

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	4245
Project Name	BIOGAS TO ELECTRICITY GENERATION GROUP PROJECT IN INDIA
Review Type	Registration
Program(s)	VCS Program
Project Proponent	EKI Energy Services Limited
Methodology	AMS-III.D, " <i>Methane recovery in animal manure management systems</i> ", Version 21.0 AMS-I.F, " <i>Renewable electricity generation for captive use and mini-grid</i> ", Version 5.0
VVB	TÜV SÜD South Asia Private Limited
Assessment Criteria	VCS Standard Version 4.4
Date of First Issue	05 October 2023
Review Conclusion	Approved
Date of Final Issue	12 June 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	Further clarification on project ownership		
	Issue Sections 1.7 and 1.5 of the project description (PD) states that the commissioning certificate shows that the legal owner is Bhagyalaxmi Dairy Farms Private Limited and that the PP is EKI Energy Services Limited. The Validation Report (VR) Summary Section states that M/s Bhagyalaxmi Dairy Farms Pvt Ltd, is the legal owner and operates a large dairy farm, while EKI Energy Services Limited is the consultant and owns the VCUs. Moreover, Section 3.1 of the VR states that EKI Energy Services Limited is the PP (as verified from the ERPA) and also owns the project (as verified from commissioning certificate). Action item 1. The VVB must ensure that the project proponent clearly identifies the project ownership and project proponent (including the evidence(s) to prove it). 2. The VVB must verify this information, provide consistent information and update the VR as needed. Program rule(s) or methodology section VCS Project Description Template v.4.2, Sections 1.5 and 1.7	Round 1 VVB Response 1. Bhagyalaxmi Dairy Farms Private Limited is the legal owner while EKI Energy Services Limited is PP and consultant and also owns the VCUs. Ownership of plant has been verified from commissioning certificate and project proponent and owner of credits has been verified from Emission Reduction Purchase Agreement between Bhagyalaxmi Dairy Farms Private Limited and EKI Energy Services Limited. 2. The inconsistency in section 3.1 from VR has been removed and VR has been updated. Verra Response The revised PD in section 1.7 states that “the commissioning certificate for project activity is the supporting documents to demonstrate the project ownership which is under legal ownership of Bhagyalaxmi Dairy Farms Private Limited. This demonstrates the right of use according to clause 3.7.1 (3) of VCS Standard version 4.4. However, it is still not clear how the project ownership has been demonstrated for the PP listed in section 1.5 of PD in line with Section 3.7 of VCS Standard, v4.4 which states that “The project description shall be accompanied by one or more of the following types of evidence establishing project ownership accorded to the project proponent(s)” Action item 1. The VVB must ensure that the project proponent clearly	Closed

	VCS Validation Report Template v.4.2, Sections Summary and 3.1	identifies the project ownership and project proponent (including the evidence(s) to prove it).	
		Round 2	
		<u>VVB Response</u> Bhagyalaxmi Dairy Farms Private limited is legal owner and PP while EKI Energy Services Limited is consultant. Ownership of the plant has been verified from commissioning certificate the same has been updated in section 1.5 of revised PD and section 3.1 of VR as per clause 3.7.1.3 of VCS Standard version 4.4.	
		<u>Verra Response</u> The project proponent and ownership has been clarified. This finding is closed.	

2 Missing information on eligibility criteria			
	<u>Issue</u> 1. In section 1.4, it is mentioned that the project has been designed to be a single installation of an activity whereas the PD indicates that it is a grouped project activity. 2. Further, under eligibility criteria of section 1.4 of PD, it is mentioned that the project is a grouped project and there is no additional information needed to be provided. 3. If the design is a grouped project, the kml file for the project boundary is missing. <u>Action item</u> 1. The VVB must ensure that the project proponent clearly defines the project design. 2. The VVB must ensure that the project proponent elaborates in Section 1.4 of the PD the eligibility criteria for inclusion of new project activity instances and how 1 st project activity fulfils the eligibility criteria.	Round 1	Closed
		<u>VVB Response</u> 1. In section 1.4 of PD PP has clearly mentioned that the project is grouped project activity. 2. In section 1.4 of PD, PP has elaborated the eligibility criteria for inclusion of new project activity instances and how 1st project activity fulfils the eligibility criteria and VVB and updated the VR. 3. PP has submitted the kml file.	
		<u>Verra Response</u> The information on eligibility criteria provided in section 1.4 is incomplete in line with Section 3.6.16 – 3.6.17 of VCS Standard, v4.4 for New Project Activity Instance Eligibility Criteria and Inclusion of New Project Activity Instances.	

