44	PP	Document to support SDG17 Partnerships	44	PP
45	Romanian Government	Certificate of incorporation of PP	45	PP
46	European Union	Section A - European Industrial Standards-Recyclable materials EN 13920 1-16 SR EN 13920-1 SR EN 13920-2 SR EN 13920-3 SR EN 13920-4 SR EN 13920-5 SR EN 13920-6 SR EN 13920-7 SR EN 13920-8 SR EN 13920-9 SR EN 13920-10 SR EN 13920-11 SR EN 13920-12 SR EN 13920-13 SR EN 13920-14 SR EN 13920-15 SR EN 13920-16	46	PP
47	PP/ Excel Metal	Agreement between Excel Metal with PP on double counting	47	PP
48	PP/ Loaker	Agreement Loaker between with PP on double counting	48	PP
49	PP/ NordferroIndustry	Agreement NordferroIndustry between with PP on double counting	49	PP
50	PP/ Pajurca Metal	Agreement Pajurca Metal Group between with PP on double counting	50	PP
51	PP/ Remat Brasov	Agreement Remat Brasov between with PP on double counting	51	PP
52	PP/ Remat Vrancea	Agreement Remat Vrancea between with PP on double counting	52	PP
53	PP/ REMATHOLDING	Agreement REMATHOLDING between with PP on double counting	53	PP

54	PP/ Romrecycling	Agreement Romrecycling between with PP on double counting	54	PP
55	PP/ Sergnef	Agreement Sergnef between with PP on double counting	55	PP
56	PP/ Remat Ilfov	Agreement Remat Ilfov between with PP on double counting	56	PP
57	PP	Internal Registration documents	57	PP
58	PP/Carbon expert	Proposal to AS Metal_Carbon Expert_17.11.2019	58	PP
59	PP/Carbon expert	Signed agreement Carbon Expert_AS METal_15.09.2020	59	PP
60	PP	PP's Decision from 03.04.2019 and Decision from 07.09.2020	60	PP
61	PP/GS	Email communications with GS by PP	61	PP
62	EU	Section A - Regulation 333□2011	62	PP
63	PP	Section A - Contract leasing Anexa 12 Optical sorting machine TOMRA.	63	PP
64	PP	Section A - Invoice Ctr leasing 2017-5616	64	PP
65	PP	Section 1.1 - Data Preview July 23, 2021	65	PP
66	Romanian Government	Section A 1.2 - Certificate of registration AS METAL	66	PP
67	Romanian Government	Section A 1.2 - Constitutive act	67	PP
68	PP	Section A 1.2 - Cover letter_signed AS METAL	68	PP
69	PP	Section A 1.2 - Terms and conditions _signed AS METAL	69	PP
70	PP	Video AS METAL .mp4	70	PP
71	PP	ODA Declaration_AS Metal_18.11.2020	71	PP
72	Alro	ALRO - Scheme EU ETS	72	PP
73	PP	List of suppliers and customers	73	PP
74	PP	Scrap use statement	74	PP
75	PP	Waste purchase contract Rematholding CO SRL	75	PP
76	PP	Waste purchase contract Nordferro Industry	76	PP
77	PP	Scrap deliveries contract ALRO	77	PP
78	PP	List of authorized economic operators according to Article 15 paragraph 2 of Law 211-2011	78	PP
79	CERC	Study Confirmation Letter CERC _AS METAL COM	79	PP
80	Rinasimtex	Certificate 333 -AS METAL COM SRL	80	PP
81	Rinasimtex	Declaration of conformity	81	PP
82	PP	Technical sheet scrap- Reg 333	82	PP
83	PP	List of landfills	83	PP
84	PP	Bauxita (English (American) literature	84	PP
85	PP	Action plan circular economy package	85	PP
86	EU	Commission Decision of 18 December 2014 amending Decision 2000□532 □ EC establishing a list of wastes under Directive 2008□98 □ EC of the European Parliament and of the Council.	86	PP
87	Romanian Government	Law 211□2011 on the waste	87	PP
88	Romanian Government/ EU	Regulation 333□2011	88	PP
89	EU	The waste framework Directive 2008□98□EC	89	PP
90	Romanian Government	Minister response on AS metals' installation for recycling activities	90	PP
90	Calibration agency	Calibration certificates weighting system	90	PP
91	PP	Electricity consumption of the recycling facility	91	PP
92	PP	Diesel consumption of the recycling facility 2020	92	PP
93	PP	Electricity label 2020	93	PP

94	PP	Natural gas consumption of the recycling facility.	94	PP
95	PP	Number of accidents and incidents	95	PP
96	PP	Statement - Expected operational lifetime of project	96	PP
97	PP	Document to support SDG7 Affordable and clean energy Total electricity consumed renewable	97	PP
98	PP	SDG-indicators_year2020_ASMETAL_NEW TOOL GS	98	PP
99	UNFCCC	Standard for sampling and surveys for GS project activities and programme of activities v7.0 https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20170509173058940/Methodology_standard05_EB94a02%28ver07.0%2C%204may17%29.pdf Guidelines for sampling and surveys for CDM project activities and programme of activities v4.0 https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20151023152925068/Meth_GC48_%28ver04.0%29.pdf	99	Publicly available
100	UNFCCC	Glossary of CDM terms v10.0 https://cdm.unfccc.int/Reference/Guidclarif/glos_CDM.pdf	100	Publicly available
101	SEAP	Emission factors for electricity consumed national and European - technical annex to the SEAP template instructions” www.eumayors.eu/IMG/pdf/technical_annex_en.pdf www.anpm.ro ; www.mmediu.ro chrome-extension://oemmnadbldboiebfnladdacbfmadadm/http://www.soglasheniemerov.eu/IMG/pdf/technical_annex_ro.pdf chrome-extension://oemmnadbldboiebfnladdacbfmadadm/http://www.mmediu.ro/app/webroot/uploads/files/2014-03-18_Lista_valorilor_nationale_FE_PCN-2014.pdf	101	Publicly available
102	ILO	International conventions for the protection of Human rights and Fundamental freedoms http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:14467954220003:::P11200_INSTRUMENT_SORT:3 United Nations Declaration on the Rights of Indigenous Peoples (61/295) dated 13 th December 2007 https://en.wikipedia.org/wiki/Declaration_on_the_Rights_of_Indigenous_Peoples	102	Publicly available
103	ILO	Article 1 of the International Covenant on economic, Social and Cultural Rights and Covenant on 27 th June 1968 and ratified on 9 th December 1974 https://en.wikipedia.org/wiki/International_Covenant_on_Economic,_Social_and_Cultural_Rights	103	Publicly available
104	National authorities	United Nations Convention Against Corruption dated 2 nd November 2004 https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XVIII-14&chapter=18&clang=en https://www.google.co.in/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=0ahUKEwigpbnhqZHbAhUKOo8KHWSOA44QFggtMAE&url=https%3A%2F%2Fwww.unodc.org%2Fdocuments%2Ftreaties%2FUNCAC%2FWorkingGroups%2FImplementationReviewGroup%2F2-6June2014%2FPanelPresentations%2FRomania_Presentation_on_whistleblowers.pdf&usq=AOvVaw1q6eyhLQUK_cPYdQ9HVy6v	104	Publicly available
105	PP	Commissioning document for Combisense (to support commissioning of the project)	105	PP
106	PP	File 6 Section A - Invoice Ctr leasing 2017-5616 (To support start date -10 th Dec 2019)	106	PP
107	PP	File 99, C.1.2 Statement - Expected operational	107	PP

		lifetime of project (to support lifetime)		
108	PP	PROJECT BOUNDARY AS METAL_27.11.2017	108	PP
109	PP	SDG7_2 Energy saving	109	PP
110	PP	SDG-Impact-tool_AS METAL_year2020_11.09.2023	110	PP
111	PP	SDG5_GSDM-I5.5.1_Number of women serving in managerial_leadership_ownership role	111	PP
112	PP	Centralised Production Report 2020_ASMETAL (to support quantity of AI waste recycled)	112	PP
113	PP	SDG4_GSDM-I4.4.1_Number of employees provided skill development training	113	PP
114	PP	SDG5_GSDG-I5.5.2_Proportion of women in managerial positions	114	PP
115	PP	SDG8_GSDM-I8.5.1_Total number of jobs	115	PP
116	PP	GS Ticket_AS Metal SFR 22.11.2022 and Mail SFR 22.11.2022 (to support SFR)	116	PP
117	PP	Printscreen listing date_AS Metal (to support listing date)	117	PP
118	ANRE	Annual Report ANRE, 2022, pg 92 and Annual Report from National Energy Regulatory Authority(ANRE), 2020, pg 126 (to support grid emission factor)	118	PP
119	PP	LSC report v2.0 (physical)	119	PP
120	PP	Mail GS_answer AS Metal_26.11.2020 (to support deviation request on remote LSC)	120	PP
121	PP	Commissioning certificate for 15 th April 2020 by reception committee, Romania	121	PP

Appendix 4. Clarification requests, corrective action requests and forward action requests

Table 1. CLs from this validation

CL ID	1	Section no.	D.3	Date: 09/12/2021
Description of CL				
Please provide document for supporting lifetime of the project activity.				
Project participant response				Date: 28/07/2022
The document Project lifetime has been provided to the VVB				
Documentation provided by project participant				
Project lifetime				
DOE assessment				Date: 20/06/2023
The validation team has reviewed the document "File 99, C.1.2 Statement - Expected operational lifetime of project .pdf" dated 18 th May 2022 and accepted the lifetime of the project is 40 years. As per review of the document, the validation team has observed that the life of the all machineries without any intervention is presented in the Catalogue on the classification and normal working life of fixed assets of 30.11.2004, integral part of the Decision 2139/2004". The validation team has closed the issue.				

Table 2. CARs from this validation

CAR ID	1	Section no.	D.4.1	Date: 09/12/2021
Description of CAR				
Applicable conditions of the applied methodology are not described in the PDD				
Project participant response				Date: 28/07/2022
The revised PDD included the applicable conditions of the methodology AMS III.AJ_version 9.0 since this methodology was applicable when the PP has started writing the PDD. The final PDD describes the applicable conditions of the applied methodology AMS III.AJ_version 9.0				
Documentation provided by project participant				
Final PDD				
DOE assessment				Date: 20/06/2023
Refer Appendix 14 of this report for closure				

CAR ID	2	Section no.	D.4.7	Date: 09/12/2021
Description of CAR				
Estimated emission reduction is not calculated in the PDD.				
Project participant response				Date: 28/07/2022
Emission calculation is added now in the PDD				
Documentation provided by project participant				
Final PDD ^{/3/}				
DOE assessment				Date: 20/06/2023
The validation assessed the PDD and now detailed calculation is mentioned in the revised PDD. Hence closed. Refer Appendix 14 for details.				

Table 3. FARs from this validation

FAR ID	1	Section no.	D.3	Date: 09/12/2021
Description of FAR				
The PD shall provide supporting data for all parameters in time for validation/design review, or allocation may be delayed. This includes and is not limited to: ER spreadsheets, individual study calculations, survey results, study reports etc.				
Project participant response				Date: 28/07/2022
PP has submitted all the documents to VVB				
Documentation provided by project participant				
-				
DOE assessment				Date: 20/06/2023
The validation team has reviewed all documents and accepted that PDD is fully supported with documents. Hence closed the FAR1.				

FAR ID	2	Section no.	D.8	Date: 09/12/2021
Description of FAR				
There are more than 5 SDGs Impacts listed in the PDD. The VVB shall assess all the SDGs in detail at the time of validation				
Project participant response				Date: 28/07/2022
Support documents provided				
Documentation provided by project participant				
-				
DOE assessment				Date: 20/06/2023
The validation team has reviewed the SDG indicators and accepted the same. Refer Appendix 14 of this report for details.				

FAR ID	3	Section no.	D.8	Date: 09/12/2021
Description of FAR				
It has been observed that the same SDG Impact/Indicator is used against a maximum of 2 SDGs. The VVB shall check whether the link is obvious and strong at the time of validation.				
Project participant response				Date: 28/07/2022
Support documents provided				
Documentation provided by project participant				
-				
DOE assessment				Date: 20/06/2023
The validation team has reviewed the SDG indicators and accepted the same. Refer Appendix 14 of this report for details.				

FAR ID	4	Section no.	D.7	Date: 09/12/2021
Description of FAR				
The physical Local Stakeholder Meeting has been delayed and postponed due to the COVID-19, however a draft SCR shall be mandatorily submitted to cover the consultation activities carried out to date at the time of validation. A Continuous Input and Grievance Mechanism must be set up prior to starting validation				
Project participant response				Date: 28/07/2022

<p>Due to Covid pandemic restrictions in Romania, the project developer could not organize the Local Stakeholder Consultation (LSC) within the Preliminary review period. It has announced Gold Standard about this on 20th November 2020, and asked the permission to hold an online LSC, respecting all GS applicable rules regarding the preparation of the LSC and its requirements to conduct the LSC meeting.</p> <p>The GS answer sent to the project developer on 26th November 2020 did not allow to substitute the physical LSC with a remote LSC. The project developer followed the GS recommendation to continue with the organization of the online LSC and undertook the remote LSC meeting on 9th December 2020. It also uploaded a Deviation request on SustainCert Registry on 26th March 2021.</p> <p>At the online LSC meeting on 9th December 2020, there have been invited stakeholders from all required categories and there was a participation of 16 persons at the online meeting from all categories. The stakeholders had received before the meeting the Key Project Information document and a presentation on the project has been held to the participants of the meeting covering all topics of an LSC, including Safeguarding Principle Assessment and Grievance Mechanism. Several sessions of Q&A have been included in the meeting and the suggestions and inputs of stakeholders have been taken into consideration in the design of the PDD and project development. Evaluation feedback forms have been sent to stakeholders, and only positive comments have been recorded.</p> <p>During the design review of the project, we have held the physical LSC meeting on 27th September 2022. The detailed LSC report was uploaded on Sustaincert on 26/01/2023.</p> <p>During the LSC meeting and the Feedback Round Consultation we found only one mitigation measure in order to reduce the potential risk of the Safeguarding principle 6.1 Labour Rights: The project developer shall record reports of accidents and incidents as well as reports on trainings on various issues, including safety and health at working environment to prevent emergency cases, technical checks and maintenance interventions. These indicators shall be monitored by the project</p>	
Documentation provided by project participant	
-	
DOE assessment	Date: 20/06/2023
The validation team has reviewed the LSC documents with support documents and accepted the same. Refer Appendix 7 of this report for details.	

FAR ID	5	Section no.	D.7	Date: 09/12/2021
Description of FAR				
Further in line with the Deviation Approval from GS dated 26/11/2020, the PD shall conduct the meeting as follows:				
1. Carry out the remote LSC and SFR now (which you have done) and a full-fledged (physical) LSC and SFR before seeking project registration, if the situation allows.				
2. If the situation doesn't allow, undergo project certification with a condition that you shall conduct a full-fledged (physical) LSC and SFR any time before the first verification (at the latest) and retroactively incorporate all relevant stakeholder feedback in the project design.				
The updated PDD/Stakeholder Consultation Report shall be submitted at the time of validation/prior to first verification. The VVB shall check the above requirements at the time of validation/prior to first verification.				
Project participant response				Date: 28/07/2022
As above				
Documentation provided by project participant				
-				
DOE assessment				Date: 20/06/2023
The validation team has reviewed the LSC documents with support documents and accepted the same. Refer Appendix 7 of this report for details.				

FAR ID	6	Section no.	D.3	Date: 09/12/2021
Description of FAR				
The VVB shall provide its opinion on the "Type of Project" (<i>End-use energy efficiency improvement or Waste handling & disposal</i>) under which the project falls following the rules/requirements of the " <i>GHG emissions reduction and sequestration product requirements</i> " at the time of validation. The VVB shall further check how the Aluminum recycling leads to additional sustainable development benefits, while displacing the primary aluminum production from raw materials (mined minerals, bauxite).				
Project participant response				Date: 28/07/2022
This is metal recycling project. So it falls under sector 13. The amount of recycled Al replaces the virgin bauxite.				

Documentation provided by project participant	
-	
DOE assessment	Date: 20/06/2023
As per the CDM Standard Applicability of sectoral scopes v1.0 EB 88 Annex 4 dated 11 th March 2016, AMS.III.AJ falls under sector 13 only.	
In the absence of the project activity, 9,370.057 tonnes of Al waste per year would not be treated and energy consumption for equivalent amount virgin material would be used leading to emission reduction. In the absence of the project, equivalent amount of virgin Al bauxite would be used.	

FAR ID	7	Section no.	D.5	Date:	09/12/2021	
Description of FAR						
The VVB shall check the start date inline with the definitions of the Start date as per the Gold Standard requirements and provide opinion on the correctness of the start date.						
Project participant response					Date:	28/07/2022
Start date is 10/12/2019.						
Documentation provided by project participant						
-						
DOE assessment					Date:	20/06/2023
The validation team has reviewed the invoice of finance deployment of AS metals to 'Alpha Leasing Romania IFN SA' through the document named as "File 6 Section A - Invoice Ctr leasing 2017-5616.pdf" and confirmed that the project start date is 10 th Dec 2019. The start date of the recycling aluminium project is 10 th December 2019, which is the date of the main financial deployment for the first installation in order to produce secondary raw materials, which are in fact the recycled Aluminum products.						

Appendix 5: Principles and Requirements v1.2

Requirements of GS Principles and Requirements v1.2	Validation opinion
<p>1. EFFECTIVE DATE, SCOPE AND APPLICABILITY</p> <p>1.1 EFFECTIVE DATE</p> <p>1.1.1 Gold Standard for the Global Goals is effective for all projects seeking Gold Standard Certification as of 24th October 2019. For projects applying previous versions of Gold Standard please refer to the Transition Requirements.</p>	<p>The project has applied Gold Standard for the Global goals Principles and requirements^{1/} v1.2. Hence accepted.</p>
<p>1.2 SCOPE</p> <p>1.2.1 The Principles & Requirements set out in this document are applicable to all Project Developers and the Projects or Programmes* for which Gold Standard Certification is sought.</p> <p>It also represents the Requirements against which Gold Standard Validation and Verification Bodies (hereafter VVBs) shall Validate or Verify the Project, in conjunction with the Validation & Verification Body Requirements and any applicable Conformity Criteria.</p> <p>*Note that for brevity, the standard refers to Projects throughout the text; this may be read as Projects, Programmes or interventions unless explicitly stated</p>	<p>The scope of the work is validation of design certification of the project. PP has satisfied all the requirements of this Gold Standard for the Global goals Principles and requirements v1.2.</p>
<p>1.2.2 The Requirements shall be applied as per the relevant sections contained within this document and those associated or referenced.</p>	<p>The scope of the work is validation opinion of design certification of the project. Hence requirements pertaining to validation of design certification applies to the project</p>

<p>1.2.3 From time to time Gold Standard may issue updates, changes, clarifications or corrections to the Requirements.</p> <p>These shall be published to the Gold Standard Website.</p> <p>Gold Standard provides notice of all such changes and specific dates for implementation and applicability.</p> <p>It is the responsibility of the Project Developer to remain up to date and to apply all such updates as required for its Project by checking the rule updates section in the Gold Standard Website, regardless of whether a notification of change has been received.</p>	<p>PP has applied all the latest version of the GS requirements (v1.2) and its associated requirements. Hence accepted.</p>
<p>1.2.4 Stakeholders may submit suggested updates, edits, changes or additions to Gold Standard for the Global Goals by sending an email to help@goldstandard.org.</p> <p>Such requests shall be considered as per the Standards Setting Procedure.</p> <p>Gold Standard reserves the right to accept or reject such submissions at its own discretion.</p>	<p>This is not relevant to the scope of the project.</p>
<p>1.2.5 In some circumstances Gold Standard allows modules or elements from other, partner or endorsed Standards (for example Fairtrade, FSC, CDM) to be considered as evidence that may be used to demonstrate conformity to certain Gold Standard Requirements.</p> <p>In such cases the Gold Standard Requirements still apply but, to help streamline processes and for practicality, shared evidence may be provided.</p>	<p>PP has applied only GS requirements. PP has applied CDM approved AMS.III.AJ v9.0 for emission reduction calculation.</p>
<p>1.2.6 The Gold Standard rules are interpreted in accordance with the Standard's core principles of fairness, reliability, conservativeness and pragmatism</p>	<p>The validation team has also interpreted the Gold Standard rules in accordance with the core principles of fairness, reliability, conservativeness and pragmatism.</p>
<p>1.3 APPLICABILITY 1.3.1 All Projects shall apply the Principles & Requirements and any associated documents</p>	<p>The project has applied Gold Standard for the Global goals Principles and requirements v1.2. Hence accepted.</p>
<p>1.3.2 All Projects shall also apply the Activity Requirements related to the project type – unless stated otherwise.</p> <p>If no Activity Requirements exist for the proposed project type, then the Requirements shall be as per this document.</p>	<p>The project does not fall under any Activity requirements.</p>
<p>1.3.3 In addition to 1.3.1 and 1.3.2, Projects that seek issuance of Gold Standard Certified Impact Statements or Products shall also follow the applicable Gold Standard Approved Impact Quantification Methodology and</p>	<p>PP has applied CDM approved AMS.III.AJ v9.0for emission reduction calculation. PP did not follow the applicable Gold Standard Approved Impact Quantification Methodology. PP has satisfied “GHG emissions reduction & sequestration product requirements” v2.1 effective 24th February 2022. The validation opinion of the same is detailed in Appendix 6</p>

<p>related Product Requirements.</p>	<p>of this report</p>
<p>2. CERTIFICATION TYPES</p> <p>This section provides an overview of the types of Gold Standard Certification outcomes.</p> <p>It should be read in conjunction with the Claims Guidelines which provides further guidance as to the application and communication around Gold Standard Project and Impact Certification.</p>	<p>The project has applied for GS design certification/Impact certification.</p>
<p>2.1 GOLD STANDARD CERTIFIED PROJECT DESIGN</p> <p>2.1.1 Gold Standard Certified Project Design status is achieved by successfully undergoing Validation and Design Review (Design Certification), which means:</p> <p>(a) The project design and planning has met Gold Standard for Global Goals Requirements, including Safeguarding Principles, Stakeholder Consultation and Engagement, and Sustainable Development Goals (SDG) requirements and has developed a compliant Monitoring Plan.</p>	<p>The project is undergoing project design status only. The scope of the EPIC's validation process involves how the project design and planning is going to meet Gold Standard for Global Goals Requirements, including Safeguarding Principles, Stakeholder Consultation and Engagement, and Sustainable Development Goals (SDG) requirements. PP has developed a compliant Monitoring Plan to be used during the crediting period.</p>
<p>(b) The project design, monitoring plan and ex-ante impact assessment have been validated by an accredited, approved third party VVB.</p> <p>(c) Following this, the project has been reviewed by Gold Standard and is subject to an over-arching independent review by the Gold Standard Technical Advisory Committee (TAC) and NGO Supporters.</p> <p>(d) It does not mean or imply that any impacts have been realised or will be realised or have been verified by a VVB or certified by Gold Standard.</p> <p>(e) To certify that impacts have been realised, a project shall undergo Performance Certification.</p>	<p>EPIC has been accredited by GS for validation of projects undergoing project design status. EPIC accredited for validation of Energy and Waste projects. https://www.goldstandard.org/project-developers/standard-documents</p>
<p>2.2 GOLD STANDARD CERTIFIED PROJECT</p> <p>2.2.1 Gold Standard Certified Project status is achieved by successfully undergoing Verification and performance review (Performance Certification), which means:</p> <p>(a) The project has followed a Monitoring Plan approved at the time of Design Certification and has submitted Monitoring Report for Verification.</p> <p>(b) The project and its Certified SDG Impacts have been validated and verified as required by an accredited, approved third party VVB.</p> <p>(c) Following this, the project has been reviewed by Gold Standard and is subject to an over-arching independent review by the Gold Standard Technical Advisory Committee (TAC) and NGO Supporters.</p> <p>(d) Any Certified SDG Impacts stated to have</p>	<p>The project is undergoing project design status only. The scope of the EPIC's validation process involves how the project design and planning is going to meet Gold Standard for Global Goals Requirements.</p>

<p>been achieved are real.</p> <p>(e) A project may be issued Certified Impact Statements and Products such as Gold Standard Verified Emission Reductions (VERs).</p> <p>This is subject to successful Performance Certification of the Project's conformity to applicable Gold Standard Impact Quantification Methodology and Product Requirements.</p> <p>(f) The Project is also able to promote its claims in accordance with the Claims Guidelines.</p>	
<p>2.2.2 All projects from Listed status and beyond, including Gold Standard Certified Impact Statements or Products are captured on the Gold Standard Impact Registry and are publicly and transparently available to all to review.</p>	<p>As per the Screenshot of project webpage, , the project was listed on GS registry on 12th November 2020.</p>
<p>2.3 STACKING</p> <p>2.3.1 The Project Developer may potentially pursue any number and combination of Certified Impact Statements or Products, provided that:</p> <p>(a) All Requirements in this document and in the applicable Gold Standard approved Methodology and/or Product Requirements are fully met.</p>	<p>PP has applied CDM approved AMS.III.AJ v9.0 for emission reduction calculation. PP did not follow the applicable Gold Standard Approved Impact Quantification Methodology.</p> <p>PP has satisfied "GHG emissions reduction & sequestration product requirements" v2.1 effective 24th February 2022. The validation opinion of the same is detailed in Appendix 6 of this report.</p>
<p>(b) The Methodology and/or Product Requirements do not stipulate that the issuance of a given combination of Impact Statements and Products is ineligible under Gold Standard.</p> <p>Such details are confirmed within the specific guidelines, Impact Quantification Methodologies or Product Requirements.</p>	<p>Since the applied methodology and/or Product Requirements did not stipulate that the issuance of a given combination of Impact Statements and Products is ineligible under Gold Standard, the validation team has accepted.</p>
<p>(c) All necessary legal terms and conditions are fully executed and complied with.</p> <p>It is noted that certain Product Requirements may impose particular legal requirements/come with Product-specific terms and conditions and other legal documents, that shall be completed.</p>	<p>PP has satisfied "GHG emissions reduction & sequestration product requirements" v2.1 effective 24th February 2022. The validation opinion of the same is detailed in Appendix 6 of this report.</p> <p>All necessary legal terms and conditions are fully executed and complied with by the project.</p>
<p>2.3.2 Project Developers and funders/buyers of Impact Statements and Products shall adhere to the Claims Guidelines as appropriate to the status of the Project. This defines and directs the use of claims made in relation to Gold Standard Certification.</p>	<p>The project has applied for GS design certification/ Impact certification.</p>
<p>2.3.3 It is possible to change the project design after Design Certification to include more Gold Standard Certified Impact Statements or Products as part of the Project (Annex A).</p> <p>However Impact Statements or Products for previously issued monitoring periods cannot be retroactively issued, unless stated</p>	<p>The scope of the validation involves design certification only and there is no project design change. Hence this is not applicable and requirements of Annex A of Gold Standard for the Global goals Principles and requirements v1.2.</p>

otherwise in Activity or Product Requirements.	
<p>3. GENERAL ELIGIBILITY CRITERIA</p> <p>3.1.1 The following General Eligibility Criteria applies to all projects seeking Gold Standard Certification:</p> <p>(a) Types of Project: Eligible projects shall include physical action/implementation on the ground.</p> <p>Pre-identified eligible project types are identified in the Eligibility Principles and Requirements section.</p>	Its metal recycling (mainly Aluminium) project implemented as part of the project.
(b) Location of Project: Projects may be located in any part of the world.	The project is located in Romania.
<p>(c) Project Area, Project Boundary and Scale: The Project Area and Project Boundary shall be defined.</p> <p>Projects may be developed at any scale although certain rules, requirements and limitations may apply under specific Activity Requirements, Impact Quantification Methodologies and Products Requirements.</p> <p>In order to avoid double counting the Project shall not be included in any other voluntary or compliance standards programme unless approved by Gold Standard (for example through dual certification).</p> <p>Also, if the Project Area overlaps with that of another Gold Standard or other voluntary or compliance standard programme of a similar nature, the project shall demonstrate that there is no double counting of impacts at design and performance certification (for example use of similar technology or practices through which the potential arises for double counting or misestimation of impacts amongst projects).</p>	<p>According to the applied methodology, AMS.III.AJ_version 9.0, the Project boundary includes the physical geographical sites of (a) Waste collection sites (e.g. door-to-door collection); (b) The recycling facility; (c) Processing/manufacturing facility; (d) Virgin material production and (e) MSW disposal site or treatment plant in the baseline scenario. The validation team has reviewed the PDD and accepted the project boundary.</p> <p>The project is located at AS METAL COM SRL's headquarter, located in the Southern part of Bucharest, Romania.</p> <p>The project does not applied under any other voluntary standards other than GS.</p>
(d) Host Country Requirements: Projects shall be in compliance with applicable Host Country's legal, environmental, ecological and social regulations.	<p>The project complies with the following European Union legislation is applicable to the project.</p> <ul style="list-style-type: none"> • The Waste Framework Directive 2008/98/EC • the Circular Economy Package, which are further reinforced by the Green Deal package of "a common EU target for recycling 65% of municipal waste by 2030" • The EU Regulation No. 333/2011, establishing criteria determining when certain types of scrap metal cease to be waste under Directive 2008/98/EC • Law 211/2011 on the waste regime implemented the EU Waste Directive 2008/98/EC • Commission Decision of 18 December 2014 amending Decision 2000/532 / EC establishing a list of wastes under Directive 2008/98 / EC of the European Parliament and of the Council • Regulation 333/2011 establishing the conditions in which certain aluminum and iron waste are no

	<p>longer considered waste</p> <ul style="list-style-type: none"> • European Standard EN 13920 1-16 Aluminum and aluminum alloys; Recyclable material. • COUNCIL REGULATION (EU) No 333/2011 • Section A 1.2 - Constitutive act • COMMISSION DECISION of 18 December 2014 amending Decision 2000/532/EC on the list of waste pursuant to Directive 2008/98/EC of the European Parliament and of the Council • Law no. 211/2011 regarding the waste regime • DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 19 November 2008 on waste and repealing certain Directives
<p>(e) Contact Details: As part of the Project Documentation the Project Developer shall provide</p> <p>(i) name and</p> <p>(ii) contact details of all Project Participants; AND in case of an organisation</p> <p>(iii) the legal registration details and</p> <p>(iv) documentation by the governing jurisdiction that proves that the entity is in good standing (defined as being a legal or other appropriate entity registered in or allowed to operate within the required jurisdiction and with no evidence of insolvency or legal/criminal notices placed against it or any of its Directors). Gold Standard retains the right (at its own discretion) to refuse use of the Standard where reputational concerns are highlighted.</p>	<p>The validation team has reviewed the final PDD^{2/} and accepted that all details given in the PDD are correct.</p>
<p>(f) Legal Ownership:</p> <p>Full and uncontested legal ownership of any Products that are generated under Gold Standard Certification, (for example carbon credits) shall be demonstrated.</p> <p>Where such ownership is transferred from project beneficiaries this must be demonstrated transparently and with full, prior and informed consent (FPIC).</p> <p>Note that for certain Project types there is a requirement for full and uncontested legal land title/tenure to be demonstrated.</p> <p>These are contained within specific Activity or Product Requirements.</p> <p>All projects shall immediately report to Gold Standard any land title/tenure disputes arising.</p>	<p>The validation team has reviewed the Certificate on incorporation of AS metals dated 21st April 2017 by Romania Ministry of Justice National Trade Register Office Unique registration no: 3272093). AS Metals owns the project and the right to claim GS VER lies with the AS metals only. AS metals has full and uncontested legal ownership of the project. AS metals owns the land of 35,000 square meter inside which project is installed and implemented. However, there is no land disputes between the PP and the original land owners.</p> <p>The validation team has reviewed the Contract leasing Anexa 12 Optical sorting machine TOMRA and Invoice Ctr leasing 2017-5616 and confirmed the same.</p> <p>The validation team has reviewed the ISO certificate by Rina Simtex dated 4th Sep 2020 no: 333-174/12/R.</p>
<p>(g) Other Rights:</p> <p>As well as legal title and ownership, the Project Developer shall also demonstrate where required uncontested legal rights and/or permissions concerning changes in use of other resources required to service the Project (for example, access rights, water rights etc.).</p>	<p>There is no land disputes between the PP and the original land owners.</p>

<p>Any known disputes or contested rights must be declared immediately to Gold Standard by the Project Developer and resolved prior to further project implementation in affected areas.</p>	
<p>(h) Official Development Assistance (ODA) Declaration:</p> <p>All Project Developers applying for project activities located in a country named by the OECD Development Assistance Committee's ODA recipient list and seeking Gold Standard Certification for carbon credits shall declare the Official Development Assistance (ODA) support.</p> <p>The Project Developer shall follow the GHG Emissions Reduction & Sequestration Product Requirements and submit the declaration at the time of Design Certification.</p>	<p>The validation team has confirmed that the DAC List of ODA Recipients for 2018-2019 & 2020 shows all countries and territories eligible to receive official development assistance (ODA). These consist of all low and middle income countries based on gross national income (GNI) per capita as published by the World Bank. The list also includes all of the Least Developed Countries (LDCs) as defined by the United Nations. Romania is part of the DAC list.</p> <p>The capital investment of the project is ensured by the PP itself using loans and equity. Hence there is no ODA involved. The validation team has reviewed the ODA declaration also.</p>
<p>4. ELIGIBILITY PRINCIPLES AND REQUIREMENTS</p> <p>4.1.1 In order to achieve Certification with Gold Standard, all Projects shall contribute to the Vision and Mission of Gold Standard, applied specifically through the following Eligibility Principles and Requirements.</p> <p>Principle 1: Contribution to Climate Security & Sustainable Development</p> <ul style="list-style-type: none"> • Projects shall be of a type pre-identified as eligible or shall submit to Gold Standard for approval of eligibility. • Projects shall define their Baseline Scenario and Project Scenario. • Projects shall contribute positively to Climate Security & Sustainable Development. These positive impacts are considered against the Sustainable Development Goals (SDGs). 	<p>The purpose of the project is recycle post-consumer obsolete waste mainly Aluminium waste. The output capacity of the project is 49,500 to 77,500 tonnes per year. In the absence of the project, the same waste would be sent to landfill only. Hence this project as treated as waste management projects.</p> <p>Project contributes positively to Climate Security & Sustainable Development.</p> <p>The project contributes to the following 5 UN Sustainable Development Goals:</p> <ul style="list-style-type: none"> SDG 4 – Quality education SDG 5 – Gender equality SDG 7 – Affordable and clean energy SDG 8 – Decent work and economic growth <p>SDG 13 – Climate action</p> <p>The validation opinion of the SDG impacts is detailed in Appendix 14 of this report.</p>
<p>4.1.2 By successfully following these requirements and procedures:</p> <p>(a) The Project is demonstrated to either be of an eligible type under Gold Standard for the Global Goals or has sought and obtained approval from Gold Standard to proceed as a new project type.</p> <p>(b) The Project demonstrates its proposed contribution to the Sustainable Development Goals, meaning at least an impact on SDG 13 plus two other SDGs.</p> <p>(c) The Project includes the above points (a & b) in its Project Documentation, including the Monitoring & Reporting Plan.</p>	<p>The Project is demonstrated (as above) to be of an eligible type under Gold Standard for the Global Goals</p> <p>The Project demonstrates its proposed contribution to the Sustainable Development Goals, meaning at least an impact on SDG 13 plus two other SDGs.</p> <p>The PDD includes the above two points in the Monitoring & Reporting Plan.</p>
<p>(a) ELIGIBLE PROJECT TYPES</p> <p>4.1.3 A Project type is automatically eligible for Gold Standard Certification if there are Gold Standard approved Activity Requirements and/or Impact Quantification</p>	<p>The purpose of the project is recycle post-consumer obsolete waste mainly Aluminum waste. The output capacity of the project is 49,500 to 77,500 tonnes per year. In the absence of the project, the same waste would be sent to landfill only. Hence this project as treated as waste management projects.</p>

<p>Methodologies associated with it or it's referenced in the Gold Standard Product Requirements.</p> <p>These are published to the Gold Standard website and shall be followed where provided for a given Project type.</p>	
<p>4.1.4 For Project types that are not automatically eligible, a Project Developer may submit to Gold Standard for approval.</p> <p>This shall be done, at a minimum, as part of the Preliminary Review, though it is recommended to engage with Gold Standard earlier to establish the criteria and requirements for approval.</p>	<p>The preliminary review has been completed and was listed on 12th November 2020.. So, it is eligible for design certification status.</p>
<p>4.1.5 Project types applying for Gold Standard approval are referred to the Gold Standard Vision and Mission.</p> <p>The Project Developer shall demonstrate how the Project would contribute to these and how the Gold Standard for the Global Goals Requirements would be met in their application for approval.</p>	<p>The preliminary review has been completed and was listed on 12th November 2020.. So, it is eligible for design certification status.</p>
<p>4.1.6 In reviewing a new Project type for approval, Gold Standard may establish new Requirements to be met by the Project in order to achieve Design Certification and ongoing Certified Project status.</p> <p>Where required, Gold Standard shall engage expert peer reviewers to establish these requirements, at the Project Developer's expense.</p>	<p>The preliminary review has been completed and was listed on 12th November 2020.. So, it is eligible for design certification status.</p>
<p>4.1.7 Gold Standard does not support Project types associated with geo-engineering or energy generated from fossil fuel or nuclear, fossil fuel switch, or any project that supports, enhances or prolongs such energy generation.</p> <p>In certain cases, concerning energy efficiency involving fossil fuels (for example, LPG stoves), an exception is made and captured in the relevant Activity Requirements, Approved Methodology and/or Product Requirements.</p>	<p>This is not relevant.</p>
<p>(b) BASELINE AND PROJECT SCENARIOS</p> <p>4.1.8 The Project shall define both the Baseline and Project Scenarios.</p> <p>These are defined as follows:</p> <p>(a) Baseline Scenario: The Baseline Scenario is defined as the reasonable, conservative scenario that would exist in the absence of the project.</p> <p>While setting the Baseline Scenario, the Project Developer shall consider the relevant applicable legislation and how effectively these are enforced.</p>	<p>The purpose of the project is recycle post-consumer obsolete waste mainly Aluminum waste. The output capacity of the project is 49,500 to 77,500 tonnes per year. In the absence of the project, the same waste would be sent to landfill only. Hence this project as treated as waste management projects.</p>

<p>(b) Project Scenario: The Project Scenario is defined as the scenario that will exist once the Project is implemented and operational.</p> <p>Note that while not defined as a scenario, a consideration of the implementation and decommissioning phases (where relevant) of the project is also an important requirement within the Safeguarding Principles and Stakeholder Consultation and Engagement procedures.</p>	
<p>4.1.9 The defined Baseline and Project Scenarios shall be included in the project documentation and used to inform the other Principles outlined in this Section.</p>	<p>PP mentioned the baseline scenario and project scenario in the PDD.</p>
<p>4.1.10 Certain Impact Quantification methodologies allow projects to account Suppressed Demand scenario when establishing a baseline.</p> <p>In such cases, the application of Suppressed Demand baseline is limited to Small Scale Projects (as defined in the relevant Activity Requirements, Product Requirements and/or Methodology).</p> <p>Where a Suppressed Demand baseline is applied, it is not possible to 'stack' Gold Standard Certified Impact Statements or Products as the definition of baseline may be contradictory.</p>	<p>The project is located in Romania. Hence the suppressed demand concept does not apply for this project. Hence the project can stack Gold Standard Certified Impact Statements or Products. The validation opinion on applicable conditions of AMS.III.AJ v9.0 is detailed in Appendix 14 of this report.</p>
<p>4.1.11 For Projects seeking Certified Impact Statements and/or Products, Gold Standard rules allow for the consideration of several potential design scenarios in the project documentation, as long as all aspects of each potential scenario are discussed in a satisfactory way.</p> <p>For example, additionality shall be demonstrated for each one of the potential scenarios, and stakeholder inputs must be gathered for each potential scenario.</p> <p>Other relevant aspects include the scale of the project, the validity/applicability of the applied methodology, and the assessment of sustainable development criteria including Safeguarding principles assessment. All potential scenarios must be Validated by the VVB and the actual scenario must be chosen before the first Verification.</p>	<p>The purpose of the project is recycle post-consumer obsolete waste mainly Aluminum waste. The output capacity of the project is 49,500 to 77,500 tonnes per year. In the absence of the project, the same waste would be sent to landfill only. The additionality, stakeholder consultation and other aspects like the scale of the project, the validity/applicability of the applied methodology, and the assessment of sustainable development criteria including Safeguarding principles assessment are based on this project scenario only.</p>
<p>(c) CONTRIBUTION TO CLIMATE SECURITY & SUSTAINABLE DEVELOPMENT</p> <p>4.1.12 All Projects shall demonstrate a clear, direct contribution to sustainable development, defined as making demonstrable, positive impacts on at least three Sustainable Development Goals (SDGs), one of which must be SDG 13</p>	<p>The project contributes to the following 5 UN Sustainable Development Goals:</p> <ul style="list-style-type: none"> SDG 4 – Quality education SDG 5 – Gender equality SDG 7 – Affordable and clean energy SDG 8 – Decent work and economic growth SDG 13 – Climate action

<p>(defined herein as Emissions Reductions or Removals and/or Adaptation to climate change).</p> <p>These are referred to as SDG Impacts.</p>	
<p>4.1.13 SDG Impacts shall be a primary effect – an intentional, direct effect of the project and shall not be ‘one off’ or an effect generated in design, construction, distribution, start-up or decommissioning of the Project.</p>	<p>SDG Impacts shall be a primary effect – an intentional, direct effect of the project</p>
<p>4.1.14 The Project shall identify the potential SDG Impacts provided by the Project by comparing the Project Scenario to the Baseline Scenario (note that multiple baseline scenarios may be relevant depending on the SDG impacts and/or methodologies followed).</p> <p>The SDG Impacts shall be demonstrated as making a positive effect beyond what would reasonably be expected to occur in the Baseline Scenario.</p>	<p>SDG Impacts shall be a primary effect – an intentional, direct effect of the project.</p>
<p>4.1.15 The Project shall identify the relevant monitoring indicators and/or monitoring parameters and define the monitoring approach in the Project Design Document to inform future Monitoring Reports.</p> <p>4.1.16 To demonstrate SDG impacts, the Project may choose any of the following options</p> <p>(a) Option 1 – For identified SDG Impacts the Project Developer shall review the SDG targets and indicators from the relevant National SDG Indicators, or in their absence, the latest internationally adopted version or the latest version ‘under consideration’ where indicators are not yet fully adopted.</p> <p>The Project Developer shall select the most relevant SDG targets and indicators to the chosen SDGs or propose indicators with justification and information that, when combined, demonstrate how the Project positively impacts the chosen SDGs and corresponding targets.</p> <p>(b) Option 2 – Follow a Gold Standard Approved SDG Tool for the demonstration of SDG Impacts.</p> <p>(c) Option 3 – Follow a Gold Standard Approved Methodology, published or referenced via the Gold Standard website.</p> <p>These are typically used by Project Developers to achieve issuance of Gold Standard Certified Impact Statements or Products.</p>	<p>PP has used Option 1 – For identified SDG Impacts the Project Developer shall review the SDG targets and indicators from the latest internationally adopted version.</p>
<p>4.1.17 For option 3, any one or more of the minimum three SDG Impacts chosen by the Project Developer may be undertaken by following a Gold Standard Approved</p>	<p>PP has used Option 1 – For identified SDG Impacts the Project Developer shall review the SDG targets and indicators from the latest internationally adopted version. Project contributes positively to Climate Security &</p>

<p>Methodology. Project Developers may submit a methodology for review and approval by Gold Standard. Refer to the Impact Quantification methodology approval procedure for details. Note that it is possible to develop a Project and a Methodology concurrently</p>	<p>Sustainable Development. SDGs applied by the project are</p> <p>SDG 4 – Quality education SDG 5 – Gender equality SDG 7 – Affordable and clean energy SDG 8 – Decent work and economic growth SDG 13 – Climate action</p>
<p>4.1.18 Projects shall seek Expert Stakeholder opinion and recommendation for certain SDG Impacts.</p> <p>Those SDGs requiring Expert Stakeholder opinion are pre-identified in specific Activity Requirements and Safeguarding Principles and Requirements, though Gold Standard reserves the right to require an Expert Stakeholder comment or an adjustment of the SDG Impact claimed to safeguard credibility.</p> <p>For new project types, these shall be decided upon by Gold Standard prior to or during Preliminary Review.</p> <p>When, Expert Stakeholder opinion and recommendation is required, the Project Developer shall demonstrate that the Expert Stakeholder has confirmed that the impact is real and that any recommendations have been considered and incorporated into the project design.</p>	<p>The validation opinion of the GS Safeguarding Principles Assessment is detailed in Appendix 8 of this report. The PDD includes the points 'a' and 'b' in the monitoring plan. Hence accepted.</p>
<p>Principle 2: Safeguarding Principles</p> <p>Projects shall conduct a Safeguarding Principles Assessment and conform to Gold Standard Safeguarding Principles and Requirements.</p> <p>4.1.19 By successfully following these Requirements and Procedures:</p> <p>(a) The Project completes a Safeguarding Principles Assessment as per Safeguarding Principles and Requirements to define the relevance of the different Requirements to the Project (note, further guidance is also provided in specific Activity Requirements).</p> <p>(b) The Project demonstrates how all relevant Requirements are met.</p> <p>(c) The Project includes above points (a & b) in the Project Design Document, including the Monitoring & Reporting Plan.</p>	<p>The validation opinion of the GS Safeguarding Principles Assessment is detailed in Appendix 8 of this report. The PDD includes the points 'a' and 'b' in the monitoring plan. Hence accepted.</p>

<p>(a) SAFEGUARDING PRINCIPLES ASSESSMENT</p> <p>4.1.20 Referring to the Gold Standard Safeguarding Principles & Requirements document – all Projects shall undertake an upfront assessment against the Gold Standard Safeguarding Principles and implement their Project in accordance with the stated requirements.</p> <p>The assessment shall apply to the Project Scenario, although assessment questions and Requirements involve a comparison to the Baseline Scenario(s) and/or the implementation or decommissioning phases of a Project.</p> <p>4.1.21 A number of Safeguarding Principles require the opinion and recommendations of an Expert Stakeholder.</p> <p>These are pre-identified in the Safeguarding Principles & Requirements Procedure and in relevant Activity Requirements.</p> <p>4.1.22 The Safeguarding Principles Assessment and evidence of conformity to the associated Requirements shall be included in the Project Design Document, including the proposed monitoring parameters in the Monitoring & Reporting Plan.</p> <p>The Monitoring & Reporting Plan shall capture any parameters that are required to be monitored and reported upon and/or reassessed in the future, in line with the Safeguarding Principles & Requirements.</p> <p>This shall be used to inform the ongoing Monitoring Reports, Verification and Performance Review.</p> <p>4.1.23 The Monitoring Report shall include reporting on Safeguarding Principles and the associated monitoring parameters, as applicable.</p>	<p>The validation opinion of the GS Safeguarding Principles Assessment is detailed in Appendix 8 of this report.</p>
<p>Principle 3: Stakeholder Inclusivity</p> <ul style="list-style-type: none"> Projects shall identify and engage Relevant Stakeholders and seek Expert Stakeholder input where necessary in the design, planning and implementation of the Project. <p>Project design shall reflect the views and inputs of stakeholders and ongoing feedback shall be sought, captured and acted upon throughout the life of the Project.</p> <p>4.1.24 By successfully following these Requirements and Procedures:</p>	<p>The validation opinion of the Stakeholder Inclusivity requirement is detailed in Appendix 7 of this report. The PDD includes the points 'a' to 'd' in the LSC section. Hence accepted.</p>

<p>(a) The Project demonstrates how it has identified, engaged and consulted with relevant stakeholders. Where required, expert stakeholders are engaged in the process.</p> <p>(b) The Project demonstrates the records of the consultation and how the outcomes of the consultation have positively influenced the project design and implementation.</p> <p>(c) The Project demonstrates that stakeholder concerns have been addressed and any disputes have been resolved.</p> <p>(d) The Project demonstrates that an appropriate system for the ongoing capture, recording and responding to stakeholder concerns is developed.</p> <p>(e) The Project includes the above points (a to d) in the Project Design Document, including the Monitoring & Reporting Plan.</p>	
<p>(a) STAKEHOLDER CONSULTATION & ENGAGEMENT</p> <p>4.1.25 All Projects shall conduct Stakeholder Consultation and an ongoing engagement process.</p> <p>The Stakeholder Consultation shall be conducted in accordance with the requirements outlined in this section and Gold Standard Stakeholder Consultation & Engagement Requirements.</p> <p>4.1.26 The Stakeholder Consultation shall comprise of a minimum of two rounds of consultation including one mandatory physical meeting and one stakeholder feedback round lasting for at least two months and these consultations shall be open to anyone wishing to attend.</p> <p>4.1.27 The Project Developer shall identify and inform all relevant (local, affected and interested) stakeholders, including relevant local and national authorities, the Gold Standard Secretariat and all Gold Standard NGO Supporters active in the host country of the Project.</p> <p>4.1.28 The Stakeholder Consultation shall be conducted prior to the start date of the Project.</p> <p>If the Consultation is conducted after the start date, the Project Developer shall provide further explanation of how comments received during the consultation are taken into account and implement a Grievance Mechanism in line with the Stakeholder Consultation & Engagement Requirements.</p>	<p>The validation opinion of the Stakeholder Inclusivity requirement is detailed in Appendix 7 of this report. The PDD includes the points 'a' to 'd' in the LSC section. Hence accepted.</p>

<p>4.1.29 The Project Developer shall share the information on the Project's objective, scale and duration, contribution to sustainable development and compliance with safeguards to ensure that stakeholders are actively involved in the Project from the beginning thus enabling stakeholders to influence the project design and implementation.</p> <p>4.1.30 In addition to seeking the views of relevant (interested and affected) stakeholder inputs, certain Safeguarding Principles and SDG Impacts may require the opinion and recommendations of Expert Stakeholders.</p> <p>These are stated in specific Activity Requirements or in the Safeguarding Principles & Requirements.</p> <p>The Project shall demonstrate how the opinions and recommendations of Expert Stakeholders are incorporated into the project design.</p> <p>The feedback from Expert Stakeholders may be sought any time during the project design and consultations, but it is recommended that they are sought during the first phase of consultation.</p> <p>4.1.31 Where a given Safeguarding Requirement, SDG Impact or other topic requires the input of independent Expert Stakeholder(s), this appointment shall be made directly by the Project Developer.</p> <p>A signed statement from the appointed Expert Stakeholders confirming that they have no conflict of interest or other financial interest in the Project, Project Developer or associated organisations shall be provided to Gold Standard.</p> <p>4.1.32 Expert Stakeholders are not necessarily required to attend face-to-face consultation meetings but must be provided with sufficient information to form opinions and recommendations concerning the Project.</p> <p>Unedited written feedback from Expert Stakeholder(s) along with evidence as to how the feedback has been addressed and incorporated into the Project design shall be provided for Validation.</p> <p>4.1.33 Where the VVBs and/or Gold Standard deem it necessary, further queries shall be raised with the Expert Stakeholder who shall be retained by the Project Developer accordingly.</p> <p>4.1.34 The Project shall have a formal input, feedback and grievance mechanism in place</p>	<p>The validation opinion of the Stakeholder Inclusivity requirement is detailed in Appendix 7 of this report. The PDD includes the points 'a' to 'd' in the LSC section. Hence accepted.</p>
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<p>and the grievance mechanism shall be discussed during the Stakeholder Consultations as per Stakeholder Consultation & Engagement Requirements.</p>	
<p>4.1.35 The project shall prepare the Stakeholder consultation report of the consultation process, including consultation feedback and how this was incorporated into the design of the Project.</p> <p>The Stakeholder consultation report shall be submitted to Gold Standard within three months of the event (though this date may be after the Project Start Date).</p> <p>4.1.36 The Monitoring Report shall include an update on stakeholder feedback received during the period and any actions taken in response.</p> <p>It shall also review the relative successes and failures of the ongoing stakeholder feedback mechanism and any proposals for improvement.</p>	<p>The validation opinion of the Stakeholder Inclusivity requirement is detailed in Appendix 7 of this report.</p>
<p>Principle 4: Demonstration of real outcomes: Projects shall:</p> <ul style="list-style-type: none"> • Design and develop an upfront Project Design Document (PDD), incorporating a Monitoring & Reporting Plan. • Undergo Design Certification (comprising Validation and Design Review). • Undertake monitoring in accordance with the Monitoring & Reporting Plan and produce Annual Reports and Monitoring Reports. • Undergo Performance Certification (comprising Verification and Performance Review) in order to achieve Gold Standard Certified Project status and to issue Gold Standard Certified Impact Statements and Gold Standard Certified Products where sought. • Undergo Gold Standard Design Certification Renewal in order to remain at the Certified Project status and to continue to seek Gold Standard Certified Products and Impact Statements where sought. 	<p>PP has already prepared the PDD and is now undergoing design certification.</p>
<p>4.1.37 This Principle represents the Gold Standard Project Cycle and the timescales and frequency for Certification.</p> <p>Refer to Project Cycle Section for requirements and procedure for Design Certification, Performance Certification, and Design Certification Renewal including the third party VVB audit.</p>	<p>The validation opinion of the timescales of the project is detailed in project cycle section as below.</p>
<p>4.1.38 By successfully following the Procedures and applicable Requirements included the Project Cycle Section, the Project demonstrates real and verified outcomes and are able to issue the relevant Certified Impact Statements and/or Products</p>	<p>The validation opinion of the timescales of the project is detailed in project cycle section as below.</p>
<p>(a) PROJECT START DATE 4.1.39 The Project start date is the earliest</p>	<p>As per clause 4.1.39 of GS Principles and Requirements v1.2, the Project start date is the earliest date on which the</p>

