

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	4578
Project Name	Biochar Project-1 by WeAct
Review Type	Registration & Verification Approval
Program(s)	VCS Program
Verification Period	12 April 2023 – 30 June 2023
Project Proponent	WeAct Pty Ltd
Methodology	VM0044, Methodology for Biochar Utilization in Soil and Non-Soil Applications, v1.1
VVB	4K Earth Science Private Limited
Assessment Criteria	VCS Standard, v4.7
Date of First Issue	24 October 2024
Review Conclusion	APPROVED
Date of Final Issue	12 June 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	<p>Unclear project ownership and rights to VCUs</p> <p><u>Issue</u></p> <p>The PDMR has the following issues:</p> <ol style="list-style-type: none"> 1. There is no clear explanation or evidence that demonstrates how ownership was established by the project proponent (PP) in line with the <i>VCS Standard</i>. No indication of the role of the local representative in the project. 2. The local stakeholders identified in Section 2.1 of the PDMR involves farmers where the biomass feedstock is sourced. Thus, it's unclear how the PP has the legal right to control and operate the project, including the rights to the VCUs generated by the project activity. <p>The VVR has the following issue:</p> <ol style="list-style-type: none"> 1. The VVB does not provided a full assessment to describe how project ownership was validated/verified and meets the requirements of the <i>VCS Standard</i>. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP demonstrates how ownership has been established in line with the <i>VCS Standard</i>. 2. The VVB must ensure the role of the local representative is clarified and discussed. 3. The VVB must ensure that the PP updates Section 1.8 of the PDMR and clarifies how the legal right to control and operate the project was obtained (e.g., agreements, contracts, etc), including the right to the VCUs considering the local stakeholders, i.e., the farmers. 4. The VVB must provide a full assessment of the revisions, and update Section 3.1 of the VVR to include sufficient details to describe how project ownership meets the 	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u></p> <ol style="list-style-type: none"> 1. PP has updated the specific section 1.8 of the PDMR to include more information related to ownership, in line with the <i>VCS Standard</i>. 2. PP would like to reconfirm that each farmer included under the project (either as a supplier of feedstock and/or user of biochar) voluntarily signs a participation agreement which confirms FPIC to the project. This confirms that PP has the legal right to control and operate the project. The sample copies of the FPIC forms are submitted to VVB. <p>Additionally, PP would like to reconfirm that project is fully established, operated and managed by WeAct (PP) with the help of its local team. The feedstock supplied to the project is purchased by PP and also supplier (i.e. the farmers) signs FPIC voluntarily,</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p> <p>Audit team received the revised version of the PD-MR from PP along with the response/justification sited above. The revision is found appropriate and addressed the requirements of this PRR. Therefore, in line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP re-demonstrated the ownership of the project by updating the section 1.8 of the PDMR. 	CLOSED

<p>requirements of the VCS Standard</p> <p><u>Program Rule(s)</u> VCS Standard, v4.7, Section 3.7</p>	<ol style="list-style-type: none"> 2. The role of local representative “Aranya Agriculture Alternatives” is clarified by PP with information added under footnote #5 and section 6.3 of the PD-MR. 3. PP has updated the section 1.8 of the PD-MR. The audit team confirmed during the site visit that PP “WeAct Pty Ltd.” owns and controls the production of biochar, the farmers who supply cotton stalks and use biochar for soil application, are not involved in the production process. The audit team also verified the FPIC forms signed with the farmers, followed by interviews with the farmers during the site visit. From these sources/evidences the audit team was able to confirm that PP has the legal rights to control and operate the project and also rights of VCUs are voluntarily given to PP by each farmers included in the FPIC form. The information included under the Section 1.8 of the updated PDMR are appropriate and in line with the verifications conducted by VVB. 4. The section 3.1 of the FVR is now updated, required information are demonstrated. 	
	<p><u>Verra Response</u></p> <p>While the VVB asserts that project ownership solely resides with WeAct Pty Ltd and confirms that farmers are not involved in the production process, there are still gaps in the justification provided.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must clearly describe how it validated the PP’s legal right to claim ownership of VCUs, including how the FPIC forms were reviewed (e.g., full review or sample-based, criteria used, and consent language). 	

		<p>2. The VVB must assess whether the language in the FPIC forms clearly and unambiguously grants VCU rights to the PP.</p> <p>3. The VVB must reference and assess the MoU between WeAct and Aranya Agriculture Alternatives to confirm that the representative has no legal or contractual rights to project operation, equipment, or credits.</p> <p>The finding is open.</p> <p>Round 2</p> <p><u>VVB Response (07/04/2025)</u></p> <p>VVB would like to further submit clarification to review team as follows:</p> <ol style="list-style-type: none"> 1) Yes, VVB has reviewed all the FPIC forms available during the first verification. The information about the FPIC related details are already demonstrated under the section 3.3.1.3 of the FVR. This is to reconfirm that the following method included during the FPIC review: <ul style="list-style-type: none"> - Physical verification of the FPIC forms - Interview with beneficiaries on sample basis which was randomly selected from the FPIC forms. The FPIC form included contact number of the beneficiary and VVB team could access the same. - The FPIC is bilingual (both English & local language of Telugu), hence consents were easily verifiable. 2) Yes, VVB could clearly verify and confirmed during the interview process that FPIC forms were transparent with bilingual texts (both English & local language of Telugu), The beneficiary provided unambiguous grant of VCUs rights to WeAct which are verified in the FPIC form page #2 section “Consent Section” which were in both languages. 3) The reference of MOU between WeAct and Aranya is already included under the table of the section 3.1 and the 	
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		<p>section 3.3.2.4 of the FVR. This is to reconfirm that VVB has reviewed the MOU and able to reconfirm that there is no any legal or contractual rights or equivalent for Aranya on the project and credits. The page “Signed Declaration” included as part of this MOU clearly confirms the same.</p> <p>However, VVB has now updated the FVR with some more information related to the above points for better understanding.</p> <p>Attached: updated FVR, dated 07 April 2025.</p>	
		<p><u>Verra Response</u></p> <p>The VVB has updated Section 3.1 and 3.3.2.4 of the FVR with the required information and assessment. The finding is closed, and no further action is required.</p>	