	3. The VVB must further validate this information and update the VR as needed. <u>Program Rule(s)</u> VCS Standard, v.4.4, Sections 3.6 and 3.11.1.3 VCS Project Description Template v.4.2, Section 1.4 VCS Validation Report Template v.4.2, Section 3.1	Further it is not clear how the statement mentioned in section 1.4 of PD, “(if new countries are being added, a PD deviation shall be submitted)” is in line with Section 3.6.17 (1) of VCS Standard. <u>Action item</u> 1. The VVB must ensure that the project proponent elaborates in Section 1.4 of the PD the eligibility criteria for inclusion of new project activity instances and how 1st project activity fulfils the eligibility criteria in line with the VCS Standard. 2. The VVB must further validate this information and update the VR as needed. Round 2 <u>VVB Response</u> PP has documented criteria in line with requirements of section 3.6.16 and 3.6.17 of VCS Standard 4.4 in section 1.4 of revised PD, PP recovers methane to anaerobic digestion from animal manure and bio gas recovers is utilized for electricity generation hence this project activity is eligible under VCS programme as per clause 2.1.3 of VCS Standard 4.4. <u>Verra Response</u> The eligibility criteria has been expanded in line with the VCS Standard and language related to expansion of geographical boundary has been removed. This finding is closed.	
3	Missing information on double counting		
	<u>Issue</u>	Round 1 <u>VVB Response</u>	Closed

There is no information on how it is ensured that no double counting occurs with the farm owner with the GHG emission reductions obtained from the treatment of their manure. <u>Action item</u> 3. The VVB must ensure that the project proponent elaborates in Section 1.16 of the PD how it is ensured that no double counting occurs with the farm owner with the GHG emission reductions obtained from the treatment of their manure. 4. The VVB must further validate this information and update the VR as needed. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 1.16 VCS Validation Report Template v.4.2, Section 3.1	4. VVB has ensured that PP has provided adequate information in 1.16 of the PD on avoidance of double counting. 5. VVB has validated this information by verifying various registry websites to check participation of project under Paris Agreement article 6 mechanisms and International Paris-related programs. The host country India does not have emission trading program or other binding limits that mandates project's participation. Further, VVB has checked that the project is not part of scope 3 supply chain and does not generate other forms of environmental credits such as RECs by checking information available in the public domain and declaration from the PP. Section 3.1 of VR has been updated to include this information. <u>Verra Response</u> It is still no clear that what is the arrangement with farm owner with the GHG emission reductions obtained from the treatment of their manure to ensure no double counting happens. <u>Action item</u> 1. The VVB must ensure that the project proponent elaborates on the method to ensure that no double counting occurs with the farm owner with the GHG emission reductions obtained from the treatment of their manure.	
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		Round 2	
		<u>VVB Response</u> The bhagyalaxmi dairy farms private limited is the farm owner and legal owner of the project activity and submitted no double counting declaration and same has been found appropriate. Further PP also included justification in section 1.16.1 of revised PD and same has been found appropriate.	
		<u>Verra Response</u> Justification regarding ownership has been provided. This finding is closed.	

4	Missing information on legal requirements and EIA		
	<u>Issue</u> Section 1.14 of the PD does not identify and demonstrate how the project complies with any environmental/operational applicable law, statute and/or regulatory framework and Section 2.3 does not clarify if the project activity is subject to an EIA approval. <u>Action item</u> - The VVB must ensure that the project proponent includes all the required information under Sections 1.14 and 2.3 of the PD the approval date of the EIA. - The VVB must verify this information and update the VR as needed.	Round 1	Closed
		<u>VVB Response</u> - PP has added the necessary required information in section 1.14 and section 2.3. - VVB has verified the information mentioned in section 1.14 and section 2.3 of PD and updated the VR in section 3.1 and section 3.2.3. VVB has verified that there is no such compliance with laws, statutes and other regulatory frameworks for animal manure handling and treatment in India and the project activity is not mandated by EIA report.	
		<u>Verra Response</u> Information on compliance with laws and regulatory framework has been provided. This finding is closed.	