<p>date on which the Project Developer has committed to expenditures related to the implementation of the Project.</p> <p>This does not include the purchase or option to purchase the land upon which a Project is intended to take place.</p>	<p>Project Developer has committed to expenditures related to the implementation of the Project. As per the section C.1.1 of PDD, project start date is 10th December 2019 which is the date of the finance deployment in the COMBISENSE optical separation and metal detection installation. On this date, PP has committed to expenditure (point of no return) related to the implementation of the project.</p>
<p>4.1.40 Examples of the start date may include the date on which contracts have been signed for equipment or construction/operation services required for the Project.</p> <p>Minor pre-project expenses, such as the contracting of services/payment of fees for feasibility studies or preliminary surveys, shall not be considered in the determination of the start date as they do not necessarily indicate the commencement of implementation of the Project.</p> <p>For distributed technology projects, the start date is the date of implementation of the first unit under the project.</p> <p>4.1.41 Note that the Project start date definition and requirements may differ under certain Activity or Product Requirements.</p>	<p>As per clause 4.1.39 of GS Principles and Requirements v1.2, the Project start date is the earliest date on which the Project Developer has committed to expenditures related to the implementation of the Project. As per the section C.1.1 of PDD, project start date is 10th December 2019 which is the date of the finance deployment in the COMBISENSE optical separation and metal detection installation. On this date, PP has committed to expenditure (point of no return) related to the implementation of the project.</p>
<p>4.1.42 The project start date and the stakeholder consultation date determines the project as</p> <p>(a) Regular Projects, for which the Stakeholder Consultation (1st round) has been conducted before the Project Start Date.</p> <p>(b) Retroactive Projects, for which the Stakeholder Consultation (1st round) is conducted after the Project Start Date</p>	<p>LSC conducted on 9th December 2020. The start date is 10th December 2019 (Date of financial commitment).</p> <p>Since LSC was conducted after the start date, the project is retroactive one.</p>
<p>(b) DEVELOPMENT OF MONITORING AND REPORTING PLAN</p> <p>4.1.43 Projects shall produce a Monitoring & Reporting Plan as part of the Project Design Document that includes a detailed approach on the following:</p> <p>(a) Monitoring and reporting of parameters identified for positive SDG Impacts and associated targets.</p> <p>(b) Monitoring and reporting of parameters associated with any Requirements and re-assessments highlighted by the Safeguarding Principles Assessment.</p> <p>(c) Monitoring and reporting of Stakeholder Engagement, feedback, grievances and any action taken, including as recommended by any Expert Stakeholder.</p> <p>(d) Any monitoring requirements and parameters in any Gold Standard Approved Methodology, Tool and/or Product Requirements selected.</p>	<p>The validation team has reviewed the PDD and accepted that monitoring and reporting plan is described in the PDD.</p>

<p>4.1.44 For each monitored parameter from (a) to (d) above the following information shall be provided in the Monitoring Plan:</p> <p>(a) Metric or variable that shall be monitored and reported. (b) Frequency of monitoring and reporting against each parameter. (c) Method of collection of information and identification and details of the organisation or individuals involved in the collection (d) Any quality control approaches for the proposed data collection and reporting. (e) Any ethical restrictions on the collection and/or reporting of collected information.</p>	<p>The validation team has reviewed the PDD and accepted that monitoring and reporting plan is described in the PDD.</p>
<p>4.1.45 The Project Monitoring & Reporting Plan shall be presented as part of the Project Documentation for Validation and shall form the basis of ongoing Monitoring Reports that shall be presented for Verification.</p>	<p>The validation team has reviewed the PDD and accepted that monitoring and reporting plan is described in the PDD.</p>
<p>Principle 5: Financial Additionality & Ongoing Financial Need</p> <ul style="list-style-type: none"> • All Projects must demonstrate impacts that are additional as compared to their baseline scenario (i.e. the benefits of the Project are beyond a business-as-usual scenario) as covered in Principle 1, above. In addition, Projects following certain certification pathways (i.e. those seeking to use certification to attract finance or issue market products through the issuance of Gold Standard Certified Products or Impact Statements) shall demonstrate Financial Additionality and Ongoing Financial Need. <p>4.1.46 By successfully following the Procedures and Requirements in this Section the Project demonstrates Financial Additionality and is therefore able to issue relevant Certified Impact Statements and/or Products.</p> <p>(a) FINANCIAL ADDITIONALITY</p> <p>4.1.47 All Gold Standard Projects seeking the issuance of Gold Standard Certified Impact Statements or Products shall be demonstrated to be additional, meaning that their impact in terms of climate security (mitigation or adaptation) and sustainable development are beyond those that would have occurred in the absence of the certified Gold Standard project. In specific Project types, the application of the Requirements in this section is determined under the relevant Activity Requirements and Product Requirements.</p> <p>4.1.48 Additionality tools:</p> <p>(a) Gold Standard Projects shall use either a UNFCCC-approved or a Gold Standard-approved additionality tool to demonstrate project additionality, with the exception of</p>	<p>The project has demonstrated impacts that are additional as compared to their baseline scenario (i.e. the benefits of the Project are beyond a business-as-usual scenario). For additionality, PP has used Tool for Additionality v7.0 and First of its kind tool to demonstrate additionality. The validation opinion of the same is detailed in Appendix 15 of this report.</p> <p>Since additionality is demonstrated successfully, project is therefore able to issue relevant Certified Impact Statements and/or Products during its actual implementation.</p>

<p>specific Activity or Product Requirements as stated in the relevant documentation.</p> <p>Where appropriate under specific Activity Requirements, small-scale Gold Standard Projects can use the latest version of the CDM “Methodological Tool - Demonstration of additionality of small scale project activities” to demonstrate additionality</p> <p>(b) Version of tool: The latest version of the additionality tool available at the time of first submission to Gold Standard shall be applied. This tool may be used by the Project until the Project completes Design Certification</p>	
<p>(c) New additionality tools: Proposals may be made for new Gold Standard additionality tools.</p> <p>Gold Standard reserves the right to require changes to proposed additionality tools, seek clarification, or reject proposed additionality tools if insufficient progress is made on requested changes.</p> <p>New approaches for additionality demonstration may also be submitted to Gold Standard for approval as part of a new SDG Impact Quantification Methodology</p>	<p>This is not applicable for this project.</p>
<p>4.1.49 Prior Consideration:</p> <p>The following requirements are applicable for the demonstration of prior consideration of revenues from Gold Standard certification for standalone projects:</p> <p>(a) Regular projects are exempt from any kind of prior consideration of revenues from Gold Standard certification checks.</p> <p>(b) Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date.</p> <p>Retroactive Project submitted at a date later than one year from the project start date will not be eligible for Gold Standard certification.</p> <p>(c) The prior consideration rule is also applicable to a Project that undergoes a design change.</p> <p>A project with a Certified Design requesting to include a new technology/measures shall submit the request for approval of design change to Gold Standard within one year of the start date of the proposed technology/measures (design change component).</p> <p>If the developer fails to submit the request for approval within one year, the design change</p>	<p>As per clause 4.1.39 of GS Principles and Requirements v1.2, the Project start date is the earliest date on which the Project Developer has committed to expenditures related to the implementation of the Project. As per the section C.1.1 of PDD, project start date is 10th December 2019 which is the date of the finance deployment in the COMBISENSE optical separation and metal detection installation. On this date, PP has committed to expenditure (point of no return) related to the implementation of the project. The project was submitted for preliminary review on 2nd October 2020 (Date of first submission) which was within one year from the date of start date of the project.(10th December 2019)</p>

component shall not be eligible for Gold Standard Certification.	
<p>4.1.50 For PoA/VPAs</p> <p>(a) Regular VPAs are exempt from any kind of prior consideration of carbon revenue checks.</p> <p>(b) Retroactive VPAs with a project start date before or after the time of first submission of the PoA must submit the required documents for preliminary review within one year of its start date. Retroactive VPAs that are submitted at a date later than one year from the VPA start date will not be eligible for Gold Standard Certification.</p>	This is not applicable
<p>(b) ONGOING FINANCIAL NEED</p> <p>4.1.51 All Gold Standard Projects (including those that transition from earlier versions) required to demonstrate Financial Additionality, as noted above, shall demonstrate Ongoing Financial Need for such mechanisms.</p> <p>4.1.52 Ongoing Financial Need shall be demonstrated at Design Certification Renewal. The project shall provide a qualitative narrative supported by an overview of project finances, that demonstrates how the finance derived Gold Standard Certification is material to the ongoing sustainability of the Project.</p> <p>The narrative may include, but not limited to the following;</p> <p>(a) Information highlighting the key categories and amounts or relative proportions (%) of project income and outgoings, including the relative proportion of certification related cost and revenue.</p> <p>(b) Description on how finance derived Gold Standard Certification contributes to or is being used to sustain or enhance the project.</p> <p>(c) Where no revenue is realised from Gold Standard certification during a given period, this would be considered a FAR for the next Issuance.</p>	This is not applicable for initial design certification.
<p>4.1.53 The submission of the information to demonstrate OFN is mandatory, however this information will not be used for formal decision making to decide whether a project shall renew or not.</p> <p>The information</p> <p>(a) shall be validated by the VVB to ensure its accuracy</p> <p>(b) may remain confidential (i.e. shall be submitted alongside other project</p>	This is not applicable for initial design certification.

<p>documentation and not published to the Gold Standard Impact Registry), in recognition of the commercially sensitive nature of the information</p> <p>(c) shall satisfy the OFN requirements and no further information (beyond responding to clarification questions) will be requested</p>	
<p>(c) STACKING AND FINANCIAL ADDITIONALITY</p> <p>4.1.54 Projects seeking to issue multiple different Gold Standard Certified Impact Statements and/or products ('stacking') shall demonstrate Financial Additionality as per above.</p> <p>Such Projects shall also provide qualitative, evidence-based justification of the need and value-add to the Project outcomes for each additional revenue stream.</p>	This is not relevant.
<p>(d) PROGRAMMES OF ACTIVITY (PoA)</p> <p>4.1.55 The Gold Standard certification cycle is suitable for multi-phased programmes with multiple interventions with an extended implementation period within a sector or multiple sectors, as is typically the case in, for example, urban low-carbon growth programmes.</p> <p>4.1.56 Programmes of Activity shall follow Programme of Activity Requirements.</p> <p>The Requirements in this document are applicable for a Programme where multiple individual activities are spread over space and time</p>	This is not relevant.
<p>5. PROJECT CYCLE</p> <p>5.1.1 Gold Standard for the Global Goals Project Certification is based on a five year renewable certification cycle, with key features as follows:</p> <p>(a) All Projects must LIST with the Gold Standard by undertaking a Preliminary Review and uploading Key Project Information, draft Project Design Document and completed Stakeholder Consultation Report.</p>	The preliminary review was concluded as on 12 th November 2020 and the project is listed on the same day. The validation team has reviewed the GS preliminary review report and accepted the same.
<p>(b) Projects may then seek Gold Standard Certified Design status by successfully completing Validation (within two years of the date of Listing) and a subsequent Design Review.</p>	The validation is completed and FVR initial version was within 2 years from the date of listing (12 th November 2020).
<p>(c) New projects attaining Gold Standard Certified Design status then enter a five-year renewable certification cycle wherein for each five-year period they must undergo Verification and Performance Review to achieve and maintain Gold Standard Certified</p>	The validation team has understood the requirement after the project is attained design status.

<p>Project status and where sought Issuance of Gold Standard Certified Impact Statements and Products.</p>	
<p>(d) To retain Certified Design status at the fifth year, all projects must undergo Design Certification Renewal by updating information and the baseline, unless otherwise stated in relevant Activity or Product requirements.</p>	<p>The scope of the EPIC is to validation of project undergoing design certification. Hence this is not relevant.</p>
<p>(e) The number of Performance Certifications in a five-year certification cycle is not limited although it must take place at least once, no later than two years after Project implementation or Design Certification, whichever is later.</p> <p>In case of Design Certification Renewal, it must take place no later than two years after Design Certification Renewal.</p>	<p>The scope of the EPIC is to validation of project undergoing design certification. Hence this is not relevant.</p>
<p>(f) The Activity Requirements and/or Product Requirements governs the maximum number of Design Certification Renewals allowed for specific project types.</p> <p>In the absence of any such stated Requirement, a Project is limited to one Renewal (i.e. maximum 10 years certification).</p>	<p>The scope of the EPIC is to validation of project undergoing design certification. Hence this is not relevant.</p>
<p>(g) Specific requirements apply in areas such as conflict and emergency zones as per Annex B of this document.</p>	<p>The project is located in Romania which is not a conflict zone.</p>

<p>5.1.2 The following process flow shows the Project Cycle for a typical Project Certification:</p> <p>(a) PRELIMINARY REVIEW</p> <p>5.1.3 The Preliminary Review (time of first submission) is conducted once at the outset (i.e., at an early stage of project design and before Listing on the Gold Standard Impact Registry, see below) of a Project.</p> <p>During the Preliminary Review, Gold Standard conducts a desk review of the Key Project Information and Draft Project Design Document.</p> <p>This review considers whether the Project has the potential to conform to the Gold Standard Requirements and may therefore progress to Listed status.</p>	<p>The preliminary review was concluded as on 12th November 2020 and the project is listed on the same day. The validation team has reviewed the GS preliminary review report and accepted the same.</p>
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<p>5.1.4 The Preliminary Review includes a desk review of the Project Eligibility Principles as well as the applicability of the methodology amongst other matters, based on the Key Project Information, draft PDD and Stakeholder Consultation Report.</p> <p>It involves one of the pathways below, dependent on the type of activity. Gold Standard shall decide which pathway a Project is required to undertake, though guidelines are provided as follows:</p> <p>(a) Pathway 1 – Completeness Check Pathway - This pathway is for regular and retroactive cycle, eligible project types unless otherwise stated in the Activity Requirements.</p> <p>Note that certain project types require certain details to be checked and resolved more thoroughly during the Completeness Check.</p> <p>These are stated in the Activity Requirements.</p> <p>The Completeness Check Pathway consists of a Preliminary Review period of 4 weeks, conducted by Gold Standard.</p> <p>(b) Pathway 2 – Detailed Preliminary Review – In this pathway, Gold Standard conducts a more thorough check of the project documentation.</p> <p>The application of a Detailed Preliminary Assessment is at the discretion of Gold Standard, though typically is required for early users of a new Project Type, Methodology or Product.</p> <p>The Detailed Preliminary Review Pathway consists of a Preliminary Review period of 4 weeks, conducted by Gold Standard.</p>	<p>The preliminary review was concluded as on 12th November 2020 and the project is listed on the same day. The validation team has reviewed the GS preliminary review report and accepted the same.</p> <p>Pathway 1- Completeness Check pathway was considered for this project.</p>
<p>5.1.5 CARs/FARs/OBs may be raised during this review that must be addressed during Validation.</p> <p>However, matters pertaining to Eligibility Principles shall be addressed prior to Listing.</p> <p>5.1.6 During the Preliminary Review step, Gold Standard may identify any further matters that require Expert Stakeholder opinion and recommendations not already pre-identified.</p> <p>5.1.7 The Preliminary Assessment starts when the Project Developer has:</p> <p>(a) signed and submitted the Terms and Conditions AND</p> <p>(b) submitted the Project Documentation AND</p> <p>(c) paid the fee for the Preliminary Review, where required.</p>	<p>The preliminary review was concluded as on 12th November 2020 and the project is listed on the same day. PP has submitted terms & conditions, Project documentation and GS Preliminary review fee for listing.</p> <p>PP has submitted terms & conditions, Project documentation and GS Preliminary review fee for listing.</p>

<p>5.1.8 The minimum requirements for submission of Project Documentation include Key Project Information and</p> <ul style="list-style-type: none"> (a) A completed Stakeholder Consultation Report (b) A substantially completed Project Design Documentation submission that captures: <ul style="list-style-type: none"> i. Fully completed details required under Section – General Eligibility Criteria. ii. A substantially completed Safeguarding Principles Assessment (meaning the majority completed, including any key matters that relate to the project type or context) including any Expert Stakeholder opinions and recommendations. iii. Defined SDG Impacts including any Expert Stakeholder opinions and recommendations sought. iv. Confirmation of certification pathway and any Gold Standard Approved Methodologies and Product Requirements followed including a demonstration of Financial Additionality where required. v. A draft Monitoring Plan. 	
<p>5.1.9 The Preliminary Review is intended as a guide to the Project Developer and does not represent a Certification review or result in Certification.</p> <p>It does not guarantee that a Project shall be successful in Validation or Design Review or ongoing Verification and Performance Review.</p> <p>Neither does it guarantee that further issues or alternative interpretation will arise later.</p> <p>The CARs, OBs and FARs are indicative only; further matters may be raised or interpreted differently by the VVB and/or Gold Standard during the Project Cycle.</p> <p>5.1.10 The outcome of the Preliminary Review may be:</p> <ul style="list-style-type: none"> (a) a successful Review without any likely or potential CARs, FARs or OBs identified, OR (b) a successful Review with likely or potential CARs, FAR s or OBs identified but that are not required to be resolved prior to Listing, OR (c) an unsuccessful Review with at least one potential Non Conformity (NC) identified. With either outcome (a) or (b) the Project may progress to Listing, as per the Section below. <p>5.1.11 With a successful Preliminary Review, the Project will obtain ‘Listed’ status in the Gold Standard Registry.</p> <p>This means that:</p> <ul style="list-style-type: none"> (a) The Key Project Information, draft Project 	<p>This is not relevant for validation as project is already listed.</p>

<p>Design Documentation and supporting documentation are made publicly available, AND</p> <p>(b) The Project Developer may promote the Project according to the Claims Guidelines as appropriate for Listed status Projects. (c) The Project may proceed to Validation.</p> <p>5.1.12 Listed status does not constitute or convey Certification and does not provide any guarantee that the Project will ultimately achieve Certification.</p>	
<p>(b) VALIDATION AND DESIGN REVIEW (DESIGN CERTIFICATION)</p> <p>5.1.13 Validation may start after:</p> <p>(a) A project has achieved Listed status, AND</p> <p>(b) The Project Developer has contracted an eligible, approved VVB, AND</p> <p>(c) The Project Developer has submitted full Project Documentation and Supporting Documents to the VVB, AND</p> <p>(d) The Project Developer has notified Gold Standard of the commencement of Validation and the indicative date for completion and submission.</p>	<p>The validation started after the PP signed contract with EPIC dated 4th Aug 2021.</p>
<p>5.1.14 Validation includes a site visit by a VVB who assesses the up-front design and monitoring plan for a Project against applicable Requirements.</p> <p>This includes Validation of:</p> <p>(a) The Project Documentation including the Project Design Document and Monitoring & Reporting Plan, including any updates to the Key Project Information after Listed Status has achieved.</p> <p>(b) Any supporting document and evidence to demonstrate conformity to all applicable Gold Standard Requirements.</p>	<p>The validation team did not conduct the physical onsite visit and instead conducted remote auditing.</p>
<p>5.1.15 The VVB is appointed directly by the Project Developer.</p> <p>A VVB shall be selected from the list of approved VVBs, eligible for the Project type and pathway proposed.</p> <p>The VVB appointment shall include for responding to any clarifications, queries, OBs, FARs and CARs raised by Gold Standard during Design Certification Review.</p>	<p>PP has appointed EPIC to conduct validation of the project. EPIC is an approved VVB as per GS website. https://www.goldstandard.org/project-developers/standard-documents</p> <p>The scope of responsibility of EPIC include validation of the project till its logical conclusion (either positive or negative).</p>
<p>5.1.16 The Project shall complete Validation (defined as the date of submission of Validation Report by the VVB) within two years of successful listing of the project.</p>	<p>The project was listed on 12th November 2020. The validation of this report v1.0 is being completed within 2 years.</p>
<p>5.1.17 Validation ends when VVB has submitted a final Validation Report with no open NCs and/or CARs, in the opinion of the VVB, to Gold Standard.</p>	<p>The scope of responsibility of EPIC includes validation of the project till its logical conclusion (either positive or negative).</p>
<p>5.1.18 Design Review may start after:</p> <p>(a) a positive final Validation Report has been</p>	<p>The assessment of this requirement is not relevant to the validating VVB.</p>

<p>submitted for Gold Standard Review (or in the case of Internal Validation, a project is successfully validated), AND (b) the required fee is paid by the Project Developer</p>	
<p>5.1.19 Design review is conducted by Gold Standard. It involves a review of all Project Documentation along with the Validation Report.</p>	<p>The assessment of this requirement is not relevant to the validating VVB.</p>
<p>5.1.20 During Design Review, all project documentation is made available to the Gold Standard Technical Advisory Committee (TAC) and NGO Supporters for review.</p>	<p>The assessment of this requirement is not relevant to the validating VVB.</p>
<p>5.1.21 Design Review lasts for a minimum period of 4 weeks and is concluded when all CARs/CLs are successfully closed. The VVB shall be retained by the Project Developer to respond to clarification requests and CARs raised by Gold Standard.</p>	<p>The assessment of this requirement is not relevant to the validating VVB.</p>
<p>5.1.22 During Design Review, new CARs, FARs and OBs may be raised by any party. If any new CARs or FARs are opened, these shall be addressed by either the Project Developer and/or the VVB</p>	<p>The assessment of this requirement is not relevant to the validating VVB.</p>
<p>5.1.23 The date of Design Certification is the last day of the 4 week Design Review period, even if the design review is concluded after this date.</p>	<p>The assessment of this requirement is not relevant to the validating VVB's scope.</p>
<p>5.1.24 A positive conclusion of the Design Review results in Gold Standard Certified Design status, which means that: (a) The Project Design Document, supporting documentation, Monitoring & Reporting Plan and final Validation Report shall be made public (unless otherwise agreed with Gold Standard, for example in the case of commercially or personal security sensitive information). (b) The Project becomes eligible for Performance Certification. (c) The Project Developer may promote the Project according to the Claims Guidelines as appropriate for Gold Standard Certified Design status Projects.</p>	<p>The Project Design Document, supporting documentation, Monitoring & Reporting Plan and final Validation Report.</p>
<p>(c) VERIFICATION & PERFORMANCE REVIEW (PERFORMANCE CERTIFICATION) 5.1.25 Verification may start after: (a) Project has achieved Gold Standard Certified Design status (it may also be combined with validation, see 'Combined Design and Performance Certification'), AND (b) The Project Developer has contracted an eligible VVB, AND</p>	<p>This is not relevant as the scope includes validation only.</p>

<p>(c) The Project Developer has submitted the Monitoring Report to the VVB, AND</p> <p>(d) The Project Developer has notified Gold Standard of the commencement of Verification.</p> <p>5.1.26 Verification includes a site visit by a VVB who assesses the following against all Gold Standard Requirements including applicable Activity Requirements, Gold Standard Methodology and Product Requirements:</p> <p>(a) The Monitoring Report (including any updates in Annual Reports)</p> <p>(b) All supporting evidence and documents included by the Project Developer to demonstrate conformity</p> <p>5.1.27 The VVB is directly appointed by the Project Developer.</p> <p>A VVB shall be selected from the list of approved VVBs, eligible for the project type and pathway proposed.</p> <p>The VVB shall be retained by the Project Developer to review and respond to queries raised during the Performance Review.</p>	
<p>5.1.28 Unless otherwise stated (for example in an applied Methodology or Product Requirements), the same VVB may undertake Validation and Verification of a given Project.</p> <p>5.1.29 Verification must occur at least once during the five-year Certification cycle with the first Verification completed within two years of project Implementation Date or Design Certification, whichever is later.</p> <p>The Project implementation date is defined as the date at which physical activity first becomes operational, for example, the commencement of energy generation or start of distribution of household technology.</p> <p>5.1.30 Verification ends when the VVB has submitted a positive Verification Report to Gold Standard. A positive Verification Report shall have no pending or open CARs in the opinion of the GS-VVB.</p> <p>5.1.31 The performance review starts after;</p> <p>(a) a positive final Verification Report is submitted for Gold Standard Review (or in the case of Internal Verification, a project is successfully verified), AND</p> <p>(b) the required fee is paid by the Project Developer</p>	<p>This is not relevant as the scope includes validation only.</p>

<p>5.1.32 Performance review is conducted by Gold Standard following success completion of Verification. It involves a review of the Monitoring Report, and all supporting Evidence and documentation including the Verification Report.</p> <p>5.1.33 During the Performance Review, all Project Documentation are also made available to Technical Advisory Committee (TAC) and NGO Supporters for their review.</p> <p>5.1.34 The Performance Review period lasts for minimum period of 3 weeks¹ and is concluded when all CARs/CLs are successfully closed.</p> <p>The VVB shall be retained by the Project Developer to respond to clarification requests and CARs raised by Gold Standard.</p> <p>Note: Unless otherwise stated in a specific Activity Requirement, Methodology or Product Requirement.</p> <p>5.1.35 During the Performance Review new CARs, FARs and OBs may be raised by any party, including Gold Standard.</p> <p>If any new CARs or FARs are opened, these shall be addressed by either the Project Developer and/or the VVB</p>	
<p>5.1.36 The positive conclusion of the Performance Review period shall result in Gold Standard Certified Project status, which means that:</p> <p>(a) The Project Documentation, supporting documentation and Verification Report are made public via the Impact Registry</p> <p>(b) The Project can issue any Gold Standard Certified Products or Impact Statements upon payment of required fee.</p> <p>5.1.37 The project may take into account retroactive period for performance Certification of Certified Impact Statement and /or Products.</p> <p>The maximum period for Retroactive Certification is two years prior to the date of Project Design Certification unless otherwise stated in a specific Methodology or Product Requirements.</p> <p>5.1.38 The project making changes to the registered project design (Annex A) may request Retroactive Certification for design change component for maximum two years prior to the date of Design Change Approval</p>	<p>This is not relevant as the scope includes validation only.</p>
<p>(d) ANNUAL REPORTING</p>	<p>The project is not yet achieved design certification status.</p>

<p>5.1.39 Transparent, annual update reports need to be provided for Projects that have achieved the Project Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals.</p> <p>An annual report shall be submitted for each monitoring year by end of next calendar year for which verification is not completed.</p> <p>If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year.</p> <p>Note: For example, if a project does not complete the verification for monitoring year 2019 by 31st December 2020, the project shall submit an Annual report for monitoring year 2019 latest by 31st December 2020</p> <p>5.1.40 Failure to provide Annual Reports as required shall result in the de certification of the Project.</p> <p>5.1.41 The Annual Report shall be submitted to Gold Standard which will be made publicly available.</p> <p>5.1.42 The Annual Report shall focus on information since the last Annual Report or Verification Report as appropriate and provide following information.</p> <p>(a) A summary of the recent activities, events and actions related to the Project,</p> <p>(b) A clear statement on how stakeholders may provide inputs/grievances,</p> <p>(c) A list of all inputs/grievances that have been received since the last Annual Report together with their respective answers/actions,</p> <p>(d) Any incidents or events that may impact the Outcomes/Impacts delivered to date (in terms of loss) or the ongoing Performance of the Project,</p> <p>(e) Any legal contest or dispute that has arisen</p>	<p>Hence this requirement is not relevant as of now.</p>
<p>(f) Any updates to the Key Project Information, Project Design Document, Monitoring & Reporting Plan and any other supporting documentation,</p> <p>(g) A brief descriptive summary of all monitoring information collected during the year,</p> <p>(h) Any update of the 'Project Participants & Secured Titles' (in case of changes)</p>	<p>The project is not yet achieved design certification status. Hence this requirement is not relevant as of now.</p>

<p>5.1.43 The Project Developer shall attest to the accuracy of the information provided by its signature on the Annual Report. The signatory shall be an individual with legal signing authority within the Project Developer's organisation.</p> <p>5.1.44 Annual Reporting does not represent Certification nor any decision making or agreement to any design change by Gold Standard.</p> <p>Annual Reporting is intended as an opportunity to share progress and track key updates and confirms to Gold Standard that the Project remains active.</p> <p>With formal review of conformity to Requirements; any changes in approach shall be undertaken at Performance Certification only.</p>	
<p>(e) DESIGN CERTIFICATION RENEWAL</p> <p>5.1.45 To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal.</p> <p>This process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle.</p> <p>Note that review of the Design Certification Renewal may complete after the last date of current crediting period.</p> <p>In this case, the renewal date shall be the first day after the end date of the current certification cycle.</p> <p>5.1.46 Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay).</p> <p>5.1.47 Design Certification Renewal follows the same process as Validation and Design Review (Design Certification) though the scope of assessment is limited to:</p> <p>(a) Changes in the Project as related to the General Eligibility Criteria</p> <p>(b) Incorporation of any relevant updates to the Gold Standard Requirements</p> <p>(c) Re-definition of Baseline Scenario and any impact of change on the Eligibility Principles, Criteria and Requirements</p>	<p>The project is not yet achieved design certification status. Hence this requirement is not relevant as of now.</p>

<p>(d) Any Gold Standard activity, product and methodology-specific Requirements</p> <p>(e) Demonstration of Ongoing Financial Need, where relevant – see Ongoing Financial Need</p> <p>5.1.48 A five - year Design Certification Renewal cycle apply to all projects though some project types are allowed for automatic renewal for a given number of cycles and/or to remove the need for any or all of (a)-(e) above.</p> <p>Such exceptions are defined in applicable Activity and/or Product Requirements and/or Methodology.</p> <p>In the absence of any such stated requirements</p>	<p>The project is not yet achieved design certification status. Hence this requirement is not relevant as of now.</p>
<p>(f) TRANSITION PROJECTS</p> <p>5.1.49 Transition projects shall maintain their existing crediting cycle and maximum crediting periods upon transition to Gold Standard for Global Goals following GHG Emissions Reductions & Sequestration Product Requirements.</p> <p>5.1.50 Transitioning projects, maintaining their existing crediting cycle shall undergo Performance Certification no later than the first two years after project implementation or design certification, whichever is later, and once every three years after that, unless the Verifier provides a convincing case for less frequent visits as part of the Verification Report</p> <p>(g) RETROACTIVE DESIGN CERTIFICATION</p> <p>5.1.51 Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date.</p> <p>5.1.52 For certain Methodologies and Gold Standard Certified Impact Statements, the Design Certification Requirements for a Retroactive Project may differ. Likewise, some Product Requirements require Prior Consideration of revenues in order to be eligible to receive an Issued Product and may limit or extend the maximum period of Certification prior to Design Certification.</p>	<p>This is not relevant as the scope includes only validation.</p>
<p>(h) COMBINING DESIGN CERTIFICATION AND FIRST PERFORMANCE CERTIFICATION</p> <p>5.1.53 Project Developers may choose to combine Design Certification with their first Verification and Performance Review. The VVB may combine site visits/consider their reports concurrently.</p>	<p>This is not relevant as the scope includes only validation.</p>

<p>5.1.54 Concurrent Design Review and Performance Review commences when the VVB submits positive Validation and Verification Reports at the same time to Gold Standard</p>	
<p>5.1.55 Following receipt of the VVB Reports, Gold Standard shall conduct a review that covers both the Design Review and the Performance Review following the process outlines above.</p> <p>In such cases, the Design Review lasts a minimum of six weeks.</p> <p>5.1.56 Successful conclusion means both Design Certification and Performance Certification are approved concurrently including any issuance of Gold Standard Certified Impact and/or Products.</p>	<p>This is not relevant to the scope of validation service.</p>
<p>6. PROJECT DOCUMENTATION AND TECHNICAL REQUIREMENTS</p> <p>6.1.1 Projects shall provide evidence of conformity to the Requirements using approved Gold Standard Project templates except for supporting evidence and documents.</p> <p>The following project documentation and associated evidence and information are required at different stages of the project cycle.</p> <p>(a) Preliminary Review</p> <ul style="list-style-type: none"> i. Key Project Information (see PDD Template) ii. Draft PDD including Safeguarding Principles Assessment, SDG Impacts identified and draft Monitoring & Reporting Plan iii. Stakeholder Consultation Report iv. Supporting evidence and documents such as maps, survey results or calculations v. Signed Cover Letter and Terms and Conditions <p>(b) Validation and Design Review</p> <ul style="list-style-type: none"> i. Completed PDD including Monitoring & Reporting Plan ii. Fully completed Stakeholder Consultation Report iii. Validation Report iv. Any Activity, Context, Methodology or Product Requirement specific documentation v. Supporting evidence and documents <p>(c) Annual Reporting</p> <ul style="list-style-type: none"> i. Completed Annual Report ii. Supporting evidence and documents <p>(d) Verification and Performance Review</p> <ul style="list-style-type: none"> i. Any updates to the Key Project Information, 	<p>The request for registration will be submitted along with PDD, this validation report, LSC report, and other supporting documents.</p> <p>The validation team has reviewed the cover letter dated 12th November 2020 and terms & conditions dated 1st October 2020 prepared by the PP.</p>

<p>PDD and Monitoring & Reporting Plan ii. Any Context, Activity, Methodology and Product Requirement specific documentation iii. Verification Report iv. Supporting evidence and documents such as maps, survey results and/or calculations</p>	
<p>6.1.2 The Project Developer shall open an account on the Impact Registry: (a) Project Documentation, PDD, Monitoring & Reporting Plan, Reports, supporting documentation and the VVB's Validation and Verification Reports shall be submitted to the Gold Standard Registry.</p> <p>Note that the VVB is responsible for uploading the final Validation or Verification Report.</p> <p>(b) All Project Documentation, except confidential information, shall be made publicly available through the Impact Registry.</p> <p>(c) All information shall be submitted in English, OR a language that has been agreed upon by the Project Developer, the Gold Standard and the VVB.</p> <p>(d) Figures above one thousand shall be formatted with a comma (for example 1,000,000), and decimals will be separated by a point (for example 1.35).</p> <p>(e) Pictures, graphs, tables and supporting documents within Project Documentation shall be clearly marked with a unique ID.</p> <p>(f) Dates shall be included in the following format: DD/MM/YYYY</p> <p>(g) Maps, where required shall include:</p> <ul style="list-style-type: none"> i. Name of the project ii. ID of the project iii. Legend iv. Printing date v. Scale vi. Direction of North vii. GPS coordinate system (e.g. WGS 84) viii. GPS grid ix. Infrastructure (roads, houses, etc.) and rivers x. Information on the satellite or aerial picture (date, resolutions, data source) 	<p>This is not relevant to the scope of validation.</p>
<p>7. NON-CONFORMITY</p> <p>7.1.1 The Project Developer shall report any potential or actual Non-Conformity against the Requirements and any associated Guidelines, Tools or Methodologies immediately upon discovery (and no later than 30 days after the Non-Conformity event discovery).</p> <p>Potential or actual non-conformities may also be submitted to Gold Standard by any party at</p>	<p>This is not relevant.</p>

<p>any time for review.</p> <p>7.1.2 Gold Standard shall undertake a review of the Non-Conformity, including potentially commissioning an independent investigation and an expert peer review of any recommended action taken.</p> <p>During the investigation Gold Standard reserves the right to suspend activities related to Certification and/or Registry, including the assignment, transfer or retirement of Gold Standard Certified Impact Statements or Products.</p> <p>7.1.3 Gold Standard shall decide upon the action taken in response to a confirmed Non-Conformity.</p> <p>This may include; a requirement for immediate rectification or change, a suspension of a Project until rectification has been Verified or a removal of Gold Standard Certified Design status from the Project.</p> <p>Factors that influence Gold Standard's consideration of the severity of the issue shall include, but are not limited to:</p> <p>(a) If the issue is repeated/systematic or fundamental to the project.</p> <p>(b) If the issue has resulted in an inappropriate certification decision or over-issuance of Gold Standard Certified Impact Statements or Products.</p> <p>(c) If the issue has continued over a longer period of time or affects a significant area or population.</p> <p>(d) If the issue has caused the endangerment of life, livelihoods, ecology or the environment.</p> <p>(e) If the Project Developer failed to notify Gold Standard, take appropriate steps to limit any damage or disruption caused or has attempted to cover up the issue</p>	
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Appendix 6: GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS v2.1

<p>GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS v2.1</p>	<p>Validation opinion</p>
<p>1 SCOPE AND APPLICABILITY</p> <p>1.1.1 This document represents the Product Requirements for the issuance of:</p> <p>a. Gold Standard Verified Emission Reductions (GSVERs)</p> <p>b. Gold Standard labels for Certified Emission Reductions (GSCERs)</p> <p>c. Planned Emissions Reductions (PERs) for Land Use & Forests</p>	<p>The project is applied under GS only. Claims regarding GS-VER only by the PP.</p>
<p>1.1.2 Certain Requirements noted in this document do not apply to Projects applying the Gold Standard Land Use & Forests Activity Requirements (hereafter “LUF requirements”), these are noted as “LUF –</p>	<p>The project is a non forest project.</p>

N/A".	
1.1.3 Claims made regarding Gold Standard Voluntary Emission Reductions (GSVERs), Certified Emission Reductions (GSCERs) or Planned Emission Reductions (PERs) shall be in line with the Claims Guidelines.	The project is applied under GS only. Claims regarding GS-VER only by the PP.
1.1.4 Unless otherwise indicated in this document or associated documents, all projects applying these Requirements shall be consistent with applicable UNFCCC rules and requirements for Clean Development Mechanism (CDM) or Joint Implementation (JI) projects, as periodically updated	The project is applied under GS only. Claims regarding GS-VER only by the PP.
2 GENERAL ELIGIBILITY CRITERIA 2.1.1 Unless otherwise stated elsewhere in the Principles & Requirements, Projects involving a mix of eligible and ineligible components can only claim credits for the Emission Reductions and/or sequestration associated with the eligible component of the project.	This is not applicable.
2.1.2 Bundled Projects : Projects submitted together for certification within a bundle, each Project that is part of bundle shall individually conform to all GS4GG Requirements. Eligibility criteria with regards to the scale of the Project shall apply to the bundle as a whole and not to the individual Projects. Note: Several project activities which form a single project activity or portfolio without the loss of distinctive characteristics of each component	This is not a bundled project.
2.1.3 Voluntary project activities (VPAs): A group of Projects submitted together for Gold Standard Design Certification within a Programme of Activities. Each of these Projects shall conform to all Requirements including the Programme of Activity Requirements. A microscale VPA can only be part of a Microscale PoA and shall conform to all requirements including those listed in Annex A of the Programme of Activity Requirements.	This is not relevant as the project is standalone project.
3 LOCATION OF PROJECT GSVER project 3.1.1 VER Projects may be located in any host country or state. However, where host countries or states have mandatory operational schemes to reduce GHG emissions in any form (e.g. cap & trade, carbon tax etc.), Projects shall only be eligible if the Project Developer has either:	The project is located in Romania. There is no double counting.

<p>a. provided Gold Standard with satisfactory justification that no double counting of emission reductions occur or b. committed to retiring eligible units equal to the quantity of Gold Standard VERs, which must be done prior to VER issuance.</p> <p>Refer to Section 15 below of this document</p> <p>Note: Alignment with Paris Agreement rules may be required in the future.</p> <p>Please refer to relevant Gold Standard Requirements, as applicable.</p>	
<p>3.2 GSCER project (LUF – N/A) 3.2.1 CDM Projects shall be located in a Non-Annex I country, as defined by the UNFCCC. 3.2.2 JI Projects shall be located in an Annex I country with a commitment inscribed in Annex B of Kyoto Protocol, as defined by the UNFCCC.</p>	<p>The project is applied under GS only. So, this is not required.</p>
<p>4 ELIGIBLE GREENHOUSE GASES</p> <p>4.1.1 Only Carbon Dioxide (CO₂), Methane (CH₄) and/or Nitrous Oxide (N₂O) are eligible for GSVERs or GSCERs, provided Projects comply with all GS4GG Requirements and eligibility criteria.</p> <p>4.1.2 Projects involving the reduction of eligible and non-eligible greenhouse gases (GHGs) shall be eligible for the crediting of emission reductions associated with eligible GHGs only.</p>	<p>CO₂ is only GHG gas involved in this project.</p>
<p>5 TYPES OF PROJECT GSVERs and GSCERs project</p> <p>5.1.1 The Following Project types are eligible for issuance of GSVERs or GSCERs:</p> <p>a. Renewable Energy Supply:</p> <p>Project activities that generate and deliver energy services (e.g. mechanical work/electricity/heat) from non-fossil and renewable energy sources.</p> <p>Note that specific requirements apply to the issuance of Gold Standard Labelled Renewable Energy GSCERs and GSVERs, as listed in section 2 of the Renewable Energy Activity Requirements.</p> <p>b. End-Use Energy Efficiency Improvement: Project activities that reduce energy requirements as compared to baseline scenario without affecting the level and quality of services or products, where the end user of the products and services are clearly identified and when the physical intervention is required at the user end. For example, efficient cooking, heating,</p>	<p>The project is recycling of Aluminum waste and is used AMS.III AJ v9.0</p>

<p>lighting, etc.</p> <p>c. Waste Handling & Disposal: The waste handling and disposal category refers to all waste handling Projects that deliver an energy service (e.g. LFG with some of the recovered methane used for electricity generation) or a usable product with sustainable development benefits (e.g. composting).</p> <p>d. Land Use and Forests: including Afforestation/Reforestation and Agriculture Projects (CDM A/R projects are not eligible for issuance of GSCERs, however project may issue GSVERs after transitioning to GS4GG).</p> <p>e. Carbon Dioxide Removal (Working definition): refers to project activities that involves measures for carbon dioxide removal from atmosphere, permanent safe storage and/or reuse as products and achieve net negative emissions.</p> <p>The eligibility of CDR project is subject to the availability of an applicable approved Gold Standard methodology.</p>	
<p>6 ODA DECLARATION GSVERs and GSCERs project</p> <p>6.1.1 Projects are ineligible for carbon crediting under GS4GG if the OFFICIAL DEVELOPMENT ASSISTANCE (ODA) is provided to the project under the condition that the credits generated by the Project will be transferred, either directly or indirectly, to the donor country providing ODA support.</p> <p>The OECD defines ODA as financial flows:</p> <ol style="list-style-type: none"> To developing countries and multilateral institutions; Provided by government agencies (e.g. USAID); Whose main objective is the economic development and welfare of developing countries; and That are concessional in character, conveying a grant element of at least 25%. 	<p>The capital investment is financed by the project owner (100%) only. There is no public funding for this project. The PP has also signed ODA declaration form dated 18th Nov 2020 as well.</p>
<p>6.1.2 Project Developer submitting a Project located in a country named by the OECD Development Assistance Committee's ODA recipient list shall sign and submit the ODA Declaration.</p>	<p>PP has also signed ODA declaration form as well.</p>
<p>6.1.3 Where there is a material change in the role of ODA for the development or implementation of a Project, the Project Developer shall immediately submit an amended ODA Declaration</p>	<p>This is not required now.</p>
<p>7 FINANCIAL ADDITIONALITY & ONGOING FINANCIAL NEED GSVER projects</p> <p>7.1.1 All Projects shall be demonstrated to be additional, meaning that they shall reduce anthropogenic emissions of greenhouse</p>	<p>The validation opinion on additionality demonstration is reported in Appendix 15 of this report.</p>

<p>gases below those that would have occurred in the absence of the proposed Project.</p>									
<p>7.1.2 All Projects shall demonstrate Ongoing Financial Need at Certification Renewal following latest version of Principles & Requirements available at the time of renewal of their crediting period, unless otherwise stated in the relevant Activity Requirements.</p>	<p>This is not required.</p>								
<p>7.1.3 If the stakeholder consultation for the Project was conducted after the start date of the Project, the Project Developer shall demonstrate that the revenues from carbon credits were seriously considered in the decision to implement the Project.</p> <p>Evidence to support carbon revenue consideration and continuous actions may include contracts, draft versions of Project information, correspondence with financial institutions or other stakeholders, minutes and notes of Board/Management meetings, agreements or negotiations with auditors, publications in newspapers.</p>	<p>LSC was conducted 9th December 2020 and the start date is 10th December 2019 as per the PDD. So, the project is considered as retroactive one. The validation team has assessed the following events and confirmed revenues from carbon credits were seriously considered in the decision to implement the Project.</p> <table border="1" data-bbox="730 611 1437 2038"> <thead> <tr> <th data-bbox="730 611 1086 645">Event/Date</th> <th data-bbox="1094 611 1437 645">Validation opinion</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 645 1086 1043"> <p>1.The management decided to discuss with the company ELSACO ELECTRONIC, about the CO2 emissions reductions of the project and the possibility to obtain carbon credits/15th March 2019</p> <p>(GS event no 1)</p> </td> <td data-bbox="1094 645 1437 1043"> <p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS METALS decided to discuss with ELSACO ELECTRONIC about the CO2 emission reductions of the project. This is accepted as GS event by the validation team.</p> </td> </tr> <tr> <td data-bbox="730 1043 1086 1686"> <p>2.Decision of the Executive Director to look for companies that might help to obtain carbon credits for the savings of the CO2 emissions and nomination of the responsible persons for that/3rd April 2019</p> <p>(GS event no 2)</p> <p>Time gap between this event and previous GS event = less than one month</p> </td> <td data-bbox="1094 1043 1437 1686"> <p>The validation team has reviewed the document “Decision no 830 dated 3rd April 2019”. As per the document Legal representative of AS Metals (Constantin Apostol) has appointed Rodica Badila, Technical Manager of AS metals responsible for the market study to identify a consulting company that can assist AS Metals in the certification process in order to obtain voluntary certificates for offsetting CO2 emissions. This is accepted as GS event by the validation team.</p> </td> </tr> <tr> <td data-bbox="730 1686 1086 2038"> <p>3.Meeting with representatives of the audit company RINA Simtex to discuss about the CO2 emission process certification according to ISO 14034 and the possibility to obtain carbon credits if the company is certified ISO 14034/20th May 2019</p> </td> <td data-bbox="1094 1686 1437 2038"> <p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. 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	<p>(GS event no 3)</p> <p>Time gap between this event and previous GS event = less than two months</p>	<p>credits. This is accepted as GS event by the validation team.</p>
	<p>4.Meeting of the executive director of AS METAL COM SRL with Constantin Damov, member of the Board of Green Group and discussion about the Greentech's recycling project certified with Gold Standard/23rd August 2019 (GS event no 4)</p> <p>Time gap between this event and previous GS event = 3 months</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with Green Group and discussed about Greentech recycling project. This is accepted as GS event by the validation team.</p>
	<p>5.The representative of AS METAL COM SRL, Rodica Badila contacted Carbon Expert in order to find more about the carbon credits and the certification process/ 7th September 2019</p> <p>(GS event no 5)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email from AS Metals to carbon Expert to find out more about the carbon credits dated 7th Sep 2019. This is accepted as GS event by the validation team.</p>
	<p>6.The representative of AS METAL COM SRL, Rodica Badila contacted Carbon for the opportunity of certification to obtain voluntary certificates./ 9th Sep 2019</p> <p>(GS event no 6)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>The validation team has reviewed the email from technical manager of AS metals Rodica Badila to Carbonexpert dated 9th Sep 2019. As per the email, it was pointed that as per discussions with Director Constantin Apostol, requesting for the opportunity of certification to obtain voluntary certificates for the compensation of carbon emissions. This is accepted as GS event by the validation team.</p>
	<p>7.Correspondence between Carbon Expert and AS METAL COM SRL regarding the CO2 emissions project certification process on the voluntary market/20th Sep 2019</p> <p>(GS event no 7)</p>	<p>The validation team has reviewed the email from AS Metals to CarbonExpert to find out more about the certification process on the voluntary markets carbon credits dated 20th Sep 2019. This is accepted as GS event by the validation</p>

	Time gap between this event and previous GS event = less than one month	team.
	<p>8.Meeting of the executive director of AS METAL COM SRL with GS Consultant named as Carbon Expert to discuss the potential of obtaining carbon credits for the Aluminum recycling project./26th Oct 2019</p> <p>(GS event no 8)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with representative from Carbon Expert to discuss the potential of obtaining carbon credits for the Aluminum recycling project.</p> <p>This is accepted as GS event by the validation team.</p>
	<p>9.Offer from Carbon Expert regarding the consulting services related to the project certification and budget estimation related to the number of carbon credits obtained/17th Nov 2019</p> <p>(GS event no 9)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>The validation team has reviewed the proposal from CarbonExpert for consultancy services in order to obtain carbon credits dated 17th Nov 2019 to AS Metals.</p> <p>This is accepted as GS event by the validation team.</p>
	<p>10. Date of financial commitment = 10th Dec 2019</p> <p>(not a GS event)</p>	<p>As per clause 4.1.39 of GS Principles and Requirements v1.2, the Project start date is the earliest date on which the Project Developer has committed to expenditures related to the implementation of the Project. As per the section C.1.1 of PDD, project start date is 10th December 2019 which is the date of the finance deployment in the COMBISENSE optical separation and metal detection installation.</p> <p>On this date, PP has committed to expenditure (point of no return) related to the implementation of the project. This is accepted as start date of the project.</p>
	<p>11.Meeting of the executive director of AS METAL COM SRL with GS consultant Carbon Expert to discuss general conditions of the offer and</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met</p>

<p>the process of certification/26th Jan 2020</p> <p>(GS event no 10)</p> <p>Time gap between this event and previous GS event = two month</p>	<p>with Carbon Expert representative to discuss general conditions of the offer and the process of certification.</p> <p>This is accepted as GS event by the validation team.</p>
<p>12.E-mail from Carbon Expert with the draft agreement dated 10th Feb 2020</p> <p>(GS event no 11)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>Company 'Carbonexpert' consultancy of this project has provided draft contract dated 10th Feb 2020 for signing for the scope of consultancy services from Carbonexpert to AS Metals.</p> <p>This is accepted as GS event by the validation team.</p>
<p>13.Due to the pandemic start in February and the lockdown imposed in Romania on 17th March 2020, the management delayed the decision to sign the agreement with Carbon Expert and restarted the discussion in August 2020/17th August 2020</p> <p>(GS event no 12)</p> <p>Time gap between this event and previous GS event = 6 months</p>	<p>The validation team has reviewed the email from Technical manager of AS metals dated 17th August 2020 stating that considering the situation they faced during that spring as a result of the imposed restrictions through the emergency ordinances as safety measures in combating the pandemic generated by the virus Covid 19, a situation that suspended all investments for a period, but also considering the fact that AS Metals is trying to get back to normal in the current period and would like to resume the discussions regarding the certification process.</p> <p>This is accepted as GS event by the validation team.</p>
<p>14.Meeting of the executive director of AS METAL COM SRL with Carbon Expert to renegotiate the contract, considering the instable future economic perspective/30th Aug 2020</p> <p>(GS event no 13)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with Carbon Expert representative to discuss renegotiate the contract, considering the instable future economic perspective.</p> <p>This is accepted as GS event by the validation team.</p>
<p>15.Management decision regarding the CO project coordinator of the recycling</p>	<p>The validation team has reviewed the document" Decision no 1614 dated 7th</p>