<p>2</p>	<p>Insufficient information on project activities</p> <p><u>Issue</u> Section 1.12 of the PDMR does not provide sufficient information on the equipment, i.e., pits and implementation considering this is a non-grouped project (see background).</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP provides sufficient information on the 3 different types of pits to be used, e.g., age, average lifetime, efficiency in the project. 2. The VVB must ensure the PP indicates the total number of farmers (or instances) that are involved. 3. The VVB must assess the revisions accordingly and update the VVR as needed. <p><u>Program Rule(s)</u> <i>VCS Joint Project Description and Monitoring Report Template, v4.3, Section 1.12</i></p>	<p>Round 1</p> <p>PP Response (25/11/2024): PP would like to clarify that Project is not a grouped project. The mention of ‘increase in number of pits/kiln as the project progress’ relates to possibility of including multiple facilities within the same project activity, which is not a separate instance as a project activity under any group. It means no new instances shall be added, but there would be multiple facilities/locations (depending on the approach types followed) within the same project boundary considered under the validation. It has been already clarified under the section 1.5 of the PDMR:</p> <div data-bbox="1016 1166 1612 1252" style="border: 1px solid #ccc; padding: 5px;"> <p>1.5 Project Design</p> <p>The project has been designed as:</p> <p><input checked="" type="checkbox"/> Multiple locations or project activity instances (but not a grouped project)</p> </div> <p>This provision is in line with the VCS Standard:</p> <div data-bbox="1016 1328 1625 1377" style="border: 1px solid #ccc; padding: 5px;"> <p>Multiple Project Activity Instances</p> <p>3.6.4 Both grouped and non-grouped projects can have multiple project activity instances.</p> </div>	<p>CLOSED</p>
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<p><u>Background</u></p> <p>The PDMR states that “location number will increase” and “Number of Box Kiln will increase,” however, inclusion of further project activity instances subsequent to initial validation of a non-grouped project is not permitted as per Section 3.2.5 of the VCS Standard, v4.7.</p> <p>If the PP intends to add instances in the future the project design must be updated to a grouped project. Otherwise, the technologies, methods, locations, farmers, etc must be fully described to a sufficient level.</p>	<p>PP would further like to reconfirm that Project intends to promote different types of low-tech facilities considering the local condition, accessibility etc. Here, all technical specs of the different type of low-tech facilities promoted under the project intends are already included under the Section 1.12, followed by specific information of the current type under the section 3.3.</p> <p>Here, PP again confirms (in line with previous response) that ownership of the project is completely with WeAct by means of production, control and operation. The Farmers are included via FPIC enrolment who will take part only in supply of feedstock and/or in use of biochar, thus increase in number of suppliers and users of biochar does not lead to addition of any new project instance into the existing project activity.</p> <p>Now, PP has updated more information under these sections to elaborate the technology types in a more presentable manner.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p> <p>Audit team received the revised version of the PD-MR from PP along with the response/justification included above. The audit team reviewed the revision and found appropriate. Therefore, in line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP updated the section 1.12 of the PD-MR which includes the missing details including life time of the production facilities, efficiency. These details are re-verified with the supporting document ‘Technology specifications reference letter & specifications issued by Samuchit Enviro Tech’. The audit team checked the authenticity and experience of the entity from the available public 	
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		<p>information and found that Samuchit is an experienced from past 20 years, a credible agency working on the biochar subjects. The information is therefore acceptable.</p> <ol style="list-style-type: none"> 2. PP clarified three different approaches depending on the possibility of adopting biochar production facility under low-technology scope. The project boundary is already fixed at region level, further checked from the KML file submitted by PP. The audit team has assessed that during the current monitoring period only a pilot phase of the project was implemented, therefore farmers are limited. Hence, the audit team is able to confirm that multiple locations mentioned under the approach 1 & 2 are within the same project activity and project boundary, there will not be any separate instance. 3. The audit team has further reviewed the referred section 3.2.5 of the VCS Standard v4.7. This section is not applicable to the project activity. Whereas, for the clarification of grouped & non-grouped project, the audit team referred to section 3.6.4 & 3.6.5 of the VCS Standard. As per 3.6.4. “Both grouped and non-grouped projects can have multiple project activity instances”. In furtherance the audit team reviewed Sections 3.6.10 – 3.6.17. The design of the project activity, baseline, additionality etc. are not limited to this first pilot phase rather the entire project is a single activity with coverage of the areas specified (i.e. the KML) in the project boundary. Additionally, the audit team is able to confirm that entire project activity (i.e. sourcing, production and application of the biochar) is owned, controlled and managed by PP only, not the farmers. Therefore, increase in number of farmers will be equivalent to increase in number of suppliers and users, hence can’t be treated as addition of project activity instances. Moreover, under the 	
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		<p>three approaches method and/or number production facilities may vary but within the project boundary, methods and structure included at validation.</p> <p>Hence, justification of the project as a “Non-grouped” project is acceptable to VVB, however for reassurance the VVB concludes this with a FAR as follows:</p> <p>Forward Action Request (FAR #01): During each upcoming verification, the geo-coordinates of the Biochar Production facilities shall be checked to ensure that they are within the registered project boundary.</p>	
		<p><u>Verra Response</u></p> <p><u>Issue:</u> While the updated PDMR (Section 1.12) provides technical specifications for the three types of low-tech biochar production facilities, the VVB’s assessment lacks clarity and completeness in the following areas:</p> <ol style="list-style-type: none"> 1. The total number of farmers or facilities involved during the current monitoring period is not explicitly stated or assessed by the VVB. 2. The expected average lifetime and maintenance cycle of the production facilities have not been clearly documented or verified. 3. The VVB references technical specifications issued by Samuchit Enviro Tech but does not provide any evidence of independent verification of the reliability or appropriateness of these specifications for the project context. 	

		<p><u>Action Required:</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP clearly states the total number of farmers or production facilities that were active during the current monitoring period and assess this information in the VVR. 2. The VVB must confirm and assess the expected average lifespan and maintenance cycle of the three types of pits/kilns used under the project. 3. The VVB must provide an independent assessment of the credibility and relevance of the technical specifications issued by Samuchit Enviro Tech. <p>The finding is open.</p> <p>Round 2</p> <p><u>VVB Response (07/04/2025)</u></p> <p>VVB would like to further submit clarification to review team as follows:</p> <ol style="list-style-type: none"> 1. The total number of farmers and their exact coordinates are already verified by VVB which are also included under the ER excel sheet. VVB has now amended the information under FVR. 2. VVB has accessed the information based on the technical details reviewed and submitted by third party agency Samuchit Enviro Tech. The VVB has also conducted a desk review of such technical information and found them relevant. The reference to the desk review links are included below: <ul style="list-style-type: none"> https://shorturl.at/it1f3 https://shorturl.at/6onj4 3. As mentioned above, the technical specifications were accepted based on the following factors: <ol style="list-style-type: none"> (i) Samuchit is an Social Enterprise working on biochar and related areas for many years. 	
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		<p>Their expertise and experience is found relevant. Additionally, the Founder and Director of Samuchit who visited and certified the specifications of the project is “Dr. Priyadarshini Karve” who is an well-known technical and sectoral expert over 25 years of experience and invented a number of improved biomass burning cooking devices, to reduce smoke in the kitchen and dependence on firewood for domestic cooking in rural areas. Apart from her extensive work in the field of biochar, Charcoal and other agriculture related sustainable technologies, her work has been honoured by several national and international awards, including World Technology Award 2005 (by World Technology Network, New York), Sahyadri Hirkani Award 2011 (by Mumbai Doordarshan, India), Pune’s Pride Award for Innovation 2013 (by Residency Club, Pune). She has also been featured in a number of national and international periodicals, publications and radio and television programmes. Therefore, VVB could satisfactorily accept the report on technical specifications and lifetime etc. submitted by Dr. Karve of Samuchit. This information are publicly available in official websites of Samuchit, on official LinkedIn page and also in the “Clean Energy Access Network (CLEAN)” where Dr. Karve drives a large community of technical experts across the sectors.</p> <p>(ii) Secondly, the tech information are comparable as conducted in desk review (link</p>	
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		<p>submitted above under #2)</p> <p>(iii) Also, based on VVB’s experience and sectoral judgment in similar technology based projects.</p> <p>However, VVB has now updated the FVR with some more information related to the above points for better understanding.</p> <p>Attached: updated FVR, dated 07 April 2025.</p> <p><u>Verra Response</u> The VVB has updated the FVR with the required information. The finding is closed, and no further action is required.</p>	
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3 Monitoring SDG contributions listed			
	<p><u>Issue</u> The PD does not clearly describe or justify provisions for monitoring and reporting on SDG contributions listed in Section 1.18.2 or Table 1 of the PDMR. Specifically, the PDMR states that “during the current monitoring period no specific claims are made except for SDG 1 and 13; whereas SD table 1 is demonstrated for future claim.” However, it is unclear how this is in line with the <i>VCS Standard</i>, i.e., the project has not demonstrated that it contributes to at least three SDGs by the end of the 1st monitoring period.</p> <p>Further, the VVB has not provided a full assessment on the SDGs reported by the project or the appropriateness of the monitoring of the same.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> The VVB must ensure the PP updates Section 1.18.2 of the PDMR and describe the provisions for monitoring and reporting of at least 3 SDG contributions in line with the <i>VCS Standard</i>. 	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u> PP would like to clarify that this is a joint VCS PD & MR. Therefore, PD keeps the provision of all possible SDGs which are potentially associated with the Project during its lifetime. However, project was at its pilot phase during the first verification which is part of this Joint VCS PDMR. Some of the SDG indicators were not established or monitored during this initial phase, whereas provisioned under the project. Hence, all indicators included under the PD have not been considered for claim during the current monitoring period,</p> <p>The particular section under the PDMR is now updated to include more specific information. Minimum requirement 3 SDGs are already achieved at project level. Please refer to the SDGs claimed under #1, #4, #5, #6, #8, #12 & #13.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p>	<p>CLOSED</p>