	<u>Program rule(s) or methodology section</u> VCS Project Description Template v.4.2, Sections 1.14 and 2.3 VCS Validation Report Template v.4.2, Section 3.1	Round 2 <u>VVB Response</u> <u>Verra Response</u>	
5	Further information and assessment on project start date <u>Issue</u> The project start date has been defined as 22/06/2021 (date of commissioning) however, it is not clear if it is the earliest date in which emission reductions occurred, provided that the activity of generating biogas (when the manure enters the biodigester tanks) is also considered an activity to reduce GHG emissions even though electricity is still not being generated. <u>Action item</u> 1. The VVB must further explain how it can be confirmed that no GHG emission reductions occurred before 22/06/2021 (providing that the production of biogas is also considered an activity to reduce GHG emissions - even if the co-generation unit was still not working). <u>Program rule(s) or methodology section</u>	Round 1 <u>VVB Response</u> Biogas storage capacity is only 2100 cum/day which is also the capacity of the plant. Hence project cannot store biogas more than one day. So GHG emissions reduction occurs from 22/06/2021 and it is the day in which manure entered in the tank even though electricity is still not being generated. It is confirmed from the on site visit. <u>Verra Response</u> The justification for project start date has been provided. This finding is closed, Round 2 <u>VVB Response</u>	Closed

	VCS Standard v.4.4, Section 3.7	<u>Verra Response</u>	
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6	Further information on no net harm		
	<u>Issue</u> Section 2.1 of the PD does not include any measures to control impacts related to noise and wastes generated. <u>Action Required</u> 1. The VVB must ensure that the project proponent includes all the measures taken in order to control impacts related to noise and waste generated. 2. The VVB must verify this information and update the VR as needed. <u>Program Rule(s)</u> <i>VCS Project Description Template v.4.2, Section 2.1</i> <i>VCS Validation Report Template v.4.2, Sections 3.2.1</i>	<u>Round 1</u> <u>VVB Response</u> 1. In section 2.1 of PDD, PP has included the explanation on the impacts related to noise and waste generated from project activity. 2. In section 3.2.1, VVB has verified the information updated in PDD. <u>Verra Response</u> The explanation on no net harm has been provided. This finding is closed.	Closed

7	Missing information on methods used for engaging local stakeholders		
	<u>Issue</u>	<u>Round 1</u> <u>VVB Response</u>	Closed

	Section 2.2 of the PD does not indicate the procedures or methods used for engaging local stakeholders. <u>Action item</u> 1. The VVB must ensure that the project proponent includes the procedures or methods used for engaging local stakeholders in Section 2.2 of the PD. 2. The VVB must further validate this information and update the VR as needed. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 2.2 VCS Validation Report Template v.4.2, Section 3.3.2	1. PP has provided the information on procedure and methods used for engaging local stakeholders in section 2.2 of PD. 2. PP has submitted the grievance registered and it is found to be in line.	
		<u>Verra Response</u> The mechanism for ongoing stakeholder consultation has been provided. This finding is closed.	

8 Missing information on public comment period			
	<u>Issue</u> Section 2.4 of the PD does not indicate if comments were received or not during the public comment period. <u>Action item</u> 1. The VVB must ensure that the project proponent includes the results of the public comment period in Section 2.4 of the PD. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 2.4	Round 1	Closed
		<u>VVB Response</u> 1. PP has confirmed that no comment has been received during the public comment period.	
		<u>Verra Response</u>	