<p>plant in the person Mihnea Jurca /7th Sep 2020</p> <p>(GS event no 14)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>Sep 2020. As per the document. Legal representative of AS metals Constantin Apostol has appointed Mihnea Jurca as project coordinator.</p> <p>This is accepted as GS event by the validation team.</p>
<p>16.Signed agreement with Carbon Expert for the consultancy on the carbon credits certification process/15th Sep 2020</p> <p>(GS event no 15)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the contract signed between CarbonExpert and AS Metals for consultancy services to obtain carbon credits dated 15th Sep 2020.</p> <p>This is accepted as GS event by the validation team.</p>
<p>17.Submission of AS METAL COM SRL documents to Gold Standard – Date of first submission/2nd Oct 2020</p> <p>(GS event no 16)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email dated 2nd Oct 2020 from company 'Carbonexpert' consultancy of this project. As per this email, Carbonexpert has emailed GS regarding the identification of account manager (Constantin Apostol) of this project for opening a GS account.</p> <p>This is accepted as GS event by the validation team.</p>
<p>18.Gold Standard approval and accounts opening/30th Oct 2020</p> <p>(GS event no 17)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email of GS to AS Metals dated 30th Oct 2020 regarding the opening on the GS account.</p> <p>This is accepted as GS event by the validation team.</p>
<p>19.Listing/ 12th November 2020</p> <p>(GS event no 18)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the screenshot of webpage of the project and accepted the same.</p> <p>This is accepted as GS event by the validation team.</p>
<p>20.Date of LSC meeting-remote/9th Dec 2020 (GS event no 19)</p> <p>Time gap between this event and previous GS</p>	<p>The validation team has reviewed the LSC report and accepted the same.</p> <p>This is accepted as GS event by the validation team.</p>

	<p>event = less than one month</p> <p>21.Date of VVB visit (Remote)/8th Dec 2021 (GS event no 19) Time gap between this event and previous GS event = less than one month</p> <p>22. Date of LSC meeting (physical) = 27th Sep 2022 (GS event no 21) Time gap between this event and previous GS event = 9 months</p> <p>23. Date of SFR round = 22nd Nov 2022 (GS event no 22) Time gap between this event and previous GS event = less than 2 months</p>	<p>The validation team has conducted the remote audit facilitated by the PP. This is accepted as GS event by the validation team.</p> <p>The validation team has reviewed the LSC report and accepted the same. This is accepted as GS event by the validation team.</p> <p>The validation team has reviewed the SFR round documents and accepted. This is accepted as GS event by the validation team.</p>
<p>7.2 GSCER projects (LUF – N/A)</p> <p>7.2.1 Gold Standard CDM and JI Projects are not required to carry out additional assessment for demonstration of additionality over and above what has been done for registration/determination with the CDM EB/JISC unless the Project falls into a category that is deemed non-Additional in an applicable GS4GG Activity Requirement.</p> <p>In such cases the relevant Activity Requirement shall take precedence.</p> <p>7.2.2 Gold Standard CDM and JI Projects shall demonstrate Ongoing Financial Need at Certification Renewal following latest version of Principles & Requirements available at the time of renewal of their crediting period, unless otherwise stated in the relevant Activity Requirements.</p>	<p>This is not required.</p>	
<p>8 ELIGIBLE METHODOLOGIES</p> <p>8.1 General Requirement</p> <p>8.1.1 All Projects shall</p> <p>a. conform to the relevant Activity Requirements and Gold Standard Approved Methodologies, including eligible CDM Methodologies.</p> <p>b. also meet the additional GS4GG methodology eligibility requirements, where applicable.</p>	<p>The project used CDM approved methodology AMS.III.AJ v9.0. This version is valid at the time of registration (9th August 2023).</p> <p>There is no activity requirement for this project.</p>	

<p>Refer to eligible CDM Methodologies.</p> <p>Note: In case any CDM methodology is not present in the GS4GG list of eligible CDM methodologies, the PD/CME may reach out to standard@goldstandard.org for further steps.</p> <p>8.1.2 The Gold Standard, subject to decision from the TAC, reserves the right to enforce revision to the applied methodology(ies) at any point, in case its application by a project/VPA has resulted and/or will result in overestimation of emission reductions</p>	
<p>8.2 GSVER projects</p> <p>8.2.1 GSVER Projects shall apply a Gold Standard Approved methodology.</p> <p>The Project shall apply the latest version of the methodology and applicable tools available at the time of first submission (preliminary review).</p> <p>For transition projects, refer to Annex B for methodology version applicability requirements.</p> <p>8.2.2 The methodology and tool version applied at the time of first submission (preliminary review) may be used for Design Certification as long as the Project is submitted for validation within six months after the time of first submission for Preliminary Review.</p> <p>If this condition is not met, the latest version of the methodology and applicable tool(s) available at the time of submission for validation shall be applied.</p> <p>Note: The time of submission for validation is the date when the VVB is contracted for the Validation of the Project, as formally confirmed by the VVB in the audit report</p>	<p>The project used CDM approved methodology AMS.III.AJ v9.0. This version is valid at the time of registration (9th August 2023).</p>
<p>8.2.3 GSVER Projects shall apply the latest version of the methodology and applicable tools available at time of submission for validation of Crediting Period Renewal.</p> <p>Please refer to relevant GS4GG requirements on Crediting Period Renewal for further guidelines.</p> <p>Note: The time of submission for validation for crediting period renewal is the date when the VVB is contracted for the re-validation of the Project, as formally confirmed by the VVB in the audit report.</p>	<p>This is not applicable for validation process.</p>
<p>8.3 GSCER projects (LUF – N/A)</p> <p>8.3.1 CDM and JI Projects seeking issuance of GSCERs shall use an approved CDM methodology and applicable tools available at</p>	<p>This is GS-VER project.</p>

<p>the time of registration with CDM.</p> <p>The project shall also meet additional GS4GG methodology eligibility requirements, where applicable.</p> <p>Refer to eligible CDM methodology</p>	
<p>8.3.2 CDM and JI Projects shall update to the latest version of an approved CDM methodology and applicable tools available at the renewal of the crediting period</p>	<p>This is not relevant as the project is GS-VER project.</p>
<p>9 PROJECT SCALE GSVER Projects</p> <p>9.1.1 GSVER Projects may be registered as 'large scale', 'small scale' (for the applicability of methodologies and tools only) or 'microscale'.</p> <p>Scale is defined in the relevant Activity Requirements or where these do not exist then per following paragraphs.</p> <p>9.1.2 All Projects exceeding the small scale thresholds are defined as large scale. Small scale projects are defined following CDM project standard for project activities, as below;</p> <p>a. Type 1: Renewable energy Projects: maximum output capacity of 15 MW(e) or 45MW(th).</p> <p>In this context:</p> <p>i. "Output" is the installed/rated capacity as indicated by the manufacturer of the equipment or plant, irrespective of the actual load factor of the plant.</p> <p>The installed/rated capacity of renewable electricity generating units that involve turbine generator systems shall be based on the installed/rated capacity of the generator;</p> <p>ii. Regarding the "appropriate equivalent" of 15 MW, refers to MW, but the project participants may refer to MW(p)6 ,3 MW(e) or MW(th).</p> <p>As MW(e) is the most common denomination, MW is defined as MW(e), and otherwise an appropriate conversion factor shall be applied;</p> <p>iii. For biomass, biofuel and biogas project activities, the maximal limit of 15 MW(e) is equivalent to a 45 MW thermal output of the equipment or the plant (e.g. boilers).</p> <p>For thermal applications of biomass, biofuels or biogas (e.g. cookstoves), the limit of 45 MW(th) is the installed/rated capacity of the thermal application equipment or device(s) (e.g. biogas stoves).</p>	<p>The project is small scale one as estimated ER is less than 60,000 tCO2e/year. So this is not type 1 project.</p>

<p>For electrical or mechanical applications, the limit of a 15 MW installed/rated output shall be used. In the case of co-firing renewable and fossil fuels, the rated capacity of the system when using fossil fuel shall apply;</p> <p>Note: For solar photovoltaic applications, 15 MW(p) may be defined by manufacturers' specifications under testing conditions of 1000 W/m² and 25 deg C or 600 W/m² and 35 deg C.</p>	
<p>iv. For thermal applications of solar energy project activities, "maximum output" shall be calculated using a conversion factor of 700 W(th)/m² of aperture area of glazed flat plate or evacuated tubular collector, that is, the eligibility limit in terms of aperture area is 64,000 m² of the collector⁷ .</p> <p>The project participants may also use other conversion factors determined, but shall then justify why the chosen conversion factor is more appropriate to the project activity; Example of technologies includes but not limited to solar photovoltaic, hydro, wind and renewable biomass that supply electricity to grid, mini grid, individual households/users or groups of households/users.</p> <p>Note: This conversion is not applicable for solar thermal parabolic and trough-type collectors used for high-grade solar thermal energy applications</p>	<p>The project is small scale one as estimated ER is less than 60,000 tCO₂e/year. So this is not type 1 project.</p>
<p>b. Type 2: End-use energy efficiency project improvement: activities that reduce energy consumption, on the supply and/or demand side, with a maximum energy saving of 60 GWh per year (or an appropriate equivalent) in any year of the crediting period.</p> <p>In this context, for project activities that improve thermal energy efficiency, the maximum energy saving of 60 GWh(e) per year is equivalent to 180 GWh(th) per year saving;</p> <p>Examples of technologies and measures include high efficiency biomass fired project devices (cookstoves or ovens or dryers) to replace the existing devices and/or energy efficiency improvements in existing biomass fired cookstoves or ovens or dryers.</p>	<p>The project is small scale one as estimated ER is less than 60,000 tCO₂e/year. So this is not type 2 project either.</p>
<p>c. Type 3: Other project activities: project involves technologies such Safe Water Supply, Waste management, etc. not included in Type I or Type II that result in GHG emission reductions not exceeding 60,000 ton CO₂e per year in any year of the crediting period.</p> <p>Examples of technologies and measures include solid waste composting, Water purification technologies including, but are not</p>	<p>The project is small scale one as estimated ER (56,282 tCO₂e/year) is less than 60,000 tCO₂e/year. So this is type 3 project.</p>

<p>limited to, water filters (e.g. membrane, activated carbon, ceramic filters), solar energy powered ultraviolet (UV) disinfection devices, solar disinfection techniques, photocatalytic disinfection equipment, pasteurization appliances, chemical disinfection methods (e.g. chlorination), combined treatment approaches (e.g. flocculation plus disinfection), boreholes, wells, water kiosks.</p>	
<p>9.1.3 'Microscale' Projects are those projects associated with annual emission reductions of less than or equal to 10,000 tCO₂eq in each year of the crediting period. In the case of LUF Project, a microscale project is defined as a project with a maximum project area of 500ha and shall generate annual emission reductions of less than or equal to 10,000 tCO₂eq.</p> <p>It should be noted that the Gold Standard definition of 'microscale projects' is different from the CDM's definition of 'microscale projects'.</p>	<p>The project is not microscale one as ER is more than 10,000 tCO₂e/year.</p>
<p>9.1.4 In case, during project operation, a small scale or microscale Project exceeds the scale definition, the Project shall only be eligible for GSCERs, GSVERs or ERUs up to the maximum number of allowable emission reductions per year corresponding to project scale definition for the given project type. E.g., when a micro-scale project achieves emission reductions greater than 10,000 tonnes of CO₂eq in a given crediting year, the claimable emissions reductions shall be capped at 10,000 tonnes of CO₂eq.</p>	<p>This is not applicable for a non GS microscale project.</p>
<p>9.1.5 GSVER project and VPAs applying suppressed demand baseline, irrespective of the applied methodology (approved GS or CDM methodology) and individual technology units, shall demonstrate compliance with applicable project type Small Scale thresholds at the aggregate level of the project or VPA, as defined in paragraph 9.1.1 above.</p> <p>Refer to Rule update for further details and CORSIA eligibility- Application of Suppressed Demand, Project Type And Applicable Scale Threshold.</p>	<p>For Romania projects, suppressed demand is not applicable.</p>
<p>9.2 GSCER projects (LUF – N/A)</p> <p>9.2.1 Gold Standard CDM or JI Projects may be 'large scale' or 'small scale'. All Project exceeding the small scale thresholds are defined as large scale. The applicability of methodologies is defined following CDM project standard for project activities.</p> <p>9.2.2 Small Scale Projects are defined as per section - Project type and eligibility, CDM project standard for project activities, summarised herein : a. Type I: Renewable energy project activities with a maximum output capacity of 15 MW (or an appropriate</p>	<p>This is GSVER project. Hence this is not applicable.</p>

<p>equivalent) b. Type II: Energy-efficiency improvement project activities < = 60 GWh(e) or 180 GWh(th) energy savings per year c. Type III: Other project activities not included in Type I or Type II < = 60,000 tCO₂e_q per year</p> <p>9.2.3 A small scale CDM project activity may contain more than one component, each belonging to one of the three project types referred above. In this case, the sum of the scale of components belonging to the same project type shall not exceed the limit of that project type.</p>	
<p>9.2.4 Microscale CDM projects are defined as per para 121, CDM project standard for project activities as follows; a. Type I: project activities with up to 5 MW output capacity that employ renewable energy as their primary technology b. Type II: project activities that aim to achieve energy savings at a scale of no more than 20 GWh per year; or c. Type III: Other project activities not included in Type I or Type II that aim to achieve GHG emission reductions at a scale of no more than 20 kt CO₂e per year.</p>	<p>This is GSVER project. Hence this is not applicable.</p>
<p>9.2.5 GSVERs may be claimed for eligible Project elements that are not covered by a CDM Project as long as the eligible elements are validated and verified separately as a GSVER activity.</p>	<p>This is GSVER project. Hence this is not applicable.</p>
<p>10 CREDITING CYCLE & ISSUANCE Crediting Period a. GSVER projects</p> <p>10.1.1 Gold Standard Projects are eligible to claim GSVERs for no more than: a. The maximum Certification Renewals/Cycles (i.e. Crediting Period) as stipulated in the relevant Activity Requirements OR b. A maximum of one Certification Renewal Cycle (i.e. Crediting Period of 10 years) in the absence of the Activity Requirements</p> <p>NOTE - Project, PoA/VPAs registered with previous versions of Gold Standard and renewing their crediting period under GS4GG shall maintain their existing crediting cycle and maximum crediting periods following Transition Requirements. - Project, PoA/CPAs registered with other standards like CDM seeking transition to GS4GG for GSVERs issuance shall refer to Annex B of this document as applicable.</p>	<p>First of its kind option is adopted by the project developer to demonstrate additionality. The crediting period would be 3 x 5 years.</p>
<p>10.1.2 Where a Gold Standard Project has been or is registered under one or more other carbon standards or certification schemes, the total aggregated crediting period under all schemes combined shall not exceed the standard crediting period allowed under Gold Standard. Gold Standard status shall immediately be withdrawn from any activities that are found to have violated this</p>	<p>The project is applied under GS only.</p>

<p>requirement and the Gold Standard reserves its right to pursue remedies in accordance with and pursuant to Terms & Conditions.</p> <p>Refer to Annex B for further details on crediting period requirements for transition projects</p>	
<p>b. GSCER projects</p> <p>10.1.3 CDM or JI Projects are eligible to claim GSCERs for no more than:</p> <p>a. The maximum Certification Renewals/Cycles (i.e. Crediting Period) as stipulated in the relevant Activity Requirements OR</p> <p>b. A maximum of one Certification Renewal Cycle (i.e. Crediting Period of 10 years) in the absence of the Activity Requirements</p> <p>10.1.4 For CDM or JI projects, registered crediting period cannot be changed/extended.</p>	<p>This is not relevant.</p>
<p>10.1.5 For CDM or JI projects, the labelling of emission reductions after registration with GS4GG is allowed up to maximum crediting period as per relevant GS4GG activity requirements or end of crediting period with standard X, whichever occurs first.</p> <p>The following examples explains how this requirement shall be applied – If a given project applies for labelling of emission reductions and is registered with Standard X with - fixed crediting period (10 years): the project can seek labelling under GS4GG for maximum up to 10 years but shall not be extended beyond the end date of crediting period with Standard X. - renewable crediting period (7*3 year): the project can seek labelling up to the maximum crediting period allowed under relevant GS4GG activity requirements.</p> <p>For example; under GS4GG, the maximum crediting period allowed for renewable energy project is 15 years.</p> <ul style="list-style-type: none"> o A renewable energy project that has already claimed 5 years under Standard X can claim labelling for 15 years of remaining crediting period after transitioning to GS4GG. o A renewable energy project that has already claimed 10 years under Standard X can claim labelling for 11 years of remaining crediting period after transitioning to GS4GG, i.e., the end date of crediting period with Standard X. <p>10.1.6 CDM or JI projects that were registered with previous versions of Gold Standard (i.e. prior to release of the Gold Standard for the Global Goals) are allowed to seek labelling of issued CERs up to their maximum CDM crediting period, i.e., 10 or 21</p>	<p>This is not relevant for GS-VER project.</p>

<p>as per Section 3.0 of Transition requirements.</p>	
<p>10.2 Crediting Period Start Date a. GSVER projects</p> <p>10.2.1 The start date of Crediting Period is the date of start of operation (start of planting for A/R Projects) or a maximum of two years (three years for A/R & AGR) prior to the date of Project Design Certification, whichever occurs later.</p>	<p>The start date of the CP is date of start of operations or a maximum of two years prior to the date of Project Design Certification, whichever occurs later. For this project, commissioning date is 15th April 2020. The validation team has reviewed the commissioning certificate and accepted the same.</p> <p>As per this certificate, the reception committee, Romania has confirmed that technical economic documentation provided for in the regulation on the implementation of the investment objectives was fully presented to the reception committee. The technological tests of the machines and installations related to the capacity for the normal operation of the technological installations and machines and ensuring the quality of the products were carried out, according to the technical economic documentation and the approved technical economic indicators.</p> <p>Considering the date of completion validation, the start date of the crediting period would start two years prior to the date of Project Design Certification only. As per the this, the crediting period will start from 1st Sep 2021.</p>
<p>10.2.2 In case the start date of the Crediting Period is after date of Project Design Certification then it may be postponed in line with the requirements listed in paragraph 3.1.3 (b) and (c), of the Design Change requirements. (LUF – N/A)</p>	<p>This is not applicable.</p>
<p>b. GSCER projects 10.2.3 CDM or JI project seeking GSCERs, the start date of the crediting period with Gold Standard shall be the start date of the crediting period under CDM or maximum of two years prior to the date of first submission (submission for preliminary review), whichever occurs later</p>	<p>This is not relevant.</p>
<p>10.3 Issuance of GSVERs or GSCERs</p> <p>10.3.1 Upon completion and approval of the Performance Review the Gold Standard shall certify the entire amount of emission reductions specified in the monitoring report and achieved by the Project.</p> <p>Certification of only part of total volume of emission reductions specified in the report approved by Gold Standard is not allowed.</p> <p>10.3.2 Once issued, GSVERs remain valid until they are permanently retired in the Impact Registry or until the time they are used for compliance or retired in an authorised registry (GSCERs).</p> <p>Once issued, GSCERs, or GSVERs cannot be retroactively cancelled.</p>	<p>For the current scope of validation, this is not required.</p>
<p>10.4 Issuance for Retroactive Period a. GSVER projects</p> <p>10.4.1 Projects may be eligible for retroactive crediting for realised emission reductions for maximum two years (three years for A/R and</p>	<p>This project is eligible for retroactive crediting for realized emission reductions for maximum two years. For this project, commissioning date is 15th April 2020 . Considering the date of completion validation, this requirement is not relevant to the project.</p>

<p>AGR) Projects.</p> <p>Note - Retroactive crediting of 10 years for A/R Projects and 5 years for agriculture projects is allowed as an exception if time of first submission (preliminary review) was before 01 January 2016 for A/R Projects and 01 January 2017 for agriculture projects.</p> <p>b. GSCER projects 10.4.2 The project shall be eligible for retroactive crediting for a maximum of two years. However, the total duration of the crediting period of the project shall not exceed the standard crediting period allowed under relevant GS4GG activity requirements.</p>	
<p>10.5 Issuance of GSVERs or GSCERs with REACs</p> <p>10.5.1 Co-issuance of Renewable Energy Attributes Certificates (REACs)⁸ with GSVERs or GSCERs for same MWh of electricity generated is not permitted.</p> <p>It is, however, possible for a Project to request issuance of either GSVERs or Gold Standard Labelled Renewable Energy Products – see the Renewable Energy Label Product Requirements for further details.</p> <p>Note: For example; Green or White Certificates</p> <p>10.5.2 Furthermore, if the Project also applies the Gold Standard Renewable Energy Label Product Requirements, then the Gold Standard Validation/Verification Body (hereafter VVB) shall check for double counting at both validation and verification stages by reviewing all relevant registries that could hold REACs from the considered project activity.</p> <p>The list of registries examined by the VVB shall be reported in the Validation Report and Verification Report.</p> <p>Refer to Renewable Energy Label Product Requirements for further details.</p>	<p>This is not required for this type of recycling project.</p>
<p>10.6 GSCERs Project Cycle (LUF – N/A) 10.6.1 CDM Project seeking labelling of issued CERs (GSCERs) shall mirror the CDM crediting period renewal cycle for Certification Renewals (e.g. 7 years).</p>	<p>This is GS VER project. Hence the requirement is not relevant.</p>
<p>Pre-CDM GSVERs and Parallel Registration 10.7.1 Project Developers can claim pre-CDM GSVERs for a maximum of two years before start of the CDM or JI crediting period (date of Design Certification/determination under UNFCCC) provided that the project enters into an agreement with the Gold Standard committing to surrender to the Gold Standard, for immediate retirement, CERs or</p>	<p>This is GS VER project. Hence the requirement is not relevant.</p>

<p>ERUs that will be issued in respect of GHG Reductions generated by the Project during the CDM or JI crediting period in an amount equal to the Pre-CDM VERs or Pre-JI VERs.</p> <p>The agreement shall make use of the Emission Reduction Acquisition Agreement template and no delivery is required for a grace period of the initial two years of issuance after CDM Design Certification/JI determination.</p> <p>10.7.2 An eligible project may be submitted for Design Certification to both the GS CDM/JI stream and the GSVER stream in parallel.</p> <p>a. If the proposed CDM/JI Project is successfully registered under the UNFCCC, Project Developer shall immediately inform The Gold Standard and the GSVER Project shall be cancelled.</p> <p>b. If the proposed CDM/JI Project is rejected by the UNFCCC, Project Developer shall immediately inform the Gold Standard. Only if the Project was rejected due to inapplicability of the methodology, can it continue to Design Certification stage under the GSVER stream.</p>	
<p>10.8 Project Design Change</p> <p>10.8.1 Permanent changes in project or PoA/CPAs design shall be assessed as per the requirements listed in the Design Change Requirements.</p> <p>Note: Section 11 is not applicable for this project</p>	<p>This is design certification of the project. So this requirement is not relevant.</p>
<p>12 GS-VVB REQUIREMENTS</p> <p>12.1.1 Gold Standard Project Developers may use a GS approved VVB as stated in the Gold Standard Validation & Verification Body Requirements.</p>	<p>EPIC has GS accredited VVB. https://www.goldstandard.org/project-developers/standard-documents</p>
<p>12.1.2 At minimum, the VVB9 shall conduct physical site visit;</p> <p>a. Within two years of project start date; and</p> <p>b. Once every three years after the first physical site visit.</p> <p>Note: For microscale project/ PoA internal validation/verification, SustainCERT acts as a VVB.</p>	<p>For validation, physical onsite was not conducted as per 12.1.4 a below. The validation team has conducted remote auditing only.</p>
<p>12.1.3 The VVB may combine both validation and verification audits in first physical site visit provided the site visit is conducted within two years of project start date.</p>	<p>The scope covers only validation only.</p>
<p>12.1.4 A physical site visit by VVB is;</p> <p>a. not mandatory at the validation (Design Certification or Design Certification Renewal) of a project.</p> <p>b. mandatory at the first verification of a project where a physical site visit is not</p>	<p>For validation, physical onsite was not conducted. The Validation team has conducted remote auditing only.</p>

<p>mandatory, the VVB shall determine (by carrying out a risk assessment) whether a remote audit is viable for an audit instance of a given project.</p> <p>Refer to Site Visit and Remote Audit Requirements and Procedures for remote audit requirements.</p>	
<p>12.1.5 GS4GG requirements for validation and verification site visits shall supersede the CDM requirements for GSCER & GSVER projects, PoA/CPAs.</p> <p>A CDM project or CDM PoA/CPA may be exempted from undertaking an audit site visit for CDM validation or CDM verification process, but it shall comply with the GS4GG requirements in order to pursue Gold Standard Design Certification and Performance Certification for issuance and labelling of CERs</p>	<p>PP used CDM approved methodology for calculating the ER. Otherwise, for requirements, PP has used GS4GG guidelines only.</p>
<p>13 UPGRADING PROJECT FROM OTHER CARBON STANDARDS OR CERTIFICATION SCHEMES</p> <p>13.1 Transition of Project, POA/CPA from Other Standards</p> <p>13.1.1 Project, PoA/CPA registered with other carbon standard or certification scheme, for example CDM may transition and register with GS4GG to issue GSVERs following the applicable requirements and guidelines provided in Annex B of this document.</p> <p>13.1.2 It is possible to upgrade an eligible A/R project from CDM/JI or VERRA/CCBA to GSVERs following applicable requirements and guidelines provided in Annex B of this document.</p> <p>13.2 GSCER Project to GSVER Project</p> <p>13.2.1 The Project Developer may convert registered GSCER Project into a GSVER Project following applicable requirements and guidelines provided in Annex B of this document.</p> <p>13.3 Issued GSCERs to GSVERs (LUF – N/A)</p> <p>13.3.1 The Project Developer may convert issued GSCERs into GSVERs following the applicable requirements and guidelines provided in Annex B of this document.</p> <p>13.4 GSVER to GSCER/JI Project (LUF – N/A)</p> <p>13.4.1 Project Developers may seek to convert a GSVER Project to a Gold Standard CDM/JI Project at any time during the crediting period for future emission reductions, provided the Project Developer either applies</p>	<p>This is not required.</p>

<p>under the Gold Standard CDM/JI stream before any GSVERs have been issued, or enters into an agreement with the Gold Standard according to which they commit to surrender to the Gold Standard, for immediate retirement, CERs or ERUs that will be issued in respect of GHG Reductions generated by the Project in an amount equal to VERs already issued.</p> <p>The agreement shall make use of Emission Reduction Acquisition Agreement template.</p>	
<p>14 DOUBLE COUNTING REQUIREMENTS</p> <p>14.1 Double Issuance</p> <p>14.1.1 Double issuance occurs when more than one emission reduction/removal unit is issued for the same emissions reductions or removals (for example when a project is registered under two different standards, programs, or schemes or twice under the same standard, program, or scheme).</p> <p>14.1.2 As outlined in the Principles & Requirements, a project shall not be included in any other voluntary or compliance standard or program unless expressly approved by Gold Standard (for example through permitted dual certification in accordance with the Gold Standard rules and requirements).</p> <p>Where dual certification is allowed, the project shall claim emission reductions or removal units of a given vintage only once and under one standard only following applicable requirements.</p> <p>Please refer to Section 2 below for applicable requirements</p>	<p>The credit will be sold as GS-VER only and not to be used as AAU. So there is no double issuance.</p>
<p>14.2 Double Use</p> <p>14.2.1 Double use occurs when the same issued emissions unit is counted twice towards achieving climate change mitigation targets or pledges (for example when a unit is used twice by the same buyer towards claims in different calendar years, or retired once on the Impact Registry but then used by two separate entities towards their distinct and individual mitigation claims).</p> <p>14.2.2 As outlined in the Principles & Requirements, project developer must demonstrate full and uncontested legal ownership of any products, including GSVERs, generated under Gold Standard certification.</p> <p>Where ownership is transferred, the legal chain of title must be demonstrated transparently, with full documentary support, and with free, prior and informed consent</p>	<p>The credit will be sold as GS-VER only and not to be used as AAU. So there is no double issuance.</p>

<p>(FPIC).</p> <p>14.2.3 In addition, registry Account Holders must accept the Gold Standard Impact Registry Terms of Use, which require Account Holders to acknowledge and agree, with respect to the retirement of GSVERs (referred to as Units), that:</p> <ol style="list-style-type: none"> a. The Account Holder is retiring Units permanently; b. Neither the Account Holder nor any third party has any further rights to take the benefit of such Unit nor the underlying Environmental Benefits corresponding to such Units, and c. The Account Holder will procure that all relevant third parties enter into such agreements as are necessary to ensure that neither the Account Holder nor any third parties have any further rights to take the benefit of such Units nor the underlying Environmental Benefits corresponding to such Units. <p>14.2.4 Account Holders that fail to comply with requirements (para 14.2.3 above) may face the suspension of their access to the Impact Registry, delisting, and other penalties under the Terms of Use</p>	
<p>14.3 Double Claiming</p> <p>14.3.1 Double claiming occurs when the same emission reduction or removal is claimed by both</p> <ol style="list-style-type: none"> (i) an emitting entity that reports lower emission levels to demonstrate achievement of mitigation targets or pledges and (ii) by another entity that uses the same emission units resulting from the same emission reduction to achieving its own mitigation targets or pledges. The practice of double claiming may involve more than two claimants, for example where emission reductions are passed through multiple parties in a value chain, used by a company for offsetting to meet a corporate GHG target and also counted towards the Nationally Determined Contribution (NDC) under Article 4 of the Paris Agreement of the Host Country in which the emission reductions occurred. a. Double claiming with a Nationally Determined Contribution (NDC) <p>14.3.2 The avoidance of double claiming with the NDC of a project's Host Country is not mandatory for all projects seeking issuance of GSVERs with a vintage of 2021 or later, but is required for GSVERs with a vintage of 2021 or later to be eligible for certain use purposes.</p> <p>These uses include:</p> <ol style="list-style-type: none"> i. Use towards an NDC or domestic climate mitigation target other than that of the Host Country; ii. Use by an aeroplane operator towards its 	<p>The credit will be sold as GS-VER only and there will be no double claiming.</p>

<p>compliance obligation under the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA)</p> <p>14.3.3 With respect to the use of GSVERs with a vintage of 2021 or later towards voluntary compensatory claims, entities should use and make claims with respect to GSVERs in accordance with Gold Standard's Claims Guidelines, once revised later in 2022.</p> <p>14.3.4 Project intending to avoid double claiming between the end-user of GSVERs and the NDC of the Host Country must receive an appropriate Letter of Authorisation from the relevant Host Country, and apply and abide by Gold Standard's 'Requirements for Credits Authorised for Use Under Article 6 of the Paris Agreement' set out in ANNEX A – REQUIREMENTS FOR CREDITS AUTHORISED FOR USE UNDER ARTICLE 6 OF THE PARIS AGREEMENT of this document. GSVERs that abide by these Requirements will be designated accordingly in the Impact Registry.</p> <p>14.3.5 The avoidance of double claiming between the end-user of a GSVER and the NDC of the Host Country is not applicable for: i. GSVERs issued to projects for emission reductions or removals that occurred within the international boundary of aviation or maritime operations, unless these activities are included within the NDC of any country. ii. GSVERs issued to projects for emission reductions or removals that occurred in 2020 or an earlier year, prior to the implementation of NDCs under the Paris Agreement.</p>	
<p>b. Double claiming with National Policies</p> <p>14.3.6 Double claiming with national climate policies and carbon pricing schemes may occur when a GSVER is included within, and claimed as an emission reduction under, a Host Country-regulated jurisdictional climate mitigation target, emissions trading scheme, or carbon pricing system, and is also claimed by another country, jurisdiction or entity that reports lower emission levels to demonstrate achievement of mitigation targets or pledges.</p> <p>Where a risk of such double claiming exists, project developer shall apply the requirements and follow the procedures set out in Section 15 below of this document</p>	<p>The credit will be sold as GS-VER only. The credit will not be used for NDC purposes. There will be no double claiming with National policies.</p>
<p>c. Double claiming with progress towards a voluntary climate mitigation pledge</p> <p>14.3.7 Double claiming between the end-user of a GSVER and progress by another company towards achievement of a voluntary climate mitigation pledge, such as a Science Based Target (SBT), is governed by requirements of the Greenhouse Gas Protocol</p>	<p>The credit will be sold as GS-VER only. The credit will not be used for NDC purposes. There will be no double claiming with voluntary climate mitigation pledge as the right to claim GS-VER lies with the PP only.</p>

<p>and is the responsibility of reporting companies. Further tracking and adjustment mechanisms are likely to emerge but are not yet fully in place in third party schemes.</p> <p>14.3.8 Where a GSVER is generated from within the inventory boundary of a company and sold to another entity, the transferring company's inventory should be appropriately adjusted to reflect this transfer. Likewise, companies purchasing GSVERs should ensure that they do not report the GSVER towards a target or pledge if they are aware that another company is doing so.</p> <p>14.3.9 Project developer should check for potential instances of double claiming prior to and during the implementation of a project, inform participants of this requirement and make Gold Standard aware wherever instances of double claiming arise. Gold Standard reserves the right to take action where it becomes apparent that such double claiming is occurring.</p>	
<p>15 REQUIREMENTS TO AVOID DOUBLE CLAIMING WITH NATIONAL CLIMATE POLICIES</p> <p>15.1 Requirements</p> <p>15.1.1 Double claiming with national climate policies describes a situation in which a GSVER is included within and counted under a regulated domestic climate mitigation target, including under a regulated GHG emissions trading scheme, and also claimed by another country, jurisdiction or entity to achieve respective mitigation targets or pledges.</p> <p>15.1.2 Where a potential risk of such double claiming exists, the project developer shall, as a requirement for the Design Certification of the project, demonstrate with documentary evidence that no double counting can occur, for instance by demonstrating one of the following:</p> <ul style="list-style-type: none"> a. The GHG emissions reductions/removals scope (e.g., sector or activity) are not accounted for within the relevant system of the host country/regional regulator; b. Participation in the regulatory scheme is voluntary (e.g., there is not mandated or automatic capture of emissions reductions within the regulator's inventory) c. The host country/regional regulator does not account for voluntary GHG emissions reduction/removal contributions. <p>This must be demonstrated credibly either through an appropriate policy instrument or by</p>	<p>The credit will be sold as GS-VER only. The credit will not be used for NDC purposes. There will be no double claiming with National policies. The credit will be sold as GS-VER only and not to be used as AAU.</p>

<p>the regulator cancelling an equivalent volume of scheme units or applying appropriate accounting adjustments.</p> <p>Such cancellation or adjustment must be demonstrated as permanent.</p> <p>15.1.3 If none of the above can be demonstrated, then the project owner shall demonstrate that Eligible Cancellation Units are cancelled by or on behalf of the project, in scenarios where this is relevant.</p> <p>15.1.4 With respect to GHG emissions trading schemes, Eligible Cancellation Units include units eligible within the Host Country's emissions trading scheme that are valid at the time of issuance (for example valid for a given commitment period), where applicable.</p> <p>15.1.5 With respect to potential double claiming with targets under the Kyoto Protocol, Eligible Cancellation Units are limited to:</p> <ul style="list-style-type: none"> a. AAUs b. CERs, with eligibility further restricted as follows: <ul style="list-style-type: none"> i. Must be from scopes/sectors eligible for Gold Standard labelling ii. Must have completed the UNFCCC SD Tool10 iii. Units may not be temporary/validated (i.e. tCER and ICERs from CDM A/R are not eligible). iv. From 1 March 2021 onwards, must be from project activities or programmes of activities registered on or after 1 January 2013. <p>15.1.6 It must be demonstrated that the Eligible Cancellation units have been cancelled for the purposes of the respective Gold Standard project addressing double counting.</p> <p>15.1.7 An equivalent number of Eligible Cancellation Units shall be cancelled prior to each issuance of an affected project.</p> <p>The GSVER issuance process will occur in line with the timescales as appropriate under the Gold Standard Rules and Requirements, but GSVER issuance will not be completed until the cancellation of an equivalent number of Eligible Cancellation Units has been confirmed/attested.</p>	
<p>15.2 Procedures</p> <p>15.2.1 At first submission to Gold Standard, a desk appraisal shall be conducted to establish</p>	<p>This is not applicable.</p>

<p>the presence of a risk of double counting with national climate policies.</p> <p>This appraisal shall be completed by Gold Standard and provided to the project developer for consideration.</p> <p>15.2.2 The project developer may provide evidence that no double counting can occur, as described above, or commit in writing to the cancellation of Eligible Cancellation Units as described above if such evidence cannot be provided.</p> <p>To enable Registration (and Issuance) to occur, approval is required from the Gold Standard Technical Advisory Committee, which shall review the matter in a timely manner.</p>	
<p>15.2.3 The Project Owner shall notify the Host Country Designated National Authority and any relevant regulatory bodies concerning the proposed issuance of voluntary GSVERs no less than two months prior to Design Certification.</p> <p>Any comments raised by such bodies in response to notifications shall be addressed prior to Design Certification.</p> <p>Gold Standard reserves the right to reject a project Listing or Design Certification should the Host Country, Designated National Authority, or applicable regulatory body object to the Gold Standard listing of project or issuance of the GSVERs on the basis of double counting risk(s).</p> <p>15.2.4 Should a regulatory scheme be proposed or commence development during the project crediting period, the project developer is hereby required to:</p> <p>a. Promptly notify the Host Country, Designated National Authority, or any newly formed regulatory body of the existence of their voluntary project in the Host Country and that steps have been taken to avoid double counting in accordance with the Gold Standard requirements, and</p> <p>b. Request that the Host Country account for and report on the activity accordingly.</p> <p>15.2.5 In cases where the project owner is required to cancel Eligible Cancellation Units, Gold Standard does not require the project owner to cancel the respective number of Units at the beginning of Gold Standard application process.</p> <p>Instead, it will be required when the audit report has confirmed the final quantity of</p>	<p>This is not applicable.</p>

GSVERs. Evidence of the cancellation of Eligible Cancellation Units shall be provided to the Gold Standard prior to the issuance of any GSVERs	
ANNEX A – REQUIREMENTS FOR CREDITS AUTHORISED FOR USE UNDER ARTICLE 6 OF THE PARIS AGREEMENT	This is not applicable
ANNEX B – REQUIREMENTS & PROCEDURE TO TRANSITION PROJECTS FROM OTHER STANDARDS TO GOLD STANDARD FOR THE GLOBAL GOALS	This is not applicable
ANNEX C – LAND-USE & FORESTS ISSUANCE GUIDELINES	This is not applicable

Appendix 7: STAKEHOLDER CONSULTATION AND ENGAGEMENT REQUIREMENTS v2.1

STAKEHOLDER CONSULTATION AND ENGAGEMENT REQUIREMENTS v2.1	Validation opinion
<p>1.SCOPE, APPLICABILITY AND ENTRY INTO FORCE</p> <p>1.1 Scope</p> <p>1.1.1 This document sets out the requirements for stakeholder consultation and engagement corresponding to the Gold Standard for Global Goals (GS4GG) Principles and Requirements</p>	The validation team has reviewed the LSC report and observed that PP has understood the purpose of LSC meeting. PP has identified the affected stakeholders to discuss the potential impacts on all aspects.
<p>1.2 Applicability</p> <p>1.2.1 The requirements specified in this document apply to all project activities for which Project Developer/Coordinating and Managing Entity (CME) seeks certification under GS4GG.</p>	The project is seeking GS-VER under GS4GG. Hence this document is applicable.
<p>1.3 Entry into force</p> <p>1.3.1 This document comes into force on 12 September 2022</p>	PP has used the latest version only.
<p>2.1 DEFINITIONS</p> <p>2.1.1 In addition to definitions contained in GS4GG – Glossary of terms, the following definitions apply to this document:</p> <p>a. Expert stakeholder refers to the individuals that hold specific expertise or knowledge about the organisation, process, or activity being audited and/or about the context and practices to which the project is applied.</p> <p>A Stakeholder is considered an expert if the expert holds over 10 years of relevant, contextually specific professional, academic or practical experience in a given topic.</p> <p>Higher academic qualifications are preferred but can be justified as not required if necessary.</p>	The validation team has recognized and accepted the local stakeholder based on this definition only.
<p>b. Marginalised individuals and groups refer to the section of society that experiences exclusion (social, political and economic), discrimination and, for whatever reason, are unable to participate in the mainstream economic, political, cultural and social activities.</p>	The validation team has recognized and accepted the local stakeholder based on this definition only.

<p>A few most common marginalised groups are women, youth, poor communities, informal sector workers, ethnic minorities, indigenous peoples, disabled or elderly people, and members of the LGBTQ community.</p>	
<p>c. Meaningful consultation refers collectively to meaningful consultation and participation in a two-way process that: – is ongoing and iterative throughout the project cycle, starting as early as possible, and – ensures that different categories of stakeholders are represented and involved, and – is equitable and non-discriminatory, and ensure that poorer or more vulnerable parts of the affected stakeholders are given a voice, and – is transparent and based on factual information, including the scope of consultation and the ability of stakeholders to influence project decisions, and encourages stakeholder feedback and engagement in the project development, design and implementation process, and – is based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timely manner and culturally appropriate format, and – considers and responds to feedback, and – is free of external manipulation, interference, coercion, discrimination, intimidation, and – is systematically documented and relevant aspects of it are disclosed publicly in a transparent manner.</p>	<p>The validation team has checked and confirmed that free prior informed consent is received from each of the local stakeholder.</p>
<p>d. Relevant stakeholder is a collective term for local, affected, interested and expert stakeholders.</p>	<p>The validation team has recognized and accepted the local stakeholder based on this definition only.</p>
<p>e. Stakeholder consultation is a broad term that covers processes involving Stakeholder identification, Stakeholder engagement planning, disclosure of information, consultation and participation, monitoring, evaluation of feedback and, addressing grievances, throughout the project life.</p>	<p>The validation team has recognized and accepted the local stakeholder based on this definition only.</p>
<p>f. Stakeholder refers to individuals, groups or institutions that have a stake, or an interest in the project activity – that may be affected by it (either positively or negatively) or they may have an interest in it and be in a position to influence its outcomes – such as local communities, Indigenous Peoples, civil society organisations, and private sector entities, comprising women, men, girls and boys.</p> <p>They can include, among others, relevant ministries, local governments, locally affected people, national and local NGOs, Community Based Organisations (CBOs), Indigenous Peoples organisations, women’s groups, private sector companies, farmers, and research institutions.</p>	<p>The validation team has recognized and accepted the local stakeholder based on this definition only.</p>
<p>3 REQUIREMENTS 3.1 General overview 3.1.1 The objective of the stakeholder consultation and engagement process is:</p>	<p>The validation team has reviewed the LSC report and confirmed the same.</p>

<p>a. to identify, engage and consult stakeholders in a meaningful manner to improve project design and its outcomes, and</p> <p>b. to inform stakeholders about the projects and discuss their likely impacts (both positive and negative) during the design, planning and implementation stage and relevance to stakeholders, and</p> <p>c. to establish an ongoing engagement process for stakeholders to provide input, feedback and to raise concerns throughout the project life.</p>	
<p>3.1.2 All Gold Standard projects shall take gender issues into account in their design, planning, and implementation of the project.</p> <p>This requires project developers to ensure that gender issues are fully factored into comprehensive social and environmental impact assessments and that equal and effective participation of both women and men in stakeholder consultation is ensured. Therefore, all projects submitted for Gold Standard certification shall meet GENDER SENSITIVE requirements (Step 1-3 of Gender Equality requirements and guidelines) AND shall adhere to the Gender Principles as established in the Gold Standard Gender Policy.</p>	<p>The validation team has reviewed the LSC report and confirmed that gender issues are factored in undergoing the LSC process.</p>
<p>3.1.3 The Stakeholder consultation shall comprise of a minimum of two rounds of consultations including one mandatory physical meeting and one stakeholder feedback round lasting for at least one month.</p> <p>The following sections outline the requirements applicable at different stages of the consultation procedure.</p>	<p>The LSC meeting was conducted on 9th December 2020. It consists of online LSC and SFR round.</p> <p>Due to Covid pandemic restrictions in Romania, the project developer could not organize the Local Stakeholder Consultation (LSC) within the Preliminary review period. It has announced Gold Standard about this on 20th November 2020 (e-mail document attached below) and asked the permission to hold an online LSC, respecting all GS applicable rules regarding the preparation of the LSC and its requirements to conduct the LSC meeting.</p> <p>The GS answer sent to the project developer on 26th November 2020 (also attached) did not allow to substitute the physical LSC with a remote LSC. The project developer followed the GS recommendation to continue with the organization of the online LSC and undertook the remote LSC meeting on 9th December 2020.</p> <p>The validation team has reviewed the following documents</p> <ol style="list-style-type: none"> 1. Correspondence email with GS from 20th and 26th November 2020; 2. Agenda of the online meeting (Romanian and English) 3. Key Project Information submitted to the stakeholders (Romanian and English) 4. List of persons invited to the remote LSC meeting 5. List of participants on the remote LSC meeting from 9th December 2020;

	<p>6.Power Point presentation held on the online LSC meeting</p> <p>7.Photos of the online meeting</p> <p>During the LSC meeting and the Feedback Round Consultation we found only one mitigation measure in order to reduce the potential risk of the Safeguarding principle 6.1 Labour Rights: The project developer shall record reports of accidents and incidents as well as reports on trainings on various issues, including safety and health at working environment to prevent emergency cases, technical checks and maintenance interventions. These indicators shall be monitored by the project.</p> <p>As per the GS email dated 26th Nov 2020, GS has instructed PP to carry out the remote LSC and SFR now and a full-fledged (physical) LSC and SFR before seeking project registration, if the situation allows.</p> <p>During the design review of the project, PP has also conducted the physical LSC meeting on 27th September 2022. The detailed LSC report was uploaded on Sustaincert on 26/01/2023.</p> <p>PP has conducted remote LSC dated 9th Dec 2020 and full-fledged physical LSC meeting dated 27th Sep 2022 and SFR round dated from 22nd Nov 2022 to 22nd Dec 2022 (for one month). The validation team has reviewed the LSC report and document supporting SFR. Since the physical LSC meeting was conducted before the project gets registered, the validation team has accepted this.</p>
<p>3.2 Timing of Stakeholder Consultation</p> <p>3.2.1 The Stakeholder Consultation shall be conducted before the start date of the project. For a definition of the project start date, please refer to: Principle 4: Demonstration of real outcomes: (a) PROJECT START DATE.</p>	<p>LSC was conducted after the start date of the project. PP has clarified that this is due to COVID situation. Hence this is accepted.</p>
<p>3.2.2 If the Stakeholder Consultation is conducted after the start date of the project (retroactive project), the project developer shall;</p> <p>a. provide clarification on why the stakeholder is not conducted before the project start date, and</p> <p>b. conduct consultation with relevant stakeholders as early as possible, and</p> <p>c. provide further explanation of how comments received during the consultation were taken into account in the design and implementation of the project.</p> <p>Note: Refer to Principle and Requirements and/or applicable activity requirements to confirm eligibility of a retroactive project with regards to the timing of first submission to Gold Standard.</p>	<p>LSC was conducted after the start date of the project. PP has clarified that this is due to COVID situation. Hence this is accepted.</p>
<p>3.3 Minimum group of stakeholders to be</p>	<p>The validation team has reviewed the LSC documents and</p>

<p>consulted</p> <p>3.3.1 The Project Developer shall identify and invite all relevant (local, affected and interested) stakeholders for consultations and comments, including, but not limited to, as mentioned below:</p> <p>a. Local people, communities and/or representatives who are expected to be directly or indirectly affected (adversely affected or beneficiaries) by the project or may have an interest in the project</p> <p>b. Stakeholders with land-tenure rights within or adjacent to the project and marginalised individuals and groups</p> <p>c. Local policymakers and representatives of local authorities</p> <p>d. National government officials or National Focal Point, for example, Designated National Authority (DNA) or equivalent body< https://cdm.unfccc.int/DNA/bak/index.html></p> <p>e. Local non-governmental organisations (NGOs), Women Groups working on topics relevant to the project or working with communities who are likely to be affected by the project</p> <p>f. Gold Standard representative at</p> <p>g. Relevant international Gold Standard NGO Supporters with representation in the region and all Gold Standard NGO Supporters located in the host country of the project.</p>	<p>confirmed that the following personnel have attended the LSC meeting.</p> <ol style="list-style-type: none"> 1.The Environment Protection National Agency 2.ROMSTAL IMEX SRL 3.DONPEDRO SRL 4.The Association for Circular Economy 5.Fundatia pentru Sanatate Orhideea Spa 6.TF SERVICE 7.TEHO INVEST CONSULT 8.IMSAT Groupe SNEF 9.Fundatia pentru Sanatate Orhideea Spa 10.WALROX 11.GIC NOSAG Metals <p>List of invitees are as follows.</p> <table border="1" data-bbox="743 674 1385 1435"> <tr><td>Lean Management Systems Promotion Society</td></tr> <tr><td>Global Offset Research</td></tr> <tr><td>My Climate</td></tr> <tr><td>GIC NOSAG METAL SRL</td></tr> <tr><td>ROMSTAL IMEX SRL</td></tr> <tr><td>DONPEDRO SRL</td></tr> <tr><td>BIODECK SA</td></tr> <tr><td>TENARIS SILCOTUB</td></tr> <tr><td>TF SERVICE</td></tr> <tr><td>TEHO INVEST CONSULT</td></tr> <tr><td>WALROX</td></tr> <tr><td>IMSAT GROUP SNEF A.COM</td></tr> <tr><td>VIVID ECONOMICS BY MCKINSEY</td></tr> <tr><td>Universitatea Politehnica Bucuresti</td></tr> <tr><td>Fundatia pentru Sanatate Orhideea Spa</td></tr> <tr><td>GovNet Romania</td></tr> <tr><td>Green Point</td></tr> <tr><td>Green Revolution</td></tr> <tr><td>The Administration for the Environment Fund</td></tr> <tr><td>The Municipality of Bucharest Sector 4</td></tr> <tr><td>The Environment Protection National Agency</td></tr> <tr><td>The Environment Protection Local Agency</td></tr> <tr><td>The Association for Circular Economy</td></tr> <tr><td>The Romanian Ministry of the Environment</td></tr> </table>	Lean Management Systems Promotion Society	Global Offset Research	My Climate	GIC NOSAG METAL SRL	ROMSTAL IMEX SRL	DONPEDRO SRL	BIODECK SA	TENARIS SILCOTUB	TF SERVICE	TEHO INVEST CONSULT	WALROX	IMSAT GROUP SNEF A.COM	VIVID ECONOMICS BY MCKINSEY	Universitatea Politehnica Bucuresti	Fundatia pentru Sanatate Orhideea Spa	GovNet Romania	Green Point	Green Revolution	The Administration for the Environment Fund	The Municipality of Bucharest Sector 4	The Environment Protection National Agency	The Environment Protection Local Agency	The Association for Circular Economy	The Romanian Ministry of the Environment
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<p>3.3.2 The Project Developer shall provide evidence that invitations were sent and comments were invited from the relevant stakeholders, at minimum, the stakeholders listed in para 3.3.1 above.</p> <p>For cases where any of the stakeholders listed in para 3.3.1 above, were not invited, the project developer shall provide a justification that shall be assessed by VVB.</p>	<p>The validation team has checked and found that invitations has been sent via email to the identified stakeholders and accepted the same.</p>																								
<p>3.4 Means of inviting stakeholders</p> <p>3.4.1 The project developer shall invite stakeholders in an open and transparent manner - that provides equal opportunity to each stakeholder to participate in stakeholder meeting and provide feedback.</p> <p>3.4.2 The project developer shall invite the stakeholders at least 30 days before the physical meeting by;</p>	<p>The validation team has checked and found that invitations has been sent via email to the identified stakeholders and accepted the same.</p>																								

<p>3.4.3 selecting an appropriate invitation method considering the context of the project, stakeholders, local and national circumstances, and</p> <p>3.4.4 using appropriate language and measures, and adequate and effective means.</p> <p>3.4.5 The project developer shall ensure that the stakeholders are invited in a gender-sensitive manner.</p> <p>Efforts shall be made to solicit input from women and marginalised groups.</p> <p>3.4.6 The stakeholder consultations shall be open to anyone wishing to attend, and participate and the project developer shall not deny anyone access to the consultation.</p>	
<p>3.5 Information to be made available to stakeholders</p> <p>3.5.1 Prior to the physical meeting, the project developer shall share information in a manner (format, medium, language(s), etc.) that allows local stakeholders to understand – how the project is likely to affect them.</p> <p>The information to be made available to stakeholders shall include, inter alia:</p> <p>a. A non-technical summary of the project, including information on project design, technology, objectives, scale, duration, and implementation plan (so far as known) and how it is likely to affect the various stakeholder groups.</p> <p>b. Summary of the economic, social and environmental impacts of the project as per Safeguarding Principles & Requirements, along with potentially known positive and negative impacts of the Project.</p> <p>c. Summary of likely contributions of the project to Sustainable Development Goals (SDGs).</p> <p>d. Other relevant information to help stakeholders understand the project design, implementation and operation.</p> <p>e. A preliminary agenda for the event summarising the different topics that will be discussed in the physical meeting.</p> <p>f. Contact details of a Project Developer’s representative to get further information.</p> <p>g. Means and methods to provide further feedback for those who are not able to join the physical meeting</p>	<p>The validation team has reviewed the LSC meeting report. Along with the public notice, PP has sent agenda of the meeting and non-technical project description, contact details to the invitees. The validation team has reviewed the LSC report and confirmed the same.</p>
<p>3.5.2 The timing of when prior information</p>	<p>Prior intimation email was sent to the stakeholders before</p>