<p>2. The VVB must assess the updates and update Section 3.1 of the VR accordingly to include a full assessment on the SDGs reported by the project. The assessment must discuss the appropriateness of the monitoring of the SDGs claimed.</p> <p><u>Program Rule(s)</u> VCS Standard, v4.7, Section 3.17.1</p>	<p>Audit team received the response/justification from PP included above and the revised version of the PD-MR. The audit team reviewed the revision and found appropriate. Therefore, in line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP updated the SDGs under the section 1.18.2 of the PDMR with more detailed explanation. The indicators are updated appropriately with “user defined indicator” wherever applicable. The justification of the claims and their presentation are found reasonable hence accepted. 2. The audit team interviewed stakeholders during the site visit and also observed the project activity and its social deliverables. The reported SDGs and their contributions are found appropriate and aligned with the actual scenarios of the ground. <p>The audit team has updated the section 3.1 of the FVR and included detailed assessment of SDGs which are reported in the PDMR.</p> <p>However, for reassurance the VVB concludes this with a FAR as follows:</p> <p>Forward Action Request (FAR #2): During the next verification cycle, the following SDGs shall be demonstrated by PP for further validated and confirmation: SDG 3.9, 9.1, 14, 15 and 17.</p>	
	<p><u>Verra Response</u> The PP has updated Section 1.18.2 and Table 1 of the PDMR to reflect claims for at least three SDGs, with supporting descriptions. However, the VVB must still provide a more robust and independent assessment in Section 3.1 of the VVR to confirm</p>	

		<p>that the SDG contributions have been appropriately monitored and validated in line with the VCS Standard.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must clearly confirm in the VVR that at least three SDG contributions have been demonstrated and monitored during the current monitoring period in line with the VCS Standard. 2. The VVB must update Section 3.1 of the VVR to include: <ol style="list-style-type: none"> a. A full assessment of the appropriateness of the SDG monitoring approaches. b. A review of supporting data and methods used to track each claimed SDG. 3. The VVB should clearly state how it independently verified these contributions (e.g., through field interviews, document review, data sampling, etc.). <p>The finding is open.</p> <p>Round 2</p> <p><u>VVB Response (07/04/2025)</u> VVB would like to further submit clarification to review team as follows:</p> <ol style="list-style-type: none"> 1. The minimum required three SDG contributions were reported. The reported information were verified against the supporting evidences. 2. The section 3.1 of the FVR is now further updated to include more references of the assessment conducted on SDGs. 3. The method of independent verification done by audit team is now included under the section of the FVR. <p>VVB has now updated the FVR with some more information related to the above points for better understanding.</p>	
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		<p>Attached: updated FVR, dated 07 April 2025</p>	
		<p><u>Verra Response</u> The VVB has updated Section 3.1 of the FVR. The finding is closed, and no further action is required.</p>	

<p>4 Insufficient information on location of PAIs</p>			
	<p><u>Issue</u></p> <p>No KML file has been submitted to Verra to review in line with Section 3.11.1 (3) of the <i>VCS Standard</i>; the single general coordinate for India is insufficient. The VVB does not provide sufficient information for how the project location was validated; the general assessment provided is insufficient.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP submits a KML file in line with Section 3.11.1 (3) of the <i>VCS Standard</i> for Verra to review or update Section 1.13 of the PDMR and include the coordinates for each instance implemented within the project area. 2. The VVB must clarify and demonstrate how the location of each instance was validated/verified during this monitoring period. <p><u>Program Rule(s)</u> <i>VCS Standard, v4.7, Section 3.11.1(3)</i></p>	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u> PP would like to clarify that this is a non-AFOLU project and also not a grouped project with multiple instances. Thus, as per Section 3.11.1 of the <i>VCS standard</i>, KML is not required.</p> <p>However, PP would like to inform that a KML file of the overall project boundary was developed and same was submitted to VVB during the validation process. Additionally, PP has records of geo-coordinates of each source (i.e. farmer) and also of the area where biochar has been applied. The details of those coordinates are already submitted to VVB.</p> <p><u>VVB Response (15/12/2024)</u> Audit team received the response/justification from PP included above and also the revised version of the PD-MR. Therefore, in line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The project activity is neither regarded as grouped project nor an AFOLU activity. Therefore, applicability of section 3.11.1 is not required. 2. Whereas, the project is designed to include low-tech biochar facilities with three different approaches where different production sites/locations could be involved, currently only a pilot phase of the project is implemented. In this regard, PP submitted an KML file with specifies locations of the project activity, in parallel project 	<p>CLOSED</p>

		<p>database includes geo-coordinates of the production site as well as geo-coordinates of each farmer participated in the project.</p> <p>The submission is found appropriate and hence acceptable.</p>	
		<p><u>Verra Response</u> The VVB reviewed the KML file with specifies locations of the project activity, in parallel with project database includes geo-coordinates of the production site as well as geo-coordinates of each farmer participated in the project. The finding is closed, and no further action is required.</p>	

5 Incomplete description assessment of safeguards			
	<p><u>Issue</u> The PDMR does not sufficiently discuss or justify the stakeholder engagement and consultation sections 2.1 - 2.3 rather indicated “N/A.” For example, the PDMR does not discuss or describe the “legal or customary tenure/access rights and benefit sharing, is “N/A”, Further, the PD states that “no redressal procedure has been established.”</p> <p>Further, the project also states that “FPIC is not required or not envisaged for this consultation.” However, it is unclear why FPIC was not obtained by the farmers and other stakeholders involved in the project.</p> <p>Sections 3.3.1 – 3.3.3 of the VVR does not have any assessment on the safeguards but also indicated “N/A;” indicating N/A is insufficient and not acceptable.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 2.1 – 2.3 of the PDMR and provide an explanation to address the 	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u> PP would like to clarify that PP has not encountered many risks aspects with the project and project being specifically designed and executed some of the safeguards are either not applicable or exclusive to the project</p> <p>Also, PP would like to reconfirm that FPIC forms are already signed by PP with the Farmers. As already responded under the Comment #1 above, PP hereby reconfirms that each farmer included under the project (either as a supplier of feedstock and/or user of biochar) voluntarily signs a participation agreement which confirms FPIC to the project. This confirms that PP has the legal right to control and operate the project. The sample copies of the FPIC forms are submitted to VVB. However, the particular statement “FPIC is not required or not envisaged for this consultation” was specific to the consultation; whereas required FPIC is already available in this project.</p> <p>However, PP has revised the sections under the #2.1 to 2.3 and</p>	<p>CLOSED</p>