		Information has been provided. This finding is closed.	
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9 Further clarification on applicability of AMS-III.D			
	<u>Issue</u> (a) Section 1.13 of the PD and CARID10 of the VR confirm that the pre project scenario is the aerobic treatment through composting. However, as per para. 2 of AMS-III.D, v.21.0, the scope covers project activities involving the replacement or modification of anaerobic animal manure management systems in livestock farms. It is not clear how the methodology has been validated as applicable to the proposed project activity. (b) It is not clear how it is ensured that all biogas is used or flared when generators are not in use since there is no mention of any flare in the PD. (c) It is not clear how it has been ensured that the liquid/sludge is handled aerobically. <u>Action item</u> 1. The VVB must ensure that the project proponent addresses issues a and c above and update the PD as needed. 2. The VVB must validate this information and update the VR as needed. <u>Program Rule(s)</u> para. 2 and applicability conditions of AMS-III.D, v.21.0	Round 1 <u>VVB Response</u> 1. In section 3.4 of PD, PP has stated that “the baseline scenario of the project is the animal manure waste was left to decay in aerobic manure management system (lagoon) at the livestock farms and methane is emitted to the atmosphere directly without any methane recovery” and VR confirmed that residual waste is handled aerobically while in pre project scenario the animal manure is handled in anerobic manure management system which is as per para. 2 of AMS-III.D, v.21.0. 2. Biogas is not flared. Biogas plant is running 350 days of year and generated biogas is simultaneously converted into electricity. Plant has spare tank to store excess biogas which is converted into electricity before 48 hours. 3. After the anaerobic digestion of the animal manure, it breaks down in three Biogas, Organic sludge and liquid organic overflow. After digestion, liquid/Sludge is transported to slurry tank from where it is pumped to a Solid/ Liquid separator where the solids are separated out and the solid matter is further processed as Organic Fertilizer; otherwise, use of the liquid slurry can also be used directly to the fields. The separated liquid is stored in lagoon from where it is recycled into the system. PP has mentioned this explanation in section 1.11 of PD.	Closed

		<u>Verra Response</u> 1. In section 3.1 of PD, it is mentioned against applicability criteria 1(d) (Criteria 2.2 (3.d) of AMS-III.D) that “There were no retention /storage system, no lagoons available (collection of manure to digester by gravity only)”. 2. In section 3.3.2 of Validation Report, VVB has assessed that This information is verified as per the Detailed Project Report and physical audit. It is found that the manure is directly feed to digester without storing it. Hence, it is not applicable. 3. In section 3.4 of PD, it is mentioned that Before project activity there was no arrangement to recover methane from animal manure and animal manure was stored in livestock farm. Further, the baseline scenario of the project is the animal manure waste was left to decay in anaerobic manure management system (lagoon) at the livestock farms. a) The information provided is inconsistent in sections of PD and VR. b) Further how has the VVB confirmed this information for baseline scenario and justification for applicability criteria 2.2 (3.d) of AMS-III.D as being not applicable when methodology is applicable only for specific baseline or pre-project scenario. c) It is not clear how VVB has confirmed this applicability criteria based on assessment provided in Section 3.3.2 of VR that the manure is directly feed to digester without storing it. <u>Action item</u> 1. The VVB must ensure that the project proponent addresses issues above and update the PD as needed.	
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		2. The VVB must validate this information and update the VR as needed. Background Information: <i>Scope of AMS-III.D: This methodology covers project activities involving the replacement or modification of anaerobic animal manure management systems in livestock farms to achieve methane recovery and destruction by flaring/combustion or gainful use of the recovered methane. It also covers treatment of manure collected from several farms in a centralized plant.</i> Round 2 <u>VVB Response</u> 1. In absence of project activity, the manure was stored in the pit, and it was verified as per the DPR submitted by PP. The same information has been updated in section 3.1 of the PD and hence criteria 1-D is applicable now. 2. Earlier the provided information was applicable to project scenario however, as mentioned above, the same information has been updated in section 3.3.2 of validation report for the baseline scenario, which was identified during site visit and DPR, page no 13 which states that in pre-project scenario the manure was stored in livestock farm without the arrangements for methane recovery. 3. In previous validation report, the VVB has provided information for project scenario where manure is fed to digester without storing it which is correct as per the site visit and DPR. The justification in baseline scenario is now correctly provided in section 3.1 of the PD and section 3.3.2 of Validation report. <u>Verra Response</u>	
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		The applicability criteria justification has been corrected. This finding is closed.	
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10	Incorrect GHG source included		
	<u>Issue</u> Section 3.3 of the PD includes CH₄ baseline emissions from electricity, which are not applicable. <u>Action item</u> 1. The VVB must ensure that the project proponent includes the only applicable GHG sources in Section 3.3 of the PD. 2. The VVB must assess this information and update the VR as needed. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 3.3 VCS Validation Report Template v.4.2, Section 3.3.3	Round 1 <u>VVB Response</u> 1. PP has corrected the CH₄ baseline emissions from electricity in section 3.3 of PD and it is in line with methodology. 2. VVB has verified the emission reduction from project boundary and it is found to be Ok.	Closed
		<u>Verra Response</u> The sources have been corrected. This finding is closed.	