<p>should be provided varies depending on the nature of the project and the local context.</p> <p>At a minimum, prior information shall therefore be provided at least a week in advance before the planned physical meeting.</p> <p>In some situations, such as projects entailing higher risk affecting Indigenous Peoples, more time may be needed.</p>	<p>the LSC meeting.</p>
<p>3.6 Physical meeting(s) and feedback round 3.6.1 The stakeholder consultation shall comprise of a minimum of two rounds of consultations including:</p> <p>a. mandatory physical meeting with local stakeholders, and</p> <p>b. stakeholder feedback round lasting for at least 30 days</p> <p>Note: The stakeholder consultation Rounds may be combined in retroactive consultations, please see para 3.6.7 below.</p>	<p>Due to COVID situation, physical LSC meeting dated 27th Sep 2022 was substituted by a remote LSC followed by a SFR.</p> <p>The validation team based on interview with local stakeholders have the following findings.</p> <p>The validation team has interviewed some of the stakeholders (who are independent to the project) during the validation process and consolidated feedback is detailed as below.</p> <ul style="list-style-type: none"> • The Feedback of the local stakeholders are as follows. • They are not displaced due to the implementation of the project. • They don't find any challenges due to the project • They don't find any negative effect on ground water due to the project • They don't find any air, water or noise pollution due to the project. • They don't have complaints or grievances against the project • They understand the importance of the project and they are aware of the communication channel if case of the grievances. • They are expressed their overall satisfaction. <p>During the design review of the project, PP has also conducted the physical LSC meeting on 27th September 2022. The detailed LSC report was uploaded on Sustaincert on 26/01/2023.</p>
<p>a. Physical meeting</p> <p>3.6.2 The objective of the physical meeting is to inform the relevant stakeholders of the project details and ensure that stakeholders are provided with an opportunity to influence project design, implementation and operation by interacting with the project developer (and also amongst each other) and exchanging views and concern(s) in a free and transparent manner.</p> <p>3.6.3 The project developer shall cover the following key aspects during the physical meeting(s):</p> <p>a. summary of project information as per para 3.5.1 above,</p>	<p>Due to COVID situation, physical LSC meeting was substituted by a remote LSC followed by SFR.</p> <p>The agenda of the LSC includes non-technical project description, contact details to the invitees. The validation team has reviewed the LSC report and confirmed the same.</p> <p>The agenda includes Opening of the meeting, welcome speech & introduction of the team and attendants presentation of the agenda, Sustainability in the Context of Climate Change, Project Description. Gold Standard Certification and Carbon Credits Explanation, Open Discussion: Questions and Answers, Potential Risks of the Project (Safeguarding Principles Assessment), Sustainable Development Impacts, Sustainable Development Monitor, Grievance and Input Mechanism Presentation</p>

<p>b. ensure that at a minimum, the discussion covers stakeholder's perceptions and expectations about project benefits and potential adverse impacts;</p> <p>how adverse impacts may be avoided and minimised and what the appropriate mitigation mechanisms may be</p> <p>c. potential options for input & feedback and grievance mechanism (refer to Stakeholder Consultation and Engagement Guidelines for details)</p> <p>d. information on next steps and contact details</p>	
<p>3.6.4 The project developer shall ensure that the place and timing of the physical meeting(s) is appropriate for all relevant stakeholders and do not pose a barrier to participation, e.g. for a particular gender or stakeholder group.</p>	<p>Due to COVID situation, physical LSC meeting was substituted by a remote LSC followed by SFR..</p>
<p>3.6.5 Where necessary, other means and approaches that are appropriate for local and national circumstances (and those of the Project) can be used to conduct physical meetings.</p> <p>For example, if a project covers a large geographical area, instead of one physical meeting, the project developer should organise several physical meetings at different locations, to ensure that as many stakeholders as possible can participate.</p> <p>Other examples could be smaller workshops and seminars, focus groups, round table meetings etc.</p>	<p>Due to COVID situation, physical LSC meeting was substituted by a remote LSC so stakeholders can attend the meeting.</p>
<p>3.6.6 For a retroactive project, the project developer shall conduct, at a minimum, a physical meeting before project submission for preliminary review.</p> <p>Note: Retroactive project - the project for which stakeholder consultation is conducted after project start date.</p>	<p>For this retroactive project, LSC was conducted remote/online LSC.</p>
<p>3.6.7 For a retroactive project, the project developer may conduct the physical meeting(s) combined with the stakeholder feedback round where the physical meeting has not taken place as a part of any previously held stakeholder consultation(s).</p> <p>However, the project developer shall conduct this combined consultation before project submission for preliminary review.</p> <p>A combined consultation shall ensure compliance with all the requirements outlined in this document. Special attention must be paid to taking into account stakeholder feedback and modifying project design, where reasonable.</p>	<p>For this retroactive project, LSC was conducted remote/online LSC.</p>
<p>3.6.8 The project developer shall encourage</p>	<p>LSC was attended by both men and women, marginalized</p>

<p>equal and effective participation by both men and women, marginalised individuals and groups in the meetings.</p>	<p>individuals.</p>																								
<p>b. Feedback round</p> <p>3.6.9 The project developer shall provide feedback to the stakeholders on how comments received in the physical meeting(s) have been considered and seek further comments from stakeholders.</p>	<p>The validation team has reviewed the LSC documents and confirmed that the following personnel have attended the LSC meeting.</p> <table border="1" data-bbox="743 338 1385 1104"> <tr><td>Lean Management Systems Promotion Society</td></tr> <tr><td>Global Offset Research</td></tr> <tr><td>My Climate</td></tr> <tr><td>GIC NOSAG METAL SRL</td></tr> <tr><td>ROMSTAL IMEX SRL</td></tr> <tr><td>DONPEDRO SRL</td></tr> <tr><td>BIODECK SA</td></tr> <tr><td>TENARIS SILCOTUB</td></tr> <tr><td>TF SERVICE</td></tr> <tr><td>TEHNO INVEST CONSULT</td></tr> <tr><td>WALROX</td></tr> <tr><td>IMSAT GROUP SNEF A.COM</td></tr> <tr><td>VIVID ECONOMICS BY MCKINSEY</td></tr> <tr><td>Universitatea Politehnica Bucuresti</td></tr> <tr><td>Fundatia pentru Sanatate Orhideea Spa</td></tr> <tr><td>GovNet Romania</td></tr> <tr><td>Green Point</td></tr> <tr><td>Green Revolution</td></tr> <tr><td>The Administration for the Environment Fund</td></tr> <tr><td>The Municipality of Bucharest Sector 4</td></tr> <tr><td>The Environment Protection National Agency</td></tr> <tr><td>The Environment Protection Local Agency</td></tr> <tr><td>The Association for Circular Economy</td></tr> <tr><td>The Romanian Ministry of the Environment</td></tr> </table>	Lean Management Systems Promotion Society	Global Offset Research	My Climate	GIC NOSAG METAL SRL	ROMSTAL IMEX SRL	DONPEDRO SRL	BIODECK SA	TENARIS SILCOTUB	TF SERVICE	TEHNO INVEST CONSULT	WALROX	IMSAT GROUP SNEF A.COM	VIVID ECONOMICS BY MCKINSEY	Universitatea Politehnica Bucuresti	Fundatia pentru Sanatate Orhideea Spa	GovNet Romania	Green Point	Green Revolution	The Administration for the Environment Fund	The Municipality of Bucharest Sector 4	The Environment Protection National Agency	The Environment Protection Local Agency	The Association for Circular Economy	The Romanian Ministry of the Environment
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<p>3.6.10 All stakeholders invited to participate in the physical meeting(s) shall be invited to provide feedback during the stakeholder feedback round.</p>	<p>The invitation has been sent to the stakeholders.</p>																								
<p>3.6.11 The project developer shall share the updated project documentation with stakeholders for thirty days via publicly accessible means i.e., easily accessible online or other means for example publicly accessible website, online platform or others.</p> <p>It shall include details on procedure & contact details for submission of further comments.</p>	<p>Telephone access, email access, internet webpage was created to provide comments.</p>																								
<p>3.6.12 At the end of the stakeholder feedback round, the project developer shall consolidate all the comments received during the feedback round.</p>	<p>The validation team has reviewed the LSC documents where all comments are consolidated.</p>																								
<p>3.6.13 The project developer may organise the Stakeholder Feedback Round in parallel to the validation process, however before concluding the validation opinion, the VVB shall take into account the feedback and how the comments were addressed and any potential revision in the project design and documentation.</p>	<p>Due to COVID situation, physical LSC meeting was substituted by a remote LSC followed by SFR.</p>																								
<p>3.7 Consideration of comments received</p> <p>3.7.1 The project developer shall ensure that all the comments received during the consultations i.e., physical meetings and</p>	<p>The validation team has reviewed the LSC documents where all comments are consolidated.</p>																								

<p>Stakeholder Feedback Round are well documented in the form they are received i.e. with minimum interpretation and without tempering with the spirit and intent of the comment.</p> <p>3.7.2 The project developer shall include details with justifications, as applicable in Stakeholder Consultation Report on how stakeholder comments have been taken into account. The Project Developer shall provide justification when any comments have not been incorporated or addressed.</p> <p>3.7.3 If the project developer receives stakeholder comments after the listing of the project at the Gold Standard Impact Registry (after preliminary review), through any channel, and before Validation, the Project Developer shall consider such comments and make suggested changes (if required) before the conclusion of validation.</p>	
<p>3.8 Continuous input and grievance mechanism</p> <p>3.8.1 All projects shall set up a formal input & feedback, and grievance mechanism with the purpose of providing stakeholders with an opportunity to submit any feedback or record concerns/grievances during the entire project lifetime.</p> <p>3.8.2 The project developer shall discuss in the physical meeting potential options for ongoing feedback & input and grievance mechanism and agree on an appropriate method.</p> <p>3.8.3 At a minimum, the Continuous Input and Grievance Expression Process book shall be made available at an agreed location.</p> <p>Refer to detailed guidelines available in the Stakeholder Consultation and Engagement Guidelines.</p> <p>3.8.4 The continuous input and grievance mechanism agreed with stakeholders shall be described in the Stakeholder Consultation Report.</p> <p>3.8.5 The project developer shall record all comments, inputs or concerns raised by the stakeholders using the agreed mode of continuous feedback or any other form (such as verbally, telephonically, via email and/or through representatives).</p> <p>The project developer shall send a written acknowledgement to the stakeholder, except if the comment is anonymous</p> <p>3.8.6 The project developer shall keep the</p>	<p>PP has kept Expression Process Book/Grievance Register at office of PP for the stakeholders to provide grievances in case.</p>

<p>stakeholder(s) informed of the measures taken in the context of the comment(s) raised.</p>	
<p>3.9 Stakeholder consultation documentation</p> <p>3.9.1 The project developer shall use the Stakeholder Consultation Report template to document all the steps taken to meet the requirements presented in this document and provide evidence to demonstrate compliance.</p> <p>3.9.2 The stakeholder consultation report shall be submitted to Gold Standard at the time of first submission (preliminary review).</p>	<p>The validation team has reviewed the LSC report.</p>
<p>3.10 Ongoing Reporting</p> <p>3.10.1 Project developer shall provide information in the annual report and monitoring report, as applicable, on the following:</p> <p>a. Concerns that have been identified during the period of project implementation and raised by stakeholders and the measures put in place to address those.</p> <p>b. Any feedback given by stakeholders as part of the project’s grievance mechanism.</p> <p>3.10.2 Any stakeholder comments received after the Validation of the Project and action taken to address the comments shall be reported at a minimum, at the time of the next Verification or earlier as part of the annual report.</p> <p>If the project undergoes a combined Validation/Verification (Design and Performance Certification), the comments shall be reported at the time of the subsequent verification or annual reporting (whichever is earlier).</p> <p>4 POA REQUIREMENTS Note: this is not required for standalone project</p>	<p>The ongoing LSC process in place at the project site.</p>
<p>5 EXPERT STAKEHOLDER ENGAGEMENT</p> <p>5.1.1 In addition to seeking the views of relevant (interested and affected) stakeholder inputs, certain Safeguarding Principles and SDG Impacts may require the opinion and recommendations of Expert Stakeholders.</p> <p>These are stated in specific Activity Requirements or the Safeguarding Principles & Requirements.</p> <p>The Project shall demonstrate how the opinions and recommendations of Expert Stakeholders are incorporated into the project design.</p> <p>Feedback from Expert Stakeholders may be sought at any time during the project design and consultations, but it is recommended that they are sought during the planning phase of</p>	<p>This is not applicable as experts were not used in stakeholder consultation process.</p>

<p>consultation.</p> <p>5.1.2 Where a given Safeguarding Requirement, SDG Impact or other topic requires the input of independent Expert Stakeholder(s), this appointment shall be made directly by the project developer.</p> <p>A signed statement from the appointed Expert Stakeholders confirming that they have no conflict of interest or other financial interest in the Project, project developer or associated organisations shall be provided to Gold Standard.</p> <p>5.1.3 Expert Stakeholders are not necessarily required to attend face-to-face consultation meetings but must be provided with sufficient information to form opinions and recommendations concerning the Project. Unedited written feedback from Expert Stakeholder(s) along with evidence as to how the feedback has been addressed and incorporated into the Project design shall be provided for Validation</p>	
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Appendix 8: GS Safeguarding principles and Requirements v1.2

<i>GS Safeguarding principles and Requirements v1.2</i>	<i>Validation opinion</i>
<p>3. SAFEGUARDING PRINCIPLES AND REQUIREMENTS</p> <p>Principle 1 – Human Rights</p> <p>3.1 Principle 1 – Human Rights</p> <p>The Gold Standard Certification:</p> <p>(a) Recognises the centrality of human rights to sustainable development, poverty alleviation and ensuring fair distribution of development opportunities and benefits; and supports “universal respect for, and observance of, human rights and fundamental freedoms for all”.</p> <p>https://www.google.co.in/url?sa=t&rct=j&q=&esrc=s&source=web&cd=16&ved=2ahUKewi5sZ6A9vrmAhWT6XMBHSBFBFsQFjAPegQICBAC&url=http%3A%2F%2Fwww.paclii.org%2Fpg%2FCPCReport%2FCPC5A.DOC&usq=AOvVaw3v0_cu5AkAPHLzY7kweZGO</p> <p>https://www.google.co.in/url?sa=t&rct=j&q=&esrc=s&source=web&cd=16&cad=rja&uact=8&ved=2ahUKewi5sZ6A9vrmAhWT6XMBHSBFBFsQFjAPegQICBAC&url=http%3A%2F%2Fwww.paclii.org%2Fpg%2FCPCReport%2FCPC5A.DOC&usq=AOvVaw3v0_cu5AkAPHLzY7kweZGO</p> <p>(mandatory requirement as GS safeguarding principles and Requirements v1.2)</p>	<p>The validation team has verified the Sustainable Development Assessments with respect to the validity of the updated baseline. The validation team has checked any necessary revision in the scores of the Sustainable Development indicator if baseline is updated. The validation team has also checked sustainable development indicators with respect to the level of risk associated with the eleven Safeguarding Principles of the Do-No Harm Assessment (DNHA). The validation opinion of the same is detailed below.</p> <p>Romania has ratified the international conventions for the protection of Human rights and Fundamental freedoms as amended by protocols No 11 and 14. With Romania signatory to this convention framed by members of council of Europe dated 10th December 1948. The validation team has observed that Romania has also endorsed United Nations Declaration on the Rights of Indigenous Peoples (61/295) dated 13th December 2007. This convention states that the primary duties of the State are: to defend national sovereignty; Ensuring the full exercise of human rights; Protect the population from threats to their security; And promote the general welfare that is based on justice and on the integral and balanced development of the Nation. It is also the duty of the State to establish and implement border policy and promote integration, particularly in their country, as well as the development and cohesion of border areas, in accordance with foreign policy.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
	<p>The validation team has also interviewed the project Director and HR department and they have understood the importance of human rights of employees employed by the project. During the onsite, the validation team has observed that the project activity is installed in inhabited areas and there is no impact of the human existence. The people interviewed by the validation team, had a positive opinion on the project and are welcome to such projects. As such there is no risk involved and therefore the project does not violate this safeguarding principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>(b) Does not recognise or support Projects that may contribute to violations of a State's human rights obligations and the core international human rights treaties, and seeks to support the protection and fulfilment of human rights.</p> <p>https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103487</p>	<p>Romania is a party to International Labour Organisation and forming employee associations is commonly practiced in the host country. The validation team has reviewed the ILO website and observed that Romania has ratified all the 8 ILO fundamental conventions. The details are</p> <ol style="list-style-type: none"> 1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (Date of ratification by Romania: on 28th May 1957) 2. Right to Organize and Collective Bargaining Convention, 1949 (No. 98) (on 26th Nov 1958) 3. Forced Labour Convention, 1930 (No. 29) (on 28th May 1957) 4. Abolition of Forced Labour Convention, 1957 (No. 105) (3rd August 1998) 5. Minimum Age Convention, 1973 (No. 138) (on 19th Nov 1975) 6. Worst Forms of Child Labour Convention, 1999 (No. 182) (on 13th Dec 2000) 7. Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957) 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111) (on 6th June 1973) <p>The validation team has interviewed the staff employed by the PP and following are confirmed. The staff employed is employed by a contract by which they are free to form an association and there is no restriction on their part for collective bargaining. The contract has provision for the identity of the parties, the place of work, the title, grade, nature or category of the work for which the employee is employed or a brief description thereof, the date of commencement of the contract, the amount of paid leave to which the employee is entitled or, failing that, the procedures for allocating and determining such leave, the length of periods of notice, information regarding the salary and the frequency of</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
	<p>its payment and working hours: daily or weekly and the collective agreements governing the conditions of employment. They are provided with sufficient holidays (5 weeks per year) with 40 working hours per week, good work place. The staffs are happy about annual increments in salary/ annual bonuses etc. One staff member conveyed to the validation team that he was proud to be associated with PP.</p> <p>Hence the validation team has accepted that Romania as a country seeks to support the protection and fulfilment of human rights. Hence accepted by the validation team. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>(c) Upholds the principles of accountability and the rule of law, participation and inclusion, and equality and non-discrimination, noting that prohibited grounds of discrimination include race, ethnicity, gender, age, language, disability, sexual orientation, religion, political or other opinion, national or social or geographical origin, property, birth or other status including as an indigenous person or as a member of a minority.</p>	<p>The validation team has interviewed the staff employed by the PP and following are confirmed. The staff employed is employed by a contract by which they are free to form an association and there is no restriction on their part for collective bargaining. The contract has provision for the identity of the parties, the place of work, the title, grade, nature or category of the work for which the employee is employed or a brief description thereof, the date of commencement of the contract, the amount of paid leave to which the employee is entitled or, failing that, the procedures for allocating and determining such leave, the length of periods of notice, information regarding the salary and the frequency of its payment and working hours: daily or weekly and the collective agreements governing the conditions of employment. They are provided with sufficient holidays (5 weeks per year) with 40 working hours per week, good work place. The staffs are happy about annual increments in salary/ annual bonuses etc. One staff member conveyed to the validation team that he was proud to be associated with PP.</p> <p>As such there is no risk involved and therefore the project does not violate this safeguarding principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>The Gold Standard Certification requires that 3.1.1 The Project Developer and the Project shall respect internationally proclaimed human rights and shall not be complicit in violence or human rights abuses of any kind as defined in the Universal Declaration of Human Rights.</p> <p>3.1.2 The Project shall not discriminate with regards to participation and inclusion.</p>	<p>Romania is a party to International Labour Organisation and forming employee associations is commonly practiced in the host country. The validation team has reviewed the ILO website and observed that Romania has ratified all the 8 ILO fundamental conventions. The details are</p> <ol style="list-style-type: none"> 1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (Date of ratification by Romania: on 28th May 1957) 2. Right to Organize and Collective Bargaining Convention, 1949 (No. 98) (on 26th Nov 1958) 3. Forced Labour Convention, 1930 (No. 29) (on 28th May 1957) 4. Abolition of Forced Labour Convention, 1957 (No.

GS Safeguarding principles and Requirements v1.2	Validation opinion
	<p>105) (3rd August 1998)</p> <p>5. Minimum Age Convention, 1973 (No. 138) (on 19th Nov 1975)</p> <p>6. Worst Forms of Child Labour Convention, 1999 (No. 182) (on 13th Dec 2000)</p> <p>7. Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957)</p> <p>8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111) (on 6th June 1973)</p> <p>Hence there is no mitigation measures needed with regards to safeguarding this principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 2 – Gender Equality and Women’s Rights</p> <p>The Gold Standard Certification:</p> <p>(a) Promotes gender equality and the empowerment of women.</p> <p>(b) Does not recognise Projects that contribute to discrimination against women or reinforce gender-based discrimination and/or inequalities.</p> <p>(mandatory requirement as GS safeguarding principles and Requirements v1.2)</p>	<p>The validation team has accepted the fact that the project will take into account the gender roles when assigning activities for the project. The project needs a large number of qualified workers, and since women has historically had less opportunities to study in Romania, men can have a bigger representation in the project. The project potentially might not take into account the abilities of women to participate in the decisions of the project since even though the meetings that the project holds are open to all members of the community, there is no significant representation of women due to the social relegation that the woman has historically had in the community. So there is no discrimination against women participation in the workforce.</p> <p>As a mitigation measure, PP planned to ensure that women’s rights and those of members of socially vulnerable groups are enshrined in all relevant company plans, policies and meetings. PP also planned to ensure robust Policy in place which recognizes and register the use rights of women and members of socially vulnerable groups. The validation team has accepted the mitigation measures as sufficient.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>(c) Recognises and seeks to contribute to SDG 5 – Achieve gender equality and empower all women and girls. The Project Developers shall refer to the Gold Standard Gender Equality Requirements Guidelines and Gold Standard Gender Policy for further details in this regard.</p>	<p>Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957) by which discrimination in any form is abolished in the host country. The staffs employed by the PP are local people. Romania has also ratified Maternity Protection convention, 2000 (No 183) on 23rd October 2002. The period of maternity leave in Romania is 126 calendar days. This ensures that there is no discrimination based on gender, race, religion, sexual orientation or any other basis. The validation team, based on review and interview, observed that PP has also employed female staffs who have been provided with maternity leave etc. Maternity leave is granted for all female employees, Women workers are entitled to 14 weeks of</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
	<p>maternity leave: 49 days of prenatal leave and 49 days postnatal leave. These rights are not negotiated irrespective of the position one is holding. The validation team has reviewed the contracts of staffs and accepted the same as correct. As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p> <p>The validation opinion of Gold Standard Gender Equality Requirements Guidelines v1.1 and Gold Standard Gender Policy v1.0 is detailed in Appendix 9 of this report.</p>
<p>The Gold Standard Certification requires that</p> <p>3.2.1 The Project shall not directly or indirectly reinforce gender-based discrimination and shall not lead to/contribute to adverse impacts on gender equality and/or the situation of women. Specifically, this shall include (not exhaustive):</p> <p>(a) Sexual harassment and/or any forms of violence against women – address the multiple risks of gender-based violence, including sexual exploitation or human trafficking.</p> <p>(b) Slavery, imprisonment, physical and mental drudgery, punishment or coercion of women and girls.</p> <p>(c) Restriction of women’s rights or access to resources (natural or economic).</p> <p>(d) Recognise women’s ownership rights regardless of marital status – adopt project measures where possible to support to women’s access to inherit and own land, homes, and other assets or natural resources.</p>	<p>Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957) by which discrimination in any form is abolished in the host country. The staffs employed by the PP are local people. Romania has also ratified Maternity Protection convention, 2000 (No 183) on 23rd October 2002. The period of maternity leave in Romania is 126 calendar days. This ensures that there is no discrimination based on gender, race, religion, sexual orientation or any other basis. The validation team, based on review and interview, observed that PP has also employed female staffs who have been provided with maternity leave etc. Maternity leave is granted for all female employees, Women workers are entitled to 14 weeks of maternity leave: 49 days of prenatal leave and 49 days postnatal leave. These rights are not negotiated irrespective of the position one is holding. The validation team has reviewed the contracts of staffs and accepted the same as correct. As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p> <p>As a mitigation measure to ensure equal participation of women, workshops will be held to raise awareness among workers to guarantee women’s rights. In view of the above, the validation team has accepted that there is less risk in safeguarding the underlying principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>3.2.2 Projects shall apply the principles of non-discrimination, equal treatment, and equal pay for equal work, specifically:</p> <p>(a) Where appropriate for the implementation of a Project, paid, volunteer work or community contributions will be organised to provide the conditions for equitable participation of men and women in the identified tasks/activities.</p> <p>(b) Introduce conditions that ensure the participation</p>	<p>Romania is a party to International Labour Organisation and forming employee associations is commonly practiced in the host country. The validation team has reviewed the ILO website and observed that Romania has ratified all the 8 ILO fundamental conventions. The details are</p> <p>1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (Date</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion		
<p>of women or men in Project activities and benefits based on pregnancy, maternity/paternity leave, or marital status.</p> <p>(c) Ensure that these conditions do not limit the access of women or men, as the case may be, to Project participation and benefits.</p>	<p>of ratification by Romania: on 28th May 1957)</p> <ol style="list-style-type: none"> 2. Right to Organize and Collective Bargaining Convention, 1949 (No. 98) (on 26th Nov 1958) 3. Forced Labour Convention, 1930 (No. 29) (on 28th May 1957) 4. Abolition of Forced Labour Convention, 1957 (No. 105) (3rd August 1998) 5. Minimum Age Convention, 1973 (No. 138) (on 19th Nov 1975) 6. Worst Forms of Child Labour Convention, 1999 (No. 182) (on 13th Dec 2000) 7. Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957) 8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111) (on 6th June 1973) <p>In view of the above, the validation team has accepted that there is less risk in safeguarding the underlying principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>		
<p>3.2.3 The Project shall refer to the country's national gender strategy or equivalent national commitment to aid in assessing gender risks.</p> <p>3.2.4 Based on the responses to assessment questions above, Gold Standard may require that the Project seek the input of an Expert Stakeholder(s) and to include their recommendations in the Project design.</p>	<p>In view of the above findings, the validation team has accepted that there is less risk in safeguarding the underlying principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>		
<p>Principle 3 – Community Health, Safety and Working Conditions The Gold Standard Certification: (a) Ensures that projects anticipate and avoid adverse impacts on the health and safety of affected communities during the Project's life cycle from both routine and non-routine circumstances. (b) Ensures that projects to provide workers with safe and healthy working conditions and to prevent accidents, injuries, and disease. The Gold Standard Certification requires that 3.3.1 The Project shall avoid community exposure to increased health risks and shall not adversely affect the health of the workers and the community.</p> <p>(mandatory requirement as GS safeguarding principles and Requirements v1.2)</p>	<p>Each staff member is provided with all the necessary personal protective equipments (PPE) among other items. PPE is designed to help minimize exposure to inherent system hazards and to identify potential hazards to the process of selecting the appropriate PPE for the task at hand. Each staff member is provided with all the necessary personal protective equipment (PPE). As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>Legislation referred</p> <table border="1" data-bbox="810 1803 1445 2078"> <tr> <td style="width: 5%;">1.</td> <td>EUROPEAN Waste Legislation A. Framework European Union legislation on waste 1. Waste Framework Directive- Directive 2008/98/EC 2. Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste. 3. Decision 2000/532/EC establishing a list of</td> </tr> </table>	1.	EUROPEAN Waste Legislation A. Framework European Union legislation on waste 1. Waste Framework Directive- Directive 2008/98/EC 2. Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste. 3. Decision 2000/532/EC establishing a list of
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	<p>wastes</p> <p>4. Commission Decision (EU) No 2014/955/EU of 18 December 2014 amending Decision 2000/532/EC on the list of waste pursuant to Directive 2008/98/EC of the European Parliament and of the Council</p> <p>5. Commission Regulation (EU) No 1357/2014 of 18 December 2014 replacing Annex III to Directive 2008/98/EC of the European Parliament and of the Council on waste and repealing certain Directives</p> <p>2. B. European Union legislation on waste management operations</p> <p>1. Directive 2000/76/EC of the European Parliament and of the Council of 4 December 2000 on the incineration of waste- Directive 2000/76/EC</p> <p>2. Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste- Council Directive 1999/31/EC</p> <p>3. Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control)- Directive 2010/75/EU</p> <p>3. C. European Union legislation on specific waste streams - Packaging and Packaging Waste</p> <p>1. European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste- Council Directive 94/62/EC</p> <p>2. Directive 2004/12/EC of the European Parliament and of the Council of 11 February 2004 amending Directive 94/62/EC on packaging and packaging waste- Directive 2004/12/EC</p> <p>3. Directive 2005/20/EC amending Directive 94/62/EC on packaging and packaging waste (extension of deadlines for the attainment of the recycling and recovery targets for the Member States acceding the EU in 2004)- Directive 2005/20/EC</p> <p>4. Regulation (EC) No 219/2009 adapting a number of instruments subject to the procedure referred to in Article 251 of the Treaty to Council Decision 1999/468/EC with regard to the regulatory procedure with scrutiny</p> <p>5. Commission Directive 2013/2/EU amending Annex I to Directive 94/61/EC on packaging and packaging waste</p> <p>6. Directive (EU) 2015/720 of the European Parliament and of the Council of 29 April 2015 amending Directive 94/62/EC as regards the consumption of lightweight plastic carrier bags</p> <p>4. ROMANIAN Waste Legislation</p> <p>A. Framework Romanian legislation on waste</p> <p>1. Legea Nr. 211 din 15 noiembrie 2011 privind regimul deșeurilor - republicata/Law No.. 211 of 15 November 2011 on waste-</p>

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	<p data-bbox="879 185 1406 219">Transpose The Waste Framework Directive</p> <p data-bbox="823 219 1433 674">5. B. Romanian legislation on waste management operations 1. Decizia 2003/33 privind stabilirea criteriilor și procedurilor pentru acceptarea deșeurilor la depozite ca urmare a art. 16 și anexei II la Directiva 1999/31/CE- Transpose The Landfill Directive 2. Hotararea Guvernului 349/2005 privind depozitarea deșeurilor, modificată și completată prin HG 210/2007- Transpose The Landfill Directive 3. Legea 278/2013 privind emisiile industriale/Law Nr. 278/2013 on industrial emissions- Transpose Directive 2010/75/EU on The Incineration of Waste</p> <p data-bbox="823 674 1433 860">6. C. Romanian legislation on specific waste streams - Packaging and Packaging Waste 1. Romanian legislation on specific waste streams - Packaging and Packaging Waste- Transpose The Packaging and Packaging Waste Directive</p> <p data-bbox="810 891 1445 1070">In view of the above, the validation team has accepted that there is less risk in safeguarding the underlying principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p data-bbox="150 1077 783 1137">Principle 4 – Cultural Heritage, Indigenous Peoples, Displacement and Resettlement</p> <p data-bbox="150 1137 528 1167">The Gold Standard certification:</p> <p data-bbox="150 1167 783 1261">(a) Promotes and supports the protection and preservation of cultural heritage and the equitable sharing of benefits from the use of cultural heritage.</p> <p data-bbox="150 1290 783 1350">(b) Advocates the avoidance of alteration, damage or removal of artifacts and objects of cultural value.</p> <p data-bbox="150 1379 783 1440">(c) Recognises and respects the prohibition of forced evictions and the use of violence generally.</p> <p data-bbox="150 1469 783 1655">(d) Recognises and fosters full respect for indigenous peoples' human rights as recognised under Applicable Law, including but not limited to their rights to self-determination, their lands, resources and territories, traditional livelihoods and cultures.</p> <p data-bbox="150 1684 783 1899">(e) Ensures that Projects that may impact indigenous peoples and local farmers are designed in a spirit of partnership with them, with their full and effective participation, with the objective of securing their free, prior, and informed consent (FPIC) where their rights, lands, resources, territories, traditional livelihoods may be affected.</p>	<p data-bbox="810 1077 1445 1626">In accordance with Article 1 of the International Covenant^{47/} on economic, Social and Cultural Rights, the project does not complicit in involuntary resettlement. Romania has signed this Covenant on 27th June 1968 and ratified on 9th December 1974. During the onsite, the validation team has observed that the project activity is installed in faraway place where there are no households and there is no impact of the human existence and there is no displacement of people at all. The same was confirmed with the people interviewed.. The validation team has interviewed the some of the labour force and they understood the importance of protection of cultural heritage sites. In view of the above, there is no immediate risk to the cultural heritage sites due to the project. The validation team has accepted that there is less risk in safeguarding the underlying principle.</p> <p data-bbox="810 1655 1445 1809">The project area is voluntarily leased from the landowner. Relocation of people will not take place as part of the project activities. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p data-bbox="150 1906 724 1966">Principle 4.1 - Sites of Cultural and Historical Heritage</p> <p data-bbox="150 1966 783 2054">The Gold Standard Certification requires that 3.4.1 The Project shall not involve or be complicit in the alteration, damage or removal of any sites,</p>	<p data-bbox="810 1906 1445 2054">Romania is committed to compliance to International Covenant on Economic, Social and Cultural Rights. The validation team has observed that the project activity is installed in a place where is no cultural heritage and there is no risk of alternation, damage</p>

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<p>objects or structures of significant cultural heritage.</p> <p>3.4.2 Where a Project proposes to utilise Cultural Heritage, including the knowledge, innovations, or practices of local communities, affected communities shall be informed of:</p> <p>(a) Their rights under Applicable Law,</p> <p>(b) The scope and nature of the proposed commercial development; and</p> <p>(c) The potential consequences of such development.</p> <p>3.4.3 The Project shall provide for equitable sharing of benefits from commercialisation of such knowledge, innovation, or practice, consistent with their customs and traditions.</p> <p>3.4.4 The opinions and recommendations of an Expert Stakeholder(s) shall be sought and demonstrated as being included in the project design.</p> <p>Does the Project Area include sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g., knowledge, innovations, or practices)?</p> <p>Assessment question as GS safeguarding principles and Requirements v1.2</p>	<p>or removal of such heritages. As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>The validation team has interviewed the some of the labour force and they understood the importance of protection of cultural heritage sites. But there are no cultural sites near to the project site. In view of the above, there is no immediate risk to the cultural heritage sites due to the project. The validation team has accepted that there is less risk in safeguarding the underlying principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 4.2 - Forced Eviction and Displacement The Gold Standard Certification requires that</p> <p>3.4.5 The Project shall not involve and shall not be complicit in the involuntary relocation of people.</p> <p>3.4.6 Projects shall avoid physical (i.e., relocation or loss of shelter) and economic displacement (i.e., loss of assets or access to assets that leads to loss of income sources or means of livelihood), and mitigate displacement impacts on displaced persons and host communities when displacement cannot be avoided. In such cases, the Project shall integrate into the Project documentation a Resettlement Action Plan or Livelihood Action Plan as appropriate. Please refer to UNDP Standard 5: Displacement and Resettlement requirements for further details in this regard.</p> <p>3.4.7 The opinions and recommendations of an Expert Stakeholder(s) shall be sought and demonstrated as being included in the project design.</p> <p>Does the Project require or cause the physical or economic relocation of peoples (temporary or permanent, full or partial)?</p> <p>(Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>There is no relocation of people as the land is procedure from private owners.</p> <p>Hence there is no risk in safeguarding the underlying principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 4.3 - Land Tenure and other rights</p>	<p>The project is located in private land owned by the</p>

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<p>The Gold Standard Certification requires that</p> <p>3.4.8 The Project Developer shall identify all such sites/matters potentially affected by the Project. For all such sites/matters identified the Project shall respect and safeguard:</p> <p>(a) Legal rights, or</p> <p>(b) Customary rights, or</p> <p>(c) Special cultural, ecological, economic, religious or spiritual significance of people shall be demonstrably promoted/ protected.</p> <p>3.4.9 Changes in legal arrangements must be in line with relevant law and regulation and must be carried out in strict adherence with such laws. All legal disputes must be resolved prior to the Project being carried out in such areas. All such changes must be demonstrated as having been agreed with free, prior and informed consent.</p> <p>3.4.10 The Project Developer must hold uncontested land title for the entire Project Boundary to complete Project Design Certification.</p> <p>3.4.11 The opinions and recommendations of an Expert Stakeholder(s) shall be sought and demonstrated as being included in the project design.</p> <p>Does the Project require any change to land tenure arrangements and/or other rights? For Projects involving land use tenure, are there any uncertainties with regards to land tenure, access rights, usage rights or land ownership?</p> <p>Examples include, but are not limited to water access rights, community-based property rights and customary rights.</p> <p>(Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>PP. There is no legal disputes. The project does not involve any land use which will have issues related to land tenure or access rights.</p> <p>As such as there is no risk in safeguarding this principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 4.4 - Indigenous people</p> <p>The Gold Standard Certification requires that</p> <p>3.4.12 The Project Developer shall identify all communities of Indigenous Peoples within the Project area of influence who may be affected directly or indirectly by the Project.</p> <p>3.4.13 The Project Developer shall recognise and respect the indigenous people's collective rights to own, use, and develop and control the lands, resources and territories that they have traditionally owned, occupied or otherwise used or acquired, including lands and territories for which they do not yet possess title .</p> <p>3.4.14 The Project Developer shall respect, protect, conserve and shall not take the cultural, intellectual, religious and spiritual property of indigenous peoples without their free, prior and informed consent (FPIC).</p>	<p>There is no indigenous people in Romania. So there is no risk.</p>

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<p>3.4.15 The Project Developer shall ensure that the indigenous people are provided with the equitable sharing of benefits to be derived from utilisation and/or commercial development of natural resources on lands and territories or use of their traditional knowledge and practices by the Project. This shall be done in a manner that is culturally appropriate and inclusive and that does not impede land rights or equal access to basic services including health services, clean water, energy, education, safe and decent working conditions and housing.</p> <p>3.4.16 The opinions and recommendations of an Expert Stakeholder(s) shall be sought and demonstrated as being included in the project design.</p> <p>Are indigenous peoples present in or within the area of influence of the Project and/or is the Project located on land/territory claimed by indigenous peoples? (Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	
<p>Principle 5 – Corruption The Gold Standard certification (a) Does not recognise Projects that engage in, contribute to or reinforce corruption of any kind.</p> <p>The Gold Standard Certification requires that 3.5.1 The Project shall not involve, be complicit in or inadvertently contribute to or reinforce corruption or corrupt Projects.</p> <p>(mandatory requirement as per GS safeguarding principles and Requirements v1.2)</p>	<p>Romania ratified the United Nations Convention Against Corruption on 2nd November 2004. There was no evidence of corruption involved as far as the project is concerned. The Romanian Congress approved the Implementation of article 33 in the Romanian legislation and Whistle-blower protection act (571/2004) in 2004. The law helps Romania in meeting its commitments under the OECD Anti-Bribery Convention. It bolsters the country's enforcement regime and creates corporate liability, administrative liability and criminal liability for the defaulters. The validation team has reviewed the payment history to the workers and confirmed that there is no corruption involved in the project activities, payments to the employees etc. by the PP. As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>There is no corruption mechanism for this project. As such there is no risk involved and therefore the project does not violate this safeguarding principle. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 6 – Economic Impacts The Gold Standard certification: (a) Promotes equitable, sustainable economic growth and stability and Projects that are appropriate and considerate of the economic situation in which they are developed.</p> <p>(b) Ensures that projects respect and promote worker's rights, promote the right to decent work, fair treatment, non-discrimination, and equal opportunity for workers, and avoid the use of forced labour and child labour.</p> <p>(c) Prioritises appropriate and properly considered</p>	<p>Romania is a party to International Labour Organisation and forming employee associations is commonly practiced in the host country. The validation team has reviewed the ILO website and observed that Romania has ratified all the 8 ILO fundamental conventions. The details are</p> <ol style="list-style-type: none"> 1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) (Date of ratification by Romania: on 28th May 1957) 2. Right to Organize and Collective Bargaining

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<p>local employment and procurement wherever possible.</p>	<p>Convention, 1949 (No. 98) (on 26th Nov 1958)</p> <p>3. Forced Labour Convention, 1930 (No. 29) (on 28th May 1957)</p> <p>4. Abolition of Forced Labour Convention, 1957 (No. 105) (3rd August 1998)</p> <p>5. Minimum Age Convention, 1973 (No. 138) (on 19th Nov 1975)</p> <p>6. Worst Forms of Child Labour Convention, 1999 (No. 182) (on 13th Dec 2000)</p> <p>7. Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957)</p> <p>8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111) (on 6th June 1973)</p> <p>Hence the validation team has accepted that Romania as a country seeks to support the protection and fulfilment of human rights. Hence accepted by the validation team.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 6.1 - Labour Rights The Gold Standard Certification requires that</p> <p>3.6.1 The Project Developer shall ensure that there is no forced labour and that all employment is in compliance with national labour and occupational health and safety laws, with obligations under international law, and consistency with the principles and standards embodied in the International Labour Organization (ILO) fundamental conventions. Where these are contradictory and a breach of one or other cannot be avoided, then guidance shall be sought from Gold Standard. It requires that;</p> <p>(a) Workers shall be able to establish and join labour organisations.</p> <p>(b) Working agreements with all individual workers shall be documented and implemented. These shall, at minimum, comprise:</p> <p>i. Working hours (must not exceed 48 hours per week on a regular basis), AND</p> <p>ii. Duties and tasks, AND</p> <p>iii. Remuneration (must include provision for payment of overtime), AND</p> <p>iv. Modalities on health insurance, AND</p> <p>v. Modalities on termination of the contract with provision for voluntary resignation by employee,</p>	<p>The validation team has checked the ILO website and observed that Romania has ratified convention Equal Remuneration Convention, 1951 (No. 100) (on 28th May 1957) by which discrimination in any form is abolished in the host country. By this convention, each Member (men or women) will, by means appropriate to the methods in operation for determining rates of remuneration, promote and, in so far as is consistent with such methods, ensure the application to all workers of the principle of equal remuneration for men and women workers for work of equal value. This principle may be applied by means of (a) national laws or regulations; (b) legally established or recognised machinery for wage determination; (c) collective agreements between employers and workers; or (d) a combination of these various means.</p> <p>Romania is a party to International Labour Organisation and child labour is illegal in the host country. The minimum legal age for employment is 16 in Romania. All the staff are grown up people and there is no child labour involved. As such there is no risk involved and therefore the project does not violate this safeguarding principle.</p> <p>The validation team has reviewed the employee contract of men and women (one male and one female) and observed that position, hours of work (daily and weekly), providing personal protection equipment & Company Equipment, Property and Funds, probation, Remuneration, leave entitlements (annual leave, sick leave), health insurance,</p>

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<p>AND</p> <p>vi. Provision for annual leave of not less than 10 days per year, not including sick and casual leave.</p> <p>3.6.2 Child labour, as defined by the ILO Minimum Age Convention is not allowed. The Project Developer shall use adequate and verifiable mechanisms for age verification in recruitment procedures. Exceptions are children for work on their families' property as long as:</p> <p>(a) Their compulsory schooling (minimum of 6 schooling years) is not hindered, AND</p> <p>(b) The tasks they perform do not harm their physical and mental development, AND</p> <p>(c) The opinions and recommendations of an Expert Stakeholder shall be sought and demonstrated as being included in the project design.</p> <p>(d) The Project Developer shall ensure the use of appropriate equipment, training of workers, documentation and reporting of accidents and incidents, and emergency preparedness and response measures.</p> <p>(mandatory requirement as per GS safeguarding principles and Requirements v1.2)</p>	<p>termination of the contract, etc. Maternity/paternity leave will be given according to the labor law. Female employees are entitled to up to 12 weeks maternity leave. The employee will qualify for paid leave after 12 months of continuous service.</p> <p>The validation team has checked the ILO website and observed that Romania has ratified convention Minimum Wage convention, 1973 on 19th Nov 1975) by which child labour in any form is abolished in the host country, Romania. The minimum age for employment is 16 years.</p> <p>In view of the above, the validation team has accepted that there is less risk in safeguarding the underlying principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>4. Principle 6.2 - Negative Economic Consequences</p> <p>The Gold Standard requires that</p> <p>3.6.3 The Project Developer shall demonstrate the financial sustainability of the Projects implemented, also including those that will occur beyond the Project Certification period.</p> <p>3.6.4 The Projects shall consider economic impacts and demonstrate a consideration of potential risks to the local economy and how these have been taken into account in project design, implementation, operation and after the Project. Particular focus shall be given to vulnerable and marginalised social groups in targeted communities and that benefits are socially-inclusive and sustainable.</p> <p>Does the project cause negative economic consequences during and after project implementation, e.g., for vulnerable and marginalized social groups in targeted communities?</p> <p>Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>The validation team has observed that there are no negative economic impacts due to the project activity. On the other hand, it is observed that beneficial socio-economic impacts expected from the Project relate to increased income levels through Project employment and recycling of metals. In addition, improvements to road access and infrastructure are likely, as well as an increase in education and training opportunities, including financial literacy.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 7 – Climate and Energy</p> <p>The Gold Standard Certification:</p> <p>(a) Promotes Climate Security (mitigation and adaptation) and Sustainable Development.</p> <p>Principle 7.1 - Emissions</p> <p>The Gold Standard requires that</p> <p>3.7.1 Projects shall not increase greenhouse gas emissions over the Baseline Scenario unless this is</p>	<p>The estimated emission reduction from the project activity is 56,282 tCO₂e per year. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

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<p>specifically allowed within Activity Requirements or Gold Standard Approved Impact Methodologies.</p> <p>Will the Project increase greenhouse gas emissions over the Baseline Scenario? Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	
<p>Principle 7.2 - Energy supply The Gold Standard Certification requires that 3.7.2 The Project shall not affect the availability and reliability of energy supply to other users.</p> <p>Will the Project use energy from a local grid or power supply (i.e., not connected to a national or regional grid) or fuel resource (such as wood, biomass) that provides for other local users? Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>The project does not affect the availability or reliability of energy supply to the users. Energy Saved would be 129,432 MWh/year This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 8 - Water The Gold Standard Certification:</p> <p>(a) Promotes sustainable management, protection, conservation, maintenance and rehabilitation of natural habitats and their associated biodiversity and ecosystem functions.</p> <p>Principle 8.1 - Impact on Natural Water Patterns/Flows The Gold Standard Certification requires that 3.8.1 The Project shall ensure that water resources are conserved. For surface waters this means:</p> <p>(a) Maintaining credible environmental flows, demonstrated by providing a verifiable calculation that shows conservation is maintained at a level as advised by the independent Expert Stakeholder, and</p> <p>(b) Ensuring that any discharged wastewater is of a high enough standard to allow beneficial reuse. For ground water this means limiting abstractions to levels less than, or equal to, rates of recharge. Managed aquifer recharge may be used to conserve groundwater resources. The project can use historical records, ongoing monitoring and reporting through data logging of physical measurements, online sources and/or government data to assess the project risks/impacts.</p> <p>Recommended methods: Quantitative documentation of all sources and volumes of water abstractions. Use of weirs and gauges, flow meters, pump energy consumption, transpiration rates, government data, remote sensing.</p> <p>Will the Project affect the natural or pre-existing pattern of watercourses, groundwater and/or the watershed(s) such as high seasonal flow variability, flooding potential, lack of aquatic connectivity or water scarcity?</p> <p>Mandatory requirement as per GS safeguarding principles and Requirements v1.2</p>	<p>There is no waste consumption in the recycling of metals. In view of the above, there is no risk as far this principle is concerned. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>3.8.2 At each Performance Certification the Project</p>	<p>There is no waste consumption in the recycling of</p>

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<p>shall assess whether it is in an area of physical water stress or scarcity. The project can conduct an analysis of the water scarcity within the Project's physical area of influence (e.g., basin, watershed) and shall monitor the impact frequently. The project can use Aqueduct, GWSP Digital water Atlas, Water Risk Filter, WBCSD Global Water Tool, Water Stress Index Maplecroft, Water Scarcity Index Pfister or other recognised tools for water stress and scarcity assessment with in the Project's physical area of influence.</p>	<p>metals. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>3.8.3 The Project shall provide verifiable evidence of water stress experienced in the basin(s) in which the Project is active, and demonstrate that consumption of water by the Project (over Baseline) is negligible or will bring positive impacts or, at a minimum, not increase the overall annual basin stress.</p> <p>3.8.4 The risk(s) of the Project negatively impacting the catchment shall be assessed and addressed to ensure its ongoing, long-term viability and impact on surrounding social-economic and environmental assets. The project can use mapping tools, or other appropriate nationally recognised tools in this regard. Recommended methods include online tools, engineering or physical assessment, historical flow records, land</p>	<p>There is no waste consumption in the recycling of metals. Hence there is no water stress for the power plant. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>3.8.5 Where the Project is involved in abstraction from water resources required to support biodiversity and other ecosystem services, an eflow assessment consistent with good practice, including a modern method outlined in one of the key references listed below must be undertaken. Alternatively, where local, national or regional regulation exists or where alternative approaches may be more appropriate then these may be put forward to Gold Standard for approval.</p> <p>3.8.6 Where environmental flow assessments are impractical, the Project is required to demonstrate that the flow rate and variability is maintained from the abstracted water resource. A verifiable calculation shall be provided for each water source demonstrating total flow rates do not fall below levels that are contextually appropriate, as advised by an independent Expert Stakeholder.</p> <p>3.8.7 The opinions and recommendations of Expert Stakeholder(s) shall be sought and demonstrated as being included in the project design and Monitoring Plan.</p>	<p>There is no waste consumption in the recycling of metals. Hence there is no water stress for the power plant. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

