PROJECT REVIEW REPORT

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

Project ID	2645
Project Name	BALIKESIR Landfill Gas (LFG) Capture and Utilization Project
Review Type	Verification
Program(s)	VCS Program
Verification Period	27 October 2019 to 31 December 2022
Project Proponent	BIOTREND Çevre ve Enerji Yatırımları Anonim Şirketi Gaia Climate Finansal Danışmanlık Hizmetleri ve Ticaret A.Ş. MUNDO VERDE CLIMATE SA
Methodology	ACM0001, ¨*Flaring or use of landfill gas*¨, Version 19.0
VVB	Earthood
Assessment Criteria	*VCS Standard Version 4.5*
Date of First Issue	23 February 2024
Review Conclusion	Approved
Date of Final Issue	14 June 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	**Missing information and assessment on no net harm**		
	Issue Section 2.1 of the monitoring report (MR) does not indicate which are the preventive measures taken to minimize the odor, dust, gas and similar negative effects that may arise from the facility and if those measures have been taken during the monitoring period. Action item 1. The VVB must ensure that the project proponent explains which were the measures undertaken during this monitoring period in order to ensure that no net harm has occurred, under section 2.1 of the MR. 2. The VVB must verify which were measures undertaken during this monitoring period by the project proponent and update section 4.2.1 of the verification report (VR) as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 2.1 *VCS Verification Report Template v.4.2, Section 4.2.1*	**Round 1** VVB Response: The assessment team confirms that PP has taken preventive measures to minimize the odor ,dust, gas, noise, leachate, etc by verifying all the necessary documents and submitted sufficient evidence to support the statements mentioned under section 2.1 no net harm of the MR. the reference for the same has been added under section 4.2.1 of the VCR. Verra Response Information regarding no net harm has been provided. This finding is closed. **Round 2** VVB Response: Verra Response	Closed

2	**Missing information on communication with local stakeholders**		
	Issue	**Round 1** VVB Response:	Closed

	Section 2.2 of the MR does not describe if any grievance/feedback has been received from the local stakeholders during the monitoring period. Action item 1. The VVB must ensure that the project proponent describes if any grievance/feedback has been received from the local stakeholders during the monitoring period, under section 2.2 of the MR. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 2.2	PP has revised section 2.2 of the MR to confirm that no grievance has been recorded for the current MP and has submitted sufficient evidence to support the statements mentioned under section 2.2 of the MR. VVB has revised section 4.2.2 of the FVR to include information accordingly. Verra Response Information regarding grievance/feedback received from the local stakeholders during the monitoring period has been provided. This finding is closed.	

3	Unclear and missing information under project description deviations		
	Issue (a) It remains unclear which is the deviation applied during the monitoring period which is related to the re-calculation of the project IRR. (b) Further it is not clear why the deviation related to the PEflare have been included under ´project description deviations´ since they are related to a methodology deviation. (c) The PPs have changed during the monitoring period, however, these changes have not been included under Section 3.2.2 of the MR. Action item	**Round 1** VVB Response: (a)PP had erroneously demonstrated IRR analysis for delay in phased wise implementation of the project which has now been mentioned under project implementation status. The MR and VCR present no information on IRR as phased wise implementation is not a deviation and is still under plan in next verifications. It shall be noted that the deviations mentioned under project description deviation do not impact additionality as assessed under section 3.3 of the VCR. b) Deviation for project emissions has been considered as methodological deviation in line with VCS standard 4.7. Detailed assessment on the same is provided under section 3.2 of the VCR.	Closed

	1. The VVB must ensure that the project proponent clearly explains which is the project description deviation related to the re-calculation of the IRR and address points a to c above. 2. The VVB must assess this information and update the VR as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Sections 3.2.1 and 3.2.2 *VCS Verification Report Template v.4.2,* Section 3.3	c) The change in PPs have been now mentioned under section 3.2 of the MR and assessed with reference to supportive under section 3.3 of the VCR. Verra Response Deviations have been explained in revised documentation. This finding is closed.	