11	Missing information and assessment on baseline identification		
	<u>Issue</u> As per the information in Section 3.4 of the PD, the baseline has been identified as animal manure left to decay anaerobically. However: (a) There is no external evidence that supports this statement and; (b) The pre-project scenario is defined as aerobic composting of the animal manure. <u>Action item</u>	Round 1 <u>VVB Response</u> In section 3.3.4, VVB has confirmed that in baseline scenario of the project is the animal manure waste was left to decay in anaerobic manure management system (lagoon) at the livestock farms and methane is emitted to the atmosphere directly without any methane recovery and destruction facility; equivalent amount of electricity was drawn from the grid connected fossil fuel fired power plants. During on site visit and interview of local stakeholders, it is confirmed that the animal manure is left to decay in lagoon at the livestock farms before establishment of the biogas generation	Closed

	1. The VVB must ensure that the project proponent justifies the identification of the baseline scenario with relevant references. 2. The VVB must validate this information and update the VR as needed. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 3.4 VCS Validation Report Template v.4.2, Section 3.3.4	plant.	
		<u>Verra Response</u> VVB has confirmed baseline scenario from site visit. However, section 3.3.4 of VR does not provide assessment on how this has been confirmed and if any external evidence that supports this statement has been cross-checked.	
		Round 2	
		<u>VVB Response</u> PP has provided detail project report dated 27 th February 2019 on page number 13 states that in pre project scenario there was no arrangement to recover methane and same has been included in section 3.3.4 of VR.	
		<u>Verra Response</u> Justification has been provided. This finding is closed.	

12	Missing information and assessment on additionality		
	<u>Issue</u> Section 3.5 of the PD and Section 3.3.5 of the VR do not indicate which is the evidence that confirms that there is no regulation in the host country, applicable to the project site, that requires the collection and destruction of methane from livestock manure. <u>Action item</u> 1. The VVB must ensure that the project proponent indicates which is the evidence that confirms that there is no regulation in the host country, applicable to the project site, that requires the collection and destruction of methane from livestock manure and updates the PD as needed. 2. The VVB must further validate the information required and update Section 3.3.5 of the VR as needed.	Round 1	Closed
		<u>VVB Response</u> As per Central Pollution Control Board, Ministry of Environment, Forest and Climate Change Government of India, animal manure is not defined as the waste for which compliance is needed. It is verified from the compliance list from Central Pollution Control Board.	
		<u>Verra Response</u> VVB has confirmed the regulatory frameworks. However, section 3.5 of PD does not describe method to demonstrate additionality for new project activity instances considering it is a grouped project.	
		<u>Action item</u>	

	<u>Program Rule(s)</u> Para. 15 AMS-III.D, v.21.0	1. The VVB must ensure that the project proponent describes method to demonstrate additionality for new project activity instances. 2. The VVB must further validate the information required and update Section 3.3.5 of the VR as needed.	
		Round 2	
		1) The demonstration of additionality for new project activity instances shall be demonstrated as per para 15 and 16 of AMS III.D. version 21.0, which is clearly described in section 3.5 of revised PD and same has been verified and included by VVB in section 3.3.5 of VR.	
		<u>Verra Response</u> The additionality demonstration has been provided. This finding is closed.	