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<p>Principle 8.2 - Erosion and/or Water Body Instability</p> <p>The Gold Standard Certification requires that</p> <p>3.8.8 The risk of the Project negatively impacting the catchment and any risks impacting the Project's success shall be assessed and addressed. The project shall ensure its ongoing, long-term viability and impact on surrounding social-economic and environmental assets. The project shall assess the sensitivity of the physical area of influence due to low percentage of impervious cover in a project (e.g., basin, catchment), susceptibility to erosion and water body instability, and lack of terrestrial habitat connectivity. The project can use mapping tools, or other appropriate nationally recognised tools, academic or published studies on the relevant area. The recommended methods include online tools, visual inspection, engineering or physical assessment, historical land use records, aerial photographs, and verbal or written surveys with local agencies and residents on the characterisation of geomorphology of water bodies.</p> <p>3.8.9 The Project shall demonstrate that measures to ensure soil protection and minimised erosion are in place prior to the commencement of the Project.</p> <p>3.8.10 The Project shall demonstrate that measures will be undertaken to ensure that surface and ground waters are protected from erosion and that these measures are in place prior to the commencement of the Project.</p> <p>3.8.11 Measures shall be incorporated to reduce soil erosion on slopes (e.g., hedge and tree rows, natural terracing, infiltration strips, permanent ground cover). For these measures, the concept of the effective slope length shall be taken into account.</p> <p>3.8.12 Impact shall be reassessed at a frequency appropriate to the context of the ecosystem affected. The monitoring approach and frequency shall be justified by reference to natural patterns and variations.</p> <p>3.8.13 Where the Project takes place in a water scarce or water stressed area, the opinions and recommendations of an Expert Stakeholder shall be sought and demonstrated as being considered and incorporated into the project design.</p> <p>Could the Project directly or indirectly cause additional erosion and/or water body instability or disrupt the natural pattern of erosion? If 'Yes' or 'Potentially' proceed to next question?</p> <p>(Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>There is no waste consumption in the recycling of metals.</p> <p>Hence there is no risk in safeguarding this principle.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>Principle 9 - Environment, ecology and land use The Gold Standard Certification:</p> <p>(a) Ensures a precautionary approach to natural resource conservation and avoids negative environmental impacts.</p> <p>Principle 9.1 - Landscape Modification and Soil The Gold Standard Certification requires that</p> <p>3.9.1 The Project shall identify the functions and services provided by the landscape and demonstrate no net degradation in existing landscape function and services.</p> <p>3.9.2 To ensure healthy soils the following aspects shall be identified, and appropriate measures shall be put in place to protect them:</p> <p>(a) Soil types, AND</p> <p>(b) Biota, AND</p> <p>(c) Erosion</p> <p>3.9.3 Measures shall be incorporated to minimise soil degradation (e.g., through crop rotation, composting, no use of heavy machinery, use of N-fixing plants, reduced tillage, no use of ecologically harmful substances).</p> <p>3.9.4 Projects that involve the production, harvesting, and/or management of living natural resources by small-scale landholders and/or local communities shall adopt the appropriate and culturally sensitive sustainable resource management practices.</p> <p>Does the Project involve the use of land and soil for production of crops or other products?</p> <p>(Assessment question as per GS safeguarding principles and Requirements v1.2)</p>	<p>There is no landscape modification as this is not a forest project.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 9.2 - Vulnerability to Natural Disaster The Gold Standard Certification requires that</p> <p>3.9.5 The Project shall avoid or minimise the exacerbation of impacts caused by natural or man-made hazards, such as landslides or floods that could result from land use changes due to Projects. The Project Developer shall include mitigation measures (if possible), the emergency preparedness plan and response strategies. The Project Developer shall disclose appropriate information about emergency preparedness and response Projects, resources, and responsibilities to affected communities.</p> <p>Will the Project be susceptible to or lead to increased vulnerability to wind, earthquakes, subsidence, landslides, erosion, flooding, drought or other extreme climatic conditions?</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>This is not applicable.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 9.3 - Genetic Resources</p>	<p>PP does not use any GMO. This safeguarding</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>The Gold Standard Certification requires that</p> <p>3.9.6 Projects involving the use of GMOs are not eligible for Gold Standard Project Design Certification.</p> <p>3.9.7 An assessment for the risk of GMO contamination from outside the Project area and reasonable and appropriate counter measures should be taken.</p> <p>Could the Project be negatively impacted by the use of genetically modified organisms or GMOs (e.g., contamination, collection and/or harvesting, commercial development)?</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 9.4 - Release of pollutants</p> <p>The Gold Standard Certification requires that</p> <p>3.9.8 The Project shall avoid the release of pollutants. This applies to the release of pollutants to air, water, and land due to routine, non-routine and accidental circumstances.</p> <p>3.9.9 The Project Developer shall ensure that pollution prevention and control technologies and practices consistent with national regulation or international good practice are applied during the Project life cycle.</p> <p>3.9.10 All potential pollution sources that may result from the Project that cause the degradation of the quality of soil, air, surface and groundwater within the Project's area of influence shall be identified. Appropriate mitigation measures and monitoring shall be implemented to ensure the protection of resources. The project can use historical records, ongoing monitoring and reporting through data logging of physical measurements, online sources, government data. The recommended methods include quantitative documentation of all sources and volumes of water abstractions, use of weirs and gauges, flow meters, pump energy consumption, transpiration rates, government data.</p> <p>Could the project potentially result in the release of pollutants to the environment?</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>The project cannot release any pollutants to the environment since all production stages are strictly monitored.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>
<p>Principle 9.5 - Hazardous and Non-hazardous Waste</p> <p>The Gold Standard Certification requires that</p> <p>3.9.11 Projects shall avoid or, when avoidance is not feasible, minimise and control release of hazardous materials resulting from their production, transportation, handling, storage and use in the Project. Where avoidance is not possible, the health risks, including potential differentiated effects on men, women and children, of the potential use of hazardous materials shall be addressed appropriately.</p>	<p>The project does not involve any production processes that use or release hazardous or non-hazardous chemicals or materials above the limits permitted by the legislation.</p> <p>This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>3.9.12 Projects shall consider the use of less hazardous substitutes for such chemicals and materials and will avoid the manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer¹⁵.</p> <p>3.9.13 All sources of waste and waste products shall be identified and classified. Waste products include amongst others:</p> <ul style="list-style-type: none"> (a) Chemical wastes, AND (b) Containers, AND (c) Fuels and oils, AND (d) Human waste, AND (e) Rubbish (including metals, plastics, organic and paper products), AND (f) Abandoned buildings, machinery or equipment. <p>3.9.14 Where waste generation may not be avoided, the Project shall reduce the generation of waste, and recover and reuse waste in a manner that is safe for human health and the environment.</p> <p>3.9.15 Where waste may not be recovered or reused, it shall be treated, destroyed, or disposed of in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.</p> <p>3.9.16 If the generated waste is considered hazardous¹⁶, reasonable alternatives for its environmentally sound disposal will be adopted while adhering to the limitations applicable to its transboundary movement¹⁷.</p> <p>3.9.17 The Project shall not make use of chemicals or materials subject to international bans or phase-outs. For example, DDT, PCBs and other chemicals listed in international conventions such as the Stockholm Conventions on Persistent Organic Pollutants or the Montreal Protocol.</p> <p>Will the Project involve the manufacture, trade, release, and/ or use of hazardous and non-hazardous chemicals and/or materials?</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	
<p>Principle 9.6 - Pesticides & Fertilisers The Gold Standard Certification requires that</p> <p>3.9.18 Projects involving pest management, the integrated pest management (IPM) and /or</p>	<p>There is no use of Pesticides or Fertilisers in the project. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>integrated vector management (IVM) approaches shall be adopted and aim to reduce reliance on chemical pesticides.</p> <p>3.9.19 The health and environmental risks associated with pest management should be minimised with support, as needed, to institutional capacity development, to help regulate and monitor the distribution and use of pesticides and enhance the application of integrated pest management.</p> <p>3.9.20 When Projects include pest management or the use of pesticides, pesticides that are low in human toxicity, known to be effective against the target species and have minimal effects on non-target species and the environment shall be selected.</p> <p>3.9.21 There shall be a 'Chemical Pesticides Policy' that is documented, implemented and regularly updated. This policy shall include at a minimum:</p> <p>(a) Provisions for safe transport, storage, handling and application, AND (b) Provisions for emergency situations.</p> <p>3.9.22 The Project Developer shall not purchase, store, manufacture, trade or use products that fall in Classes IA (extremely hazardous) and IB (highly hazardous) of the World Health Organization Recommended Classification of Pesticides by Hazard.</p> <p>3.9.23 Fertilisers shall be avoided, or their use shall be minimised and justified. If the aerial application of fertiliser is used, then measures shall be put in place to prevent drift.</p> <p>Will the Project involve the application of pesticides and/or fertilisers? (Assessment question as per GS safeguarding principles and requirements v1.2)</p>	
<p>Principle 9.7 - Harvesting of Forests The Gold Standard Certification requires that 3.9.24 The Project shall:</p> <p>(a) Enhance the sustainable management of forests, including the application of independent, credible certification for commercial, industrial-scale timber harvesting, AND</p> <p>(b) Maintain or enhance biodiversity and ecosystem functionality in areas where improved forest management is undertaken.</p> <p>Will the Project involve the harvesting of forests? (Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>This is not forest project. Hence it is not applicable.</p>
<p>Principle 9.8 - Food The Gold Standard Certification requires that 3.9.25 The Project activity shall not negatively influence access to and availability of food for people</p>	<p>There is no risk to the food security due to the project activity.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>affected.</p> <p>Does the project modify the quantity or nutritional quality of food available such as through crop regime alteration or export or economic incentives? (Assessment question as per GS safeguarding principles and requirements v1.2)</p>	
<p>Principle 9.9 - Animal husbandry The Gold Standard Certification requires that 3.9.26 The welfare of animals shall be ensured by:</p> <p>(a) Provision of sufficient drinking water, AND</p> <p>(b) Access to daylight, AND</p> <p>(c) The prohibition of cattle trainers, AND</p> <p>(d) No hindrance in their sensory perception and performing their basic needs, AND</p> <p>(e) Management policies and staff training to prevent mistreatment (evidence of animal mistreatment shall be treated as an immediate Non-conformity).</p> <p>3.9.27 Excessive or inadequate use of veterinary medicines shall be avoided. Thus, all medications shall be:</p> <p>(a) Administered strictly according to label and package instructions, OR</p> <p>(b) According to a trained veterinarian.</p> <p>3.9.28 Injured or sick animals shall be treated and isolated, if necessary, for recovery.</p> <p>3.9.29 Synthetic growth promoters including hormones shall not be administered.</p> <p>3.9.30 Animals shall be exposed to the least stress possible during transportation and slaughtering.</p> <p>3.9.31 Appropriate space per animal and stocking rates per land unit should be set according to their developmental and physical needs.</p> <p>Will the Project involve animal husbandry? (Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>There is no feedstock in the project boundary. Hence there is no risk involved. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>Principle 9.10 - High Conservation Value Areas and Critical Habitats</p> <p>The Gold Standard Certification requires that 3.9.32 No Project that potentially impacts identified habitats as identified above shall be implemented unless all of the following are demonstrated:</p> <p>(a) The risk of the Project negatively impacting the catchment and risks impacting project success shall be assessed and addressed to ensure its ongoing, long-term viability and impact on surrounding HCV and ecological assets.</p> <p>(b) No measurable adverse impacts on the criteria or biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values;</p> <p>(c) A robust, appropriately designed, and long-term Habitats and Biodiversity Action Plan is in place to achieve net gains of those biodiversity values for which the critical habitat was designated.</p> <p>3.9.33 Within the Project the area that is managed by the Project Developer and the area of impact downstream, the following shall be identified and protected/enhanced. In the case of downstream impacts, the Project shall ensure mitigation is in place within the Project Boundary such that the Project shall not adversely affect these areas:</p> <p>(a) Existing patches of native tree species, AND</p> <p>(b) Single solitary stems of native tree species, AND</p> <p>(c) All freshwater resources including rivers, lakes, swamps, ephemeral water bodies and wells</p> <p>(d) Habitats of rare, threatened and endangered species, AND</p> <p>(e) Areas relevant for habitat connectivity shall be identified and managed to protect or enhance biological diversity.</p> <p>3.9.34 If the Project is located in such habitats; the Project Developer shall:</p> <p>(a) Minimise unwarranted conversion or degradation of the habitat.</p> <p>(b) Identify opportunities to enhance the habitat as part of the Project. For Projects applying the Land Use & Forest Activity Requirements Projects, a minimum 10% of the Project area shall be identified and managed to protect or enhance the biological diversity of native ecosystems. For this, the HCV approach should be followed (www.HCVnetwork.org). This area has to be located within the project region and managed by the Project Developer. The area may also include the areas of the requirement (for example, buffer zones for water</p>	<p>No land area in the Project area qualifies as High Conservation Value. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

GS Safeguarding principles and Requirements v1.2	Validation opinion
<p>bodies in the case of Land Use & Forests).</p> <p>3.9.35 The opinions and recommendations of an Expert Stakeholder shall be sought and demonstrated as being included in the Project design. The project can use mapping tools such as LEFT, IUCN Red List, IBAT or other appropriate nationally recognised tools may be used or visual inspection. The recommended methods include online tools, visual inspection, engineering or physical assessment, use historical data and verbal or written surveys with local residents.</p> <p>Does the Project physically affect or alter largely intact or High Conservation Value (HCV) ecosystems, critical habitats, landscapes, key biodiversity areas or sites identified? For example, Ramsar wetlands, World Heritage Areas, 'wilderness' areas, free-flowing rivers, unique or species-rich areas, primary forest, threatened or endangered species, migratory species as defined by treaties and national authorities or areas of natural cultural significance.</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	
<p>Principle 9.11 - Endangered Species The Gold Standard Certification requires that</p> <p>3.9.36 Under no circumstances shall the Project lead to the reduction or negative impact of any recognised Endangered, Vulnerable or Critically Endangered species¹⁹.</p> <p>3.9.37 Habitats of endangered species shall be specifically identified and managed to protect or enhance them.</p> <p>3.9.38 The opinions and recommendations of an Expert Stakeholder shall be sought and demonstrated as being considered and incorporated into the project design.</p> <p>Are there any endangered species² identified as potentially being present within the Project boundary (including those that may route through the area)? Does the Project potentially impact other areas where endangered species may be present through transboundary affects?</p> <p>(Assessment question as per GS safeguarding principles and requirements v1.2)</p>	<p>There is no endangered species in the project boundary. This safeguarding principle is correctly addressed by the PP in the PDD. Hence accepted by the validation team.</p>

Appendix 9: Gender Equality Requirements and Guidelines

Gender Equality Requirements and Guidelines v1.1 effective from 1 st March 2018	Validation opinion
<p>1.0 CERTIFICATION PATHWAYS</p> <p>1.1 As outlined in the Gold Standard Gender Policy, gender certification is available at two levels. The first level is mandatory; the second level is optional.</p> <p>1. Mandatory Gender-Sensitive Requirements –</p>	<p>PP has opted for mandatory gender sensitive requirements. Since the project is regular/new project seeking certification under the GS for Global goals, Gender Equality Requirements & Guidelines will apply. The below section reports how the project</p>

Gender Equality Requirements and Guidelines v1.1 effective from 1 st March 2018	Validation opinion
<p>These requirements are mandatory for all projects (regardless of type of project) seeking Gold Standard certification. They include compliance with the Gender Safeguarding Principles and Requirements, and gender sensitive stakeholder consultations.</p> <p>2. Optional Gender-Responsive Guidelines – These apply only to those projects that fulfill all the Gender Sensitive Requirements and further seek gender certification at the performance level. These projects must proactively conduct gender analysis and undertake actions to intentionally address gender gaps and contribute to gender equality and women’s empowerment. Such projects are then eligible to obtain Gold Standard Certified SDG Impacts under SDG 5 (as well as other relevant SDGs).</p> <p>1.2 The Gender Equality Requirements & Guidelines will apply to all new projects that are seeking certification under the Gold Standard for Global Goals (GS4GG). These Requirements & Guidelines will not apply retroactively to projects registered with previous versions of Gold Standard and transitioning to GS4GG.</p>	<p>satisfies Gender Equality Requirements & Guidelines (steps 1 to 3 only).</p>
<p>2.0 GENDER SENSITIVE REQUIREMENTS (STEPS 1-3)</p> <p>2.1 STEP 1: BASIC CONTEXT</p> <p>2.1.1 Provide evidence that the Project concept and design covers the overall societal context from a gendered perspective.</p> <p>2.1.1.1 Align the project to the Gold Standard Gender Policy.</p> <p>WHY IS THIS IMPORTANT?</p> <p>The main objective of the Gender Policy is to strengthen the Gold Standard and its stakeholders’ responsiveness to the multiple, culturally-derived principles of gender equality and women’s empowerment and to address and account for the links between gender equality, natural resources management and environmental sustainability.</p> <p>REQUIREMENTS</p> <p>The Gender Policy applies to all projects applying for Gold Standard certification, spells out the principles for achieving Gender Responsive certification at the performance level, and through supporting technical guidance on gender, solidifies the operational requirements for stakeholder involvement and partnership in the design, implementation, and evaluation of projects.</p> <p>Question 1: Does the project reflect the key issues and requirements of Gender Sensitive design and implementation as outlined in the Gender Policy? Explain how.</p>	<p>PP’s company policy has a proactive gender-responsive approach, considering that it has its own company policy, which includes gender policy and strategy and commitment to implement its policies and ISO procedures and practices.</p> <p>The project is aligned with the key issues and requirements of Gender Sensitive design and implementation of the Gold Standard Gender Policy. The project has its own company policy and complies with all requirements of the company policy. The standard requirements of ISO 9001 have been taken into account into the company policy.</p> <p>It is the policy of the project that all project employees receive the same protection and treatment and shall have the same rights and opportunities without discrimination for reasons of gender, race, national or family origin, language, religion, political or philosophical.</p>
<p>2.1.1.2 Conduct background gender research and align project to existing national policies, strategies, and best practices</p> <p>Question 2: Does the project align with existing country policies, strategies and best practices? Explain how.</p>	<p>The host country, Romania, is an EU country since 2007 and it has its own legislation in place in accordance with the European legislation, prohibiting the violation of Human Rights and gender discrimination of any kind.</p> <p>Romania has also ratified the international conventions of Human Rights and its protocols on</p>

<i>Gender Equality Requirements and Guidelines v1.1 effective from 1st March 2018</i>	<i>Validation opinion</i>
	<p>1954, 1990 and 2015, and it actively enforces the compliance with this country.</p> <p>The project respects life, liberty and security as well as personal and political freedom and also respects economic, social, cultural freedoms and property according to its company policy, which is fully integrated into the national and European legislation.</p>
<p>2.2 STEP 2: APPLY GOLD STANDARD SAFEGUARDING PRINCIPLES REQUIREMENTS Apply the Gold Standard Safeguarding Principles & Requirements and take note of the gender guidelines and examples provided in the guidance notes. Country-level safeguards shall supersede the Gold Standard Requirements if they go beyond Gold Standard Requirements Question 3: Does the project address the questions raised in the Gold Standard Safeguarding Principles & Requirements document? Explain how. 2.2.1 Gold Standard may direct/support whether an expert stakeholder opinion (with a specific emphasis on gender and environment expertise) is required to support the gender safeguards assessment process depending on project type, scale and context.</p>	<p>The validation opinion of the questions raised in the Gold Standard Safeguarding Principles & requirements document is detailed in Appendix 8 of this report.</p>
<p>2.3 STEP 3: CONDUCT STAKEHOLDER CONSULTATION REQUIREMENTS Apply the Gold Standard Stakeholder Consultation & Engagement Procedure, Requirements & Guidelines and take note of the gender guidelines. Question 4: Does the project apply the Gold Standard Stakeholder Consultation & Engagement Procedure, Requirements & Guidelines? Explain how.</p>	<p>The validation team has reviewed the LSC report and accepted that it follows the Stakeholder Consultation & Engagement Procedure, Requirements & Guidelines v1.2.</p>

Appendix 10: Site Visit and Remote Audit Requirements & Procedures

Requirements of Site Visit and Remote Audit Requirements & Procedures	Verification opinion
<p>1 SCOPE AND APPLICABILITY 1.1 Scope 1.1.1 This document applies to planning and carrying out validation/verification audits as required under GS4GG, informing VVB consideration of the application of remote audit/assessment approaches.</p>	<p>The verification team has conducted remote auditing on 8th December 2021. The demonstration of remote auditing approach followed by the verification team is mentioned in below section.</p>
<p>1.2 Applicability 1.2.1 The requirements contained in this document apply to audits/assessments conducted for standalone project activities, including standalone micro-scale projects, seeking design certification, performance certification, or design certification renewal.</p>	<p>The proposed project is standalone project.</p>
<p>1.2.2 The remote assessment requirements/approach outlined in this document do not apply to: a. Land Use & Forest Projects b. Programs of Activities (PoAs), including micro-scale PoAs 1.2.3 Note – The remote audit/assessment requirements will be designed and developed for</p>	<p>The proposed project is not a LUF or PoA project. Hence applicable.</p>

LUF and PoAs separately, considering the unique nature of such projects and certification pathways	
1.3 Entry into force 1.3.1 The document may be applied FROM 18 DECEMBER 2021 (30 days of AFTER publication) by projects within the applicable scope that have not yet had a physical site visit during their current audit event	This is applicable as the verification team did not conduct the physical onsite visit. The validation team has conducted remote auditing on 8 th December 2021
2 DEFINITIONS a. Audit instances/events: Audit instances/events refers to validation and verification events that a VVB is engaged to assess	The proposed audit instance refers to validation.
b. Remote audit/assessment: Remote audit refers to the use of Information and Communication Technology to gather information, interview an auditee, etc., when “face-to-face” methods are not possible or desired. (ISO 19011)	The verification has used Google meet during the remote auditing.
c. For this document, the remote audit/assessment refers to validation and verification by VVB from a location other than being physically present at the project site. The remote assessment may involve use of Information and Communication Technologies for auditing/assessment purposes. The remote assessment may also involve a hybrid approach involving on-site measures to verify compliance with the requirements. In such cases, the VVB may appoint an individual expert or audit team member to help lead auditors to verify practices on the ground by facilitating data/information collection, transfer, and verification using technology/electronic and other means, e.g. interviews, videos, photos, surveys, etc.	The remote auditing refers to validation by EPIC from its registered office –Bangalore with the project owners present at the project site.
d. Remote audit techniques: Auditing techniques applied to validate/verify aspects of a project without the validator/verifier being physically present at the project site. These include phone calls, video calls, video recordings, geo-location data and geo-information systems, etc. They may be used in remote audits as well as in audits involving a physical site visit.	This is applicable as the validation team did not conduct the physical onsite visit. The verification team has conducted remote auditing on 8 th December 2021.
e. Information and Communication Technology (ICT): also referred to as “technology” in this document. Technologies – including, but not limited to, software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others. The use of ICT may be appropriate for auditing/assessment both locally and remotely.	The verification has used Google meet-video during the remote auditing.

<p>Examples of the use of ICT during audits/assessments may include but are not limited to:</p> <p>Meetings; by means of teleconference facilities, including audio, video and data sharing</p> <p>Audit/assessment of documents and records by means of remote access, either in real time or asynchronously</p> <p>Recording of information and evidence by means of still video, video or audio recordings</p> <p>Providing visual/audio access to a remote location</p>	
<p>3 MINIMUM PHYSICAL SITE VISIT REQUIREMENTS</p> <p>3.1 Frequency of physical site visits 3.1.1 At minimum, the VVB shall conduct physical site visit a. Within two years of project start date; and b. Once every three years after the first physical site visit</p> <p>Note: For rules on possible deviations from the minimum site visit requirements, please see the Rule Update "Applicability of minimum site visit requirements by VVB"</p> <p>Note: For micro-scale project internal validation/verification, SustainCERT acts as a VVB. For example: - if a retroactive project's start date is 1 year before submission for preliminary review, the project has 1 more year (total of maximum 2 years from the start date) to undergo an audit with a physical site visit. - If a project is greenfield, i.e. it is not implemented at the time of validation, the first site visit may be done during first verification, and not during validation, if all aspects of the validation can be audited remotely.</p>	<p>Onsite is not mandatory for validation. For the current validation, physical onsite was not possible due to travel restriction due to COVID situation. The remote auditing was conducted on 8th December 2021.</p> <p>The validation team has accepted the same as reasonable. The deviation is accepted by the verification team.</p>
<p>3.2 Audit events 3.2.1 A physical site visit by VVB is not mandatory at the validation (Design Certification or Design Certification Renewal) of a project. 3.2.2 A physical site visit by VVB is mandatory at the first verification of a project. 3.2.3 The first physical site visit may combine both validation and verification audits if the project developer and VVB combine Design Certification with the first verification and Performance Review.</p>	<p>Onsite is not mandatory for validation. For the current validation, physical onsite was not possible due to travel restriction due to COVID situation. The remote auditing was conducted on 8th December 2021.</p> <p>The validation team has accepted the same as reasonable. The deviation is accepted by the verification team.</p>
<p>4 REQUIREMENTS FOR ALL AUDITS 4.1 General requirements for all audit instances 4.1.1 If the project developer explicitly requests an audit to be conducted remotely: a. The VVB shall determine whether a physical site visit is mandatory as per the minimum physical site visit requirements. b. The VVB shall determine whether or not a remote</p>	<p>The project developer has requested the validation team to do remote audit due to COVID condition. For the validation, physical onsite was not possible due to travel restriction due to COVID situation. Therefore, the remote auditing was conducted on 8th December 2021.</p> <p>The validation team has conducted the risk assessment and found there is no risk found in the final decision making regarding validation opinion.</p>

<p>audit is viable for an audit instance of a given project where a physical audit is not mandatory.</p> <p>The VVB shall conduct the risk assessment applying qualification criteria described in ANNEX 1 - RISK ASSESSMENT GUIDELINES and any additional qualification criteria that VVB finds appropriate for decision making.</p> <p>The VVB is the decision-making body and shall not be unduly influenced by the project developer in this regard.</p>	<p>The detailed assessment is mentioned in the annex 1 of this section.</p>
<p>4.1.2 The VVB audit team shall carry out any assessment, whether remote or including a physical site visit, as per their established roles/responsibilities as per the Gold Standard Validation and Verification Body Requirements</p>	<p>The validation team has followed the standard auditing techniques during the verification.</p>
<p>4.1.3 Remote audit techniques may be used as appropriate, and applying the safeguards and procedures in this document, in any audit, whether it includes a physical site visit or not.</p> <p>See ANNEX 2 – TECHNOLOGY/ELECTRONIC MEANS FOR REMOTE ASSESSMENT/AUDIT</p>	<p>The validation team has followed the standard auditing techniques during the verification. The validation team has used Google meet during the remote auditing.</p>
<p>4.1.4 The VVB, in its audit report, shall include the template referenced in ANNEX 3 – of this document to report on:</p> <ul style="list-style-type: none"> a. the auditing techniques used in each audit, for each aspect of the project b. the assessment of the appropriateness of the selected auditing techniques c. any mitigation measures implemented to reduce risks associated with the auditing techniques d. any aspects of the project that need to be further audited during the following audit (Forward Action Requests) 	<p>The validation team has used this GS prescribed auditing techniques for validation.</p>
<p>4.1.5 Gold Standard reserves the right to enforce a mandatory site visit before concluding the design and or performance review, should material issues be identified with the use of remote auditing techniques during an audit.</p> <p>Such a site visit:</p> <ul style="list-style-type: none"> a. may be of a limited scope, covering only the material issues identified b. shall be conducted by a Gold Standard-approved validator/verifier and may not be outsourced to a local expert. <p>Note: Material issues include, among others, non-conformity with the present requirements: frequency, risk assessment, team structure and competence, adequacy of remote audit techniques employed, etc.</p>	<p>This is not relevant for the scope of work of EPIC.</p>
<p>5 REQUIREMENTS FOR AUDITS USING REMOTE AUDIT TECHNIQUES</p> <p>5.1 Confidentiality, security and data protection</p> <p>5.1.1 The security and confidentiality of electronic or electronically transmitted information is particularly</p>	<p>The confidential information is data protected and is not shared to outside of the company.</p>

important when using technology/electronic means for remote assessment purposes.	
<p>5.1.2 The use of technology for remote assessment purposes shall be mutually agreed upon by the project developer, participants, and VVB according to information security and data protection measures and host country legislation and regulations before any technology/electronic means are used for remote audit/assessment purposes.</p> <p>Any data security or privacy breaches associated with remote auditing are the responsibility of the VVB to resolve and Gold Standard accepts no liability in this regard.</p>	<p>The validation team has used Google meet during the remote auditing. The same was mutually agreed upon between the project developer and the verification team.</p>
<p>5.1.3 VVB shall document evidence of such agreements.</p> <p>This evidence could be recorded, agreed on procedures, or emails.</p> <p>The importance resides in having these criteria acknowledged by all participants.</p>	<p>The validation team has used Google meet during the remote auditing. The same was mutually agreed upon between the project developer and the validation team by email.</p>
<p>5.1.4 Measures to ensure confidentiality and security shall be confirmed during first interaction, i.e. meeting calls and maintained throughout remote audit/assessment activities.</p>	<p>The agreement signed between project developer and EPIC for the scope of work of validation has this confidentiality clause.</p>
<p>5.1.5 In the case of non-fulfilment of these measures or non-agreement of information security and data protection measures, the VVB shall use other methods to conduct the remote assessment.</p>	<p>This is not relevant as agreement signed between project developer and EPIC has this confidentiality clause</p>
<p>5.1.6 If sufficient information cannot be obtained via application of the technology/electronic means and required information is necessary for VVB to form a conclusion with the planned audit techniques, the VVB may use other technology/electronic means or expand the scope/sample of the assessment until sufficient information is obtained.</p> <p>If expanding the scope of the audit is not sufficient, the VVB shall:</p> <ol style="list-style-type: none"> a. Repeat the assessment at another time when e.g. the connection/conditions allow the VVB to conduct the assessment b. Carry out a physical site visit, within the same audit process, covering at least the aspects not sufficiently audited by remote techniques. c. Discontinue the audit (do not issue a validation/verification opinion) and re-start the audit with a new set of planned techniques, including a physical site visit. 	<p>This is not required as remote auditing has covered all the validation auditing aspects.</p>
<p>5.2 Team structure and competence requirements</p> <p>5.2.1 An audit team that conducts the remote assessment shall meet the structure and competence requirements as outlined in the Validation & Verification Body Requirements.</p>	<p>The competence of the validation team is mentioned in Appendix 2 of the report.</p>
<p>5.2.2 When using ICT, VVB and other involved experts (e.g. drone pilots, technical experts) shall have the competency and ability to understand and utilise the information and communication technologies employed to achieve the desired results</p>	<p>The competence of the validation team is mentioned in Appendix 2 of the report.</p>

<p>of audit(s)/assessment(s).</p> <p>The auditor/assessor shall also be aware of the risks and opportunities of the information and communication technologies used and the impacts that they may have on the validity and objectivity of the information gathered.</p>	
<p>5.2.3 The VVB may engage individual experts and/or external individual(s) for remote assessment following the requirements outlined in section 7.5.2 of VVB requirements.</p>	<p>The competence of the validation team including technical expert is mentioned in Appendix 2 of the report.</p>
<p>5.2.4 When an individual expert/external individual is involved, the VVB must ensure that the expert/individual has</p> <ul style="list-style-type: none"> a. no financial interest or any other conflict of interest concerning the Project b. a non-disclosure agreement covering the project audited c. access to infrastructure to safeguard the confidentiality and security of the data gathered d. sufficient briefing from the VVB on at least the following aspects of the assignment: <ul style="list-style-type: none"> i. relevant Gold Standard rules, requirements, procedures, templates ii. objectives iii. tasks iv. procedures v. timelines and audit plan vi. logistical arrangements vii. access to/use of interpreters, where required 	<p>The external technical expert has signed an agreement with EPIC where these terms and conditions are mentioned. The technical expert has no financial interest in the project. The training on Gold Standard rules, requirements and EPIC procedures is conducted to the technical expert.</p>
<p>5.2.5 The VVB shall ensure that the individual expert/external individual has as a minimum the following competencies:</p> <ul style="list-style-type: none"> a. Basic knowledge of the local context 	<p>The local technical expert has knowledge in plastic industry and based in Romania.</p> <p>The technical expert has a Doctoral studies in the Environmental Protection domain in Technical University “Gheorghe Asachi” Iași, Faculty of Engineering and Environmental Protection “Cristofor Simionescu and has Master’s degree. Study domain- Environment Engineering. Study program – Management, waste treatment and recovery. He has more than 12 years of experience in waste management field. He is based in Romania.. He has excellent communication skills, the ability to multitasking, he is computer literate and good in English and Romanian</p>
<ul style="list-style-type: none"> b. Basic auditing techniques 	<p>He has strong management and organizational skills, excellent project management expertise, negotiating, excellent knowledge of the industry, decisiveness and mercantile shrewdness, good numeracy skills, good attention details. He has the basic knowledge of basic auditing techniques like document review, interview etc.</p>
<ul style="list-style-type: none"> c. Knowledge and well versed with the technologies/ electronic modes selected for remote assessment (if any) 	<p>The technical expert has a Doctoral studies in the Environmental Protection domain in Technical University “Gheorghe Asachi” Iași, Faculty of</p>

	Engineering and Environmental Protection “Cristofor Simionescu and has Master’s degree. Study domain- Environment Engineering. Study program – Management, waste treatment and recovery. This suggested he has minimum computer knowledge on technologies/ communication channels like Google meet etc selected for remote assessment
d. Interview techniques (if conducting interviews)	He has more than 20 years of experience in commercial field, from which 12 years in recycling industry.
e. Speak the language of the interviewees (if conducting interviews)	He is based in Romania. So he can speak Romanian language. He is also fluent in English.
f. Sufficiently speak a language spoken by the Team Leader	He is based in Romania. So he can speak Romanian language. He is also fluent in English.
5.2.6 In certain audits, the individual expert/external individual may be engaged for remote audit/assessment as a facilitator and without replacing the auditor and/or technical reviewer in their respective roles. This means that the facilitator: a. Only enables the (part of the) audit to happen remotely, e.g. through data/video/image collection, operation of equipment, interpreting/translation, etc.	The technical expert has engaged in remote audit as a facilitator and complementing the lead auditor in completing the remote auditing. He provided technical inputs and translation from Romanian to English and vice-versa during remote auditing and thereafter till completion of the verification report.
b. Works entirely under the explicit directions of an auditor	He worked under the explicit directions of the lead auditor only.
c. Does not participate in forming a validation/verification opinion, even on specific topics,	He did not participate in forming the verification opinion
d. Does not participate in the writing of the validation/verification report	He did not participate in writing of the verification report.
5.2.7 Whenever the individual expert/external individual is engaged for remote assessment/audit only as a facilitator, the expert/individual is not required to: a. Undergo the VVB online exam.	Since he had engaged for remote assessment as a facilitator only, it was not a requirement for him to undergo VVB online exam.
b. Be trained on aspects of the Gold Standard outside the scope of their assignment	Since he had engaged for remote assessment as a facilitator only, it was not a requirement for him to be trained on aspects of the Gold Standard outside the scope of his assignment.
5.2.8 The VVB audit team shall provide individual expert/external individual training on, as a minimum: a. Project-specific and relevant standard-specific requirements, b. Interview techniques c. The information to be collected on-site, d. The reporting format, e. The channel of communication through which information shall be transferred from while on-site and during the future course of exchanges	The technical expert was trained on GS aspects, project requirements, standard specific requirements, interview techniques, information to be collected, reporting format of the validation report, communication channel before the engagement for remote auditing.
5.2.9 The individual expert/external individual shall collect and report information in the prescribed format/checklist by audit team and present it to the auditing team (team leader and technical expert). The VVB shall keep said report in records and shall	The validation team has used checklist in collecting the information during remote auditing and for verification.

<p>provide a copy to Gold Standard if needed.</p>	
<p>6 REMOTE AUDIT PROCEDURE & GUIDELINES 6.1 Objectives</p> <p>6.1.1 Remote assessments (those that do not include a physical site visit by an auditor) provide the opportunity to optimise audit/assessment effectiveness and efficiency while maintaining the integrity of the audit/assessment process.</p> <p>The objective of a remote assessment is to establish the level of confidence in the VVB certification process by direct observations carried out through an electronic medium.</p>	<p>By doing the remote auditing, the validation team has followed all the auditing techniques while maintaining the integrity of the validation process.</p>
<p>6.2 Agreement</p> <p>6.2.1 The use of remote assessments by VVB of a given project may be requested by the project developer for its assessment needs (validation, verifications, etc.) when a physical site visit is not mandatory or feasible, and where the PD and the VVB consider a remote audit feasible for the project's context.</p> <p>Remote audit is at the discretion of the VVB, who is entitled to reject any request from project developers to consider it as an option.</p>	<p>The project developer has requested for the remote auditing due to COVID conditions. The validation team has accepted that remote auditing was feasible due to the current situation.</p>
<p>6.3 Qualifying criteria for initiating a remote assessment</p> <p>6.3.1 The VVB may consider a project developer's request for a remote audit/assessments following the below listed qualifying criteria:</p> <p>6.3.2 A minimum physical site visit is not mandated as per GS4GG requirements or not required/recommended as per VVB's previous audit findings.</p> <p>6.3.3 The VVB can create a feasible audit plan that covers all aspects of a project design validation/project performance verification (as per ANNEX 3 – AUDIT TECHNIQUES) with suitable auditing techniques (as per ANNEX 2 – TECHNOLOGY/ELECTRONIC MEANS FOR REMOTE ASSESSMENT/AUDIT.</p> <p>6.3.4 The VVB can perform a risk assessment according to ANNEX 1 - RISK ASSESSMENT GUIDELINES and its own risk assessment procedure</p>	<p>The project developer has requested for the remote auditing due to COVID conditions.</p> <p>The verification team has prepared an audit plan that covers all aspects of project design with suitable auditing techniques and risk assessment.</p>
<p>6.3.5 The VVB is confident that any identified significant risk/issue can be addressed and assessed/audited by the VVB using technology/ electronic means to attain reasonable level of assurance</p>	<p>From the remote auditing, the validation team has achieved reasonable level of assurance.</p>
<p>6.3.6 The VVB can confirm before the audit commences that:</p> <p>a. The VVB and the project developer can provide representatives who are capable of communicating proficiently in the same language.</p> <p>b. The VVB has the capability and aptitude to</p>	<p>The project owner representative has good English communication skills. The technical expert also has good English communication skills.</p> <p>The project owners, technical expert and lead auditor have used Google meet during remote auditing.</p> <p>EPIC has signed an agreement with the project</p>

<p>conduct the remote assessment in the chosen medium/forum.</p> <p>c. The PD, including all interviewees, has the capability and aptitude to undergo the remote assessment in the chosen medium/forum.</p> <p>d. A list of activities, areas, information and personnel to be involved in the remote assessment is available.</p> <p>e. The infrastructure required for the chosen auditing techniques/media as well as secure data storage is available.</p> <p>f. A confidentiality agreement is in place between the VVB and the project participants, and the remote audit does not contradict any confidentiality agreements between the project participants.</p> <p>g. In case of a verification audit, the project developer has implemented the registered monitoring plan and has a data management system where records, data, etc. and can be audited remotely.</p>	<p>developer for verification scope which contains confidentiality clause.</p> <p>The project developer has implemented the registered monitoring plan and has a data management system where records are being audited remotely by the validation team with the help of technical expert. .</p>
<p>6.4 Planning and scheduling</p> <p>6.4.1 Before initiating a remote assessment, the VVB should define:</p> <p>a. The agenda for the planned remote assessment with pre-defined records and documentation to be available during remote assessment.</p> <p>b. The desired scope of audit.</p> <p>c. The list of activities, areas, information and personnel to be involved in the remote assessment.</p> <p>d. The list of items to be assessed.</p> <p>e. The timeframe for conducting the remote assessment</p> <p>f. A plan to review information that cannot be shared remotely (i.e. due to confidentiality or access issues). The VVB should define or express how this will be dealt with (i.e., follow-up, issuance of a non-conformance, etc.)</p>	<p>The validation team has prepared the validation plan containing all the aspects in question.</p>
<p>6.4.2 For any type of remote audit, advance document review of materials from the project developer is an essential step.</p> <p>Building out a standardised list of the required documentation can increase consistency and clarity of approach.</p> <p>At a minimum, VVB should request the same list of documents that they would require to conduct an on-site assessment.</p> <p>Additionally, based on the criteria that can be assessed virtually, they should identify what documents or data are needed to support that assessment.</p>	<p>The validation team has prepared the validation plan containing all the aspects in question.</p> <p>The validation team has reviewed all the documents before the remote auditing.</p>

<p>Documents should be requested well in advance of the audit so that requests for additional or outstanding information can be followed up in advance of the audit</p>	
<p>6.4.3 The scheduling of interviews of a sample of e.g. users or stakeholders need not be shared with the project developer in advance, in order to safeguard the impartiality of the interview process.</p> <p>The VVB should request, in advance of the audit, the contacts of all potential interviewees and should not share the sample selected with the Project Developer in advance of the remote audit</p>	<p>The interview questions to the local stakeholders are asked during the remote auditing only.</p>
<p>6.4.4 Selection of technology/electronic medium and planning should include:</p> <ol style="list-style-type: none"> a. Determining the electronic mode for hosting the assessment, to be agreed upon between VVB, project developer and other participants. Refer to Annex - 2 for some examples. b. Granting security and/or access to all participants. c. Testing platform compatibility prior to remote assessment. d. Encouraging and considering the use of webcams, cameras, etc. when physical evaluation of an event is desired or necessary 	<p>Google meet was used for the remote auditing.</p>
<p>6.4.5 Scheduling requires the following to be carefully considered:</p> <ol style="list-style-type: none"> a. Time zone acknowledgement and management to coordinate reasonable and mutually agreeable convening times. b. A trial meeting using the same media platforms agreed upon should be conducted to ensure the scheduled assessment will perform as planned. c. Proper security measures should be taken, when applicable, to protect confidential information 	<p>Remote auditing was conducted at the convenient time for the project developer, technical expert and local stakeholders.</p>
<p>6.5 Conducting remote assessments</p> <p>6.5.1 Should the VVB not be able to review any aspect of the project or make a complete determination, the VVB should make a record of this aspect and the related issues.</p> <p>6.5.2 The assessment should be carried out in quiet environments whenever possible to avoid interference and background noise (i.e., speakerphones)</p> <p>6.5.3 Facilitation of the assessment should follow normal assessment plans and processes.</p> <p>6.5.4 Both parties should make their best effort to confirm what was heard, stated and read throughout the assessment.</p> <p>6.5.5 All remote assessments should be concluded with a summary, review of the day(s)'s events, issues of concern, clarification of issues, non-</p>	<p>The standard remote auditing technique was followed throughout the remote auditing.</p>

<p>conformances and expectations.</p> <p>6.5.6 The VVB may terminate the assessment prior to the schedule due to an inability to maintain good connections or conditions during the scheduled time.</p> <p>This should be recorded in the assessment report.</p>	
<p>6.5.7 The VVB & project developer should take appropriate measures to safeguard the confidentiality of data in any format.</p> <p>The audit team should prevent the access and retention of more documented information than it would in a normal face to face audit.</p> <p>The audit team will probably want to have access to more information to prepare for the audit or to have the ability to analyse documented information asynchronously.</p> <p>When documented information is to be analysed in an asynchronous manner, it is a good practice that it should be shared in a secure and agreed system, such as cloud-based, Virtual Private Network or other file-sharing systems, utilising confidentiality and data privacy guidelines.</p> <p>Once the audit is complete, the auditor should delete from its system or remove access to any documented information and records not required to be retained as objective evidence.</p> <p>6.5.8 Any screenshots of documents or records or other kind of evidence that the auditor/individual expert takes should be previously authorised by the project developer and participants.</p>	<p>The standard remote auditing technique was followed throughout the remote auditing.</p>
<p>6.6 Post-assessment activities</p> <p>6.6.1 Findings (non-conformities, corrective actions, etc.) need to be drafted by the Remote Assessment audit team members in a timely manner for each session for review and acknowledgement prior to closure of nonconformities.</p> <p>6.6.2 The audit report should include the details of the records reviewed, people interviewed, and any findings.</p> <p>6.6.3 The VVB should ensure deletion of any confidential documents, images, recordings, etc.</p> <p>6.6.4 The treatment of non-conformities should follow the same processes that are applied for on-site assessments.</p> <p>6.6.5 The VVB should include in the audit report the template contained in Annex – 3, covering, for each aspect of the project:</p> <ul style="list-style-type: none"> a. the auditing techniques employed, b. a risk assessment of the techniques employed, c. mitigation measures employed by the VVB d. any observations (CARs, CLs, and/or FARs) 	<p>The validation report contains the audit findings, people interviewed, auditing techniques, risk assessment etc.</p>

<p>related to the auditing techniques used, and</p> <p>e. a conclusion on whether the remote assessment means are sufficient for the purpose of the audit while maintaining the integrity of the audit/assessment process.</p>	
<p>7 FURTHER READING AND REFERENCES</p> <p>ISO – 19011 – 2018 ISO 9001 Auditing Practices Group Guidance on: REMOTE AUDITS 2020</p> <p>IAF Mandatory Document For The Use Of Information And Communication Technology (Ict) For Auditing/Assessment Purpose 2018</p> <p>ISEAL Remote Auditing Good Practices 2021</p>	<p>The validation team has understood the aspects of ISO standards in question.</p>
<p>ANNEX 1 - RISK ASSESSMENT GUIDELINES</p> <p>The VVB shall create a risk assessment procedure to determine the necessity of conducting physical site visits based as a minimum on the following list of criteria and supplemented with the VVB's internal audit risk assessment criteria, as deemed appropriate.</p> <p>The VVB shall assess during the desk review/planning stage whether any of the following risks exist that cannot be addressed and/or audited without a physical site visit:</p> <p>For all certification stages:</p> <p>a. Risk of non-conformity with core GS4GG principles including but not limited to safeguarding principles, stakeholder inclusivity, SDG Impacts.</p> <p>b. Risk of non-conformity with potential reversal of GHG benefits and other SDG Impacts.</p> <p>c. Risk of non-conformity with key methodological requirements (applicability conditions, project boundary, identification of baseline scenario, algorithms and/or formulae used to determine emission reductions, monitoring methodology).</p> <p>d. Risk of any negative feedback/observations received from GS stakeholders, e.g., TAC, end-users, NGO supporters etc, not being addressed sufficiently by the project.</p> <p>e. Risk of key stakeholders and/or end users of project technology not willing/able to be interviewed through telephone/video calls.</p>	<p>There is no risk on safeguarding principles as validation team has able to check all the relevant principles.</p> <p>There is no reversal of GHG benefits for waste management projects.</p> <p>The validation team has reviewed the methodology requirements and confirmed that the project implementation is in line with the requirements.</p> <p>There is no negative comment from GS stakeholders.</p> <p>The validation team has able to interview the stakeholders.</p>
<p>For Validations:</p> <p>a. Any project aspect that might cease to exist after validation, e.g. the baseline technology.</p>	<p>This is not applicable.</p>
<p>For Verifications/Renewals</p> <p>a. Any outstanding FAR(s)/pending issue(s) since the previous physical site visit.</p> <p>b. Any design change(s)/temporary deviation(s) since the previous physical site visit.</p> <p>c. Any gaps in monitoring data, if any, that cannot be justified as per applicable requirements.</p>	<p>There is no FAR raised during this validation. There is no project deviations for this project.</p>

<p>ANNEX 2 – TECHNOLOGY/ELECTRONIC MEANS FOR REMOTE ASSESSMENT/AUDIT</p> <p>A remote audit/assessment involves information, document sharing and review and a form of virtual interaction with the site in question, e.g., remote interviews or site tours, in combination with a review of project documents and other sources of data and information.</p> <p>In almost all cases of remote assessments, the audit team should incorporate greater scrutiny of client documentation in advance of any virtual engagement.</p> <p>A remote audit/assessment employs the integration of suitable technology and new data sources to gather information, interview an auditee, etc., when “face-to-face” methods are not possible or desired.</p> <p>This section outlines example means/methods that VVBs can use for carrying out remote audits.</p> <p>They are not prescriptive and only indicative.</p> <p>These examples are drawn from credible external sources like ISO standards, ISEAL guidelines/recommendations and CDM requirements/procedures, amongst others</p> <p>Note: The VVB should review the appropriateness of conducting interviews remotely in the cultural and technological context of the project.</p> <p>Very often, stakeholders and end users of the technology may feel intimidated by conducting interviews online or on the phone, which may limit the ability of the auditor to assess key aspects of the project.</p> <p>Careful selection of appropriate methods by the VVB according to the is required, in consultation with the Project Developer and/or local experts</p>	<p>The validation team has used Google meet during the remote auditing.</p>
<p>ANNEX 3 – AUDIT TECHNIQUES TEMPLATE Audit Techniques Template</p>	<p>The validation team has used auditing technique-annex 3 during remote auditing.</p>

Appendix 11: Applicability of minimum site visit requirements by VVB

RULE UPDATE-Applicability of minimum site visit requirements by VVB	Validation opinion
<p>1 SCOPE AND APPLICABILITY</p> <p>1.1.1 This rule update (and requirements contained therein) applies to all standalone projects, Programme of Activities (PoAs) and project activities (VPAs/CPAs) (hereafter termed as projects) undergoing verifications, scale and activity type, where a project is in non-compliance with minimum site visit requirements.</p> <p>1.1.2 This rule update is also applicable to projects registered with Gold Standard V1.0.</p> <p>1.1.3 The relevant paragraphs to GSCERs projects have been notified, where applicable.</p>	<p>The project is standalone validation GS-VER project.</p> <p>The project developer has used GS4GG principles and requirements v1.2.</p>
<p>2 REQUIREMENTS The VVB may approve a deviation to address a non-</p>	<p>For the validation, onsite is not mandatory. Moreover, it was not possible due to travel</p>

<p>compliance with the minimum site visit requirement as follows;</p>	<p>restriction due to COVID situation. The remote auditing was conducted on 8th December 2021.</p>
<p>2.1 Validate the reason for gaps in site visit: 2.1.1 The reasons for non-compliance with site visit requirements could be either Force Majeure or Non-Force Majeure</p> <p>a. Force-Majeure: Any cause constituting force majeure i.e., an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable.</p> <p>Such events may include, but are not limited to</p> <ul style="list-style-type: none"> -any act of war (whether declared or not), invasion, revolution, insurrection, terrorism, or any other acts of a similar nature or force, that prevents VVB travel to project site -Natural disaster like flood, earthquake, etc. -Change in Governmental requirements, policy, etc that affect the project implementation and operation -Any other situation which meets the definition above <p>Force majeure does not include shortage of personnel, industrial action, economic downfall, sickness of personnel, breach of contract by subcontractors and liquidity or solvency problems</p> <p>b. Non Force majeure: Any other cause that is not covered under force majeure</p>	<p>For the validation, onsite is not mandatory. Moreover, it was not possible due to travel restriction due to COVID situation</p>
<p>2.2 Deviation approval</p> <p>2.2.1 VVB may approve such deviation as per the following paragraphs</p> <p>2.2.2 First site visit: In case the VVB site visit is not conducted within first two years after the start of crediting period,</p> <p>i. If the start date of the crediting period (as specified in registered PDD) is after the project registration date, the VVB shall review the project's compliance with paragraph 3.1.3(b) of the Design Change Requirements and the start date of the crediting period can be updated accordingly.</p> <p>The reasons for delays could be either Force or Non-force majeure.</p> <p>ii. If the start date of the crediting period is before the project registration date and the delays were due to;</p> <p>a. Force majeure, the project crediting period start date may be postponed for a maximum upto two years.</p> <p>In such a case, the VVB shall validate that no changes have occurred to the baseline, otherwise a conservative approach needs to be followed.</p> <p>b. Non-Force Majeure, no deviation is allowed.</p>	<p>This is not the verification for the project. This is not applicable.</p>

<p>The VVB shall not verify the monitoring period falling before two-year of the site visit date.</p> <p>Under similar circumstances for GSCERs projects, CERs only for two years before the site visit date shall be labelled as GSCERs.</p>	
<p>2.2.3 Follow-up site visits – In case follow-up site visits are not conducted within three years after the previous site visit, and the delays were due to:</p> <p>i. Force Majeure, the VVB shall submit a request for deviation to Gold Standard.</p> <p>ii. Non-Force Majeure, the VVB shall not verify the monitoring period falling before three years of the site visit date.</p> <p>Under similar circumstances for GSCERs projects, CERs only for three years before the site visit date shall be labelled as GSCERs</p>	<p>This is not applicable.</p>
<p>2.2.4 The project may have more than two years (first site visit) or three years (follow up site visit) of monitoring periods before the site visit date, the remaining years of the retroactive periods will be foregone without any extension of crediting period.</p>	<p>This is not applicable.</p>
<p>2.3 Verification requirements</p> <p>2.3.1 VVB shall ensure that the deviation detail and VVB opinion are included in the appropriate section of the monitoring and verification report (for the relevant Monitoring Period).</p> <p>2.3.2 The VVB shall ensure no monitoring gaps exist within the eligible Monitoring Period(s).</p> <p>However, if gap(s) exist, the VVB shall ensure that conservative approach(es) have been applied and verified in line with section 3 of the Deviation Approval Requirements and Procedures (version 1.1) and overarching Gold Standard principles (as applicable).</p>	<p>This is not applicable.</p>

Appendix 12: Requirements-COVID 19: INTERIM MEASURES

COVID 19: INTERIM MEASURES	Validation opinion
<p>1.0 RATIONALE AND TARGET AUDIENCE</p> <p>1.1 RATIONALE</p> <p>1.1.1 Due to COVID-19 outbreak and subsequent travel restrictions announced by many countries, Gold Standard recognises the associated challenges for projects, developers and Validation and Verification Bodies (VVBs).</p> <p>Gold Standard is committed to support projects, developers and VVBs in these circumstances.</p> <p>These Interim Measures aim to provide flexibility with different steps of the Gold Standard certification cycle without compromising the quality and rigour of the Standard.</p>	<p>Due to COVID conditions and travel restrictions, remote auditing was conducted by the validation team without compromising the quality and rigour of the GS Standard and EPIC process.</p>
<p>1.2 TARGET AUDIENCE</p> <p>1.2.1 The Gold Standard announces the following guidance for project developers, VVBs and SustainCERT on how project implementation & audit</p>	<p>This interim measure is applicable to the validation team as well.</p>

requirements may be managed in the interim period	
<p>2.0 STAKEHOLDER CONSULTATIONS The project developer may apply the following Interim Measures in cases where physical stakeholder consultation meetings cannot reasonably be conducted by projects due to COVID-19, and the projects are submitted for preliminary review and design/performance certification before the end date of the validity period of this guidance.</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.
<p>2.1 ALTERNATIVE MEASURES 2.1.1 The project developer may postpone physical stakeholder consultation meetings and the Stakeholder Feedback Round (SFR) for Gold Standard project/POA/VPA until the COVID-19 situation eases.</p> <p>However, PoA Design Consultations shall proceed as normal since these consultations do not necessarily require a physical meeting.</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.
<p>2.2 REQUIREMENTS 2.2.1 If the project developer postpones the physical meeting, they shall carry out the physical stakeholder consultation meeting and SFR at a later stage, as soon as the situation allows.</p> <p>Note: The postponed physical stakeholder consultation and SFR shall be carried out in line with the Gold Standard Stakeholder Consultation and Engagement Requirements (Version 1.2 dated October 2019).</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.
<p>2.2.2 The project developer shall set up a continuous input and grievance mechanism before starting the validation of the project (i.e., official submission of project design documents to the validating VVB), in line with the requirements prescribed in Section 7 of the GS Stakeholder Consultation and Engagement Requirements.</p> <p>The stakeholders, especially communities around the project site, should be informed about the grievance mechanism and available methods for sharing inputs and concerns</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.
<p>2.2.3 Relevant comments received on the project design, sustainable development assessment and safeguarding principles etc., during the delayed physical stakeholder consultation meeting, shall be accounted for and reflected in the project documentation.</p> <p>The project developer shall note that they may be required to retroactively modify the project design, safeguarding principles and SDG impact parameters (which may, for instance, involve retroactively reducing the amount of emissions reductions/impact statements issued in first verification as a result of the project design changes) based on all relevant feedback received from stakeholders during the delayed physical stakeholder consultation meeting and SFR.</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.
<p>2.3 SUBMISSION OF STAKEHOLDER CONSULTATION REPORT 2.3.1 The project developer may submit the project/CPA/VPA for preliminary review without conducting the physical meeting and SFR. 2.3.2 If the project developer postpones the physical</p>	The scope of work of EPIC is design certification where LSC was conducted remote. Hence this is not applicable.