4	Missing information on calibration		
	Issue Section 4.2 of the MR does not provide any information on the calibration frequency required for the devices used to measure TEG,y, T and P. Action item 1. The VVB must ensure that the project proponent includes all the calibration information of the instruments used under Section 4.2 of the MR. 2. The VVB must verify this information and update the VR as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 4.2 *VCS Verification Report Template v.4.2,* Section 4.5	**Round 1** VVB Response: The calibration frequency has been added in the MR in line with the manufacturer's specifications for the mentioned parameters and same has been verified in the verification report with added reference to the manufacturer's specification as a supportive. Verra Response Calibration details have been provided. This finding is closed.	Closed

5	Further clarification of measurement of flow sent to the flare		
	Issue	**Round 1** VVB Response:	Closed

	It is not clear how the flow sent to the flare is measured provided that under page 57 of the MR it is stated that the monitoring equipment for VRG,m is the ¨flare timer¨. Further, the monitoring of that parameter has not been reported in the submitted ER spreadsheet. Action item 1. The VVB must request the project proponent to explain how the flow sent to the flare is measured during the monitoring period in line with the requirements in the registered PD. 2. The VVB must further verify this information and update the VR as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 4.2 *VCS Verification Report Template v.4.2,* Section 4.4	PP has sought deviation for not installing flow meter and applied conservative values for calculating project emissions from flaring. Detailed assessment of deviation is provided in section 3.2 of VCR. Verra Response The deviation applied has been explained. This finding is closed.	

6	Clarification on monitoring of F_{CH4PJ}		
	Issue As per the information in the registered PD, F_{CH4PJ} is calculated as per Option F of the TOOL08, v.03.0. However: (a) It remains unclear why the density of methane has been fixed given that as per Option F it has to be calculated. (b) It is not clear why V,t,wb, Vi,RG,m, VRG,m, MRG,m , $VO2,EG,m$ $fCCH4,EG,m$ and $FCH4,EG,t$ are described as measured on ¨dry basis¨ whereas Option F requires the ¨wet basis¨ values.	**Round 1** VVB Response: PP has sought project description deviation and applied option A as the PDD marked both options on different pages and following option F was not feasible. Moreover, PP has sought additional methodology deviation for the entries which failed to follow the condition of Tool 8(para 23(b). For such 1491 entries, option C has been applied to derive a lower value as an alternative conservative approach. It shall be noted that FAR#01 has been raised to avoid deviation from condition of para 23(b) from Tool8.	Closed

	(c) Why it has been considered that $FC_{H4,PJ,y}$ is equal to $F_{CH4,EL,y}$ provided that a flare is installed under the project activity. Action item 1. The VVB must ensure that the project proponent addresses points a to c above and calculates the F_{CH4PJ} as per the applied TOOL08. 2. The VVB must further verify this information and update the VR as needed. Program Rule(s) TOOL08, v.03.0.	a) Following the deviation stated above PP has applied fixed density where option A has been followed. b) Baseline emissions from flare have been considered 0 as no flaring has been done during the current MP. The reason in clearly stated in the MR to deduce the equation of $FC_{H4,PJ,y}$ is equal to $F_{CH4,EL,y.}$ Verra Response The deviation has been applied and VVB has confirmed that it results in conservative ERR calculation. This finding is closed.	

7	Further clarification on TDL value used		
	Issue Page 39 of the MR states for the TDL that ´The annual average value based on the most recent data available within TÜRKİYE is used from the data provided by TEİAŞ. In accordance with the Methodological Tool, for the data from the relevant year, 2021, is absent´. It remains unclear whether most recent data from year 2022 is available. Action item 1. The VVB must ensure that the project proponent uses the latest data for TDL. 2. The VVB must further verify this information and update the VR as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 4.2 *VCS Verification Report Template v.4.2*, Section 4.4	**Round 1** VVB Response: The value is an ex-ante parameter which was determined and fixed at the time of validation. Nonetheless, the value has been updated to apply latest available value from the data published by TEIAS. Verra Response Justification for value used has been provided. This finding is closed.	Closed

8	Inconsistent values for PEflare		
	Issue The values reported for PEflare under page 75 of MR are not in line with calculated ones in the ER spreadsheet, TAG Project Emissions. Action item 3. The VVB must ensure that the project proponent reports consistent values for the PEflare. 4. The VVB must further verify this information and update the VR as needed. Program Rule(s) *VCS Monitoring Report Template v.4.2,* Section 4.2 *VCS Verification Report Template v.4.2*, Section 4.4	**Round 1** VVB Response: The values have been revised to present the information consistently between the MR and ER sheet. Moreover, PP has considered the average methane content which is the most conservative value available for project emission calculations. Verra Response Values have been corrected. This finding is closed.	Closed