<p>issues above; indicating “N/A” is not acceptable.</p> <p>2. The VVB must provide a clear assessment opinion on the safeguards; copying and pasting the information from the PDMR is insufficient.</p> <p><u>Program Rule(s)</u> <i>VCS Standard, v4.7, Sections 3.18, 3.18.2(6), 3.19, VCS Joint Project Description and Monitoring Report Template, v4.3, Sections 2.1 - 2.3</i></p>	<p>under the section #3 to include more specific details and justifications against each sub-section.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p> <p>Audit team received the response/justification from PP for this particular finding as included above. PP updated the particular sections in the PDMR which are found appropriate. Therefore, in line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The sections & sub-sections under 2.1 to 2.3 of the PDMR are updated by PP with justification/clarification. <p>Audit team confirms that project deploys the practice of establishing FPIC forms for each farmer. Whereas, a detailed stakeholders consultation was performed by PP before the start of the project and feedback were recorded. The audit team reviewed the stakeholders’ records and also interviewed 31 beneficiaries during the on-site visit. Information were found correct, appropriate and hence accepted. The team is therefore able to confirm that prior consent was obtained from the stakeholders involved in the project.</p> <ol style="list-style-type: none"> 2. The audit team has updated the relevant sections (3.3.1 to 3.3.3) of the FVR with proper assessment based on which updated version of the PDMR was accepted. <p><u>Verra Response</u></p> <p>Although the PDMR has been updated to provide additional information on stakeholder engagement and FPIC, the VVB’s assessment in Sections 3.3.1–3.3.3 of the VVR remains insufficient. Specifically:</p>	
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		<ul style="list-style-type: none"> • The VVB does not provide an independent evaluation of the adequacy and completeness of the FPIC process. • There is no justification for treating key safeguard elements—such as benefit sharing, and redress mechanisms—as “Not Applicable.” • The assessment lacks detail on whether stakeholder concerns were raised and, if so, how they were addressed. • The analysis appears to rely heavily on PDMR content without sufficient evidence of independent verification. <p><u>Action Required:</u> The VVB must:</p> <ol style="list-style-type: none"> 1. Provide an independent assessment of the FPIC process, including how it was verified and whether it meets best practice criteria (e.g., inclusiveness, voluntariness, clarity of rights). 2. Justify the treatment of benefit sharing, and redress mechanisms as “Not Applicable” and assess their applicability based on project context. 3. Clarify whether any stakeholder concerns were raised during consultations and how these were resolved. 4. Update Sections 3.3.1–3.3.3 of the VVR to reflect a complete and evidence-based evaluation of the project’s safeguards. <p>The finding is open.</p> <p>Round 2</p> <p><u>VVB Response (07/04/2025)</u> VVB would like to further submit clarification to review team as follows:</p> <ol style="list-style-type: none"> 1. The audit team would like to reconfirm that FPIC process
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		<p>was reviewed and FPIC forms were checked during the on-site visit. VVB was able to verify that FPIC template is bilingual includes local language Telugu, clauses were relevant includes required disclosures and declaration, etc. These had satisfied the requirement of an independent judgement of the review team in the contexts of assessing similar FPIC process other than this project. Hence VVB confirms the adequacy and completeness of the FPIC process and record keeping practice. More information related to the independent process now included under the FVR.</p> <ol style="list-style-type: none"> 2. VVB found that few sections such as “benefit sharing” are not applicable for the project activity. There are sufficient details submitted by PP at JPDM reflecting such non-applicability status. Therefore, under the summary section VVB submits its verification opinion with a clear outcome that benefits sharing is not envisaged in this project. Hence, “Not applicable” status is demarked in the other cells of that table. However, the table is now updated to include more information in support of the verification opinion. 3. Under the section 3.3.1.1 & 3.3.1.2 of the FVR, the audit team included the overall summary and required information of Stakeholders Consultation conducted by PP. This section was reviewed further based on the supporting documents received from PP during the onsite visit followed by interactions with the local stakeholders. The VVB is able to confirm that there is no specific concern raised during the consultation process, a few were curious to understand few facts better and those queries were addressed adequately by the ground team. Hence, the outcome of the stakeholders’ meet did not lead to any action for resolution from PP side. 	
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		<p>4. The sections 3.3.1–3.3.3 of the FVR are now updated to include more details for informed justification.</p> <p>Attached: updated FVR, dated 07 April 2025.</p> <p>Verra Response The VVB updated sections 3.3.1-3.3.3 of the FVR. The finding is closed, and no further action is required.</p>	
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6 Insufficient evidence and incomplete demonstration of applicability conditions			
	<p><u>Issue</u></p> <p>These are the following issues in the PDMR and VVR:</p> <ol style="list-style-type: none"> 1. a. Section 3.2 of the PDMR does not demonstrate with sufficient evidence how the project meets each of the applicability conditions in Section 4 of VM0044. b. all of the applicability conditions in Table 1 or conditions 9-15 have not been addressed. c. no evidence to demonstrate the source(s) of biomass in line with Appendix 2 of the methodology, including whether the feedstock biomass covered the five years preceding the project start date. 2. a. Section 3.4.2 of the VVR does not provide a full assessment on how it was validated that the project meets each of the applicability conditions 9-15. b. No indication on whether the VVB assessed the source(s) of biomass in line with Appendix 2. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 3.2 of the PDMR to address the issues 1a-c above. 2. The VVB must provide a full assessment on how it was validated that the project meets each of the applicability conditions 9-15. 3. The VVB must provide an assessment opinion on 	<p>Round 1</p> <p>PP Response (25/11/2024):</p> <p><u>1.</u></p> <ol style="list-style-type: none"> a. PP has updated the specific section in the PDMR to reconfirm demonstration of all applicability conditions of Section 4 of VM0044. b. PP has updated the PDMR to fill all the applicability conditions under the Table 1. c. The biomass sources and coverage related details are further explained under the PDMR in line with the Appendix 2 of the methodology. PP has already informed under the applicability table that source of the feedstock and its fate (both availability & accessibility) both are already assessed. It is referred in the Baseline study. The report includes the assessment which was conducted related to the fate of the biomass feedstock and their coverage. Also, the feedstock sources, locations of application, their distances etc. can be further cross-checked during verification from the Sourcing & Biochar Application logs. <p>Additionally, the fate of the biomass feedstock in line with</p>	<p>CLOSED</p>

<p>whether the source(s) of biomass is in line with Appendix 2, including providing a clear assessment on whether the waste biomass was obtained from the same sources 5 years prior to the start of the project’s implementation.</p> <p><u>Program Rule(s)</u> VM0044, v1.1, Appendix 2</p>	<p>the Appendix 2 of the methodology has already been included under the Parameter “Biomass categories and quantities used for selection of the baseline scenario and production of biochar utilized in the project activity” under the section 6.1. The Baseline survey report is also submitted to VVB for further reference.</p> <p>However, PP would also like to inform that at the time of conceptualization of the project and its baseline assessment (i.e. till Feb 2023), the version 01 of the Methodology was available which did not stipulate the requirement of assessment of 5 years prior to the start of the project. Therefore, the assessment of biomass feedstock conducted as part of the baseline survey was not specific to any period (i.e. 5 years); however the inputs received from the farmers during the survey were by-default inclusive of their entire historical practices, crop types, waste types, waste treatment type etc. as inputs (i.e. questionnaire designed) were not invited with respect to any specific time frame. Therefore, the condition related to assessment of “five years preceding the project start date” has already been addressed while conducting the survey and arriving at the baseline scenario.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u> Audit team received the response/justification from PP as included above and updated PDMR is also received. The updated information under the respective sections 3.2 and Appendix 4 are found in line with the applied version of the methodology, hence accepted. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP demonstrated all the applicability conditions of the 	
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		<p>methodology under the section 3.2. The requirement of Appendix 2 of the methodology related to demonstration of feedstock as waste biomass is included under the Appendix 4 of the PDMR. PP included justification to establish the source, availability and supply of feedstock biomass covered past years with over five years preceding the project start date. The supporting documents were reviewed and found acceptable.</p> <ol style="list-style-type: none"> 2. Accordingly, VVB updates the Section 3.4.2 of the FVR. 3. Based on the site visit, interviews and supporting documents, the Audit team submits the following assessment opinion related to the source of biomass: <ul style="list-style-type: none"> • Biomass feedstock used at project is monotype – Cotton Stalk. • Cotton stalks are supplied by the local cotton farmers to PP and FPIC is signed voluntarily confirming free of any rights to PP. • Cotton stalks are available in the region as all the suppliers are conventional cotton farmers and waste cotton stalks are openly combusted under the regular common practices that makes the baseline scenario. • There was no past use of cotton stalks, due to the practice of burning no supply of waste was found. • Thus, the audit team able to clearly evaluate that there is no issues of availability and accessibility waste. 	
		<p><u>Verra Response</u> <u>Issue</u> There is no clear statement from the VVB affirming that it assessed the historical timeframe of five years prior to the project start date in line with the methodology requirement.</p>	