<p>meeting, they shall submit the draft stakeholder consultation report with self-assessment of Sustainable Development Goals (SDGs) and safeguards assessment with other required documents for preliminary review and design certification, as applicable</p>	
<p>2.4 GUIDELINES FOR VVBs AND SUSTAINCERT 2.4.1 The VVBs and/or SustainCert shall, through appropriate means at their disposal, seek feedback from relevant stakeholders on the grievance mechanism, safeguarding principles and sustainable development assessment during the remote audit/review process.</p> <p>Feedback shall be communicated to the project developer and addressed by them, as necessary.</p> <p>If applicable, the VVB shall further evaluate project developer's addressal of stakeholder feedback, if any, and provide their opinion in the validation/verification report</p>	<p>The verification team has interviewed the local stakeholders the grievance mechanism, safeguarding principles and sustainable development assessment during the remote audit/review process. The opinion of the local stakeholder is already provided in the above sections. There was no grievance from the local stakeholders.</p>
<p>3.0 MONITORING REQUIREMENTS: COVID-19 may affect ongoing monitoring activities, and projects could face difficulties in conducting monitoring as per the registered monitoring plan.</p>	<p>The verification team has reviewed the relevant documents covering the related to the monitoring plan. The project implementation is in line with the monitoring plan.</p>
<p>3.1 ALTERNATIVE MEASURES 3.1.1 The project developer may seek deviations from the registered monitoring plan on a case by case basis for the interim period.</p>	<p>This is not applicable.</p>
<p>a. Alternative monitoring approach: The project developer may propose an alternative monitoring approach/arrangement. For example, the project developer may seek deviation to apply technology based remote monitoring (through remote sensing, relevant proxy remote-monitorable data etc.), which enables the project to meet the monitoring requirements while ensuring completeness and conservativeness of the monitored parameters.</p> <p>Note: The developer and VVBs may refer to example cases available at https://www.climateledger.org/en/Knowledge.25.html</p>	<p>This is not applicable as complete data covering the monitoring period necessary for validation is available and the validation team has already reviewed and confirmed its authenticity.</p>
<p>b. Postpone monitoring: The project developer may seek deviation to suspend the monitoring until the end of the validity period of the Interim Measures.</p> <p>The project shall be able to complete the monitoring at a later stage and/or apply credible, conservative assumptions or discount factors to the extent required to ensure that GHG emission reductions or removals will not be overestimated as a result of the postponement of monitoring.</p> <p>For example, where possible, monitoring can be done retrospectively (where data is recorded by the project but must be downloaded), or through interpolation of the monitoring period.</p> <p>For interpolations, a reasonable discount factor (for example, 20% reduction on metrics) should be applied to account for higher uncertainty.</p> <p>c. Gap in Monitoring: The project developer may seek</p>	<p>This is not applicable as complete data covering the monitoring period necessary for validation is available and the validation team has already reviewed and confirmed its authenticity.</p>

<p>approval for a 'gap' period in monitoring until the end of validity period of interim measures and extend the current project crediting period by a period equal to the gap period.</p>	
<p>3.2 REQUIREMENTS 3.2.1 The project developer can only request the above deviations for monitoring during the period of the Interim Measures (this guidance).</p>	<p>This is not required.</p>
<p>3.2.2 The project developer shall: Submit the deviation request before the end of the validity period of Interim Measures. Clearly state the start and end date of the monitoring period for which deviation applies. Where the end date of deviation is not known at the time of application and is intended to be the end date of the Interim Measures, the deviation request should state 'End of Interim Measures'. The monitoring deviation will end 28 calendar days from the Gold Standard declared end date of the Interim Measures. Project proponents that can re-establish monitoring sooner, may revert to the original registered monitoring plan sooner, clearly reporting the change date from interim to registered monitoring.</p>	<p>This is not required.</p>
<p>3.3 SUBMISSION OF DEVIATION REQUEST 3.3.1 When seeking deviations on account of all three approaches listed above, the project developer shall complete the Deviation Request Form and send to Gold Standard at "covid19@goldstandard.org".</p>	<p>This is not required.</p>
<p>3.4 GUIDELINES FOR VVBs AND SUSTAINCERT 3.4.1 In case of paragraph 3.1.1 b, the VVBs and SustainCERT shall determine whether the project has applied sufficiently conservative values and/or approach for the monitoring period for which the postponement applies</p>	<p>This is not required.</p>
<p>4.0 MANDATORY SITE VISITS BY VVBs The Validation and Verification bodies & SustainCERT may apply the following interim measures in cases where on-site inspections cannot reasonably be performed due to COVID-19 and travel restrictions. Note: For microscale project/PoAs/VPAs</p>	<p>Due to COVID conditions, the validation team has conducted remote auditing instead of physical visit as an interim measure.</p>
<p>4.1 ALTERNATIVE MEASURES 4.1.1 Alternative Measures relating to mandatory on-site visits for VVBs audits include: a. A VVB may postpone site visits for on-site inspections, taking into account the rules of relevant national and local authorities (local to the DOE offices as well as to locality of the site visits), World Health Organization (WHO) recommendations, policies of the VVB (if any) and other relevant travel restrictions and guidance (for example, a requirement to self-isolation upon return from specific countries). b. If site visit cannot be postponed due to significant impact of delaying the site visit on VVB and/or project developer due to timeline/commitment as per validation/verification or GS-VERs delivery agreement, VVB may replace mandatory on-site visits with remote audits.</p>	<p>Due to COVID conditions, physical visit by the validation team was not possible. The onsite visit also cannot be postponed due to timeline agreed between EPIC and the project developer.</p>

The audit may include but not limited to validation, verification, the inclusion of VPAs, design change review etc.	
4.2 REQUIREMENTS 4.2.1 In case of 4.1.1 a, the VVB shall complete the on-site inspection as normal when the COVID-19 situation eases	This is not relevant.
4.2.2 In case of 4.1.1 b, the VVB shall ensure the completeness and conservativeness of the monitored parameters at the time of verification. In doing so, it shall: i. Use validation/verification techniques and advanced communication technology solutions to validate/verify information and compliance with applicable requirements to the extent possible, to ensure the completeness and credibility of the audit; ii. Use means such as, but not limited to, tele/video meetings; interviews with relevant stakeholders, local authorities, project participants, persons responsible for data collections, end user and/or beneficiaries of the project; photographic evidence, video recordings; data collection using drones, satellite image (where possible); relevant documents; and other publicly available information. iii. Transparently disclose in the audit report that a. The audit is undertaken remotely and b. Describe the alternative means used and justification that they are sufficient for the audit	The validation team has checked the relevant document; conducted Google meet with the project developer, local stakeholders and confirming the implementation of the project.
iv. Must submit the audit report requesting design certification and/or performance certification within six (6) months of the declared end date of the Interim Measures	This is not applicable.
4.3 GUIDELINES FOR VVBs 4.3.1 The maximum monitoring period that VVB can verify based on remote audit (paragraph 4.1.1 b) is two years.	This is not applicable.
4.3.2 In cases of apparent malfeasance observed/identified at a later stage, Gold Standard retains the right to take retrospective action including retracting issued VERs, suspending project registration and/or withdrawing the accreditation of the VVB.	This is not applicable.
5.0 SUBMISSION TIMELINES: 5.1 EXTENSION REQUEST 5.1.1 Where project submission timelines are affected by COVID-19, the project developer may seek an extension by submitting a request to Gold Standard. It includes but is not limited to the following key submission stages: <input type="checkbox"/> Submission of the project within one year of start date; <input type="checkbox"/> Successful completion of validation within two years of the date of project Listing; <input type="checkbox"/> Completion of first verification within two years (5 years in case of A/R) of project implementation date or design certification or design certification renewal, whichever is later; <input type="checkbox"/> Submission of design review no later than the last date of current certification cycle; <input type="checkbox"/> Claiming retroactive crediting (extension of	For the validation verification, onsite was not mandatory. Moreover, it was not possible due to travel restriction due to COVID situation. The remote auditing was conducted on 8 th December 2021.

<p>retroactive crediting period to cover delays in addition to maximum allowed period of 2 years); <input type="checkbox"/> Submission of annual report.</p>	
<p>5.2 REQUIREMENTS 5.2.1 When seeking extensions, the project developer shall demonstrate with evidence (such as public statements from relevant authorities on travel restrictions) that the project submission is affected due to COVID-19. For example, the project must be able to demonstrate that all the necessary actions for submission of the project within the first year of start date were taken and evidence such as proof of stakeholder engagement, agreement with VVBs, etc. are available to validate the claim. 5.2.2 Extension requests shall be submitted before the declared end date of these Interim Measures.</p>	<p>Travel restriction due to COVID conditions prevailing in many countries including Romania.</p>
<p>5.3 SUBMISSION OF EXTENSION REQUEST 5.3.1 The project developer shall complete the Deviation Request Form and send the request to Gold Standard at "covid19@goldstandard.org"</p>	<p>This is not relevant.</p>
<p>6.0 FURTHER SUGGESTIONS The Gold Standard encourages all stakeholders, including project developers, VVBs, practitioners and other interested parties to send suggestions on alternative measures and means that can be used to facilitate the stakeholder consultations, monitoring, validation & verification to support Gold Standard projects. Please send your suggestions to Gold Standard at "covid19@goldstandard.org".</p>	<p>This is not relevant.</p>
<p>ANNEX-1:RECOMMENDED VALIDATION/ VERIFICATION TECHNIQUES In assessing the information, the VVB shall apply the means of validation and verification, including, but not limited to: i. Cross checks between information provided in the PDD/PoA-DD/Monitoring report and information from third-party or publicly available sources other than those used; if available, the DOE's sectoral or local expertise; and, if necessary, independent background investigations. ii. Telephone, video or email interviews with relevant stakeholders in the host country, such as personnel with knowledge of the Project/PoA design and implementation; iii. Cross checks between the information provided by interviewed personnel (i.e. by checking sources or other interviews) to ensure that no relevant information has been omitted; iv. Reference to available information relating Annex -1 Recommended validation techniques to assess programme, projects or technologies similar to the proposed Project/PoA under validation/verification; v. Review, based on the selected methodologies, the selected standardised baselines and other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations;</p>	<p>The validation team has used standard auditing during the entire verification process.</p>

<p>vi. Where no means of validation/verification is specified, the VVB shall apply the standard auditing techniques.</p> <p>The VVB may use other standard auditing techniques for validation or verification, as referred to in sections 7.1.3 and 9.1.3 of the CDM VVS-PA and sections 7.1.3 and 10.1.3 of the CDM VVS-PoA.</p> <p>vii. Reference to recently released ISO and ISEAL guidance documents for carrying out remote audits without compromising the reliability and effectiveness of the certification process.</p>	
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Appendix 13: GS Validation and Verification Standard V1.0

Requirements of GS Validation and Verification Standard V1.0	Validation opinion
<p>1 OBJECTIVE, SCOPE, APPLICABILITY AND ENTRY INTO FORCE</p> <p>1.1 Objectives</p> <p>1.1.1 The objectives of the “Validation and Verification Standard” are to:</p> <p>a. Enhance consistency and clarity of minimum requirements for validation and verification activities under GS4GG;</p> <p>b. Improve the quality and consistency in the preparation, execution and reporting of GS4GG validation and verification activities;</p> <p>c. Enhance the overall efficiency and integrity of the GS4GG.</p>	<p>The validation team has used this standard to validate the project requirements.</p>
<p>1.2 Scope and Applicability</p> <p>1.2.1 This document provides Validation and Verification Bodies (VVBs) and Certification Bodies (CB) with minimum requirements to perform Validation, and Verification of GS4GG activities - including projects, PoAs and their Voluntary Project Activities (VPAs), based on approved GS4GG rules and requirements.</p>	<p>The scope of EPIC’s work involves validation of a standalone project.</p>
<p>1.2.2 The requirements outlined in this document apply to all activities seeking certification of emission reductions and/or removals, and other sustainable development impacts under GS4GG and any earlier versions of Gold Standard.</p>	<p>The project is applied for GS-VER and other SDG impacts.</p>
<p>1.2.3 The VVBs shall refer to the Validation & Verification Body Requirements for assessing and understanding requirements and procedures for: seeking approval/re-approval to become a GS-VVB and be eligible for performing validation and verification activities, and maintaining eligibility as a GS-VVB to conduct validation and verification activities.</p>	<p>EPIC is eligible to perform validation of a project.</p>
<p>1.2.4 If it is found at any stage of the project/PoA that a VVB and/or Project Developer has engaged in malfeasance or fraud, Gold Standard retains the right to take action against such entities.</p> <p>The actions may include but are not limited to suspension of the project with immediate effect, retraction of certified products & statements, blacklisting entities and their registry accounts, or cancellation of VVB approval status.</p>	<p>The validation team has demonstrated their required competence and has no conflict of interest with the PP. Hence this situation does not arise.</p>
<p>1.3 Entry into force</p>	<p>The standard was published on 6th March 2023. At the time of writing of this report, it is mandatory for</p>

<p>1.3.1 The Version 1.0 of the Validation and Verification Standard enters into force 90 days after publication date. VVB shall demonstrate full compliance with the requirements of this standard for any new audit activity (validation, verification, design change, renewal of crediting period etc.) for which the contract(s) between VVB and the project developer/Coordinating and Management Entity (CME) is signed on or after this standard enters into force.</p>	<p>the VVB to use.</p>
<p>1.3.2 The VVB may voluntarily apply this standard to any new or ongoing audit activity for certification after its publication date.</p>	<p>The standard was published on 6th March 2023. At the time of writing of this report, it is mandatory for the VVB to use.</p>
<p>1.3.3 The VVB shall ensure that where this standard is not mandatorily applicable as per para 1.3.1 , such as ongoing audits, the audit activities are completed as per the applicable CDM, Gold Standard and best practice requirements</p>	<p>The standard was published on 6th March 2023. At the time of writing of this report, it is mandatory for the VVB to use.</p>
<p>2 TERMS AND DEFINITIONS 2.1.1 In addition to the definitions contained in the GS4GG Glossary, located on the GS4GG website, the following terms apply in this document: a. “Shall” is used to indicate requirements to be followed; b. “Should” is used to indicate that among several possibilities, one course of action is recommended as particularly suitable; c. “May” is used to indicate what is permitted.</p>	<p>The validation team has reviewed and understood these requirements of this standard.</p>
<p>3 PRINCIPLES The following principles guide the preparation, execution, and reporting of validation and verification activities by GS VVBs and CBs. 3.1 Independence 3.1.1 Remain independent of the activity in the process of validation or verification, and free from bias and conflict of interest. Maintain objectivity throughout the validation or verification to ensure that the findings and conclusions are based on objective evidence generated during the validation or verification Note: Sourced and adapted from ISO 140643:2006 - Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions. This standard can be obtained from any ISO member from the website of the ISO Central Secretariat at the following address: <www.iso.org>. Copyright remains with ISO.</p>	<p>The validation team has followed the principles of GS in the validation of the project.</p>
<p>3.2 Ethical Conduct 3.2.1 Demonstrate ethical conduct through trust, integrity, confidentiality and discretion throughout the validation or verification.</p>	<p>The validation team has followed the principles of GS in the validation of the project.</p>
<p>3.3 Fair presentation 3.3.1 Reflect truthfully and accurately the validation or verification activity, findings, conclusions and reports. Report significant obstacles encountered during the validation or verification, as well as unresolved and /or diverging opinions among validators or verifiers, the certification body, the standard (Gold Standard) and the client (e.g.the Project Developers).</p>	<p>The validation team has followed the principles of GS in the validation of the project.</p>

<p>3.4 Due professional care 3.4.1 Exercise due professional care and judgement based on the importance of the task performed and the confidence placed by clients and intended users.</p> <p>Have the necessary skills and competences to undertake the validation or verification.</p>	<p>The validation team has followed the principles of GS in the validation of the project.</p>
<p>SECTION A: GENERAL VALIDATION AND VERIFICATION REQUIREMENTS 4 GENERAL VALIDATION AND VERIFICATION APPROACH 4.1.1 The VVB shall select a competent team to perform the validation or verification for the project, PoA or VPA - collectively termed as 'projects' hereafter unless explicitly stated.</p>	<p>The validation team has demonstrated its competency. Competency of the team is detailed in Appendix 2 of this report.</p>
<p>4.1.2 In carrying out its validation or verification work, the VVB shall:</p> <p>a. Follow this standard and integrate VVB's own quality management system, as approved by Gold Standard and/or assessed by the relevant accreditation body;</p>	<p>After the completion of assessment by the validation team all the relevant documentation is submitted to a qualified, Independent Technical reviewer as part of EPIC' internal quality control system. A Technical reviewer team is appointed to review the draft final validation report (Draft FVR). The comments made by the Technical reviewer team are taken into consideration and incorporated in the final FVR. The technical reviewer team assesses whether all the reporting requirements have been fulfilled and whether all the issues raised were closed satisfactorily by the validation team with justification. The technical review process can also raise issues in this regard which is resolved further by the validation team to the satisfaction of the technical reviewer. The technical reviewer team either accepts or rejects the report made by the validation team. The final report (after resolutions of all findings) is then submitted to the Head-operations for review and approval.</p>
<p>b. Follow this standard, its provisions and most recent applicable decisions and guidance provided by Gold Standard;</p>	<p>The validation team has used the latest versions of the requirements for validation.</p>
<p>c. Determine whether each GS4GG project meets all applicable rules and requirements, including those specified in the Principles and Requirements, relevant Activity Requirements, Product Requirements, Programme of Activity Requirements (where applicable), selected and applied methodologies, methodological tools, templates and guidelines as applicable to each project being validated/verified, taking into account applicable Rule Updates, Rule Clarifications and guidance provided by Gold Standard, as well as any deviations granted to the project.</p>	<p>The validation opinion of the various requirements are detailed in Appendices of this report.</p>
<p>d. Assess the accuracy, conservativeness, relevance, completeness, consistency and transparency of the information provided by the Project Developers (PDs) or Coordinating and Managing Entity (CME);</p> <p>Note: Interpretations of conservativeness: Conservativeness is a principle that is used to choose between options - when assessing comparable alternatives that are similar in completeness and accuracy.</p> <p>Consequently, the principles of completeness and accuracy always apply and the principle of</p>	<p>The validation team has used these principles in arriving the validation opinion.</p>

<p>conservativeness may apply. Additionally, the principles of completeness and accuracy apply before applying the principle of conservativeness.</p> <p>Conservativeness is interpreted differently depending on the circumstances.</p> <p>For a project that is claiming emission reductions for monetary value, the understatement of the baseline and overstatement of the project emissions would be conservative.</p> <p>This principle is applicable to validation and verification.</p> <p>Adapted as per ISO 14064-3:2019(E), B.9 Interpretations of conservativeness.</p> <p>Note: Principles for each can be found in relevant applicable requirements</p>	
<p>e. Determine whether information provided by the Project Developer(s) or CME is reliable and credible</p>	<p>The validation team has accepted the documents based on its reliability and credibility only.</p>
<p>f. Apply consistent validation/verification criteria:</p> <p>i. To the requirements of the applicable regulatory documents (as defined in point c above);</p> <p>ii. To projects/PoAs with similar characteristics such as a similar application of applicable regulatory documents e.g. methodologies, use of technology, time period or region;</p> <p>iii. To expert judgements, over time and among projects/PoAs;</p>	<p>The validation team has applied the consistent auditing criteria.</p>
<p>g. Base its findings and conclusions on objective evidence and conduct all validation or verification activities in accordance with GS4GG rules, associated requirements and procedures;</p>	<p>The validation opinion is based on the objective evidence only</p>
<p>h. Not intentionally omit evidence that is likely to alter the validation or verification opinion;</p>	<p>The validation opinion is based on the objective evidence only</p>
<p>i. Present information in the validation report or verification and certification report in a factual, neutral and coherent manner and document all assumptions, provide references to background material, and identify changes made to the documentation</p>	<p>The validation opinion is free from omission and misstatements.</p>
<p>j. Safeguard the confidentiality of all information obtained or created during the validation or verification</p>	<p>The validation team is bound by confidentiality clauses defined by the EPIC.</p>
<p>5 USE OF AND COMPLIANCE WITH APPLICABLE STANDARDS</p> <p>5.1.1 In carrying out its validation and verification work, the VVB shall use and determine the compliance with the valid version of the applicable regulatory documents approved under GS4GG.</p> <p>Note: Regulatory document refers to applicable standards, methodologies, standardised baselines, methodological tools, guidelines and other regulatory documents adopted by Gold Standard</p>	<p>The validation team has applied the valid version of the GS requirements only.</p>
<p>6 GENERAL VALIDATION REQUIREMENTS</p> <p>6.1 Objectives of validation</p> <p>6.1.1 The VVB shall conduct a thorough and independent assessment of the proposed project (including standalone project, PoA and VPAs) against the applicable GS4GG requirements and procedures</p>	<p>The validation has conducted independent assessment of the project against the auditing criteria.</p>
<p>6.2 Validation approach</p>	<p>The validation team has checked if the project complies with the requirements of the applicable</p>

<p>6.2.1 In carrying out its validation work, the VVB shall:</p> <p>a. Determine whether the proposed project complies with the requirements of the applicable regulatory documents.</p>	<p>GS requirements.</p>
<p>b. Assess the claims and assumptions in the Design Documentation (DD) e.g. PDD, POA-DD, VPA-DD.</p> <p>The evidence used in this assessment shall not be limited to that provided by the Project Developer (s) or Coordinating and Managing Entity (CME).</p>	<p>The validation team has assessed the claims and assumptions made in the PDD in providing the validation opinion. The detailed opinion is reported in Appendices of this report.</p>
<p>c. Assess the evidence, claims assumptions made as part of the project documentation, including (as applicable) but not limited to:</p> <p>i. Stakeholder Consultation Report(s)</p> <p>ii. SDG Impact Tool</p> <p>iii. Safeguarding Principles Assessment</p> <p>iv. Official Development Assistance (ODA) declaration</p> <p>v. Other project documents e.g., Risks and Capacities Guidelines</p>	<p>The validation team has assessed the claims and assumptions made in the SCR report, SDG impact tool, Safeguarding principles assessment, ODA declaration and others in providing the validation opinion. The detailed opinion is reported in Appendices of this report.</p>
<p>d. Assess whether Project Developer(s)/ Coordinating and Managing Entity (CME) addressed Forward Action Requests (FAR) (if any) from the Preliminary Review stage.</p>	<p>There are 7 FARs raised (raised during the preliminary review) which are resolved during this validation process.</p>
<p>6.3 Means of validation</p> <p>6.3.1 The VVB shall follow the standard auditing techniques as described herein to assess the information provided by the Project Developer(s) or Coordinating and Managing Entity</p>	<p>The validation team has used the standard auditing techniques such as document review, interview etc during the validation process.</p>
<p>6.3.2 In assessing the information, the VVB shall apply the means of validation specified throughout this document and, where appropriate, standard auditing techniques, including, but not limited to:</p> <p>a. Document review involving:</p> <p>i. A review of data and information;</p> <p>ii. Cross checks between the information provided in the DD and information from sources other than those used; if available, the VVB's sectoral or local expertise; and, if necessary, independent background investigations.</p> <p>b. Follow-up actions (e.g., on-site inspection and telephone or e-mail interviews), including:</p> <p>i. Interviews with relevant stakeholders in the host country, such as personnel with knowledge of the activity design and implementation;</p> <p>ii. Cross checks between information provided by interviewed personnel (i.e., by checking sources or other interviews) to ensure that no relevant information has been omitted;</p> <p>iii. Take necessary steps to maintain, avoid bias and undue influence from Project Developer(s) in selection</p>	<p>The validation team has used the standard auditing techniques such as document review, interview with stakeholders, PP, crosschecking with third party documents, etc during the validation process.</p>

<p>of stakeholders and interviews.</p> <p>c. Reference available information relating to projects or technologies similar to the proposed activity under validation;</p> <p>d. Review, based on the selected methodologies and related documents (like standardised baselines, tools and guidelines), of the appropriateness of formulae and accuracy of all calculations;</p>	
<p>e. Sampling approach in accordance with the applied methodology(ies) and/or latest version of “Standard: Sampling and surveys for CDM project activities and programme of activities” including:</p> <p>i. A random sampling for cases where the Project Developer (s)/CME did not apply a sampling approach;</p> <p>ii. An acceptance sampling or another sampling approach for cases where the Project Developer(s)/CME applied a sampling approach.</p> <p>Where inconsistency occurs, requirements outlined in the applied methodology(ies) takes precedence. The VVB may apply stricter sampling approaches based on activity related risks</p>	<p>No sampling was used in this project.</p>
<p>a. Site visit requirements for standalone project activities 6.3.3 The timing and type of the VVB validation site visit, physical or remote, shall be determined and conducted in accordance with:</p> <p>a. The GHG Emissions Reductions and Sequestration Product Requirements (on the timing of the first physical site visit)</p> <p>b. The Site Visit and Remote Audit Requirements (on required mode of the validation site visit i.e. physical, remote or hybrid)</p> <p>c. It is optional for the VVB to conduct a physical site visit for:</p> <p>i. Validation of a standalone project activity for design certification</p> <p>ii. Design certification renewal of a standalone project activity,</p> <p>iii. Post-registration changes to a design certified standalone project activity.</p>	<p>Since it is optional for the validation team for physical visit for validation, the validation team has conducted remote audit only.</p>
<p>6.3.4 If the VVB conducts an on-site inspection for the instances mentioned in para 6.3.3 above, it does not necessarily need to include a visit to the geographical locations where project will be or are implemented but could be to the office of the Project Developer or Coordinating/Managing Entity.</p> <p>If the VVB doesn't conduct an onsite inspection as means of validation, the VVB shall describe the alternative means used and justify that they are sufficient for the purpose of validation.</p>	<p>Since the remote auditing contains all aspects as that of physical audit, the validation team has able to achieve reasonable level of assessment.</p>
<p>b. Site visit requirements for PoAs and VPAs</p>	<p>This is not applicable for a standalone project.</p>

<p>6.3.5 The site visit requirements shall be in accordance with the provisions of Programme of Activity Requirements. Validation of PoA and its real case VPAs shall include a site visit by a VVB who assesses the up-front design and monitoring plan for a PoA and its real case VPA against applicable requirements.</p> <p>This includes validation of:</p> <ul style="list-style-type: none"> a. The PoA and VPA documentation including the design document and monitoring & reporting plan, including any updates to the key project information after listed status has been achieved. b. Any supporting document and evidence to demonstrate conformity to all applicable GS4GG requirements. <p>6.3.6 For regular VPAs that are included using the regular inclusion process, which involves a compliance check by the VVB, conducting a site visit is not mandatory for validation.</p> <p>However, if the inclusion is done without a VVB site visit, a site visit shall be conducted within two years of a VPA's start date for any other proceeding certification process, such as verification.</p> <p>6.3.7 For regular VPAs directly included by the CME following the fast track inclusion pathway, a VVB shall conduct the site visit within two years of a VPA's start date for any proceeding certification process such as verification.</p> <p>6.3.8 For VPAs following combined inclusion and issuance of real case and regular VPAs, the VVB shall conduct a validation (real case VPAs)/compliance check (regular VPAs) for inclusion of new VPA in the PoA.</p> <p>The VVB shall conduct a verification of all new VPAs and/or any existing VPAs.</p> <p>The VVB may combine verification assessment for all VPAs with same monitoring period start and end date in a single Verification Report.</p> <p>Also, the VVB may carry out a combined site visit for both validation and verification process.</p> <p>A VVB site visit is mandatory in such case.</p>	
<p>6.3.9 Renewal of PoA period shall include a site visit by a VVB who assesses the PoA against all GS4GG Requirements.</p> <p>A VVB shall validate the PoA and real case VPA for renewal of certification cycle. For regular VPAs renewal of certification, the CME may select any of the pathways outlined for inclusion of VPAs.</p> <p>6.3.10 For microscale Programme of Activity, where Certification Body is acting as a VVB, please refer to Annex 2 of the Programme of Activity requirements</p>	<p>This is not applicable for a standalone project.</p>

<p>and procedures.</p> <p>6.3.11 Where no specific means of validation are specified, the VVB shall apply the standard auditing techniques described in paragraph 6.3.2 above.</p> <p>6.3.12 The VVB shall use any mandatory templates to document audit techniques, if applicable to the activity type being audited</p>	
<p>c. Corrective Action Requests (CARs), Clarification Requests (CLs) and Forward Action Requests (FARs) by the VVB</p> <p>6.3.13 If the VVB identifies issues that require further elaboration, research or expansion in order to determine whether the project, PoA, VPA meets the GS4GG requirements and procedures and can achieve credible emission reductions and SDG impacts, the VVB shall ensure that these issues are accurately identified, formulated, discussed and concluded in the validation report.</p>	<p>Appendix 4 of this report details the CAR/CL/FAR raised for this project.</p>
<p>6.3.14 The VVB shall raise a Corrective Action Request (CAR) if one of the following situations occurs:</p> <p>a. The Project Developer(s) has made mistakes that will influence the ability of the proposed project to achieve real, measurable, verifiable and additional emission reductions/GHG Removals and SDG impacts (e.g., establishment of inaccurate baseline scenario(s), implementation of incorrect/inapplicable methodological steps and/or data and parameter values for calculation of emission reductions and SDG impacts, adoption of erroneous estimations/assumptions for demonstration of additionality etc.);</p> <p>b. The applicable GS4GG requirements and procedures have not been met (e.g., partial or complete non-compliance with applicable regulatory documents, e.g. local stakeholder engagement, safeguarding principles assessment and sustainable development impact assessment etc.);</p> <p>c. There is a risk that GHG emission reductions and SDG impacts cannot be monitored or calculated.</p>	<p>Appendix 4 of this report details the CAR/CL/FAR raised for this project.</p>
<p>6.3.15 The VVB shall raise a Clarification Request (CL) if information is insufficient or not clear enough to determine whether the applicable GS4GG requirements and procedures have been met.</p>	<p>Appendix 4 of this report details the CAR/CL/FAR raised for this project.</p>
<p>6.3.16 The VVB shall raise a Forward Action Request (FAR) during validation to identify issues related to project implementation that require review during the first verification(s) of the proposed project, PoA, VPAs (e.g., confirming implementation status of the activity, establishing the technical specifications of the equipment installed, demonstrating compliance with relevant monitoring/measurement requirements etc.).</p> <p>The VVB shall not raise a FAR that relates to the GS4GG rules and requirements to confirm Design Certified status of the project, PoA and/or VPA.</p>	<p>The validation team did not raise any FAR during the validation process.</p>
<p>6.3.17 The VVB shall resolve or “close out” CARs and CLs only if the Project Developer(s)/CME modify the activity design, rectify the DD(s), or provide</p>	<p>All the CARs/CLs/FARs raised in this validation process has been resolved before RFR.</p>

<p>additional explanations or evidence that satisfy the VVB's concerns.</p> <p>If this is not done, the VVB shall not submit a request for Design Certification of the proposed project, PoA and VPA.</p>	
<p>6.3.18 The VVB shall report on all CARs, CLs and FARs in its Validation Report.</p> <p>This reporting shall explain the issues raised, the responses provided by the Project Developer(s)/CME, the means of validation of such responses and references to any resulting changes in the DD(s) or supporting annexes</p>	<p>Appendix 4 of this report details the CAR/CL/FAR raised for this project.</p>
<p>d. Corrective Action Requests (CARs), Clarification Requests (CLs) and Forward Action Requests (FARs) by the Certification Body (CB)</p> <p>6.3.19 Should the CB raise CARs, CLs, and/or FARs within the Design Certification Review process:</p> <p>a. For the Project Developer(s)/CME: the VVB shall assess how the Project Developer(s)/CME has addressed the CARs, CLs and/or FARs before the response is sent to the Certification Body.</p> <p>The project documentation may need to be updated accordingly to ensure that its final version reflects accurately the characteristics and expected impact of the project, PoA and/or VPA(s).</p> <p>b. For the VVB: the VVB shall address the CARs, CLs, and/or FARs before the response is sent to the Certification Body.</p> <p>The Validation Report shall be updated accordingly to ensure that its final version reflects accurately the characteristics and expected impact of the project</p>	<p>GS has raised 9 CARs and 7 FARs during the preliminary review. 9 CARs have been resolved during the preliminary review itself.</p> <p>7 FARs has been resolved in the validation process. No FAR is raised in the validation process.</p> <p>Appendix 4 of this report details the CAR/CL/FAR raised for this project.</p>
<p>6.4 Risk assessment - PoA Validation</p> <p>6.4.1 As part of PoA validation, the VVB shall validate the appropriateness of the sampling approach (including approach proposed for site-visits) as part of the Validation Report.</p> <p>The VVB shall take into account the following factors, amongst others, while assessing proposed sampling approach for validation:</p> <p>a. Risks related to the type(s) of project activity/technology/geographic location</p> <p>b. Risks related to non-identification of emission and leakage sources</p> <p>c. Risks related to double counting, especially in the case of distributed technologies</p> <p>d. Uncertainty with respect to the data monitored etc.</p> <p>e. Risks related to environmental, economic or social safeguards</p>	<p>This is standalone validation project. Hence not applicable.</p>

f. Risks on account of previous VPA having been erroneously included or other VPA facing significant grievances from local stakeholders or ongoing legal cases for existing VPA etc	
6.5 Use of applicable document templates 6.5.1 The VVB shall determine whether the DD and project documentation have been completed using the valid version of the DD template, Stakeholder Consultation Report(s), SDG Impact Tool, and any other applicable templates.	PP has used the relevant version of PDD v1.2, SCR report, SDG impact tool v1.2.
6.5.2 The VVB shall state its opinion on whether the project, PoA, VPA(s) has been submitted using the valid version of the relevant templates and following the instructions therein, and in related guidance documents	PDD has complied with the instructions mentioned therein.
6.6 Preparation and submission of VVB reports 6.6.1 The VVB contracted to conduct; a. validation of a proposed activity, design changes or design certification renewal of a design certified project or renewal of a design certified PoA period or inclusion of VPAs in a design certified PoA, shall prepare and submit a Validation Report using the valid version of the relevant validation report form. Note: The VVB shall use the validation report forms available on the UNFCCC CDM website with appropriate changes as needed to fulfil GS4GG requirements, if applicable form is not provided on GS4GG website. b. verification and certification for the implementation of the design certified project or PoA or included VPAs and monitored emission reductions and SDG impacts shall prepare a Verification and Certification Report using the valid version of the relevant verification and certification report form.	This is validation project. The validation team has prepared the validation report using CDM template with modification.
6.6.2 The VVB shall include in every report a full list of staff, staff of outsourced entities, and subcontracted individuals (including team leaders, auditors, technical reviewers, technical experts, country/local experts, interpreters, audit equipment operators, etc.) participating in the assessment, including their full names, affiliation, role in the assessment, and competence relevant to the assessment (sectoral scope, country expertise, etc.), as well as whether they are or not an approved Gold Standard auditor	The validation report contains the full list of team members in Appendix 2 of this report.
6.7 Use of applicable Global Warming Potentials 6.7.1 The VVB shall determine whether the Global Warming Potentials (GWPs) were correctly applied in the design documents (DDs e.g. PDD, PoA-DD and VPA- DD) and in the Monitoring Report in accordance with relevant GS4GG requirements	GWP of CO2 is taken as 1.
6.8 Validation and Verification by same VVB 6.8.1 If the same VVB wishes to perform verification of a given activity for which they have performed validation activity (including the inclusion of VPA, design certification renewal, design change review), the VVB shall ensure that the integrity and impartiality of the verification audit are maintained.	This is validation project. This requirement is not relevant.

<p>In such cases, the VVB shall meet the following requirements:</p> <p>a. The VVB shall ensure that the entire verification audit team, including the lead auditors, auditors, technical reviewers and sectoral experts, are different from the team that performed the validation activity (including the inclusion of VPA, design certification renewal, design change review).</p> <p>b. The VVB shall transparently disclose in the verification report that the same VVB has performed validation activity (including the inclusion of VPA, design certification renewal, design change review) for the given activity.</p> <p>The VVB shall disclose the details of the audit team, including full names of all the team members and their roles in the previous audit performed by the same VVB.</p> <p>c. An exception to the above stated rule shall be for the technical reviewer where the validating technical reviewer may participate in the verification audit team, and a member of the validation audit team may be the verifying technical reviewer.</p>	
<p>6.8.2 The requirement to have different audit teams does not apply to combined design certification with first verification and performance review for a given project, VPA (paragraph 5.1.53, Principles and Requirements).</p> <p>The same audit team may perform both validation and verification for combined Design Certification and first performance certification for a given project.</p>	<p>This is validation project. This requirement is not relevant.</p>
<p>SECTION B: STANDALONE PROJECT ACTIVITY This section is applicable to standalone projects.</p> <p>For validation and verification requirements for PoA/VPAs please refer to Section C below.</p> <p>7 VALIDATION FOR DESIGN CERTIFICATION 7.1 Type and Scale 7.1.1 The VVB shall determine whether the activity type and scale of proposed project is correctly identified in accordance with the relevant GS4GG requirements and procedures.</p>	<p>The project involves metal recycling in Romania. It falls under Type 3 project. Estimated ER is 56,282 tCO₂e/ year</p>
<p>7.2 Purpose and general description of proposed project 7.2.1 The VVB shall determine whether the description of the proposed project in the PDD is accurate, complete, and provides an understanding of the proposed project</p>	<p>Based on the assessment, the validation team has able to confirm the description is accurate and complete.</p>
<p>7.2.2 The VVB shall validate that:</p> <p>a. the project is eligible under GS4GG Principles and Requirements and all applicable regulatory documents.</p> <p>The VVB shall state its opinion on the compliance of the project with each eligibility criterion, as applicable.</p> <p>b. the project has addressed Forward Action Requests (if any) from the Preliminary Review stage.</p>	<p>The project is eligible under GS4GG principles & and Requirements v1.2 (Refer Appendix 5 of this report for details.</p>

7.2.3 If the proposed project involves the alteration of an existing installation or process, the VVB shall assess whether the project description states the differences resulting from the project compared to the pre-project situation.	There is no such alteration.
7.2.4 There may be different aspects of the pre-project situation relevant to different intended SDG impacts. The VVB shall assess if the pre-project situation relevant to each SDG impact is addressed as per para 6.2.1 above.	The validation opinion is detailed in Appendix 14 of this report.
7.2.5 If the project area overlaps with that of design certified Gold Standard project(s) and/or project(s) from any other voluntary or compliance standard programme of a similar nature, the VVB shall confirm that there is no double counting of impacts at design and performance certification (for example use of similar technology or practices through which the potential arises for double counting or misestimation of impacts amongst projects). In doing so, the VVB shall use its local and sectoral expertise and, where applicable, refer to Annex A - Double Counting Requirements of GHG Emissions Reduction & Sequestration Product Requirements.	There is no such condition.
7.2.6 The VVB shall: a. Describe the process undertaken to validate the accuracy and completeness of the project description; b. State its opinion on the accuracy and completeness of the project description and eligibility as required in para 6.2.1 above.	EPIC has employed a risk-based approach in the validation based on the recommendations in the requirements focusing on validity of applied methodology, baseline, monitoring plan and emission reduction calculations as documented in the PDD. The validation is not meant to provide any consulting towards the client. However, the stated requests for clarifications and/or corrective actions may provide input for improvement of the project design.
7.3 Project boundary 7.3.1 The VVB shall assess the boundary of the proposed project in terms of geographical area (e.g. municipality, region within a country, country or several countries) within which activity will be implemented. 7.3.2 The VVB shall determine whether, in establishing the boundary of the proposed project, the Project Developer has taken into consideration all applicable national and/or sectoral policies and regulations within the chosen boundary.	The validation opinion of the same is demonstrated in Appendix 14 of this report.
7.4 Demonstration of additionality 7.4.1 The VVB shall determine whether the proposed project is additional as demonstrated in the PDD. 7.4.2 The VVB shall assess and verify the reliability and credibility of all data, rationales, assumptions, justifications and documentation provided by the Project Developer(s) to support the demonstration of additionality. This requires the VVB to assess critically the evidence presented, using local knowledge and sectoral and financial expertise. 7.4.3 If required by the applied methodology(ies), the VVB shall consider methodological tools and	PP has used 'first of its kind' pathway to demonstrate additionality. The validation opinion of the same is demonstrated in Appendix 15 of this report.

<p>guidelines provided to demonstrate the additionality of proposed project.</p> <p>The VVB shall also consider specific complementary or alternative requirements included in the applied methodology(ies) for demonstrating the additionality of the proposed project activity.</p> <p>7.4.4 The VVB shall describe all steps taken and sources of information used to crosscheck the information contained in the design document. The VVB shall describe how it has determined that the evidence assessed is credible, where appropriate.</p>					
<p>7.4.5 If investment analysis has been used to demonstrate the additionality of the proposed project activity, the VVB shall determine whether the proposed project activity would not be:</p> <p>a. The most economically or financially attractive alternative; or</p> <p>b. Economically or financially feasible without the revenue from the sale of GS VERs.</p>	<p>PP has used 'first of its kind' pathway to demonstrate additionality. Hence this is not relevant.</p>				
<p>7.4.6 The VVB shall:</p> <p>a. Describe in detail how the parameters used in any financial calculations have been validated;</p> <p>b. Describe how the suitability of any benchmark applied has been assessed;</p> <p>c. Confirm whether the underlying assumptions are appropriate, and the financial calculations are correct.</p> <p>d. Confirm whether the proposed project activity is not common practice.</p>	<p>PP has used 'first of its kind' pathway to demonstrate additionality. Hence this is not relevant.</p>				
<p>7.5 Demonstration of prior consideration</p> <p>7.5.1 If the stakeholder consultation for the Project was conducted after the start date of the Project i.e., retroactive project or prior consideration justification is required as per activity requirements, the VVB shall determine whether revenue from carbon credits were considered necessary in the decision to undertake the project as a proposed project activity.</p>	<p>LSC was conducted 9th December 2020 and the start date of the project is 10th December 2019 (financial commitment towards project implementation) as per the PDD. So, the project is considered as retroactive one. The validation team has assessed the following events and confirmed revenues from carbon credits were seriously considered in the decision to implement the Project.</p> <table border="1" data-bbox="826 1529 1437 2067"> <thead> <tr> <th data-bbox="834 1541 1137 1574">Event/Date</th> <th data-bbox="1145 1541 1437 1574">Validation opinion</th> </tr> </thead> <tbody> <tr> <td data-bbox="834 1585 1137 1933"> <p>1.The management decided to discuss with the company ELSACO ELECTRONIC, about the CO2 emissions reductions of the project and the possibility to obtain carbon credits/15th March 2019</p> <p>(GS event no 1)</p> </td> <td data-bbox="1145 1585 1437 2056"> <p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS METALS decided to discuss with ELSACO ELECTRONIC about the CO2 emission reductions of the project. This is accepted as GS event by the validation team.</p> <p>Since the carbon</p> </td> </tr> </tbody> </table>	Event/Date	Validation opinion	<p>1.The management decided to discuss with the company ELSACO ELECTRONIC, about the CO2 emissions reductions of the project and the possibility to obtain carbon credits/15th March 2019</p> <p>(GS event no 1)</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS METALS decided to discuss with ELSACO ELECTRONIC about the CO2 emission reductions of the project. This is accepted as GS event by the validation team.</p> <p>Since the carbon</p>
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		<p>revenues were considered by PD prior to the project start date. Thus, the validation team has confirmed that prior consideration rule is satisfied by the project.</p>
	<p>2. Decision of the Executive Director to look for companies that might help to obtain carbon credits for the savings of the CO2 emissions and nomination of the responsible persons for that/3rd April 2019 (GS event no 2) Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the document "Decision no 830 dated 3rd April 2019". As per the document Legal representative of AS Metals (Constantin Apostol) has appointed Rodica Badila, Technical Manager of AS metals responsible for the market study to identify a consulting company that can assist AS Metals in the certification process in order to obtain voluntary certificates for offsetting CO2 emissions. This is accepted as GS event by the validation team.</p>
	<p>3. Meeting with representatives of the audit company RINA Simtex to discuss about the CO2 emission process certification according to ISO 14034 and the possibility to obtain carbon credits if the company is certified ISO 14034/20th May 2019 (GS event no 3) Time gap between this event and previous GS event = less than two months</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with RINA Simtex to discuss about the CO2 emission process certification according to ISO 14034 and the possibility to obtain carbon credits. This is accepted as GS event by the validation team.</p>
	<p>4. Meeting of the executive director of AS METAL COM SRL with Constantin Damov, member of the Board of Green Group and discussion about the Greentech's recycling project certified with Gold Standard/23rd August</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with Green Group and discussed about Greentech recycling project.</p>

	<p>2019 (GS event no 4)</p> <p>Time gap between this event and previous GS event = 3 months</p>	<p>This is accepted as GS event by the validation team.</p>
	<p>5.The representative of AS METAL COM SRL, Rodica Badila contacted Carbon Expert in order to find more about the carbon credits and the certification process/ 7th September 2019 (GS event no 5)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email from AS Metals to carbon Expert to find out more about the carbon credits dated 7th Sep 2019. This is accepted as GS event by the validation team.</p>
	<p>6.The representative of AS METAL COM SRL, Rodica Badila contacted Carbon for the opportunity of certification to obtain voluntary certificates./ 9th Sep 2019 (GS event no 6)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>The validation team has reviewed the email from technical manager of AS metals Rodica Badila to Carbonexpert dated 9th Sep 2019. As per the email, it was pointed that as per discussions with Director Constantin Apostol, requesting for the opportunity of certification to obtain voluntary certificates for the compensation of carbon emissions. This is accepted as GS event by the validation team.</p>
	<p>7.Correspondence between Carbon Expert and AS METAL COM SRL regarding the CO2 emissions project certification process on the voluntary market/20th Sep 2019 (GS event no 7)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email from AS Metals to CarbonExpert to find out more about the certification process on the voluntary markets carbon credits dated 20th Sep 2019. This is accepted as GS event by the validation team.</p>
	<p>8.Meeting of the executive director of AS METAL COM SRL with Carbon Expert to discuss the potential of</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and</p>

	<p>obtaining carbon credits for the Aluminum recycling project./26th Oct 2019</p> <p>(GS event no 8)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>accepted this date. On this date, AS Metals met with Carbon Expert to discuss the potential of obtaining carbon credits for the Aluminum recycling project.</p> <p>This is accepted as GS event by the validation team.</p>
	<p>9.Offer from Carbon Expert regarding the consulting services related to the project certification and budget estimation related to the number of carbon credits obtained/17th Nov 2019</p> <p>(GS event no 9)</p> <p>Time gap between this event and previous GS event = one month</p>	<p>The validation team has reviewed the proposal from CarbonExpert for consultancy services in order to obtain carbon credits dated 17th Nov 2019 to AS Metals.</p> <p>This is accepted as GS event by the validation team.</p>
	<p>10. Date of financial commitment = 10th Dec 2019</p> <p>(not a GS event)</p>	<p>As per clause 4.1.39 of GS Principles and Requirements v1.2, the Project start date is the earliest date on which the Project Developer has committed to expenditures related to the implementation of the Project. As per the section C.1.1 of PDD, project start date is 10th December 2019 which is the date of the finance deployment in the COMBISENSE optical separation and metal detection installation.</p> <p>On this date, PP has committed to expenditure (point of no return) related to the implementation of the project. This is accepted as start date of the project.</p>
	<p>11.Meeting of the executive director of AS METAL COM SRL with Carbon Expert to discuss general conditions of the offer and the process of certification/26th Jan 2020</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with Carbon Expert representative to</p>

	<p>(GS event no 10)</p> <p>Time gap between this event and previous GS event = two month</p>	<p>discuss general conditions of the offer and the process of certification. This is accepted as GS event by the validation team.</p>
	<p>12.E-mail from Carbon Expert with the draft agreement dated 10th Feb 2020</p> <p>(GS event no 11)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>Company 'Carbonexpert' consultancy of this project has provided draft contract dated 10th Feb 2020 for signing for the scope of consultancy services from Carbonexpert to AS Metals. This is accepted as GS event by the validation team.</p>
	<p>13. Date of commissioning = 15th April 2020</p>	<p>The start date of the CP is date of start of operations or a maximum of two years prior to the date of Project Design Certification, whichever occurs later. For this project, commissioning date is 15th April 2020. The validation team has reviewed the commissioning certificate and accepted the same. As per this certificate, the reception committee, Romania has confirmed that technical economic documentation provided for in the regulation on the implementation of the investment objectives was fully presented to the reception committee. The technological tests of the machines and installations related to the capacity for the normal operation of the technological installations and machines and ensuring the quality of the products were carried out, according to the technical economic</p>

		<p>documentation and the approved technical economic indicators. This is not a GS event.</p>
	<p>14. Due to the pandemic start in February and the lockdown imposed in Romania on 17th March 2020, the management delayed the decision to sign the agreement with Carbon Expert and restarted the discussion in August 2020/17th August 2020</p> <p>(GS event no 12)</p> <p>Time gap between this event and previous GS event = 6 months</p>	<p>The validation team has reviewed the email from Technical manager of AS metals dated 17th August 2020 stating that considering the situation they faced during that spring as a result of the imposed restrictions through the emergency ordinances as safety measures in combating the pandemic generated by the virus Covid 19, a situation that suspended all investments for a period, but also considering the fact that AS Metals is trying to get back to normal in the current period and would like to resume the discussions regarding the certification process. This is accepted as GS event by the validation team.</p>
	<p>15. Meeting of the executive director of AS METAL COM SRL with Carbon Expert to renegotiate the contract, considering the instable future economic perspective/30th Aug 2020</p> <p>(GS event no 13)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the consolidated internal registration document for AS Metals and accepted this date. On this date, AS Metals met with Carbon Expert to discuss renegotiate the contract, considering the instable future economic perspective. This is accepted as GS event by the validation team.</p>
	<p>16. Management decision regarding the CO project coordinator of the recycling plant in the person Mihnea Jurca /7th Sep 2020</p> <p>(GS event no 14)</p> <p>Time gap between this</p>	<p>The validation team has reviewed the document "Decision no 1614 dated 7th Sep 2020. As per the document. Legal representative of AS metals Constantin Apostol has appointed Mihnea Jurca as</p>

	<p>event and previous GS event = less than one month</p>	<p>project coordinator. This is accepted as GS event by the validation team.</p>
	<p>17.Signed agreement with Carbon Expert for the consultancy on the carbon credits certification process/15th Sep 2020 (GS event no 15) Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the contract signed between CarbonExpert and AS Metals for consultancy services to obtain carbon credits dated 15th Sep 2020. This is accepted as GS event by the validation team.</p>
	<p>18.Submission of AS METAL COM SRL documents to Gold Standard – Date of first submission/2nd Oct 2020 (GS event no 16) Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email dated 2nd Oct 2020 from company 'Carbonexpert' consultancy of this project. As per this email, Carbonexpert has emailed GS regarding the identification of account manager (Constantin Apostol) of this project for opening a GS account. This is accepted as GS event by the validation team.</p>
	<p>19.Gold Standard approval and accounts opening/30th Oct 2020 (GS event no 17) Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the email of GS to AS Metals dated 30th Oct 2020 regarding the opening on the GS account. This is accepted as GS event by the validation team.</p>
	<p>20.Listing/ 12th November 2020 (GS event no 18) Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the screenshot of webpage of the project and accepted the same. This is accepted as GS event by the validation team.</p>