		<p>Action Required</p> <p>The VVB must revise Section 3.4.2 of the VVR to:</p> <ul style="list-style-type: none"> - Explicitly state whether and how it validated that the baseline survey covered the five years preceding the project start date, and - Confirm that the survey meets the expectations of Appendix 2 of VM0044. <p>The finding is open.</p> <p>Round 2</p> <p><u>VVB Response (07/04/2025)</u></p> <p>VVB would like to further submit clarification to review team as follows:</p> <ol style="list-style-type: none"> 1. The baseline survey sufficiently covered preceding years over 5 years of the project start date. More information is now included under the section 3.4.2 of the FVR including the process of validation of the baseline. 2. <u>VVB is able to reconfirm that the baseline assessment met the expectation of the requirements set out under Appendix 2 of the applied meth VM0044.</u> <p><u>Attached: updated FVR, dated 07 April 2025.</u></p> <p><u>Verra Response</u></p> <p>The VVB has updated Section 3.4.2 of the FVR with additional information on the baseline assessment. The finding is closed, and no further action is required.</p>
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7	No information for survey conducted under baseline scenario	
	<p>Issue</p> <p>No information provided in the PDMR for the baseline survey conducted, e.g., number of respondents/farmers, location, survey method, results, etc.</p>	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u></p> <p>PP would like to clarify that baseline survey related details were documented in a separate report and submitted to VVB. The</p>
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<p>Further, it is unclear whether the project conducted its own survey or the primary survey was used. No clear assessment opinion provided by the VVB on the appropriateness of the baseline survey (or primary survey data used) conducted (see Background).</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 3.4 of the PDMR to include details for the survey conducted, including number of respondents/farmers, location, survey method, results. 2. The VVB must ensure the PP clarifies whether the project conducted its own survey or used the primary survey conducted in the project region. 3. The VVB must provide a clear assessment to justify the appropriateness of the baseline (or primary) survey conducted and why the other alternatives were not suitable. 4. The VVB must ensure to provide a clear assessment opinion in Section 3.4.4 of the VVR on the revisions in Section 3.4 of the PDMR. <p><u>Program Rule(s)</u> VM0044, v1.1, Section 6</p> <p><u>Background</u> Per Section 6 of VM0044, “The project proponent must provide credible evidence of the baseline scenario of waste biomass. Examples of evidence include but are not limited to annual government records, records of a waste disposal facility, and records of a production facility. In the absence of records, the project proponent must utilize data from existing literature, existing survey data of similar industries in the same region, or conduct its own survey. ”</p>	<p>baseline assessment was project specific, and information are inclusive of data/records which are treated as confidential. Therefore, details were excluded from the PDMR. However, PP has already confirmed that “There was a third-party assessment to identify and establish the baseline scenario of this project” under the footnote reference (#21) under the section 3.4 (also under footnote #22). However, PP has now further updated the specific section of the PDMR with more information about the baseline survey.</p> <p><u>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</u></p> <p><u>VVB Response (15/12/2024)</u> Audit team received the response/justification from PP as included above and the updated PDMR. The updated information under the sections 3.4 is found appropriate, hence accepted. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP submitted the baseline survey report, supporting data and calculations etc. during the desk review, also verified by audit team during the on-site visit, followed by recheck during current review. The required information are now updated in the updated PDMR and found correct in line with the supporting survey data. 2. The audit team is able to confirm that the survey was conducted by PP as primary survey with the help of a third-party agency “FCF India Pvt. Ltd.”. The audit team conducted desk review of the party, found credible as they are an independent entity, into similar services with experience. Also the party does not have any involvement into the project. Therefore, the primary survey and the overall baseline assessment is reasonable, hence accepted. 	
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		<p>3. The audit team interacted with the stakeholders during the site visit and also conducted desk review. The baseline scenario, biomass feedstock etc. are confirmed as resulted from the baseline survey. However there was no publicly available database, report, existing literature, existing survey data of similar industries in the same region; therefore primary survey was recognized as the best option. However, the audit team also reviewed that there was communication from PP with the local Mandal Agriculture Office (MAO) regarding the baseline scenario, waste, existing practices, etc. and acknowledgement was also received from MAO official. However, that letter serves the secondary reference or support. Therefore, primary survey is acceptable.</p> <p>4. In line with the revised PDMR and information re-verified by VVB, the section 3.4.4 of the FVR is now updated to include the assessment opinion of the audit team.</p>	
		<p><u>Verra Response</u> The updated PDMR now comprehensively documents the baseline survey details and confirms that the primary survey conducted—with third-party support—is appropriate for establishing the baseline scenario. The VVB’s independent assessment and the updated Section 3.4.4 of the VVR fully support this revision. The finding is closed, and no further action is required.</p>	

8 Insufficient information for methodology deviation					
	<p><u>Issue</u> The PDMR has the following issues:</p> <ol style="list-style-type: none"> 1. It is unclear how the biomass/biochar is being dried in the project given the oven drying method is not employed/used. 	<table border="1"> <tr> <th data-bbox="1001 1190 1776 1226">Round 1</th> <td data-bbox="1776 1190 1906 1396" rowspan="2">CLOSED</td> </tr> <tr> <td data-bbox="1001 1226 1776 1396"> <p><u>PP Response (25/11/2024):</u> PP would like to clarify the following:</p> <ol style="list-style-type: none"> 1. Project deploys open drying method during the first monitoring period as ‘oven method’ was not deployed at project level. Here PP would like to clarify that in oven </td> </tr> </table>	Round 1	CLOSED	<p><u>PP Response (25/11/2024):</u> PP would like to clarify the following:</p> <ol style="list-style-type: none"> 1. Project deploys open drying method during the first monitoring period as ‘oven method’ was not deployed at project level. Here PP would like to clarify that in oven
Round 1	CLOSED				
<p><u>PP Response (25/11/2024):</u> PP would like to clarify the following:</p> <ol style="list-style-type: none"> 1. Project deploys open drying method during the first monitoring period as ‘oven method’ was not deployed at project level. Here PP would like to clarify that in oven 					

<p>2. The project has “adopted direct measurement using Digital Moisture Meters” but no indication on how the project will ensure that the samples maintain constant weight.</p> <p>3. Further, the deviation described does not have sufficient information to demonstrate the conservativeness, improve accuracy of biochar production or the effect on the organic carbon content, CCT,k,y.</p> <p>The VVR has the following issues:</p> <ol style="list-style-type: none"> 1. No assessment on whether the VVB validated that the deviation will not negatively impact the accuracy of biochar production or the organic carbon content, CCT,k,y. 2. It’s unclear the steps taken by the VVB to independently assessed the methodology deviation; the information presented in the VVR seems to be copied and pasted from the PDMR. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 3.6 of the PDMR to clarify whether the oven drying method is employed or not by the project. 2. The VVB must ensure the PP discusses how the project will ensure that the samples maintain constant weight. 3. The VVB must ensure that the PP also demonstrates the conservativeness, improve accuracy of biochar production and the effect on the organic carbon content, CCT,k,y is not negatively impacted by the deviation. 4. The VVB must update Section 3.4.7 of the VVR TO provide an assessment on how it validated that the deviation will not negatively impact the accuracy of biochar production or the organic carbon content, CCT,k,y. 5. The VVB must assess the revisions and update the VVR 	<p>drying method initial weight with moisture and weight after oven drying both are taken and then manually calculation is performed as per standard procedure. Whereas in case of current method (i.e. digital moisture meter) which has been considered as part of the methodological deviation during the current monitoring period, the drying and separate weighing is not required. The digital moisture meter has induction terminals that touch the sample and then calculate the moisture level and displays on the digital screen instantly. Hence during the current monitoring period drying requirement was not there and the same was reported under the PDMR.</p> <p>2. PP has already clarified under the deviation section that “use of digital moisture meter” is part of deviation sought under this verification period, whereas oven method is deployed as regular practice. In this regard, PP had already intimated VERRA during the design phase of the project and deviation was informed. The email communication details were already submitted to VVB, same is now re-submitted.</p> <p>W.r.t. the concern of consistency in weight of the samples in case of digital moisture meter, PP would like to clarify that digital moisture meter does not work based on weight function as parameter unlike the case of regular oven method where weight of the sample is an important parameter. PP would like to refer to the image attached (also all sample images taken during moisture measurement using digital meter were already submitted to VVB for reference), as can be checked from the images, the contact-terminals of the digital gadget touch the sample and readings are displayed from the instrument, Here, sample size, weight, texture, etc. are not functional</p>	
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<p>to provide the steps taken to independently assess the methodology deviation in the PDMR.</p> <p><u>Program Rule(s)</u> VM0044, v1.1, Sections 3 and 8.2.2.2</p>	<p>aspects of the measurement.</p> <p>3. PP has updated the section specific to the deviation with more details in line with the previous intimation served to verra.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p>VVB Response (15/12/2024) Audit team received the response/justification from PP as included above and the updated PDMR. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The audit team confirms that the section 3.6 of the PDMR includes information and justification related to deviation in measurement of moisture contents. The audit team also rechecked the communication between PP & VERRA team related to the possibility of taking deviation in moisture measurement method. PP considered the deviation with a reference of the statement “<i>as per the VCS Standard, “methodology deviations can be requested in certain cases where alternative methods may be more efficient for project-specific circumstances”</i>”. Here the audit team reviews that (i) the alternate method is the use of digital meter which is found to be reasonable as moisture meters are now used globally for similar purposes and results are also being used, (ii) this method is also found to be efficient mainly specific to the project circumstance. This is because the project pilot phase was situated in a village area and box-kiln was performing in open field during the season; therefore required facilities or to setup a proper space for oven drying method was not practical for PP, especially due to non-use of electricity in that production site; whereas digital moisture meter could easily be used to measure moisture 	
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		<p>efficiently through the pilot phase. Most of the pre-processing activities (such as equal size cutting of the samples, taking it to the specific area) as well as recoding of multiple parameters to arrive at moisture % are not involved in digital method, hence digital process used during the period was easy and efficient for PP. The audit team during the site visit also verified the records, log books, photographs taken during the moisture measurement, device technical details, etc. and this practice was found acceptable.</p> <p>However, PP also confirmed that this only a deviation during the pilot phase and as the project proceeds required amenities for adopting oven drying method shall be developed and used for moisture measurement. Therefore, during the current review at PRR stage the audit team further reviewed the possibility of implementing oven drying method by PP. It has been realized that PP has already setup the oven drying method for next season which includes all requirement tools & instruments such as manual cutter for preparing uniform sample size, weighing scale, ovens, separate log book etc. Therefore, VVB approves the deviation.</p> <ol style="list-style-type: none"> 2. As stated above, the digital method adopted during the current monitoring period due to which pre-processing requirements are not required; therefore consistency in samples or weight is not an input parameter during this deviation. Whereas, under the oven drying method such requirements will be included including samples to maintain constant size, weight etc. 3. The audit team reviews that PP included justification of no negative impact on conservativeness of quantifying GHG removals. Additionally, the audit team has conducted desk review to compare such moisture % in 	
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		<p>similar type of production; the values are found comparable and even conservative than the values resulted at the project,</p> <p>4. VVB has now updated the section 3.4.7 of the FVR to include assessment opinion on the deviation process adopted by PP under the PDMR.</p>	
		<p><u>Verra Response</u></p> <p>The Section 3.6 of the PDMR has been updated to clarify that open drying was used during the pilot phase and that the digital moisture meter was adopted for its practicality in the field, eliminating the need for constant sample weight. Additionally, Section 3.4.7 of the VVR now documents an independent assessment confirming that this deviation does not adversely affect the accuracy of biochar production or the measurement of organic carbon content (CCt,k,y). The finding is closed, and no further action is required.</p>	

9 Leakage and GHG ERRs, including Tables A, B and C			
	<p><u>Issue</u></p> <p>No justification to why ex-ante leakage emissions are considered zero.</p> <p>Section 5.1 (and 7.2) of the PDMR indicate that baseline emissions are zero, however, baseline emissions (or removals) are reported in Tables A, B and C in Section 5.4 (and 7.5).</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 5.3 (and 7.4) of the PDMR and justify why ex-ante (and ex-post) leakage emissions are considered zero. 2. The VVB must ensure the PP updates Tables A, B, and C to clarify why baseline emissions (or removals) have been reported even though no baseline emission (or removals) were determined by the project in Section 5.1 	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u></p> <p>PP would like to clarify that Leakage emission related details are already included under the Section 5.3 of the PDMR.</p> <p>W.r.t. the baseline emission as “zero”, please note that baseline emission from sourcing, production & application are zero in line with the methodology. Whereas the ER value is estimated using Equation 1 & 2 of the applied methodology where in the project scenario, the net GHG balance depends on the organic carbon content at the biochar production stage. Thus, table A, B & C of the Section 5.4 and 7.5 are now updated to reconfirm the same. Whereas the results calculated & reported under the ER sheet are correct, hence no change.</p>	<p>CLOSED</p>

<p>(and 7.2) of the PDMR.</p> <p>3. The VVB must assess the revisions accordingly and update the VVR as needed. The GHG ERR spreadsheet must be updated.</p> <p><u>Program Rule(s)</u> VM0044, v1.1, Sections 8.3 and 8.5</p>	<p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p> <p>Audit team received the response/justification from PP as included above and also reviewed the updated PDMR. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The audit team rechecked the section 5.3 and 7.4 of the PDMR. The justifications are already included due to which leakage emission is zero. The audit team also verified this information (i.e. the distance between the source & site and site & end-use) during the site visit based on the physical area review, interviews, log data etc. and found correct. 2. The table A, B, C of the section 5.4 and 7.5 of the PDMR are now updated correctly by PP. 3. The updated PRMR is acceptable to VVB whereas no change is required in ER spreadsheet. 	
	<p><u>Verra Response</u></p> <p>The updated PDMR provides a clear justification for zero leakage emissions based on waste biomass use and transport distances under 200 km. Tables A, B, and C were revised to clarify that baseline values reflect methodological calculations, not direct emissions. The VVB’s review and conclusion are acceptable. The finding is closed, and no further action is required.</p>	