	<p>21.Date of LSC meeting-remote/9th Dec 2020 (GS event no 19)</p> <p>Time gap between this event and previous GS event = less than one month</p>	<p>The validation team has reviewed the LSC report and accepted the same. This is accepted as GS event by the validation team.</p>
	<p>22.Date of VVB visit (Remote)/8th Dec 2021 (GS event no 20)</p> <p>Time gap between this event and previous GS event = 1 year</p>	<p>The validation team has conducted the remote audit facilitated by the PP. This is accepted as GS event by the validation team.</p>
	<p>23. Date of LSC meeting (physical) = 27th Sep 2022 (GS event no 21)</p> <p>Time gap between this event and previous GS event = 9 months</p>	<p>The validation team has reviewed the LSC report and accepted the same. This is accepted as GS event by the validation team.</p>
	<p>24. Date of SFR round = 22nd Nov 2022 (GS event no 22)</p> <p>Time gap between this event and previous GS event = less than 2 months</p>	<p>The validation team has reviewed the SFR round documents and accepted. This is accepted as GS event by the validation team.</p>
<p>7.5.2 The VVB shall assess whether the Project Developer:</p> <p>a. Had an awareness of the carbon revenue prior to the project activity start date, and that the benefits of the carbon revenue were a decisive factor in the decision to proceed with the project.</p> <p>Evidence to support this could include, inter alia, minutes and/or notes related to the consideration of the decision by the board of directors, or equivalent, of the Project Developer(s), to undertake the project as a proposed project activity;</p> <p>b. Demonstrated that real and continuing actions were taken to secure eligibility status for carbon revenue as per GS4GG or other similar standard for example CDM, for the project in parallel with its implementation</p>	<p>It is already validated as above.</p>	
<p>7.5.3 Assessment of real and continuing actions shall be conducted by the VVB and should focus on real documented evidence as indicated in para 7.5.2 above, including an assessment by the VVB of the authenticity of the evidence.</p> <p>The VVB shall assess letters, e-mail exchanges and other documented communications submitted by the Project Developer to substantiate the above</p>	<p>It is already validated as above.</p>	

<p>information, and these shall be considered as evidence only after the VVB has assessed the reliability and authenticity of such communications, inter alia through cross-checking (e.g., interviews).</p> <p>7.5.4 In validating a proposed project activity where:</p> <p>a. There is a gap of less than two years between the documented evidence, the VVB shall conclude that continuing and real actions were taken to secure GS4GG status for the project activity;</p> <p>b. A gap between documented evidence is greater than two years and less than three years, the VVB may determine that continuing and real actions were taken to secure GS4GG status for the project activity and shall justify any positive or negative validation opinion based on the context of the evidence and information assessed;</p> <p>c. A gap between documented evidence is greater than three years, the VVB shall conclude that continuing and real actions were not taken to secure GS4GG status for the project activity.</p>	
<p>7.5.5 The validation report shall:</p> <p>a. Describe the evidence for prior consideration of the carbon revenue (if necessary) that was assessed and the process of cross-checking the evidence, including the real and continuing action; Provide a validation opinion regarding whether the proposed project activity complies with the applicable requirements related to the prior consideration of the carbon revenue.</p>	<p>It is already validated as above.</p>
<p>7.6 Start date, crediting period type and duration</p> <p>7.6.1 The VVB shall determine whether the Project Developer(s) specified the following for the proposed project in accordance with relevant GS4GG requirements:</p> <p>a. Start date of the proposed project;</p> <p>b. Expected operational lifetime;</p> <p>c. Type and duration of the crediting period;</p> <p>d. Start date of the crediting period.</p>	<p>a. Start date of the proposed project is 10th Dec 2019 when PP has committed to investment.</p> <p>The first phase of the project as written in the earlier FVR is actually the pre-project phase, which consists of preliminary sorting activities as shown in the revised Project Boundary Diagram. The preliminary sorting is done manually according to document proof File 12 - Video AS Metal, second 40-43 and with the fragmentation process, the waste was not transformed into secondary raw materials, but there were only minimising their dimensions. The aluminium waste in this pre-project phase was sold like Aluminum wastes, and not like recycled Aluminum products. After discussing again with the project developer and checking of documents, the validation team has understood the correct situation: in the pre-project phase, the company sold only Aluminum wastes, and not like recycled Aluminum products; and in the project situation starting with the acquisition of the Combisense technology line of production, the company started to recycle and sell recycled Aluminum products. The validation report is corrected accordingly.</p> <p>All these investments were made in the idea of producing secondary raw material according to</p>

	<p>Regulation 333/2011 for Aluminum and iron and the inclusion of other types of metal waste in European standards in terms of quality and chemical composition.</p> <p>b.As per review of catalogue of classification and normal working life of fixed assets dated 30th Nov 2004, integral part of the decision 2139/2004, Expected operational lifetime of project is 40 years.</p> <p>C.The PP has selected renewable 10 year crediting period.</p> <p>d.Start date of the CP is from 1st Sep 2021</p>
<p>7.6.2 The VVB shall assess the start date and crediting period type and duration specified in the PDD by means of a document review, use of official sources and its local and sectoral expertise, interviews with relevant personnel and/or, where conducted through a remote or an on-site/physical inspection (as applicable).</p> <p>7.6.3 The VVB shall describe the steps taken to assess and state its opinion on the compliance of start date and crediting period type and duration specified in the PDD with the relevant GS4GG requirements. The VVB shall also provide its opinion on the retroactive crediting (if applicable).</p>	<p>Start date of the proposed project is 10th Dec 2019 when PP has committed to investment.. As per review of catalogue of classification and normal working life of fixed assets dated 30th Nov 2004, integral part of the decision 2139/2004, Expected operational lifetime of project is 40 years. The PP has selected renewable 10 year crediting period. Start date of the CP is from 1st Sep 2021 (retroactive CP).</p>
<p>7.7 Safeguarding Assessment</p> <p>7.7.1 The VVB shall determine whether an upfront assessment against the Safeguarding Principles had been carried out and the project has been implemented in accordance with the requirements set out in Safeguarding Principles and Requirements.</p> <p>7.7.2 The VVB shall describe the steps taken to assess the requirements and state its opinion on whether:</p> <p>a. assessment applies to the project scenario (although assessment questions and requirements involve a comparison to the baseline scenario(s) and/or the implementation or decommissioning phases of a Project);</p> <p>b. the Project Developer(s) has provided suitable responses and their justifications to the non-exhaustive list of assessment questions set out against each Safeguarding Principle (listed in the Safeguarding Principles and Requirements document);</p>	<p>The validation opinion on safeguarding principles is reported in Appendix 8 of this report .</p>
<p>c. for requirements that are not accompanied by an assessment question, the Safeguarding Principles Assessment includes a description with justifications on how a project met these requirements;</p> <p>d. where a risk is identified, the requirements have been used to guide re-design/mitigation proposals, i.e., the response to a given outcome has been designed with the intention of achieving the stated requirements.</p> <p>e. where Safeguarding Principles and Requirements requires opinion and recommendations of Expert Stakeholder(s), the Project Developer(s) has demonstrated that the Expert Stakeholders have conducted a thorough review (and, if needed, an</p>	<p>The validation opinion on safeguarding principles is reported in Appendix 8 of this report .</p>

<p>onsite visit) and that their recommendations have been suitably incorporated into the project design.</p> <p>f. The Project Developer(s) has provided appropriate level of information with regards to Safeguarding Assessment at different project stages listed below (in line with the requirements of paragraph 2.1.11 (Table 2) of Safeguarding Principles and Requirements):</p> <p>i. Stakeholder Consultation;</p> <p>ii. Preliminary Review;</p> <p>iii. Design Review;</p> <p>iv. Performance Review.</p>	
<p>7.7.3 The VVB shall invoke Non-Conformity section of the Gold Standard Principles and Requirements in case it identifies any failure, during validation, in respect to the completion of the Safeguarding Principles Assessment, including conformity with Requirements and Monitoring & Reporting Requirements.</p> <p>The VVB shall record the Non-Conformity(ies) and provide its justification and opinion in the Validation Report.</p> <p>7.7.4 The VVB shall assess the appropriateness and feasibility of the re-design/mitigation proposals, by means of review of the documented procedures, interviews with relevant personnel, project plans and, where conducted through a remote or an on-site/physical inspection (as applicable) of the proposed project.</p> <p>7.7.5 The VVB shall also determine whether the Project Developer(s) conducted an environmental impact assessment, if considered significant by the Project Developer(s) or by the host Party, in accordance with the host Party's procedures.</p> <p>7.7.6 The VVB shall assess the above requirements by means of a document review and/or using local official sources and expertise</p>	<p>The validation opinion on safeguarding principles is reported in Appendix 8 of this report .</p>
<p>7.7.7 The VVB shall</p> <p>a. describe steps taken to validate the sources of information used to cross check the assessment and information related to Safeguarding Principles Assessment contained in the DD:</p> <p>b. state its opinion on the adequacy of the Safeguarding Principles Assessment conducted by the Project Developer(s).</p>	<p>The validation opinion on safeguarding principles is reported in Appendix 8 of this report .</p>
<p>7.8 Gender Sensitivity Assessment</p> <p>7.8.1 The VVB shall determine whether the proposed project has demonstrated compliance with the mandatory requirements as outlined in Gender Equality Requirements and Guidelines.</p>	<p>The validation opinion on gender sensitivity assessment is reported in Appendix 8 of this report .</p>
<p>7.9 Contribution to Sustainable Development Goals</p> <p>7.9.1 The VVB shall determine whether proposed projects have demonstrated clear, direct contribution</p>	<p>The validation opinion on SDGs is reported in Appendix 8 of this report .</p>

<p>to sustainable development, defined as making demonstrable, positive impacts on at least three Sustainable Development Goals (SDGs), one of which must be SDG 13 in accordance with the requirements set out in Principles and Requirements</p>	
<p>7.9.2 The VVB shall describe the steps taken to assess the requirements and state its opinion on whether:</p> <p>a. All assumptions and data used by the Project Developer(s) are listed in the PDD, including their references and sources;</p> <p>b. All documentation used by the Project Developer(s) as the basis for assumptions and source of data is correctly quoted and interpreted in the PDD;</p> <p>c. Potential SDG Impacts are a primary effect – an intentional, direct effect of the proposed project and not a ‘one off’ or an effect generated in design, construction, distribution, start-up or decommissioning of the proposed project;</p> <p>d. The proposed project has identified potential SDG Impacts by comparing the project scenario to the baseline scenario (note that multiple baseline scenarios may be relevant depending on the SDG impacts and/or methodologies followed).</p> <p>In other words, the SDG impacts shall be demonstrated as making a positive effect beyond what would reasonably be expected to occur in the baseline scenario.</p> <p>e. The proposed project has identified relevant monitoring indicators and/or monitoring parameters and described the monitoring approach in the PDD to inform future Monitoring Reports (MRs).</p> <p>f. Where certain SDG Impacts require opinion and recommendations of Expert Stakeholder(s), the Project Developer(s) has demonstrated that the Expert Stakeholders have conducted a thorough review (and, if needed, an onsite visit) and that their recommendations have been suitably incorporated into the project design and monitoring and reporting plan.</p>	<p>The validation opinion on SDGs is reported in Appendix 8 of this report .</p>
<p>7.9.3 The VVB shall</p> <p>a. describe other steps taken, and sources of information used to crosscheck the information related to contribution to SDGs contained in the PDD;</p> <p>b. state its opinion on the adequacy of the SDGs Assessment conducted by the Project Developer(s).</p>	<p>The validation opinion on SDGs is reported in Appendix 8 of this report .</p>
<p>7.10 Stakeholder Consultation</p> <p>7.10.1 The VVB shall determine whether the Project Developer(s) have completed the Stakeholder Consultation and are carrying out an ongoing stakeholder engagement process in accordance with the relevant requirements in the Stakeholder Consultation and Engagement Requirements.</p>	<p>The validation opinion on stakeholder consultation is reported in Appendix 7 of this report .</p>

<p>7.10.2 The VVB shall determine whether there are applicable host country rules on Stakeholder Consultation. Where such rules exist, the VVB shall, by means of document review and interviews with local stakeholders and/or the Designated National Authority (DNA)⁷, as appropriate, determine whether the Stakeholder Consultation was conducted in accordance with the rules.</p> <p>7.10.3 If applicable host country rules on Stakeholder Consultation do not exist, the VVB shall, by means of document review and interviews with local stakeholders and/or the DNA as appropriate, determine whether the Stakeholder Consultation was conducted in accordance with the requirements in the Stakeholder Consultation and Engagement Requirements pertaining to:</p> <ol style="list-style-type: none"> a. Scope of Stakeholder Consultation b. Timing of Stakeholder Consultation c. Minimum group of stakeholders to be consulted d. Means for inviting stakeholders e. Information to be made available to stakeholders f. Conduct of consultation g. Continuous input and grievance mechanism h. Consideration of comments received i. Ongoing monitoring and reporting mechanism j. Stakeholder Consultation documentation 	
<p>7.10.4 Notwithstanding the requirements stated in paragraph 7.10 above, the VVB shall describe the steps taken to assess the requirements and state its opinion on whether:</p> <ol style="list-style-type: none"> a. The Stakeholder Consultation comprised of a minimum of two rounds of consultation including one mandatory physical meeting and one stakeholder feedback round lasting for at least one month and these consultations were open to anyone wishing to attend. b. The Project Developer(s) has identified and informed all relevant (local, affected and interested) stakeholders, including relevant local and national authorities, the Gold Standard Secretariat and all Gold Standard NGO Supporters active in the host country of the proposed project. c. The Stakeholder Consultation has been conducted prior to the start date of the proposed project. <p>If the Consultation has been conducted after the start date, the Project Developer(s) has provided further explanation of how comments received during the consultation are taken into account and implement a Grievance Mechanism in line with the Stakeholder Consultation & Engagement Requirements.</p> <ol style="list-style-type: none"> d. The Project Developer(s) has shared with the stakeholder the information on the proposed project's objective, scale and duration, contribution to sustainable development and compliance with safeguard. e. Where Safeguarding Principles and SDG Impacts 	<p>The validation opinion on stakeholder consultation is reported in Appendix 7 of this report .</p>

<p>Assessment requires opinion and recommendations of Expert Stakeholder(s), the Project Developer has demonstrated that the Expert Stakeholders have conducted a thorough review (and, if needed, an onsite visit) and that their recommendations have been suitably incorporated into the project design.</p> <p>f. The proposed project has established a formal input, feedback and grievance mechanism in place and the grievance mechanism shall be discussed during the Stakeholder Consultations as per Stakeholder Consultation & Engagement Requirements.</p> <p>g. The proposed project has prepared the Stakeholder Consultation Report of the consultation process, including consultation feedback and how this was incorporated into the project design.</p> <p>Moreover, the Stakeholder Consultation Report has been submitted to Gold Standard at the time of first submission to GS (though this date may be after the Project Start Date).</p>	
<p>7.10.5 The VVB shall</p> <p>a. describe steps taken, and sources of information used to crosscheck the information related to Stakeholder Consultation contained in the PDD and stakeholder consultation report.</p> <p>b. describe the steps taken to assess the adequacy of the local stakeholder consultation;</p> <p>c. state its opinion on the adequacy of the local stakeholder consultation</p>	<p>The validation opinion on stakeholder consultation is reported in Appendix 7 of this report .</p>
<p>7.11 Approval and Authorisation</p> <p>7.11.1 The VVB shall validate that the Letter of Authorisation & Authorisation checklist - if available at the time of validation, for the following information:</p> <p>a. It has been issued by relevant National Focal Point designated by the Host Country or Countries, under its arrangements for providing Article 6 Authorisation.</p> <p>b. In the Letter of Authorisation, the host country has:</p> <p>i. Identified the project/activity Note: Project/activity refers to an individual project activity</p> <p>ii. Authorised the project's emission reductions or removals, issued as credits (tCO₂eq units), for use ITMOs under Article 6 of the Paris Agreement.</p> <p>Note: If the GWP value used by a country in its NDC reporting is different than the GWP value applied for issued credits, Gold Standard will convert the issued credit volume by applying the GWP values that country uses in its NDC reporting so as to provide the numbers that host country should adjust.</p> <p>iii. Declared that the Host Country will not use the project's emission reductions or removals to implement and achieve its NDC and will account for the project's emission reductions and removals as ITMOs under Article 6 of the Paris Agreement by applying corresponding adjustments in accordance</p>	<p>This is not relevant.</p>

<p>method;</p> <p>b. A proposed project activity does not have access to the data sources specified by the methodology for a certain parameter; a different source of data can be accessed by the project activity to estimate the parameter with equal reliability and accuracy;</p> <p>c. A minor deviation is sought for a project-specific situation, which is well justified and conservative. For example: a methodology requires limiting production in the project scenario between +/- 5% of rated capacity, if the historical baseline is to be applied.</p> <p>Due to government restrictions, the plant has never been operated at its rated capacity but at a capacity which is much below its rated capacity (20% below the rated capacity).</p> <p>A deviation can be presented specifying conservative approaches to calculate the emission reduction in such a project-specific case;</p> <p>d. A conservative estimation technique or default factor suggested addressing uncertainties related to project-specific situations, which are not addressed in the methodology.</p> <p>For example, a well-justified conservative uncertainty factor proposed to be used in equations of baseline emissions to address uncertainties in the real-life situation during the crediting period.</p>	
<p>7.12.2 The VVB shall apply specific guidance and/or clarifications provided by the Gold Standard with respect to the approved methodologies, standardised baselines and other methodological regulatory documents that are selected by the Project Developer.</p>	<p>The validation team has checked the project against the auditing criteria that included all meth, tools, clarifications, updates etc.</p>
<p>7.12.3 The VVB shall determine whether the selected methodology(ies), and related documents apply to the proposed project and were correctly applied with respect to the following:</p> <p>a. Project boundary;</p> <p>b. Identification of baseline scenario;</p> <p>c. Demonstration of additionality;</p> <p>d. Explanation of methodological choices/approaches for estimating the SDG Impact</p> <p>e. Algorithms and/or formulae used to determine emission reductions/removals and SDG impacts (if applicable);</p> <p>f. Monitoring and reporting methodology.</p> <p>7.12.4 The VVB shall determine whether the proposed project meets all the applicability conditions of the selected methodology(ies) and related regulatory documents.</p> <p>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.</p> <p>If the VVB, based on local and sectoral knowledge, is</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>

<p>aware that comparable information is available from credible sources other than that used in the PDD, then the VVB shall cross check the PDD against other sources to confirm that the proposed project meets the applicability conditions of the selected methodology(ies) and related documents within the applicable timelines as given in the methodology.</p> <p>7.12.5 For each applicability condition listed in the selected methodology(ies) and related documents, the VVB shall describe the steps taken to assess the relevant information contained in the PDD against these criteria.</p> <p>7.12.6 The VVB shall state its opinion on the applicability of the selected methodology(ies) and related documents to the proposed project</p>	
<p>b. Project boundary, sources and greenhouse gases</p> <p>7.12.7 The VVB shall determine whether all main GHG emission sources, the project boundary of the proposed project, and other relevant project and baseline emission sources/sinks covered in the applied methodology(ies) and related documents included within the project boundary for the purpose of calculating project and baseline emissions/removals for the proposed project.</p> <p>7.12.8 The VVB shall determine whether the justification provided to exclude GHG emission sources is reasonable, based on an assessment of supporting documented evidence provided by the Project Developer and corroborated by observations if required.</p> <p>7.12.9 The VVB shall confirm the project boundary based on documented evidence and shall corroborate it by a remote or an on-site/physical inspection (as applicable).</p> <p>VVB shall confirm that such an inspection is appropriate to the nature, type and scale of activity. Where site visit is not conducted at the time of Validation, the VVB shall raise a FAR for 1st verification to confirm the project boundary based on documented evidence.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.12.10 The VVB shall 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 remote or an on-site/physical inspection undertaken (i.e., observations of the physical site or equipment used in the process).</p> <p>7.12.11 The VVB shall state whether the identified boundary and the selected sources and gases are justified for the proposed project.</p> <p>Should the VVB identify emission sources that will be affected by the implementation of the project activity and which are expected to contribute more than 1 per cent of the overall expected average annual GHG emission reductions or net anthropogenic GHG removals, and are not addressed by the applied</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>

<p>methodologies or the applied standardised baselines, the VVB shall request a clarification of, revision to, or deviation from the methodologies or the standardised baselines, as appropriate.</p>	
<p>7.13 Baseline scenario</p> <p>7.13.1 The VVB shall determine whether the baseline identified for the proposed project is the scenario that reasonably represents the anthropogenic emissions by sources of GHGs / removals by sinks that would occur in the absence of the proposed project.</p> <p>7.13.2 The VVB shall determine whether any procedure contained in the applied methodology(ies) to identify the most reasonable baseline scenario has been correctly applied.</p> <p>If the applied methodology(ies) requires the use of methodological tools (such as the CDM’s “Tool for the demonstration and assessment of additionality” and the “Combined tool to identify the baseline scenario and demonstrate additionality”) to establish the baseline scenario, the VVB shall consult the methodologies on the application of these methodological tools.</p> <p>In such cases, the specific guidance in the methodologies shall supersede the corresponding requirements of the methodological tools.</p> <p>7.13.3 If the applied methodology(ies) requires several alternative scenarios to be considered in the identification of the most plausible baseline scenario, the VVB shall, based on financial expertise and local and sectoral knowledge, determine whether all scenarios that are considered by the Project Developers and any scenarios that are supplementary to those required by the methodology(ies), are realistic and credible in the context of the proposed project and that no alternative scenario has been excluded.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.13.4 The VVB shall determine whether the most plausible baseline scenario identified is reasonable by validating the assumptions, calculations and rationales used in the PDD.</p> <p>It shall determine whether documents and sources referred to in the PDD are correctly quoted and interpreted.</p> <p>The VVB shall cross check the information provided in the PDD with other verifiable and credible sources, such as local expert opinion, if available.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.13.5 The VVB shall determine whether, drawing on its knowledge of the sector and/or advice from local experts, all applicable GS4GG requirements and procedures have been taken into account in the identification of the baseline scenario for the proposed project, as well as relevant national and/or sectoral policies, regulations and circumstances.</p> <p>If the project area of the proposed project overlaps with that of registered GS project(s) and/or project(s) from any other voluntary or compliance standard programme of a similar nature, the VVB may use the</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>

<p>information/data available from such projects to cross-check the baseline.</p> <p>7.13.6 The VVB shall determine whether the PDD provides a description of the identified baseline scenario, including a description of the technology(ies)/measures that would be employed and/or the activities that would take place in the absence of the proposed project.</p> <p>7.13.7 The VVB shall describe the steps taken to assess the requirements and state its opinion on whether:</p> <p>7.13.8 The VVB shall describe other steps taken and sources of information used to crosscheck the information contained in the PDD</p> <p>a. All the assumptions and data used by the Project Developers are listed in the PDD, including their references and sources;</p> <p>b. All documentation used is relevant for establishing the baseline scenario and correctly quoted and interpreted in the PDD;</p> <p>c. Assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence and can be deemed reasonable;</p> <p>d. Relevant national and/or sectoral policies, regulations and circumstances are considered and listed in the PDD;</p> <p>e. The applied methodologies have been correctly followed to identify the most plausible baseline scenario and the identified baseline scenario reasonably represents what would occur in the absence of the proposed project.</p>	
<p>7.14 Estimation of emissions reductions or net anthropogenic removals</p> <p>7.14.1 The VVB shall determine whether the description of how to undertake the ex-ante and ex-post calculations of baseline, project and leakage emissions as well as emission reductions to be achieved by the proposed project is in accordance with the applied methodology(ies) and related documents and, where applicable, the latest version of the “Standard: Sampling and surveys for CDM project activities and programme of activities”. The sampling requirements of the applied methodology takes precedent in every case.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.14.2 Where the applied methodologies and related documents allow for selection between options for equations or parameters, the VVB shall determine whether adequate justification has been provided (based on the choice of the baseline scenario, context of the proposed project and other evidence provided) and that the correct equations and parameters have been used, in accordance with the applied methodology(ies) and related documents.</p> <p>7.14.3 The VVB shall verify the justification given in</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>

the PDD for the choice of data and parameters used in the equations:

7.14.4 | The VVB shall describe the steps taken to assess the requirements and state its opinion on whether:

a. Data and parameters fixed ex ante:

The VVB shall determine whether all data sources and assumptions are appropriate and calculations are correct as applicable to the proposed project, and will result in an accurate or otherwise conservative estimate of the emission reductions.

As applicable, the VVB shall determine whether the sampling efforts were undertaken in accordance with the applied methodology(ies) and related documents and, where applicable, latest version of the CDM's "Standard: Sampling and surveys for CDM project activities and programme of activities";

b. Data and parameters to be monitored:

The VVB shall determine whether the estimates provided in the PDD for these data and parameters are reasonable.

As applicable, the VVB shall determine whether the sampling efforts were undertaken in accordance with the applied methodology(ies) and related documents and, where applicable, latest version of the CDM's "Standard: Sampling and surveys for CDM project activities and programme of activities".

a. All assumptions and data used by the Project Developer(s) are listed in the PDD, including their references and sources;

b. All documentation used by the Project Developer(s) as the basis for assumptions and source of data is correctly quoted and interpreted in the PDD;

c. All values used in the PDD including GWPs are considered reasonable in the context of the proposed project;

d. The methodology(ies) and related documents have been applied correctly to calculate baseline, project and leakage emissions, as well as emission reductions/removals;

e. All estimates of the baseline emissions can be replicated using the data and parameter values provided in the PDD;

f. The sampling efforts were undertaken in accordance with the methodological requirements/CDM's "Standard: Sampling and surveys for CDM project activities and programme of activities", where the applied methodologies require that the data and parameters be determined in accordance with this standard.

g. Accounting and treatment of uncertainties of LUF

<p>parameters follows Annex A of Land-use & Forests Activity Requirements</p>	
<p>7.14.5 The VVB shall describe how it has verified the data and parameters used in the equations, including references to any other data sources used.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.15 Monitoring Plan 7.15.1 The VVB shall determine whether the description of the monitoring plan included in the PDD complies with the applied methodology(ies) and related documents and, where applicable, the CDM’s “Standard: Sampling and surveys for CDM project activities and programme of activities”.</p> <p>7.15.2 The VVB shall apply a three-step process to meet the above requirement:</p> <p>a. To assess compliance of the monitoring plan with the applied methodology(ies) and related documents, the VVB shall:</p> <p>i. Identify the list of parameters required by the applied methodology(ies) and related documents by means of document review;</p> <p>ii. Confirm that the description of the monitoring plan contains all necessary parameters, that they are described, and that the means of monitoring described in the monitoring plan comply with the requirements of the applied methodology(ies) and related documents;</p> <p>b. To assess the feasibility of the monitoring plan, the VVB shall, by means of review of the documented procedures, interviews with relevant personnel, project plans and, where conducted through a remote or an on-site/physical inspection (as applicable) of the proposed project, assess whether:</p> <p>i. The monitoring arrangements described in the monitoring plan are feasible within the project design;</p> <p>ii. The means of implementation of the monitoring plan, including the data management and quality assurance and quality control procedures, are sufficient to ensure that emission reductions/removals achieved by/resulting from the proposed project can be reported ex-post and verified;</p> <p>c. To determine whether the proposed sampling plan provides parameter value estimates in an unbiased and reliable manner, where the Project Developer(s) applied a sampling approach to determine data and parameters, the VVBs shall assess the proposed sampling plan in accordance with the methodology requirement/CDM’s “Standard: Sampling and surveys for CDM project activities and programme of activities”.</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>
<p>7.15.3 The VVB shall:</p> <p>a. State its opinion on the compliance of the monitoring plan with the requirements of the applied methodology(ies) and related documents and, where applicable, the CDM’s “Standard: Sampling and surveys for CDM project activities and programme of</p>	<p>The validation opinion of the baseline, project boundary, additionality, ER and monitoring procedures is reported in Appendix 14 of this report.</p>

<p>activities”;</p> <p>b. Describe the steps undertaken to assess whether the monitoring arrangements described in the monitoring plan are feasible within the project design;</p> <p>c. State its opinion on the Project Developer’s ability to implement the monitoring plan.</p>	
<p>7.16 Validation opinion and report</p> <p>a. Validation opinion</p> <p>7.16.1 The VVB shall include a statement on the likelihood of the proposed project achieving the anticipated emission reductions/GHG removals and SDG Impacts stated in the PDD.</p> <p>7.16.2 The VVB shall notify the Project Developer(s) of the validation outcome.</p> <p>The notification to the Project Developer(s) shall include:</p> <p>a. A confirmation of validation and date of submission of the validation report as part of the request for Design Certification of the proposed project to Gold Standard; or</p> <p>b. An explanation of reasons for non-acceptance if the proposed project, as documented, is determined not to fulfil the requirements for validation.</p>	<p>Estimated ER per year is 56,282 tCO₂e per year.</p> <p>Project contributes positively to Climate Security & Sustainable Development.</p> <p>The project contributes to the following 5 UN Sustainable Development Goals:</p> <p>SDG 4 – Quality education SDG 5 – Gender equality SDG 7 – Affordable and clean energy SDG 8 – Decent work and economic growth SDG 13 – Climate action</p> <p>The validation opinion of the SDG impacts is detailed in Appendix 14 of this report.</p>
<p>7.16.3 The VVB shall provide either:</p> <p>a. A positive validation opinion in its Validation Report if the VVB determines that the proposed project complies with the applicable GS4GG requirements and procedures; or</p> <p>b. A negative validation opinion in its Validation Report explaining the reason for its opinion if the VVB determines that the proposed project does not fulfil the applicable GS4GG requirements and procedures</p>	<p>The validation team has determined that proposed project complies with the applicable GS4GG requirements and procedures.</p>
<p>7.16.4 The VVB shall include the following in its opinion:</p> <p>a. A summary of the validation method and process used and the validation criteria applied;</p>	<p>The scope of the DOE is GS Validation which includes independent assessment of the project against GS Validation requirements. This report summarizes the findings of the validation of the project, performed on the basis of UNFCCC criteria for CDM, GS requirements. The validation team has, based on the recommendations in the Validation and Verification Standard^{1/} for project activities version 1.0, GS Principles and requirements v1.2 and other associated requirements and employed a risk-based approach in the validation, focusing on the identification of significant risks and reliability of project monitoring and generations of GS-VERs. The validation has confirmed that applicable version of methodology^{2/} (AMS.III.AJ version 9.0) was valid at the time of registration of the project under GS. EPIC has employed a risk-based approach in the validation based on the recommendations in the requirements focusing on validity of applied methodology, baseline, monitoring plan and emission reduction calculations as documented in the PDD The validation is not meant to provide any consulting towards the client. However, the stated</p>

	requests for clarifications and/or corrective actions may provide input for improvement of the project design.
b. A description of project components or issues not covered by the validation process	The validation team has covered all the issues.
c. A summary of the validation conclusions	Estimated ER per year is 56,282 tCO2e per year.
d. A statement on the validation of the expected emission reductions and SDG Impacts	Project contributes positively to Climate Security & Sustainable Development. The project contributes to the following 5 UN Sustainable Development Goals:
e. A statement on whether the proposed project meets the applicable GS4GG requirements and procedures	SDG 4 – Quality education SDG 5 – Gender equality SDG 7 – Affordable and clean energy SDG 8 – Decent work and economic growth SDG 13 – Climate action
b. Validation Report 7.16.5 The VVB shall report the results of its assessment in the Validation Report.	Validation opinion is detailed in Section F of this report.
7.16.6 In its Validation Report, the VVB shall provide the following:	It is already reported as above.
a. A summary of the validation process and its conclusions;	
b. Results of the dialogue between the VVB and the Project Developer(s), as well as any adjustments made to the project design following the stakeholder consultation. It shall reflect the responses to CARs and CLs, the identification of FARs, and discussions on and revisions to the project documentation	Section C.2 and C.3, Appendix 4 of this report details this requirement. There is no change in project design following the stakeholder consultation.
c. All its applied approaches, findings and conclusions on the requirements set out in sections above, including the Audit Techniques Template, if applicable. The VVB may choose to use the template even if not applicable;	The filled in audit techniques is attached herewith.
d. A validation opinion;	It is already reported as above.
e. A list of interviewees (with name and general information if consent is provided by interviewees).	Section C.3 of this report details this.
f. Documents reviewed, sampling approaches used by the VVB and, outline of on-site inspections. Where the VVB applied a sampling approach to the on-site or remote inspection (as applicable), the VVB shall include a description of how the sample size was determined and how the field check/remote check was carried out;	There is no sampling approach followed for this validation process.
g. Details of the validation team, technical experts and internal technical reviewers involved, together with their roles in the validation activity and, details of who conducted the on-site or remote inspection;	Appendix 2 of this report details this.
h. Information on quality control within the team and in the validation process;	After the completion of assessment by the validation team all the relevant documentation is submitted to a qualified, Independent Technical reviewer as part of EPIC' internal quality control system. A Technical reviewer team is appointed to review the draft final validation report (Draft FVR). The comments made by the Technical reviewer team are taken into consideration and incorporated in the final FVR. The technical reviewer team

	<p>assesses whether all the reporting requirements have been fulfilled and whether all the issues raised were closed satisfactorily by the validation team with justification. The technical review process can also raise issues in this regard which is resolved further by the validation team to the satisfaction of the technical reviewer. The technical reviewer team either accepts or rejects the report made by the validation team. The final report (after resolutions of all findings) is then submitted to the Head-operations for review and approval.</p>
<p>i. Appointment certificates or curriculum vitae of the VVB's validation team members, technical experts and internal technical reviewers for the proposed project which are not part of the Gold Standard Approved Auditor list at the time of start of the validation contract.</p>	<p>Appendix 2 of this report details this.</p>
<p>j. The VVB shall update the validation report according to any corrections, changes, CARs, CLs, FARs, issued/requested by the Certification Body or done by the Project Developer(s) during the performance certification process and ensure that the information and data presented, especially on estimated SDG impacts, is aligned between the PDD, Stakeholder Consultation Report, the SDG Impact tool, the design review form, and the validation report</p>	<p>This is not applicable.</p>

Appendix 14: Methodology AMS.III.AJ v9.0 Requirements

<i>Applicable conditions of AMS.III.AJ v9.0</i>	<i>Validation opinion</i>
<p>1. Introduction 1. The following table describes the key elements of the methodology.</p> <p>Table 1. Methodology key elements Typical projects The following materials which are recycled from municipal solid wastes (MSW) and processed into intermediate or finished products are covered in the methodology: Plastics: HDPE, LDPE, PET and PP plastic materials; Container glass cullet; Metals – Aluminum and Steel</p> <p>Type of GHG emissions mitigation action Energy efficiency: Reduction of production of HDPE, LDPE, PET, PP and container glass from virgin materials, thus reducing related energy consumption</p>	<p>The project involves metal Aluminium recycling. It consists of recycling MSW waste into secondary or intermediary product, thus reducing mined Aluminium ore-Bauxite or virgin raw materials</p>
<p>2. Scope, applicability, and entry into force 2.1. Scope</p> <p>2. This methodology comprises activities for the recovery and recycling of materials in municipal solid waste (MSW) to process them into intermediate or finished products, displacing the production of virgin materials in dedicated facilities, thereby resulting in avoidance of energy use.</p> <p>For paper and cardboard recycling, if the baseline scenario is the decay in a disposal site, the avoided methane emissions may be claimed.</p> <p>Note: Non-hazardous waste materials suitable for</p>	<p>The project involves metal Aluminium recycling. It consists of recycling MSW waste into secondary or intermediary product (such as SR EN 13920-4, SR EN 13920-5, SR EN 13920-6), thus reducing mined Aluminium ore-Bauxite or virgin raw materials and therefore reduction of energy use.</p> <p>The validation team has observed that it takes 4.5 tonnes of bauxite to produce 1 tonne of aluminium, the yield being 22%, the difference being the waste from production.</p> <p>In the case of aluminum waste recycling, the melting yield is between 75 and 98%, so to produce one tonne of aluminium requires 1.02 to</p>

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<p>deposition in a solid waste disposal site (SWDS), paper/cardboard refers to post-consumer wastes</p>	<p>1.33 tonnes of aluminium waste.</p> <p>The waste material includes such as cans of juice, cables, old cars, clippings.</p> <p>The validation team has reviewed the European Industrial Standards-Recyclable materials as follows and accepted the same.</p> <ol style="list-style-type: none"> 1. EN 13920 -1;Part1- General Requirements, sampling and tests 2. EN 13920-2; Part2-Unalloyed aluminium scrap 3. EN 13920-3; Wire and cable Scrap 4. EN 13920-4; Scrap consisting of one single wrought alloy 5. EN 13920-5; Scrap consisting of two or more wrought alloy of the same series 6. EN 13920-6; Scrap consisting of two or more wrought alloy 7. EN 13920-7; Scrap consisting of castings 8. EN 13920-8;Scrap consisting of non ferrous materials from shredding processes destined to Aluminium separation processes 9. EN 13920-9; Scrap from aluminium separation processes of non ferrous shredded materials 10. EN 13920-10;Scrap consisting of used aluminium beverages cans 11. EN 13920-11;Scrap consisting of aluminium copper radiators 12. EN 13920-12;Turnings consisting of one single alloy 13. EN 13920-13;Mixed turnings consisting of two or more alloys 14. EN 13920-14;Scrap from post consumer Aluminum packaging 15. EN 13920-15;Decorated aluminium scrap from post consumer aluminium packaging 16. EN 13920-16;Scrap consisting of skimming, drosses, spills and metallics. <p>However, the waste consists of post consumer-obsolete waste only.</p>
<p>3. The methodology covers the emissions associated with:</p> <p>(a) Production of virgin pellets of plastics consisting of either high density polyethylene (HDPE), low density polyethylene (LDPE), Polyethylene Terephthalate (PET) or Polypropylene (PP). For the sake of this methodology, “plastic” means HDPE, LDPE, PET and PP, unless otherwise specified;</p> <p>(b) Production of container glass using virgin input (“container glass” hereafter) that is displaced by the recycled container glass (“container glass cullet” hereafter) due to the project activity;</p> <p>(c) Production of metals (i.e. aluminum and steel) from mined ore or virgin raw materials that is displaced by the recycled metals due to the project activity.</p> <p>Note: Other metals are not covered under this</p>	<p>It falls under category C.</p> <p>The project involves metal Aluminium recycling. It also involves some small amount of other ferrous and non-ferrous metal substances. But PP did not take non Aluminium waste into account for calculating ER.</p>

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<p>methodology</p> <p>2.2. Applicability</p> <p>4. The methodology is applicable in the following two cases</p> <p>2.2.1. Case A: Project activities that target the participation of the informal waste sector</p> <p>5. In Case A, the recycling facility is operated by the informal sector.</p> <p>The recycling facility may also receive wastes collected by the formal waste sector (e.g. public collection system).</p> <p>Waste fractions that were already being recycled in the baseline by enterprises in the formal sector cannot be included in the calculations</p>	<p>The recycling facility is operated by formal sector. Moreover, recycling is regulated and national regulations does not allow for informal sector. Hence the project does not fall under Case A.</p>
<p>6. The following applicability conditions shall apply to project activities under this case:</p> <p>(a) The recycling facility may be an existing facility, or a newly implemented facility;</p> <p>(b) It is possible to directly measure and record the final output of the recycling facility, that is the weight of materials leaving the recycling facility (on a dry basis), segregated by type;</p> <p>(c) Each type of recycled material is sold directly to a processing/manufacturing facility, or to a chain of intermediary retailers that are able to transfer the materials to final identifiable processing/manufacturing facilities that process the segregated fractions;</p> <p>(d) The Project Design Document (PDD) shall explain the procedures such as contractual agreements proposed to eliminate double counting of emission reductions, for example due to the formal waste sector or the processing/manufacturing facility, or other parties possibly claiming credits for emission reductions.</p> <p>Similarly, through contractual agreement and other means such as survey/analysis undertaken by a third party, credible proof shall be provided to show that the materials supplied from the recycling facility are used for processing/manufacturing and not for other purposes such as a source of fuel or disposal;</p> <p>(e) Emission reductions can be claimed for the difference in energy use for the production of materials from virgin inputs versus production from recycled material. In the case of paper or cardboards, emission reductions due to the avoidance of methane formation in anaerobic decay may be claimed if the baseline scenario is the waste disposal in a disposal site without methane recovery.</p>	<p>This is not applicable.</p>
<p>2.2.2. Case B: Greenfield facility and/or capacity addition to existing facilities with formal sector participation</p> <p>7. In Case B, the recycling facility is owned and operated by the formal waste sector.</p>	<p>The project is installed in Greenfield facility where in there was no activity the pre-project activity. The project is installed with formal sector participation.</p> <p>Since recycling facility is newly implemented as a Greenfield activity, all recycled materials are</p>

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<p>It may receive recyclable materials from the informal waste sector, but has no participation of the informal sector in its organization or management functions.</p> <p>The following applicability conditions shall apply under this case:</p> <p>(a) If the recycling facility is an existing activity, the average data on the amount of recycled materials from the previous three years of operation (a minimum of one-year data would be required if the facility is less than three years old) shall be used for the estimation of the baseline recycling activity, and project activity shall consist of the increase of the recycling capacity above this level.</p> <p>If the recycling facility is newly implemented as a Greenfield activity, all recycled materials are eligible for the emission reduction calculation.</p> <p>However, in this case the project participants shall demonstrate that the materials recycled by the project activity are not diverted from other existing recycling facilities belonging to the formal sector, or, alternatively, that it is not a common practice in the region to recover and recycle these materials from municipal solid waste streams by means of formal businesses;</p>	<p>eligible for the emission reduction calculation.</p> <p>As per the recycling international journal, https://recyclinginternational.com/business/romania-targets-aluminium-and-pet/6595/, Aluminium recycling rate in Romania is only 3%. The validation team was able to conclude Aluminium recycled by the project activity are not diverted from other existing recycling facilities belonging to the formal sector. Recycling is not a common practice in the host country Romania to recover and recycle these materials from municipal solid waste streams by means of formal businesses. As demonstrated in the additionality section, recycling of Aluminium is the project region - Bucharest-Ilfov is first of its kind.</p> <p>The validation team has reviewed the document "File 39, 49 List of landfills.pdf"</p> <p>The validation team has observed that there are 46 landfills in Romania and only 3 are from Bucharest-Ilfov region. So there is no chance of diversion of waste from these landfills to this project.</p>
<p>(b) It is possible to directly measure and record the final output of the recycling facility and the input to the final processing/manufacturing facilities, that is the weight of materials leaving the recycling facility and of those entering the processing/manufacturing facilities (on a dry basis), segregated by type;</p> <p>Note: If multiple processes or facilities are involved, consider the final weight of the clean and dry material.</p>	<p>As per the section B.7.1 of the PDD, project is able to measure the amount of waste incoming to the recycling facility on a dry basis (Quantity of aluminum waste collected per year or Municipal Solid Waste -monitoring parameter no 8 of 15 as per PDD) and amount of final output going out of the project facility (Quantity of aluminium recycled in year y-monitoring parameter no 9 of 15 as per PDD)</p>
<p>(c) The recycled materials shall be sold directly to a processing/manufacturing facility, or to a chain of intermediary retailers that are able to transfer the recycled materials to a final identifiable processing/manufacturing facility;</p>	<p>The validation team has reviewed the agreement signed with ALRO dated 19th Feb 2020, a secondary Aluminium ingot production through a document "File 33, 37 Scrap deliveries contract ALRO.pdf". The other customers listed below are similar to ALRO i.e secondary Aluminium ingot production units.</p> <p>List of customers of AS metals are</p> <ol style="list-style-type: none"> 1.Remat Brasov SA 2.Silcotub SA 3.Alumetal Poland SP ZOO 4.Alro SA 5.Romrecycling SRL 6. Liberty Galati SA 7. Eural Gnutti SPA 8. Rematholding Co SRL 9. Rottam Padana SPA <p>So for this project, the recycled material is transferred to the secondary aluminum ingot production section.</p>
<p>(d) The PDD shall explain how procedures, such as contractual agreements, shall be put in place to</p>	<p>The right to claim GS-VER lies with the PP only. The PP has signed agreement (with the 10 year</p>

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<p>eliminate double counting of emission reductions, for example potentially resulting from waste pickers, the recycling facility or the processing/manufacturing facility, or other parties possibly claiming credits for emissions reduction.</p> <p>Similarly, through contractual agreement and other means, credible proof shall be provided to show that the materials supplied from the recycling facility are used for processing/manufacturing and not for other purposes such as a source of fuel or disposal;</p>	<p>validity) with the following entities with the agreement that PP has the right to claim 100% GS-VER and for avoiding double counting.</p> <ol style="list-style-type: none"> 1.Excel Metal SRL dated 22nd Feb 2022 2.Loacker dated 16th Feb 2022 3.Nord Ferroindustry Ltd dated 21st Feb 2022 4. SC Pajurca Metal Group SRL dated 17th Feb 2022 5.Remat Brasov SA dated 18th Feb 2022 6. Remat Vrancea dated 21st Feb 2022 7. REMATHOLDING Co SRL dated 23rd Feb 2022 8.Romrecycling SRL dated 21st Feb 2022 9.Sergnef Waste Recycling SRL dated 21st Feb 2022 10. Remat Ilfov SRL dated 22nd Feb 2022 <p>The validation team has reviewed the contract signed between PP and REMATHOLDING Co SRL(dated 6th January 2020) and Nordferro Industry (dated 8th January 2020) for Al waste purchase. The validation team has reviewed the contract signed between Alro SA dated 19th Feb 2020 for scrap delivery. The validation team has reviewed the List of authorized economic operators according to Article 15 paragraph 2 of Law 211/2011.</p>
<p>(e) For recycling of PVC/PET/PP, the project participants shall demonstrate the chemical equivalence of the recycled PET/PP to that of PVC/PET/PP made from virgin inputs by the comparison of intrinsic viscosities to ensure that the recycled PVC/PET/PP replaces virgin inputs;</p>	<p>This is not applicable metal recycling. The validation team has reviewed the Declaration on Conformity dated 16th March 2020 by AS metals. However, the recycled product conforms to EN 13920-05 (supplier of scrap being SC Alro SA, Romania). The composition, size, type and property conforms to the EN 13920-05. PP has used quality management system that accepts article 6 of Regulation EU no 333/2011(1).</p> <p>List of customers of AS metals are</p> <ol style="list-style-type: none"> 1.Remat Brasov SA 2.Silcotub SA 3.Alumetal Poland SP ZOO 4.Alro SA 5.Romrecycling SRL 6. Liberty Galati SA 7. Eural Gnutti SPA 8. Rematholding Co SRL 9. Rottam Padana SPA
<p>(f) Emission reductions can only be claimed for the difference in energy use for the production of finished products from virgin inputs versus production from recycled materials.</p> <p>In the case of paper or cardboards, emissions reductions due to avoidance of methane formation in anaerobic decay may be claimed, if the baseline scenario is waste disposal in a disposal site without methane recovery.</p>	<p>The validation team has reviewed the ER sheet and emission reduction calculation is related to the difference in energy use for the production of finished products from virgin inputs and that of recycled materials production.</p>
<p>2.2.3. Applicability conditions for both cases i.e. Case A and Case B</p> <p>8. In any of the above cases the project proponent shall be able to demonstrate, using three years historic data (market data, official statistics etc.) prior to the start date of the project activity, that the finished</p>	<p>Since PP has invoked para 9 requirements, this para (para 8) is not applicable for the project scenario to demonstrate its compliance.</p>

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<p>products (HDPE, LDPE, PET, PVC, PP, steel aluminum, paper and cardboard and glass) were manufactured in the host country of the CDM project using either virgin raw materials produced in country or virgin raw materials imported from another non-Annex I country.</p> <p>This analysis may be limited to only those finished products where recycled materials have proven to be a technically viable option, that is those types of products that are expected to be the end products produced from materials recycled as part of the project activity.</p> <p>Note: A minimum of one-year data would be required if the facility is less than three years old</p> <p>Note: As per the definition of start date provided in the EB 41 report, paragraph 67</p>	
<p>9. As an alternative to the requirement stipulated in paragraph 8 above, the project proponents may choose to adjust the baseline emissions by using the baseline correction factor (Bi) as described under the baseline section below.</p>	<p>PP has used Bi = 0.72 for Aluminium as per the methodology.</p>
<p>10. The recycling facility shall source its materials from MSW; materials from an unknown source are not eligible under this methodology.</p> <p>The project activity consists of separation of the recyclables from bulk MSW by means of manual or magnetic or mechanical separations.</p> <p>If the project activity involves the collection of wastes on a door to door basis, or collection at recipient's containers for the voluntary dispensing of wastes by the local community, all recyclables (paper, plastics, glass, etc.) processed by the recycling plant shall be collected together, selective collection of metals or any other wastes is excluded.</p> <p>As a consequence, wastes not pertaining to the identified baseline waste collection and destination stream that would not be delivered to the baseline disposal site and/or treatment plant (e.g. incineration) are not eligible.</p>	<p>The waste material includes such as cans of juice, cables, old cars, clippings.</p> <p>As per the PDD and process diagram of AS Metal reviewed, the Project activity consists of separation of the recyclables from bulk MSW by means preliminary separation, pre-shredded, magnetic separation, shredded, particle size separation, automatic sorting with eddy current, optical sorting and metal detection.</p> <p>The validation team has reviewed video of AS Metals process and observed that MSW are separated by means of initial granular size separation, x-ray separation, eddy current separation, magnetic separation.</p> <p>Hence it is accepted by the validation team.</p>
<p>11. In the specific case of metals, the methodology excludes collection of the scraps generated from the production process of primary/secondary/finished metal and materials or in the processing of the finished metal and materials into final products, and it covers only postconsumer obsolete wastes.</p> <p>Project proponents shall provide evidence that the materials recycled under the project activity are recovered only from end-of-life-wastes and project activity does not divert waste from any historically existing informal or formal recycling activity.</p> <p>Note: Post-consumer obsolete wastes cover for example small domestic appliances in the daily waste collection system, and it excludes collection of large devices</p>	<p>The waste material includes such as cans of juice, cables, old cars, clippings. The material recycled are recovered only from end-of-life wastes. Since the project activity is first of its kind in the project region, there is no chance that project activity does divert waste from any historically existing informal or formal recycling activity.</p>

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<p>such as refrigerators, vehicles.</p> <p>This is because these devices are usually scrapped and not treated and disposed together with MSW as assumed by this methodology; further recycling/recovery of metals from such devices would potentially involve emissions due to physical leakage of refrigerants and accounting such emissions are not under the scope of this methodology.</p>	
<p>12. For the projects involving the recycling of PVC, only facilities that employ mechanical recycling are eligible.</p>	<p>This is not required for metal recycling.</p>
<p>13. The amount of fuel and electricity consumed by the recycling facility can be measured and recorded.</p>	<p>Electricity consumption (monitoring parameter no 7 of 15), diesel consumption (monitoring parameter no 10 of 15), natural gas consumption (monitoring parameter no 11 of 15)) are measured and recorded periodically by the project.</p>
<p>14. Project proponents shall demonstrate that the properties of the materials produced from waste recycling are the same as those from virgin materials.</p> <p>For example, if the waste materials such as recycled plastic bottles are converted into building blocks or roof tiles, the emission reductions based on displacement of original virgin materials cannot be claimed under this methodology.</p> <p>For recycled materials, project proponents shall provide documentation proving that the properties of the materials produced are comparable according to standard testing methods for each material.</p>	<p>Properties of the Aluminum recycled material produced is comparable to aluminium product from virgin raw materials.</p> <p>Primary aluminium consuming companies, which are PP's clients, have replaced the consumption of primary aluminium raw material with secondary raw material. By this way, the validation team has confirmed that properties of materials produced are comparable.</p> <p>The validation team has reviewed the technical sheet for Al scrap and this conforms to Regulation 333/2011 with Al purity 97.3136% which was authorised by Rina Simtex. This is comparable to the virgin Aluminium. Moreover, aluminum is infinitely reusable, as per scientific studies, there is no loss of quality once the recycling process is finished.</p> <p>Moreover, the validation team has reviewed the document SR EN 13920-1 to 16, which is the European Standard for Aluminum and Aluminum Alloys produced from waste.</p> <p>The validation team has reviewed the European Industrial Standards-Recyclable materials as follows and accepted the same.</p> <ol style="list-style-type: none"> 1. EN 13920 -1;Part1- General Requirements, sampling and tests 2. EN 13920-2; Part2-Unalloyed aluminium scrap 3. EN 13920-3; Wire and cable Scrap 4. EN 13920-4; Scrap consisting of one single wrought alloy 5. EN 13920-5; Scrap consisting of two or more wrought alloy of the same series 6. EN 13920-6; Scrap consisting of two or more wrought alloy 7. EN 13920-7; Scrap consisting of castings 8. EN 13920-8;Scrap consisting of non ferrous materials from shredding processes destined to Aluminium separation processes 9. EN 13920-9; Scrap from aluminium separation processes of non ferrous shredded materials