10	<p>No information on sampling by the VVB</p> <p><u>Issue</u> Section 2.1 of the VVR does not provide any information on whether sampling was conducted or provide a justification for the same.</p>	<p>Round 1</p> <p><u>PP Response:</u> NA.</p>	CLOSED
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	<p><u>Action Required</u> The VVB must update Section 2.1 of the VVR to clarify and provide details on whether sampling was conducted. If sampling was not conducted the VVB must provide a justification for the same considering the multiple instances across the project area.</p> <p><u>Program Rule(s)</u> VCS Standard, v4.5, Section 4.1.30</p>	<p><u>VVB Response (15/12/2024)</u> VVB would like to clarify that the audit team did not conduct any sampling approach during the current monitoring period. The previous comments and responses justified that project is not a grouped activity, whereas different approaches adopted by PP for production of biochar but within the project boundary confirmed in the PDMR. During the current monitoring period PP adopted only the approach 2 which defines “Multiple biochar production moveable Box-Kilns across the project boundary”. This approaches allows PP to adopt one or more Box-kilns which can be used in one or more locations where biochar can be produced, However, PP conducted only a pilot phase implementation during the current monitoring period that included single box kiln (with the same specified technical parameters) which was operated in one location only. Therefore, sampling was not considered.</p> <p>VVB has updated the section 2.1 of the FVR to include more information under the 2.3.</p>	
		<p><u>Verra Response</u> The VVB has updated Section 2.1 of the VVR to clarify that no sampling was conducted during the current monitoring period. The explanation is consistent with the project design and the PDMR, and the VVB has provided sufficient information. The finding is closed, and no further action is required.</p>	

11 Unreported Methodology Deviation			
	<p><u>Issue</u> Section 6.2 of the PDMR indicates that the parameter, H:Corg “for the initial validation and verification value can also be derived from published literature.” However, this does not align with the methodology, VM0044. Further, the PDMR states that the value of H:Corg will be monitored using</p>	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u> PP would like to clarify that this provision was only considered under “comment” section of the particular parameter under Section 6.2. This is because this is first of its kind project in the region or in the country and hence published literature may also lead to more conservative consideration. However, actual H:C</p>	CLOSED

<p>laboratory analysis once in each seasonal production, but this also does not align with the methodology requirements.</p> <p>The VVB’s assessment of H:Corg in the VVR does not provide any indication of how this parameter was independently validated in line with <i>VCS Standard</i> or monitoring provisions as outlined in VM0044.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 3.6 of the PDMR and report the deviation regarding the parameter, H:Corg. 2. The VVB must clarify whether H:Corg was validated for the project’s initial instance given Section 7.1 of the PDMR indicates that the value for H:Corg is 0.54 but no value reported in Section 6.2. The VVB must ensure that H:Corg is validated for the first instance in line with the applied methodology and provide a full assessment of the same. 3. The VVB must update the VVR accordingly. <p><u>Program Rule(s)</u> VM0044, v1.1, Sections 4 and 9.2</p>	<p>value was used from the lab tests in line with the methodological requirement. The particular statement is now removed from the table under the section 6.2.</p> <p>Additionally, the current project activity is designed based on monotype feedstock and hence biochar-type produced is also same/uniform across the project. Additionally, the feedstock (i.e. Cotton stalk) is seasonal and hence biochar production is also seasonal. During the current monitoring period, the quantity of biochar produced was extremely small, hence there is apparently no batch variation. Therefore, it is proposed that the value of H:C shall be evaluated using laboratory analysis once in each seasonal production considering that the characteristic of the biochar output is expected to be uniform. However, methodology prescribes frequency of monitoring/recording of this parameter as “each batch of biochar produced at the production facility”. Therefore, this deviation is now included under the section 3.6 of the PDMR to report under methodological deviation.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u> Audit team received the response/justification from PP as included above and also reviewed the updated PDMR. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The consideration of frequency of measurement of H:C org parameter during the current MP is now included under the section 3.6. This deviation is found to be appropriate as current monitoring period was limited in biochar production as part of the pilot phase. It can be reasonably assessed that there was apparently no such batch variation during this pilot phase. The single testing and 	
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		<p>tested values are representative of the entire production.</p> <ol style="list-style-type: none"> 2. The value of this parameter was reported as 0.54 which was a lab tested value as per required protocol. This value is reported into the PDMR correctly. 3. The methodology prescribes the source of the value and method as “Laboratory analysis” and “to follow IBI Biochar Testing Guidelines or EBC Production Guidelines”. The audit team has verified and confirmed that the value reported is based on Lab analysis and as per required protocol. The biochar sample was tested by “Quality Service & Solutions”, VVB independently verified the credential of the entity with a desk review and confirmed that the agency is an “ISO 17025 :2017 NABL” authorized laboratory and hence credible entity in India to conduct test for such bio products. The report includes the Codes of the Method adopted for each parameter to calculate H:C ration; these codes are found as per the required Testing and EBC production guideline. Hence, the reported value is acceptable. <p>This assessment has been included under the deviation outcome of the project, under the section 3.4 of FVR.</p>	
		<p><u>Verra Response</u></p> <p>The VVB has satisfactorily addressed the issues related to the monitoring and validation of the H:Corg parameter:</p> <ol style="list-style-type: none"> 1. The earlier allowance for using literature values was a misstatement in Section 6.2 of the PDMR. This has now been removed, and the value of H:Corg used 	

		<p>(0.54) was confirmed to be based on laboratory analysis, as required by methodology VM0044.</p> <ol style="list-style-type: none"> 2. The project proponent has formally reported a deviation in Section 3.6 of the PDMR, justifying that H:Corg was monitored once during the seasonal production due to uniform feedstock and limited production volume. This has been accepted by the VVB as reasonable for the pilot phase. 3. The VVB has verified the laboratory credentials—an ISO 17025:2017 NABL-accredited facility—and confirmed that the testing methods followed IBI and EBC guidelines. 4. The assessment and justification have been clearly documented in Section 3.4 of the VVR. <p>The finding is closed, and no further action is required.</p>	
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12 Missing monitoring parameters, Mp,y and FCp,t,p			
	<p><u>Issue</u> Section 6.2 of the PDMR does not include all of the required monitored parameters required by the methodology. For example, parameters, Mp,y and FCp,t,p have been excluded but no explanation has been provided.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure that Section 6.2 (and 7.1) of the PDMR is updated to include all of the monitored parameters, as required. Otherwise, an explanation must be provided to sufficiently justify the same. 2. The VVB must assess the revisions and update the VVR as needed. 	<p>Round 1</p> <p><u>PP Response (25/11/2024):</u> PP would like to clarify that this project promotes only low-technology facilities of biochar production. Therefore, all parameters are not applicable.</p> <p>For example, the parameter Mp,y is used under the equation #3 which is specific to high technology facility only, However, FCp,t,p is applicable to low tech facility also, hence same is included (<u>not excluded</u> as stated in the comment) as an ex-ante value available at validation, hence included under the Section 6.1 of the PDMR wherein default value prescribed under the methodology has been referred (under the page 26 of the meth v1.1).</p> <p>PP has included a footnote reference #25 to submit justification</p>	<p>CLOSED</p>

	<p><u>Program Rule(s)</u> VCS Joint Project Description and Monitoring Report Template, v4.3, Section 6.2</p>	<p>of parameters which are not applicable under the section 6.2 of the PDMR.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VB Response (15/12/2024)</u> Audit team received the response/justification from PP as included above and also reviewed the updated PDMR. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. The audit team rechecked and found all required parameters included under the section 6.2 and 7.1. The project promotes only low-tech facilities, therefore some of the parameters are not applicable. PP has incorporated one footnote (#25) under the section 6.2 to clarify the non-inclusion of the parameters $M_{p,y}$, T_{prod}, WS_p. 2. The revision and clarification submitted by PP found acceptable. The information is also updated under the FVR. <p><u>Verra Response</u> The section 6.2 and 7.1 of the joint PDMR is updated. The finding is closed, and no further action is required.</p>	
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13	Insufficient information on monitoring plan		
	<p><u>Issue</u> The PDMR does not provide sufficient information on the monitoring plan regarding the 3 stages (sourcing, production, and application) in accordance with the applied methodology. The VVR does not provide sufficient information on how it validated/verified the monitoring plan; the details provided are insufficient considering the 3 different approaches implemented by the project.</p>	<p>Round 1 <u>PP Response (25/11/2024):</u> PP would like to clarify that the monitoring related information across the 3 stages “Sourcing”, “Production” and “application” are indicated under the layout of the Operation & Management system, followed by layout of the specific elements of the project database across these stages. However, the monitoring plan section is now further updated with more information related to the 3 stages of the biochar value chain, in line with the applied</p>	CLOSED

<p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure Section 6.3 of the PDMR is updated to include sufficient details in the monitoring plan, specifically, procedures for calibrating monitoring equipment, accuracy classes, field sampling approaches, including target precision levels, sample sizes, frequency of measurement and QA/QC procedures (e.g., how long data will be stored, etc). 2. The VVB must assess the revisions and update the VR and provide in detail a clear assessment opinion on the monitoring plan considering the 3 different approaches implemented by the project. <p><u>Program Rule(s)</u> VM0044, v1.1, Section 9.3</p>	<p>methodology.</p> <p>W.r.t. the calibration, testing etc. the provision is already included under “Internal Auditing and QA/QC procedure”.</p> <p>Entire monitoring scope will be applicable to the project activity irrespective of the 3 different approaches proposed under the project. This is because only the production sites/methods will be different under the approaches, whereas the prescribed monitoring parameters and adopted practices will be applicable in all three stages; here the same resources will be able to address the requirement under all approaches.</p> <p>Enclosed: Updated PDMR version 04, dated 25-Nov-2024.</p> <p><u>VVB Response (15/12/2024)</u></p> <p>Audit team received the response/justification from PP as included above and the updated PDMR. In line with “action required” the audit team of VVB concludes this finding as follows:</p> <ol style="list-style-type: none"> 1. PP included more and relevant information under the section 6.3 of the PDMR, it addresses the identified gaps in the PRR. Hence accepted. 2. The audit team has revised the relevant section of the FVR to address the monitoring requirements and included assessment opinion. <p><u>Verra Response</u></p> <p><u>Issue:</u> Section 6.3 of the PDMR does not provide sufficient detail to meet the requirements of the VCS Monitoring Report Template. While general monitoring procedures are described, key components are missing or inadequately addressed, including:</p>	
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		<ul style="list-style-type: none"> • Detailed procedures for calibrating monitoring equipment (e.g., methods, responsible parties, traceability); • Complete accuracy class information for all monitoring devices (e.g., moisture meters); • Clear field sampling methodology, including target precision levels, sample sizes, and sampling frequency; • Parameter-specific QA/QC procedures for sampling and measurement activities. <p><u>Action Required:</u> The VVB must ensure Section 6.3 of the PDMR is updated to:</p> <ol style="list-style-type: none"> 1. Include calibration procedures for all monitoring equipment, including responsible personnel and traceability to standards 2. Provide accuracy class specifications for all devices used in monitoring 3. Clearly describe the field sampling approach, including sample sizes, frequency, and target precision levels 4. Detail parameter-specific QA/QC procedures, including how long data will be stored and how data quality is assured during collection and analysis. <p>The finding is open.</p> <p>Round 2</p> <p><u>PP Response (05/04/2025)</u> PP hereby confirms the following:</p> <ol style="list-style-type: none"> (i) PP has already included monitoring devices and their testing/calibration details under the section 7.1. However, the section 6.3 of the PDMR is now updated to include more information related to calibration process, personnel roles and responsibilities etc. (ii) The information related to the accuracy class & specification of the devices were reported under Section 7.1, however information is now also included under the 	
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		<p><u>6.3.</u></p> <p>(iii) Regarding the Sampling Requirements, PP would like to clarify that at project monitoring level, sampling is not envisaged as all the ex-post monitoring parameters will be recorded in detail. Also, the input values to the ER calculation shall use the entire data as per primary records. This information is now included under the section 6.3 of the report to clarify the non-requirement of sampling.</p> <p>(iv) QA/QC procedures under the monitoring tables are updated to include with more specified information related to accuracy and data/record keeping validity period.</p> <p>Attached: Updated JPDMR, version dated 05/04/2025.</p> <p>VVB Response (07/04/2025) VVB would like to confirm that PP has submitted the updated Joint PDMR and revisions are found to be in line with the review comments raised. Hence, accepted.</p> <p><u>Verra Response</u> Section 6.3 of the Joint PD-MR has been updated. The finding is closed, and no further action is required.</p>	
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14 Summary: Lack of key details missing			
	<p><u>Issue</u> The summary provided in Section 1.4 of the VVR is missing key details for the project, e.g., crediting period, monitoring period, GHG ERRs achieved, etc.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> The VVB must ensure to update Section 1.4 of the 	<p>Round 1</p> <p><u>PP Response:</u> NA for PP</p> <p><u>VVB Response (15/12/2024)</u> VVB has updated the section 1.4 of the FVR to include the missing details identified at PRR stage.</p>	<p>CLOSED</p>

	<p>VVR and include key details to further summarize the project.</p> <p><u>Program Rule(s)</u> VCS Joint Validation and Verification Report Template, v4.3, Section 1.4</p>	<p><u>Verra Response</u> The VVB has updated the section 1.4 of the FVR with the key details. The finding is closed, and no further action is required.</p>	
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15 No information on evidence gathering by the VVB			
	<p><u>Issue</u> No information on the evidence gathering methods employed during the validation/verification of the project in Section 4.1 of the VVR.</p> <p><u>Action Required</u> 1. The VVB must update Section 4.1 of the VVR and include details on the evidence gathering methods employed during the validation/verification process.</p> <p><u>Program Rule(s)</u> VCS Standard, v4.7, Section 4.1.30</p>	<p>Round 1</p> <p><u>PP Response:</u> NA for PP</p> <p><u>VVB Response (15/12/2024)</u> The section 4.1 of the FVR is further updated to include more information on methods of evidence gathering.</p> <p><u>Verra Response</u> The VVB has updated section 1.4 of the FVR with additional information on evidence gathering methods employed during the validation/verification process. The finding is closed, and no further action is required.</p>	CLOSED

16 No assessment of technologies/measures			
	<p><u>Issue</u> Section 3.1 of the VVR does not include an assessment on the technologies/measures implemented by the project; the information provided is insufficient. Also, no indication on whether the project is likely to achieve the estimated GHG ERRs.</p> <p><u>Action Required</u> 1. The VVB must update Section 3.1 of the VVR and provide a full assessment on the</p>	<p>Round 1</p> <p><u>PP Response:</u> NA for PP.</p> <p><u>VVB Response (15/12/2024)</u></p> <ol style="list-style-type: none"> The audit team has collected, verified and assessed all required information and evidences related to the technology/measure implemented by PP at the project. The section 3.1 of FVR is now updated. The audit team reviewed the project design implemented as the pilot phase, thereby evaluated the design parameters of the project including the 	CLOSED

	<p>technologies/measures implemented by the project.</p> <p>2. The VVB must also provide an assessment opinion on whether the project is likely to achieve the estimated GHG ERRs.</p> <p><u>Program Rule(s)</u> <i>VCS Joint Validation and Verification Report Template, v4.3, Section 3.1</i></p>	<p>biomass feedstock, technology, ability to scale to reach the projected production, followed by the calculation reported for ex-ante GHG ERRs. Also, required information were discussed during the site visit interviews. The VVB is able to assess and confirm that project is likely to achieve the estimated ERRs. The section 3.1 of the FVR is now updated to include this assessment opinion.</p>	
		<p><u>Verra Response</u> The VVB has provided the relevant assessment and opinion on the technology/measures adopted by the project in Section 3.1 of the VR. The finding is closed, and no further action is required.</p>	