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	<p>10. EN 13920-10;Scrap consisting of used aluminium beverages cans 11. EN 13920-11;Scrap consisting of aluminium copper radiators 12. EN 13920-12;Turnings consisting of one single alloy 13. EN 13920-13;Mixed turnings consisting of two or more alloys</p> <p>The validation team has reviewed the Declaration of conformity by S.C ALRO S.A dated 16th March 2020 which stated that AS metals products are acceptable to them citing norms EN 13920-05.</p>
<p>15. Measures are limited to those that result in aggregate emission reductions of less than or equal to 60ktCO₂ equivalent annually.</p>	<p>The estimated ER per year = 56,282 tCO₂e per year only every year.</p>
<p>2.3. Entry into force 16. The date of entry into force is the date of the publication of the EB 115 meeting report on 8 September 2022.</p>	<p>At the time of registration , ver 9.0was applicable. However,PP is required to use this meth version v9.0.</p>
<p>2.4. Applicability of Sectoral Scopes 17. For validation and verification of CDM projects and programme of activities by a designated operational entity (DOE) using this methodology, application of sectoral scope 13 is mandatory.</p>	<p>The project falls under Sector 13 only.</p>
<p>3. Normative references 18. Project participants shall apply the “General guidelines for SSC CDM methodologies”, and “Guidelines on the TOOL21: Demonstration of additionality of small-scale project activities” provided at<http://cdm.unfccc.int/methodologies/SSCmethodologies/approved.html>.</p> <p>19. This methodology also refers to the latest approved version of the following approved methodology and tools: (a) “AMS-III.BA.: Recovery and recycling of materials from E-waste” (hereinafter referred to as AMS-III.BA.); (b) “TOOL03: Tool to calculate project or leakage CO₂ emissions from fossil fuel combustion” (hereinafter referred to as TOOL03); (c) “TOOL04: Emissions from solid waste disposal sites” (hereinafter referred to as TOOL04); (d) “TOOL05: Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation” (hereinafter referred to as TOOL05); (e) “TOOL07: Tool to calculate the emission factor for an electricity system” (hereinafter referred to as TOOL07); (f) “TOOL09: Determining the baseline efficiency of thermal or electric energy generation systems” (hereinafter referred to as TOOL09).</p>	<p>PP has used large scale additionality tool v7.0 and First of its kind tool to demonstrate additionality.</p>
<p>4. Definitions 20. . The definitions contained in the Glossary of CDM</p>	<p>As per the PDD, the Project activity consists of separation of the recyclables from bulk MSW by</p>

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<p>terms shall apply.</p> <p>21. For the purpose of this methodology the following definitions apply:</p> <p>(a) Mechanical Recycling - physical/mechanical processes by which recyclable materials are obtained from municipal solid waste by way of separation, cleaning and compaction/packing (for plastics and paper) or grinding (for container glass) for further processing in order to produce intermediate/finished products to substitute virgin raw materials in an industrial production chain.</p> <p>The process may be accomplished manually and/or using mechanical equipment including one or more of the following measures: washing of the separated materials with hot water, drying, compacting, shredding or pelletizing;</p>	<p>means preliminary separation, pre-shredded, magnetic separation, shredded, particle size separation, automatic sorting with eddy current, optical sorting and metal detection. Hence it is accepted by the validation team.</p>
<p>(b) Recycling facility - facility(ies) where the recyclable fraction of the collected municipal solid waste is sorted, classified and prepared into marketable commodities for processing/manufacturing in single or multiple locations.</p> <p>In the case of plastics recycling, washing with hot water to clean the plastic to free it from extraneous materials is an essential part of this activity and associated emissions shall be monitored and accounted as project emissions.</p> <p>Similarly, the recycling of container glass cullet is an essential part of the project activity and associated emissions shall be accounted as project emissions.</p> <p>For steel and aluminium, the separation of these metals from extraneous non-metallic pieces present in the recycled wastes (e.g. plastics or glass) shall also take part at the recycling facility;</p> <p>Note: The recycling facility includes final segregation of the waste types and no further segregation occurs in the Processing/Manufacturing facility</p>	<p>As per the PDD, the Project activity consists of separation of the recyclables from bulk MSW by means preliminary separation, pre-shredded, magnetic separation, shredded, particle size separation, automatic sorting with eddy current, optical sorting and metal detection. Hence it is accepted by the validation team.</p>
<p>(c) Processing/Manufacturing facility - includes industrial processes to transform recyclable materials obtained from the recycling facility into intermediate or finished products that is plastic resin, i.e. production of recycled plastic resin or pellets and/or the glass manufacturing facility where the container glass cullet is melted;</p>	<p>This is not included as the product from the project activity</p>
<p>(d) Informal Waste Sector - individuals or a group of individuals who are involved in waste management activities, but are not formally registered or formally responsible for providing the waste management services.</p> <p>Newly established formalized organizations of such individuals, that is cooperatives, can also be considered as the informal sector for the purpose of this methodology;</p>	<p>The project is installed in Greenfield facility where in there was no activity the pre-project activity,. The project is installed with formal sector participation</p>
<p>(e) Formal Waste Sector - solid waste management activities planned, sponsored, financed, carried out or</p>	<p>The project is installed in Greenfield facility where in there was no activity the pre-project activity,. The</p>

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<p>regulated and/or recognized by the local authorities or their agents, usually through contracts, licenses or concessions.</p>	<p>project is installed with formal sector participation.</p>
<p>5. Baseline methodology 5.1. Project boundary 22. The project boundary includes the physical geographical sites of:</p> <ul style="list-style-type: none"> (a) Waste collection sites (e.g. door-to-door collection); (b) The recycling facility; (c) Processing/manufacturing facility; (d) Virgin material production; (e) MSW disposal site or treatment plant in the baseline scenario. <p>Note: Virgin material production is included in the project boundary, even if it is not an identifiable site, because the emission factor for virgin material production for baseline calculation is based on the assumptions on the typical conditions for the virgin material production in the host country or in a non-Annex I country.</p> <p>Note: Project proponent is encouraged to submit proposals to revise the methodology to include emissions avoided associated with the acquisition of raw materials and CO2 emissions avoided from the use of carbonated materials (such as limestone and soda) in the glass manufacturing process.</p>	<p>The project boundary consists of weigh bridge, feeding of the recycling plant with waste, preliminary sorting, pre-shedding, magnetic sorting, particle size separation, automatic sorting with eddy current, optical sorting and metal detection.</p>
<p>5.2. Baseline emissions 23. Baseline emissions include:</p> <ul style="list-style-type: none"> (a) For the production of plastic, the emissions associated with energy consumption for the production of plastic pellets from virgin plastic materials; (b) For paper and cardboard, the emissions associated with the anaerobic decay within a disposal site may be claimed; (c) For the production of glass, emissions associated with the energy consumption for the production of virgin container glass corresponding to the preparation and mixing of raw materials before the melting stage; <p>Note: Project proponent is encouraged to submit proposals to revise the methodology to include emissions avoided associated with the acquisition of raw materials and CO2 emissions avoided from the use of carbonated materials (such as limestone and soda) in the glass manufacturing process</p> <ul style="list-style-type: none"> (d) For the production of metals, emissions associated with energy consumption for the production from virgin materials. 	<p>The project involves metal recycling only. Baseline scenario includes emissions associated with the energy consumption for the production of emissions associated with energy consumption for the production from virgin materials.</p>
<p>24. Baseline emissions shall be determined as: $BE_y = BE_{plastic,y} + BE_{glass,y} + BE_{paper,y} + BE_{Metal,y}$ Where</p>	<p>The project has been recycling Aluminium waste (municipal solid waste), reducing energy consumption that would otherwise be required for</p>

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<p>BE_y- Baseline emissions in year y BE_{plastic,y} –Baseline emissions in year y associated with the recycling of plastic BE_{paper,y} -Baseline emissions in year y associated with the recycling of paper BE_{Metal,y}- Baseline emissions in year y associated with the recycling of metal <i>i</i>, i.e. Steel and/or Aluminium</p> <p>25. Only the baseline emissions which would take place in non-Annex I countries shall be credited.</p> <p>Therefore, in the case where requirements stipulated under paragraph 8 cannot be met, the baseline emissions calculated for the total amount of recycled materials obtained in the project activity are adjusted by a correction factor “<i>Bi</i>”, calculated as the ratio of the production of the material “<i>i</i>” in non-Annex I countries and the total production of this material in the world.</p> <p>See the Table 2 below. These correction factors shall be updated at each renewal of the crediting period, and project participants shall use the values from the latest version of the methodology at renewal of the crediting period</p> <p>Table 2. Baseline correction factor for metals, plastics and glass from virgin materials</p> <table border="1" data-bbox="151 981 799 1330"> <thead> <tr> <th>Metal/Plastic</th> <th>Bi adjustment factor based on the share of the production in non-Annex I countries</th> </tr> </thead> <tbody> <tr> <td>Aluminum</td> <td>0.72</td> </tr> <tr> <td>Steel</td> <td>0.68</td> </tr> <tr> <td>PET</td> <td>0.60</td> </tr> <tr> <td>HDPE</td> <td>0.60</td> </tr> <tr> <td>LDPE</td> <td>0.60</td> </tr> <tr> <td>PP</td> <td>0.60</td> </tr> <tr> <td>PVC</td> <td>0.60</td> </tr> <tr> <td>Glass</td> <td>0.67</td> </tr> </tbody> </table> <p>Note: For details on how the values of <i>Bi</i> were determined, please refer to Appendix 1 of AMS-III.BA.: Recovery and recycling of materials from E-waste”. For plastics, values of <i>Bi</i> were sourced from PlasticsEurope and EPRO</p> <p>Note: Association of Plastics Manufacturers in Europe (PlasticsEurope), European Association of Plastics Recycling and Recovery Organisations (EPRO). 2022. Plastics – the Facts 2021. Available at , accessed on 29 June 2022.</p>	Metal/Plastic	Bi adjustment factor based on the share of the production in non-Annex I countries	Aluminum	0.72	Steel	0.68	PET	0.60	HDPE	0.60	LDPE	0.60	PP	0.60	PVC	0.60	Glass	0.67	<p>the production of virgin materials, and consequently reducing GHG emissions.</p> <p>As per the PDD, PP has considered the baseline correction factor (<i>Bi</i>) to be 0.72; the validation team has accepted the same as correct.</p>
Metal/Plastic	Bi adjustment factor based on the share of the production in non-Annex I countries																		
Aluminum	0.72																		
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LDPE	0.60																		
PP	0.60																		
PVC	0.60																		
Glass	0.67																		
<p>5.2.1. Baseline emissions for plastics recycling 26. Baseline emissions for the production of pellet <i>i</i> from virgin inputs are calculated using the equation below. $BE_{plastic,y} = \sum [Q_{i,y} \times L_i \times (W_{i,in-country,y} \times SE_{i,in-country,y} + W_{i,imported,y} \times SE_{i,imported,y})]$ Where BE_{plastic,y} -Baseline emissions for plastics recycling in year y</p>	<p>BE_{plastic,y} =0 as this project is about metal recycling.</p>																		

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<p>i-Indices for material type <i>i</i> (<i>i</i> = 1,2,3,4 for HDPE, LDPE, PET, PVC and PP) $Q_{i,y}$ -Quantity of plastic type <i>i</i> recycled in year <i>y</i> L_i- Net to gross adjustment factor to cover degradation in material quality and material loss in the production process of the final product using the recycled material $W_{i,in-country,y}$ -Percentage of plastics produced in the hostcountry out of total plastic consumed in year <i>y</i> $SE_{i,in-country,y}$ - Specific emissions in the baseline for the production of virgin plastics type <i>i</i> in the host Country in year <i>y</i> $W_{i,imported,y}$ - Percentage of imported plastics out of total plastic consumed in year <i>y</i> $SE_{i,imported,y}$ - Specific emissions in the baseline for virgin plastics type <i>i</i> imported in year <i>y</i></p>																
<p>27. Specific emissions in the baseline for the production of virgin plastics type <i>i</i> in the host Country ($SE_{i,in-country,y}$) are determined based on the equation below: $SE_{i,in-country,y} = (SEC_{BL,i} \times EF_{BL,el,y}) \times (SFC_{BL,i} \times EF_{BL,FF,CO2})$ $SEC_{BL,i}$ - Specific electricity consumption in the production of virgin material type <i>i</i> $EF_{BL,el,y}$ - Emission factor for the baseline electricity consumption for virgin plastic production in the host party $SFC_{BL,i}$ - Specific fuel consumption for the production of virgin material type <i>i</i> $EF_{BL,FF,CO2}$ - CO2 emission factor of the baseline fossil fuel.</p> <p>Project participants shall assume that the baseline fuel is natural gas when it's not possible to identify the type of fuel consumed for the production of plastics from virgin materials</p>	<p>This is not applicable as the project involves metal recycling only.</p>															
<p>28. Specific emissions in the baseline for virgin plastics type <i>i</i> imported are determined based on the equation below: $SE_{i,imported,y} = \sum [B_i \times SEC_{BL,i} \times EF_{el,imported} + SFC_{BL,i} \times EF_{FF,imported,CO2}]$ Where B_i-Correction factor based on share of production in non-Annex I countries, as specified in Table 2 $EF_{el,imported}$ - Emission factor for the baseline electricity consumption for the portion of plastic that is imported $EF_{FF,imported,CO2}$ - CO2 emission factor for fossil fuel. Assume that natural gas supplies the energy needed to produce the virgin plastic imported if it is not possible to identify the fuel type</p>	<p>This is not applicable as the project involves metal recycling only.</p>															
<p>29.. The values of the parameters $SEC_{BL,i}$ and $SFC_{BL,i}$ are illustrated in the table below: Table 3. Values of specific energy and fuel consumptions for the production of different types of plastics from virgin materials</p> <table border="1" data-bbox="199 1899 751 2063"> <thead> <tr> <th>Plastic</th> <th>$SEC_{BL,i}$ (MWh/t)</th> <th>$SFC_{BL,i}$ (GJ/t)</th> </tr> </thead> <tbody> <tr> <td>PET</td> <td>1.11</td> <td>15</td> </tr> <tr> <td>HDPE</td> <td>0.83</td> <td>15</td> </tr> <tr> <td>LDPE</td> <td>1.67</td> <td>15</td> </tr> <tr> <td>PVC</td> <td>0.18</td> <td>25.7</td> </tr> </tbody> </table>	Plastic	$SEC_{BL,i}$ (MWh/t)	$SFC_{BL,i}$ (GJ/t)	PET	1.11	15	HDPE	0.83	15	LDPE	1.67	15	PVC	0.18	25.7	<p>This project is about metal recycling. Hence these parameters are not relevant.</p>
Plastic	$SEC_{BL,i}$ (MWh/t)	$SFC_{BL,i}$ (GJ/t)														
PET	1.11	15														
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Applicable conditions of AMS.III.AJ v9.0	Validation opinion			
<table border="1" data-bbox="199 185 751 215"> <tr> <td data-bbox="199 185 331 215">PP</td> <td data-bbox="331 185 560 215">0.56</td> <td data-bbox="560 185 751 215">11.6</td> </tr> </table> <p>Note: The following conservative assumptions were made to derive the default values contained in the table above:</p> <ol style="list-style-type: none"> The virgin monomers Ethylene, Propylene, Ethylene Glycol and Terephthalic Acid are produced through thermal cracking of naphtha. <p>Note: For the production of the monomers Ethylene Glycol Terephthalic Acid, it was conservatively estimated that the energy needed is the same for the production of the same mass of ethylene through thermal cracking.</p> <ol style="list-style-type: none"> A value of 15 GJ/tons of energy needed to produce ethylene from thermal cracking of naphtha was selected from Table 4.3 of the IEA (2007); Note: International Energy Agency (IEA). 2007. Tracking Industrial Energy Efficiency and CO2 emissions. Paris: Head of Communication and Information Office A value of 11.6 GJ/t of energy needed to produce propylene from thermal cracking of naphtha was sourced from Saygin et al (2011), as the sum of the specific energy consumed from the best practice technologies (13.1 GJ/t) and the specific energy needed to produce the steam (-1.5 GJ/t) provided in Table 1; Note: Saygin D, Patel MK, Worrell B, Tam C, Gielen DJ. 2011. Potential of best practice technology to improve energy efficiency in the global chemical and petrochemical sector. Available at https://www.sciencedirect.com/science/article/abs/pii/S0360544211003446?via%3Dihub, accessed on 12 May 2021. A value of 25.7 GJ/t of energy needed to produce virgin vinylchloride monomer (VCM) was determined based on the sum between the energy needed to produce ethylene (15 GJ/t, see above), chlorine (1.11 GJ/t based on Saygin et al, 2011, and assuming a ratio 0.586 tCl₂/tVCM), ethylene dichloride-EDC (6.98 GJ/t based on Table 4.18 of IEA, 2007, and assuming a ratio 1.58 tEDC/tVCM) and VCM (2.7 GJ/t based on Table 4.18 of IEA, 2007); <p>The energy needed for the production of the polymers is supplied by electricity:</p> <ol style="list-style-type: none"> For HDPE, LDPE and PP, the most conservative values from Table 4.9 of the IEA (2007) were selected and divided by 3.6 to convert to MWh/t; For PET, a conservative value of 4.0 GJ/t (divided by 3.6 to convert MWh/t) was sourced from Table 1 of Saygin et al (2011). For PVC, a conservative value of 0.18 MWh/t was determined as the weighted average between the PVC produced from suspension and emulsion processes, where the ratios of each production processes over the global production of PVC (85% through S-PVC 	PP	0.56	11.6	
PP	0.56	11.6		

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<p>and 15% through E-PVC) and the specific electricity consumed by each production process are sourced from PlasticsEurope and ECVM.</p> <p>Note: Association of Plastics Manufacturers in Europe (PlasticsEurope), European Council of Vinyl Manufacturers (ECVM). 2015. Eco-profiles and Environmental Product Declarations of the European Plastics Manufacturers: Vinyl chloride (VCM) and Polyvinyl chloride (PVC).</p> <p>5. The remaining steps of virgin pellet production (melting and shaping, pelletizing, compounding) require relatively negligible amounts of energy and hence are ignored.</p>	
<p>30. The emission factor for the baseline electricity consumption for virgin plastic production in the host party (parameter $EF_{BL,el,y}$) shall be determined based on the weighted average consumption of electricity from the electric grid(s) and from captive power plant(s) as indicated in the equation below.</p> <p>Project participants may choose to fix this parameter ex ante and update it at the renewal of the crediting period or monitor this parameter ex post. If the parameter is fixed ex ante, it shall be calculated using the most recent data available. Otherwise, a default value of 0.24 tCO₂/MWh shall be applied.</p> $EF_{BL,el,y} = \frac{\sum (EF_{BL,grid,k,y} \times EC_{BL,grid,k,y}) + \sum (EF_{BL,captive,j,y} \times EC_{BL,captive,j,y})}{\sum EC_{BL,grid,k,y} + \sum EC_{BL,captive,j,y}}$ <p>Where</p> <p>$EF_{BL,grid,k,y}$ – Emission factor of the grid k supplying electricity to produce virgin plastics in the host country in year y</p> <p>$EC_{BL,grid,k,y}$ - Electricity consumed from the grid k to produce virgin plastics in the host country in year y</p> <p>$EF_{BL,captive,j,y}$ - Emission factor of the captive power plant j supplying electricity to produce virgin plastics in the host country</p> <p>$EC_{BL,captive,j,y}$ - Electricity consumed from the captive power plant j to produce virgin plastics in the host country in year y</p> <p>Note: This default value is determined assuming electricity is supplied by a natural gas cogeneration plant with an efficiency of 83% (the efficiency is sourced from the Table 2 of the Appendix of the “TOOL09).</p>	<p>This project is about metal recycling. Hence these parameters are not relevant.</p>
<p>31. If project participants can't identify the sources to determine the baseline emissions from plastics produced in the host Country, a simplified approach can be applied assuming that all plastic consumed in the host Country is imported and a weight of 0 is assigned to $w_{i,in-country,y}$ and 1 to $w_{i,imported,y}$ in Equation 2.</p>	<p>This project is about metal recycling. Hence these parameters are not relevant.</p>
<p>5.2.2. Baseline emissions associated with the recycling of paper and cardboard</p> <p>32. Baseline emissions for the anaerobic decay of paper and cardboard in the solid waste disposal site are calculated using the latest version of the TOOL04.</p>	<p>$BE_{paper,y} = 0$ as this project is about metal recycling.</p>

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<p>5.2.3. Baseline emissions associated with the recycling of glass</p> <p>33.. Baseline emissions for the production of container glass from virgin inputs are calculated using following equation $BE_{glass,y} = Q_{glass,y} \times L_{glass} \times B_i \times SEC_{BL,glass} \times EF_{el,PJ,y}$ $Q_{glass,y}$ - Quantity of glass cullet recycled by the project activity in year y L_{glass} - Net to gross adjustment factor to cover degradation in material quality and material loss in the production process of the final product using the recycled material $SEC_{BL,glass}$ - Specific electricity consumption for the production of raw materials displaced by the glass recycling $EF_{el,PJ,y}$ - Emission factor of the electric grid supplying electricity to the recycling facility in year y</p>	<p>Baseline emissions for the production of container glass from virgin inputs are calculated using following equation $BE_{glass,y} = 0$ as this project is about metal recycling.</p>
<p>34.. The following conservative assumptions were made to determine the baseline emissions for the production of container glass from virgin inputs: (a) Container glass cullet will displace only the preparation and mixing of raw materials before the melting stage; (b) The only source of energy consumed by the preparation and mixing of raw materials is electricity – no fossil-fuels are used (c) The default value for SEC (specific electricity consumption) of 0.026 MWh/tglass shall be used; Note: Source: “Revision of AMS-III.AJ methodology to cover glass – Conservativeness study for the baseline calculation”, prepared by ALLCOT Group, available at http://cdm.unfccc.int/UserManagement/FileStorage/NC0TF6YEJU8GMV1K49D1LBSWP3HRO2. (d) The remaining steps of container glass production are not considered because the use of container glass cullet does not avoid melting and the subsequent steps of the glass manufacturing process (i.e. forming and post-forming).</p>	<p>This is not applicable for metal recycling.</p>
<p>5.2.4. Baseline emissions associated with the recycling of metals</p> <p>35. Baseline emissions for the production of metal type <i>i</i> from virgin inputs are calculated using equation below. $BE_{metals,y} = \sum [Q_{i,y} \times B_i \times SE_i]$ Where $BE_{metals,y}$ - Baseline emissions for metals recycling in year <i>y</i> (tCO₂/year) <i>i</i>-Metal type <i>i</i> (i.e. Steel or Aluminum) $Q_{i,y}$ - Quantity of metal type <i>i</i> (Steel or Aluminum) recycled and sent to a processing or manufacturing facility in year <i>y</i> (t/y) SE_i- Specific CO_{2e} emission factor for production of metal <i>i</i> (tCO₂/t), take value specified in Table 4 below</p>	<p>As per para 35 of the applied methodology, $BE_{metals,y} = \sum [Q_{i,y} \times B_i \times SE_i]$ Where $BE_{metals,y}$ - Baseline emissions for metals recycling in year <i>y</i> (tCO₂/year) <i>i</i>-Metal type <i>i</i> (i.e. Steel or Aluminum) $Q_{i,y}$ - Quantity of metal type <i>i</i> (Steel or Aluminum) recycled and sent to a processing or manufacturing facility in year <i>y</i> (t/y) B_i- Correction factor based on share of production in non-Annex I countries SE_i- Specific CO_{2e} emission factor for production of metal <i>i</i> (tCO₂/t), take value specified in Table 4 below</p> <p>The validation of the same is detailed below.</p>
<p>Metal type <i>i</i> = Aluminium only</p>	<p>The project involves metal Aluminium recycling. It also involves some small amount of other ferrous</p>

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	and non-ferrous metal substances. But PP did not take non-Aluminium waste into account for calculating ER.						
<p>Quantity of metal type i (Steel or Aluminium) recycled and sent to a processing or manufacturing facility in year y ($Q_{i,y}$) =9,370.057 tonnes of Al waste per year</p> <p>(monitored parameter no 9 of 15 as per the PDD)</p> <p>SDG 13- Climate Action</p>	<p>It is measured directly using weigh balance located in the metal recycling plant and recorded monthly. It is sourced from Centralised production report AS Metal for the year 2020 from 1st Jan to 31st Dec. The weigh balance is calibrated every 5 years. The validation team has reviewed one sample calibration certificate dated 16th July 2021.</p> <p>In the absence of the project activity, 9,370.057 tonnes of Al waste per year would not be treated and energy consumption for equivalent amount virgin material would be used leading to emission reduction. In the absence of the project, equivalent amount of virgin Al bauxite would be used.</p>						
<p>Correction factor based on share of production in non-Annex I countries (B_i) =0.72</p> <p>(ex-ante parameter number 2 of 4)</p>	<p>As per table 2 of the applied methodology, PP has considered the baseline correction factor (B_i) to be 0.72 for Aluminium; the validation team has accepted the same as correct</p>						
<p>Specific CO₂e emission factor for production of metal i (SE_i) =8.4 tCO₂/ tonne of Al</p> <p>(ex-ante parameter number 1 of 4)</p>	<p>This is sourced from the para 36- table 4 of the applied methodology</p>						
<p>36. The specific CO₂ emission factors are indicated in below. These values shall be updated at each renewal of the crediting period, in accordance with the latest version of the methodology</p> <p>Table 4. Specific CO₂ emission factor for production of metals</p> <table border="1" data-bbox="188 1137 762 1294"> <thead> <tr> <th>Metal</th> <th>Specific CO₂ emission factor for production of metals (tCO₂/t)</th> </tr> </thead> <tbody> <tr> <td>Aluminium</td> <td>8.40</td> </tr> <tr> <td>Steel</td> <td>1.27</td> </tr> </tbody> </table> <p>Note: (a) For details on how the emission factor for the production of aluminium was determined, please refer to Appendix 2 of the methodology “AMS-III.BA(b) For details on how the emission factor for the production of steel was determined, please refer to Appendix 3 of the methodology “AMS-III.BA</p>	Metal	Specific CO ₂ emission factor for production of metals (tCO ₂ /t)	Aluminium	8.40	Steel	1.27	<p>This is sourced from the para 36- table 4 of the applied methodology</p>
Metal	Specific CO ₂ emission factor for production of metals (tCO ₂ /t)						
Aluminium	8.40						
Steel	1.27						
<p>Baseline emissions for metals recycling in year y ($BE_{metals,y}$) =56,670tCO₂/year</p>	<p>As per para 35 of the applied methodology, $BE_{metals,y} = \sum [Q_{i,y} \times B_i \times SE_i]$</p>						
<p>5.3. Project emissions</p> <p>37. Project emissions include emissions associated with the energy use at recycling facility and at the processing facility, and are calculated based on the equation below.</p> <p>No project emissions need to be considered in the case of paper and cardboard.</p>	<p>The project includes recycling and processing of the Aluminium waste.</p>						
<p>38. For project activities where the recycling facility includes both waste sorting and processing, project emissions are calculated through the equation below:</p>	<p>$PE_y = EC_{PJ,y} \times EF_{el,PJ,y} + \sum (FC_{f PJ,y} \times NCV_{f,y} \times Ef_{f,CO_2,y})$</p> <p>Where $EC_{PJ,y}$- Electricity consumed by the recycling facility in year y $EF_{el,PJ,y}$ - Emission factor of the electric grid supplying electricity to the recycling facility in year y</p>						

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	<p>$FC_{f,PJ,y}$ - Fuel type f consumed by the recycling facility in year y $NCV_{f,y}$ - Net calorific value of the fossil fuel type f consumed in the recycling facility in year y $E_{f,CO_2,y}$ - CO2 emission factor of the fossil fuel type f consumed at the recycling facility in year y</p>						
<p>Electricity consumed by the recycling facility in year y ($EC_{PJ,y}$)=589.114 MWh/ year (monitored parameter no 7 of 15) SDG 13- Climate Action</p>	<p>It is calculated as a difference from the total consumed electricity at the recycled plant. The meter is located in the metal recycling plant and recorded monthly. It is sourced from Centralised production report AS Metal. The meter would be calibrated every 10 years.</p>						
<p>Emission factor of the electric grid supplying electricity to the recycling facility in year y ($EF_{el,PJ,y}$) =0.21337 tCO2/MWh (monitored parameter no 12 of 15) SDG 13- Climate Action</p>	<p>As per the table 5 of the 'Data and parameters monitored under the applied methodology, this emission factor (as $EF_{grid,CM,y}$) should be calculated as per Tool 07 - Tool to calculate the emission factor for an electricity system. However as per para 5 of the tool 07, "In case of CDM projects the tool is not applicable if the project electricity system is located partially or totally in an Annex I country". Since Romania being an Annex country, this tool is not applicable. Since $EF_{el,PJ,y}$ is directly sourced p127 of 394 (in pdf) of Annual Report from National Energy Regulatory Authority (ANRE) for the year 2020, the validation team has accepted the value as correct.</p>						
<p>Fuel type (f) = Diesel and Natural gas</p>	<p>It is sourced from Centralised utility consumption report AS Metal.</p>						
<p>Fuel type f consumed by the recycling facility in year y ($FC_{f,PJ,y}$)</p> <table border="1" data-bbox="151 1144 663 1240"> <thead> <tr> <th>Fuel type f</th> <th>$FC_{f,PJ,y}$</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>644.494 MWh per year</td> </tr> <tr> <td>Natural gas</td> <td>233.712 MWh per year</td> </tr> </tbody> </table> <p>(monitored parameter no 10& 11 of 15 as per PDD) SDG 13- Climate Action</p>	Fuel type f	$FC_{f,PJ,y}$	Diesel	644.494 MWh per year	Natural gas	233.712 MWh per year	<p>It is sourced from Centralised utility consumption report AS Metal. It can be crosschecked with purchase invoices.</p>
Fuel type f	$FC_{f,PJ,y}$						
Diesel	644.494 MWh per year						
Natural gas	233.712 MWh per year						
<p>Net calorific value of the fossil fuel consumed in the recycling facility in year y ($NCV_{f,y}$)</p> <table border="1" data-bbox="151 1429 799 1525"> <thead> <tr> <th>Fuel type</th> <th>$NCV_{f,y}$</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>43 TJ/Gg</td> </tr> <tr> <td>Natural gas</td> <td>48 TJ/Gg</td> </tr> </tbody> </table> <p>(ex-ante parameter no 4 of 4 as per PDD)</p>	Fuel type	$NCV_{f,y}$	Diesel	43 TJ/Gg	Natural gas	48 TJ/Gg	<p>It is sourced from the IPCC 2006 database. Since this is default value as per IPCC, this value is expected to change over crediting time period. Hence the validation team has accepted this as ex-ante parameter (fixed for the crediting period)</p>
Fuel type	$NCV_{f,y}$						
Diesel	43 TJ/Gg						
Natural gas	48 TJ/Gg						
<p>CO2 emission factor of the fossil fuel consumed at the recycling facility (EF_{FF,CO_2})</p> <table border="1" data-bbox="151 1653 799 1749"> <thead> <tr> <th>Fuel type</th> <th>$EF_{F,CO_2,y}$</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>73.56 tCO2/TJ</td> </tr> <tr> <td>Natural gas</td> <td>0.389 tCO2/MWh</td> </tr> </tbody> </table> <p>(monitored parameter no 13 of 15 as per the PDD) monitored parameter no 14 of 15 as per the PDD SDG 13 Climate Action</p>	Fuel type	$EF_{F,CO_2,y}$	Diesel	73.56 tCO2/TJ	Natural gas	0.389 tCO2/MWh	<p>For diesel: It is sourced from Romanian publication "The list of the national values of the emission factors and net calorific values, specific to each type of fuel and type of activity - EU-ETS 2012" www.anpm.ro For natural gas: It is sourced from Annual Report from National Energy Regulatory Authority (ANRE) pag 126, year 2020</p>
Fuel type	$EF_{F,CO_2,y}$						
Diesel	73.56 tCO2/TJ						
Natural gas	0.389 tCO2/MWh						
<p>Density of diesel =0.832 kg/litre (ex-ante parameter no 3 of 4 as per PDD)</p>	<p>This is sourced from IPCC value https://unfccc.int/files/national_reports/non-annex_i_natcom/cge/application/pdf/energy_ps_lesotho_2016.pdf Hence accepted by the validation team.</p>						
<p>Project emissions (PE_y) =388 tCO2e per year</p>	<p>$PE_y = EC_{PJ,y} \times EF_{el,PJ,y} + \sum (FC_{f,PJ,y} \times NCV_{f,y} \times$</p>						

Applicable conditions of AMS.III.AJ v9.0	Validation opinion
	E _{f,CO₂,y})
<p>39. For project activities where the recycling facility includes only waste sorting and the waste processing is done by a third-party processing plant, project emissions are determined through the equation below.</p> $PE_y = EC_{P,J,y} \times EF_{el,P,J,y} + \sum (FC_{f,P,J,y} \times NCV_{f,y} \times E_{f,CO_2,y})$ $+ \sum \{Q_{i,y} \times [SEC_{P,i} \times EF_{el,P,J,y}] \times EF_{el,y} + \sum (SFC_{f,i,P,J,y} \times NCV_f \times EF_{f,CO_2})\}$ <p>Where Q_{i,y} -Quantity of material type <i>i</i> recycled in year <i>y</i> SEC_{P,i} -Specific electricity consumption factor for processing of recycled material <i>i</i> in the processing/manufacturing facility <i>P</i> SFC_{f,i,P,J,y} -Specific consumption of fuel type <i>f</i> by the processing facility apportioned to material type <i>i</i> in year <i>y</i> Note: Emissions associated with transportation of recyclable materials and processing/manufacturing under the project activity are considered as equivalent to the corresponding emissions for the virgin materials and therefore ignored in this methodology.</p>	This is not applicable as both waste sorting and waste processing is done at the project site.
<p>40. For project activities that fall under Case A, the parameters EC_{P,J,y} and FC_{f,P,J,y} may be estimated based on the nameplate specific energy consumption of the equipment used and the average time of operation and level of service delivered, or based on measurement campaigns of the energy consumption under typical operation conditions.</p> <p>Note: In case the nameplate energy consumption and/or service provided by the equipment used in the recycling facility in Case A are unknown, they may be estimated by a local expert in order to define a locally applicable emission factor for the recycling plant.</p>	The project activity does not fall under case A i.e informal sector. So, this condition is not applicable.
<p>41. For the recycling of plastics, project emissions may alternatively be calculated using the equation below.</p> $PE_y = \sum [Q_{i,y} \times SEC_{rec} \times EF_{el,P,J,y}]$ <p>Where SEC_{rec} -Specific electricity consumption for the recycling of plastic type <i>i</i></p>	This is not applicable.
<p>42. If the recycling plant is claiming emission reductions for only part of recycled materials (e.g. only for plastics and not for metals), project emissions may be allocated to each mass unit of segregated material by gross sales revenues, that is apportioning the emissions proportional to the market prices of plastics, metals, organics, glass and paper etc. and their respective throughput.</p> <p>The market prices are the average prices of recycled materials paid by processing units/retailers to the recycling plants, may be either monitored ex post or be determined once for the crediting period.</p> <p>This rule can be applied only if transparent and reliable information on market prices is available.</p> <p>Alternatively, as a conservative approach, all project emissions shall be allocated to recycled material.</p>	In the project, only metal that has been collected which has marketable price, this paragraph is not relevant.

Applicable conditions of AMS.III.AJ v9.0	Validation opinion
<p>43. The following formulas may be used to allocate project emissions to each mass unit of segregated material s by market prices.</p> $EC_{i,PJ,y} = EC_{PJ,y} \times (Q_{i,y} \times \$_{i,y}) / \sum (Q_{s,y} \times \$_{s,y})$ $FC_{f,l,PJ,y} = FC_{f,PJ,y} \times (Q_{i,y} \times \$_{i,y}) / \sum (Q_{s,y} \times \$_{s,y})$ $PE_y = \sum Q_{i,y} \times [EC_{i,PJ,y} \times EF_{el,PJ,y} + \sum (FC_{f,l,PJ,y} \times NCV_{f,y} \times Ef_{f,CO2,y})]$ <p>Where s-Type of material segregated at the recycling facility with a market price, including plastic and other marketable items such as organics EC_{PJ,y} -Total electricity consumption of the recycling facility in year y apportioned to product i FC_{f,PJ,y} -Total fossil fuel type f consumption of the recycling facility in year y apportioned to product i Q_{s,y}-Quantity of material type s segregated in the recycling facility in year y \$_{i,y} -Sale price of product i in year y \$_{s,y} -Sale price of the segregated material type s in year y</p>	<p>In the project, only metal that has been collected which has marketable price, this paragraph is not relevant.</p>
<p>5.4. Leakage 44. If it is demonstrated that organic biogenic waste segregated in the recycling facility would otherwise have been deposited in a landfill without methane recovery in the baseline scenario, or if the baseline scenario is the incineration of the wastes, then no leakage calculation is required.</p> <p>Leakage emissions (LE_y) = 0 tCO₂e/year</p>	<p>As per para 44 of the applied methodology, if it is demonstrated that organic biogenic waste segregated in the recycling facility would otherwise have been deposited in a landfill without methane recovery in the baseline scenario, or if the baseline scenario is the incineration of the wastes, then no leakage calculation is required. Since PP is not collecting any biogenic waste in the recycling facility, leakage is zero.</p>
<p>5.5. Emission reductions 45.. The emission reductions achieved by the project activity shall be determined as the difference between the baseline emissions and the project emissions and leakage</p> $ER_y = 56,282 \text{ tCO}_2\text{e/year}$ <p>(monitored parameter no 6 of 15 SDG 13- Climate Action</p>	<p>The emission reductions achieved by the project activity shall be determined as the difference between the baseline emissions and the project emissions and leakage</p> $ER_y = BE_y - PE_y - LE_y$ <p>Where BE_y-Baseline emission in year y PE_y-Project emission in year y LE_y-Leakage emission in year y</p> <p>The validation team has reviewed the ER sheet and accepted the calculation as correct. The validation team has validated the SDG impact tool as well.</p>
<p>6. Monitoring methodology 46. The following parameters as indicated in section 6.1 below shall be monitored and recorded during the crediting period. The applicable requirements specified in the "General guidelines for SSC CDM methodologies" are also an integral part of the monitoring guidelines specified below and therefore shall be referred to by the project participants.</p>	<p>The verification team has confirmed "General guidelines for SSC CDM methodologies" v23.1 monitoring requirements are followed in this project.</p>
<p>6.1. Data and parameters monitored Data / Parameter table 1.</p> <p>Quantity of material i recycled and sent to a processing or manufacturing facility in year y (i=1,2,3,4,5,6,7,8 for HDPE, LDPE, PET, PVC, PP, aluminum, steel, paper and cardboard) (Q_{i,y})</p>	<p>Q_{i,y} is already validated as above.</p>

<i>Applicable conditions of AMS.III.AJ v9.0</i>	<i>Validation opinion</i>
Quantity of glass cullet recycled by the project activity in year y (Q_{glass})	
Quantity of material type s segregated in the recycling facility in year y ($Q_{s,y}$)	
Data / Parameter table 2	This is not applicable .
Percentage of plastics produced in the host party out of total plastic consumed in year y ($W_{i,\text{in-country},y}$)	
Data / Parameter table 3.	This is not applicable .
Percentage of imported plastics out of total plastic consumed in year y ($W_{i,\text{imported},y}$)	
Data / Parameter table 4.	This is not applicable
Emission factor of the electric grid supplying electricity to the recycling facility in year y ($EF_{\text{BL,grid},k,y}$)	
Data / Parameter table 5.	This is already validated as above.
Emission factor of the electric grid supplying electricity to the latest version of the recycling facility in year y ($EF_{\text{el,PJ},y}$)	
Data / Parameter table 6.	This is not applicable
Electricity consumed from the grid k to produce virgin plastics in the host country in year y ($EC_{\text{BL,grid},k,y}$)	
Data / Parameter table 7.	This is not applicable
Emission factor of the captive power plant j supplying electricity to produce virgin plastics in the host country ($EF_{\text{BL,captive},j,y}$)	
Data / Parameter table 8.	This is not applicable
Electricity consumed from the captive power plant j to produce virgin plastics in the host country in year y ($EC_{\text{BL,captive},j,y}$)	
Data / Parameter table 9.	This is already validated as above.
Electricity consumed by the recycling facility in year y ($EC_{\text{PJ},y}$)	
Data / Parameter table 10.	This is already validated as above.
Fossil fuel type f consumption of the recycling facility in year y ($FC_{f,\text{PJ},y}$)	
Data / Parameter table 11.	This is already validated as above.
Net calorific value of the fossil fuel type f consumed in the recycling facility in year y ($NCV_{f,y}$)	
Data / Parameter table 12.	This is already validated as above.
CO ₂ emission factor of the fossil fuel type f consumed at the recycling facility in year y (E_{f,CO_2})	
CO ₂ emission factor of the baseline fossil fuel ($EF_{\text{BL,FF,CO}_2}$)	
Data / Parameter table 13.	This is not applicable
Specific consumption of fuel type f of the processing facility, apportioned to material type l in year y ($SFC_{f,i,\text{PJ},y}$)	

Applicable conditions of AMS.III.AJ v9.0	Validation opinion
<p>Data / Parameter table 14.</p> <p>Quantity of municipal solid waste collected at the recycling facility =12,016 tonnes per year</p> <p>SDG 13-Climate action</p>	<p>As per the applied methodology, it is measured by direct weighing and recording of the weight, cross checked with company's records (Document name: Intrari marfuri pe documente) for the year 2020 that is invoiced and backed by receipt of payments. The verification team has accepted the monitoring procedure and accepted the same as feasible.</p> <p>In the absence of the project activity, 12,016 tonnes of waste Al would be sent to the landfill as municipal solid waste.</p>
<p>Data / Parameter table 15.</p> <p>Sale price of plastic type <i>i</i> or material <i>s</i> in year <i>y</i> (\$_{i,y}, \$_{s,y})</p>	<p>This is not applicable</p>
<p>Data / Parameter table 16.</p> <p>Intrinsic Viscosity of PET/PP</p>	<p>This is not applicable</p>
<p>6.2. Project activity under a programme of activities</p> <p>47. Further guidance on leakage would be required to adapt this methodology for application to project activities under programme of activities</p>	<p>This is not applicable.</p>
<p>Number of employees trained on recycling vocational skills =64</p> <p>(monitored parameter number 1 of 15 as per the PDD)</p> <p>SDG 4- Quality education</p>	<p>As per the PDD, it is measured from internal employment records. It is recorded annually. This refers to the number of employees (full-time, part-time, or temporary), by gender who received training services of any type.</p> <p>The validation team has reviewed the internal employment records and hence accepted. In the absence of the project activity, 64 number of employee trainings on recycled materials would not be possible. The validation team has validated the SDG impact tool as well.</p>
<p>Number of women in managerial positions =3</p> <p>1. Badila Rodica /Age 62 / Director Technical</p> <p>2.Dirjan Georgeta Marga Age 56 Director -General</p> <p>3.Radu Ioana Cristiana Age 58 Director Economics</p> <p>(monitored parameter number 2 of 15 as per the PDD)</p> <p>SDG 5 Gender Equality</p>	<p>As per the PDD, it is measured from internal employment records. It is recorded annually. This refers to number of female management employees (managers) (full - time) at AS Metals.</p> <p>The validation team has reviewed the internal employment records-Managerial. Hence accepted.</p> <p>In the absence of the project activity, employment of 3 number of females in the managerial position would not be possible. The validation team has validated the SDG impact tool as well.</p>
<p>Proportion of women in managerial positions from total management positions = 50% (3 out of 6)</p> <p>(monitored parameter number 3 of 15 as per the PDD)</p> <p>SDG 5 Gender Equality</p>	<p>As per the PDD, it is measured from internal employment records. It is recorded annually. This refers to proportion of number of female management employees (managers) (full - time) at AS Metals. The validation team has reviewed the internal employment records-Managerial. Hence accepted.</p> <p>In the absence of the project activity, proportion of 50% employment in managerial position would not be possible. The validation team has validated the SDG impact tool as well.</p>
<p>Energy Saving = 129,432 MWh_{electricity} per year</p> <p>(monitored parameter number 4 of 15 of 36 as per the PDD)</p> <p>SDG 7 Affordable and Clean Energy</p>	<p>As per the PDD, it is measured from internal consumption records. It is recorded annually. The validation team has reviewed the internal consumption records. Hence accepted.</p> <p>Primary Aluminum energy consumption (electrolytic) =13.97 MWh per tonne of Al</p> <p>Quantity produced of secondary Aluminum AS METAL = 9,370.057 tonnes of Al</p>

Applicable conditions of AMS.III.AJ v9.0	Validation opinion
	<p>Baseline primary Aluminum production energy consumption =130,899.70 MWh/year of production Energy Consumption of production of 9370.057 tonnes of secondary Al =1,467.32 MWh per year of production of Al Energy Saving would be 129,432 MWh_e In the absence of the project activity, proportion of 129,432 MWh_e per year would not be possible.</p> <p>The validation team has reviewed a statement from PP that declared that on its own responsibility that is used in 2020 in the foundry section the quantity of 9,037.617 tonnes (96.45%) of secondary raw material of the entire quantity produced in the recycling section. The difference of 332.44 tonnes (3.55%) was delivered to other processing/turning facilities. The validation team has validated the SDG impact tool as well.</p>
<p>Number of employees trained on recycling vocational skills =64</p> <p>(monitored parameter number 5 of 15 as per the PDD) SDG 8- Decent work and economic growth</p>	<p>As per the PDD, it is measured from internal employment records. It is recorded annually. This refers to total jobs generated as a result of the project.</p> <p>The validation team has reviewed the internal employment records and hence accepted. In the absence of the project activity, 64 number of employee trainings on recycled materials would not be possible The validation team has validated the SDG impact tool as well.</p>
<p>Number of accidents and incidents =1</p> <p>(monitored parameter number 15 of 15 as per the PDD)</p> <p>Parameters to monitor the Safeguard Principles</p>	<p>As per the PDD, it is measured from Internal reports on accidents. It is recorded annually.</p> <p>The validation team has reviewed the Internal reports on accidents dated 2020 included one number of accidents and incidents. In the absence of the project activity, none of these would be possible</p>

Appendix 15: Additionality Requirements v7.0

Requirements of additionality	Validation opinion
<p>Appendix of Tool-“Demonstration of additionality of small scale project activities” v13.1</p>	<p>The validation team has assessed the additionality of the project as per Appendix of Tool-“Demonstration of additionality of small scale project activities” v13.1 and “Tool for the demonstration and assessment of additionality” v7.0. Emission reduction from the project is 56,282 tonnes per year.</p> <ol style="list-style-type: none"> 1.Emission reduction of the project is less than 60,000 tCO₂e per year. 2.The project technology (metal recycling) does not fall positive list under Tool32 -Positive lists of technologies v4.0. So, the project is not automatic additional. 3. Emission reduction of the project is not less than 20,000 tCO₂e per year. So the project cannot use Tool19 “Demonstration of additionality of microscale project activities” v10.0 to demonstrate additionality. <p>So due to the above 3 facts, PP has to use regular additionality procedure by applying “Tool for the demonstration and assessment of additionality” v7.0 for demonstrating additionality.</p>
<p>Step 0: Demonstration whether the proposed project activity is the first-of-its-kind</p>	<p>The validation team has checked whether PP has demonstrated additionality and identified baseline in line with the latest approved version of the “Tool for the demonstration and assessment of additionality version 7.0.0 (hereinafter referred to as additionality tool). The validation team checked if all the assumptions and data used by the project participants are listed in the PDD, including their references and sources, all documentation used is relevant for establishing the baseline scenario and correctly quoted and interpreted in the PDD, assumptions and data used in</p>

	<p>the identification of the baseline scenario are justified appropriately, supported by evidence and can be deemed reasonable, the approved baseline methodology has been correctly applied to identify the most plausible baseline scenario and the identified baseline scenario reasonably represents what would occur in the absence of the proposed project activity. The validation of the project against the relevant requirements of the additionality tool (Step 0 to step 4) is detailed below.</p> <p>This step identifies whether the project of its kind in the geographical area. PP has also chosen this step to demonstrate that the project is the first of its kind. The validation of this step prescribed by the additionality tool is explained below.</p>
Measure = Switch of technology with or without change of energy source including energy efficiency improvement as well as use of renewable energies	As per para 16 of the additionality tool, if the project applies measures that are listed in Tool on “Additionality of first-of-its-kind project activities” version 3.0(hereinafter referred to as first of its kind tool), then underlying guidance specified in the tool shall be applied to demonstrate that the project activity is the first-of-its-kind. The proposed project activity is Switch of technology with or without change of energy source. Since the proposed project activity applies ‘Switch of technology with or without change of energy source’ as a measure, the latest version of the first of its kind tool can be applied to demonstrate that the project activity is the first-of-its-kind. The validation of the same is demonstrated below.
Applicable geographical area or region or defined region = Bucharest-Ilfov (Ilfov is the county that surrounds Bucharest, the capital of Romania)	As per para 13a of the additionality tool and para 8 of first of its kind tool, default geographical area is host country. But PP has used Bucharest-Ilfov as applicable geographical area. The validation team has also accepted that justification for the applicable geographical area is required if PP preferred to define area smaller than the host country. Bucharest-Ilfov is different from the rest of the country based on development and based on fact that AI waste cans collection is in large proportion in Bucharest-Ilfov. Hence applicable geographical area is deemed appropriate.
Proposed project activity = first-of-its-kind	<p>As per para 12 of first of its kind tool, the proposed project activity is the first of its kind in the applicable geographical area if the following three conditions are satisfied</p> <p>(a) The project is the first in the applicable geographical area that applies a technology that is different from technologies that are implemented by any other project, which are able to deliver the same output and have started commercial operation in the applicable geographical area before the project design document is published for global stakeholder consultation or before the start date of the proposed project activity, whichever is earlier;</p> <p>(b) The project implements one or more of the measures;</p> <p>(c) The project participants selected a crediting period for the project activity that is “a maximum of 10 years with no option of renewal”.</p> <p>The validation team has checked the compliance against the conditions a,b,c below.</p>
<p>Type of technology of the proposed project activity = different</p> <p>Start date of the project = 10th December 2019</p> <p>Start date of the validation (listed on) = 12th November 2020</p>	<p>An official Letter from the Circular Economy Coalition (CERC) no 72 dated 12th April 2022 demonstrating that the project was the first project involving secondary raw materials made of Aluminium.</p> <p>The validation team has concluded that there is no metal recycling plant in Bucharest-Ilfov region. The CERC, by way of the letter, has confirmed that proposed project is the first factory that performs recycling activities for AI waste and produces recycled AI obtained from 100% AI waste inside Bucharest-Ilfov region. There is no recycling facility before the start date of the project (10th December 2019). Hence the technology of the project activity is different by size. Hence this condition ‘a’ is satisfied.</p>
Output = Recycled AI products	The output service is production of recycled AI. hence accepted.
Measure = Switch of technology with or without change of energy source	The proposed project activity is Switch of technology with or without change of energy source. Hence this condition ‘b’ is satisfied.
Type of crediting period= Fixed (10 years)	PP has selected renewable crediting period (5years x 3 times =15 years). Hence this condition c is satisfied.
Outcome of step 0:	Since all the three conditions are satisfied, proposed project activity is first-

<p>Proposed project activity = first-of-its-kind</p>	<p>of-its-kind in the applicable geographical area. As per para 18 of additionality tool v7.0, Since the proposed project is the first-of-its-kind, its additionality is demonstrated. Step 1 to step 4 of the tool is not required to be assessed.</p>
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Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
03.1	11 January 2018	Editorial revision to remove an erroneously included instruction paragraph in section D.2 (Identification of project type).
03.0	31 October 2017	Revision to align with the requirements of the “CDM validation and verification standard for project activities” (version 01.0).
02.0	22 July 2016	EB 90, Annex 3 Revision to include provisions related to automatically additional project activities.
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