13	Missing formulas		
	<u>Issue</u> The formulas to calculate VSLT, PEPL, PEpower (in case electricity is consumed from the grid) and MDy have not been included in the PD. <u>Action item</u> 1. The VVB must ensure that the project proponent includes the formulas to calculate VSLT and MDy in the PD. 2. The VVB must further validate the formulas and update the VR as needed. <u>Program rule(s)</u> VCS Project Description Template v.4.2, Sections 4.1 and 4.4	Round 1	Closed
		<u>VVB Response</u> In the baseline scenario the electricity would have taken from the grid. Project activity is displacing electricity from the grid. Hence there is no project emissions in case electricity is imported from grid.	
		<u>Verra Response</u> VVB has provided response on only the electricity component. The response for formulas to calculate PEPL, and MDy have not been included in the PD.	
		<u>Action item</u>	

	VCS Validation Report Template v.4.2, Section 3.3.6	1. The VVB must ensure that the project proponent includes the formulas to calculate PEPL, and MD_y in the PD. 2. The VVB must further validate the formulas and update the VR as needed. <u>Program rule(s)</u> VCS Project Description Template v.4.2, Sections 4.1 and 4.4 VCS Validation Report Template v.4.2, Section 3.3.6 Round 2 PE_{PLy} and MD_y formulas are now included in section 4.2 and 4.4 of revised PD and same has been verified by VVB and found correct as per the methodology AMS III.D version 21.0, also included in section 3.3.6 of VR. <u>Verra Response</u> The formulae have been included. This finding is closed.	
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14	Further clarification on the exclusion of PEflaring <u>Issue</u> (a) Section 4.2 of the PD indicates that PEflaring may be considered as zero while the project uses the biogas for electricity generation and also includes a flare (as per CL03 of the VR). Therefore, the possibility to exclude these project emissions is not applicable to the project case. <u>Action item</u> 1. The VVB must ensure that the project proponent includes, in the project emissions calculation, the PEflaring. 2. The VVB must validate this information and update the VR as needed. <u>Program rule(s)</u>	Round 1 <u>VVB Response</u> There is no arrangement for flaring at site. So project activity due to flaring is zero, while in CL03 PP explained that they could have flared the gas but they are utilising the biogas generated on daily basis to provide electricity instead. PEflaring will be zero as there is no flaring on site. It is confirmed from on site visit. <u>Verra Response</u> VVB has confirmed that there is no flaring. This finding is closed.	Closed
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	VCS Project Description Template v.4.2, Section 4.2		
	VCS Validation Report Template v.4.2, Section 3.3.6		

15	Further clarification on the exclusion of project emissions from incremental transportation and combustion of fossil fuels		
	<u>Issue</u> (a) Section 4.2 of the PD does not clarify if there exists any fossil fuel combusted (such as in a back up emergency generator) in the project activity, in order to exclude the PE from fossil fuel combustion. (b) It remains unclear whether there are any incremental distances between the treatment sites and the sites for soil application and further treatment of the residual waste (i.e., soil application of fertilizers and wastewater) in order to account for PEmtransp. <u>Action item</u> 1. The VVB must ensure that the project proponent addresses issues a and b above and updates Section 4.2 of the PD as needed. 2. The VVB must validate this information and update the VR as needed. <u>Program rule(s)</u> VCS Project Description Template v.4.2, Section 4.2 VCS Validation Report Template v.4.2, Section 3.3.6	Round 1 <u>VVB Response</u> In section 4.2, PP have added that the digester is only at 10m distance from the cow shed hence they use scraper to move dung from the shed to the digester. The fertilizer generated through the project activity is being consumed in the same village. Hence there is no incremental distances. During on site visit, VVB has confirmed that there is no incremental distances as the manure is shoved in digester via hand shovel in an inclined plane and farmer collect the manure from dairy itself. There is no any transportation use of fossil fuel on the plant. <u>Verra Response</u> The response is incomplete since it is still not clear if there exists any fossil fuel combusted (such as in a back up emergency generator) in the project activity, in order to exclude the PE from fossil fuel combustion. <u>Action item</u> 1. The VVB must ensure that the project proponent addresses issue above and updates Section 4.2 of the PD as needed. 2. The VVB must validate this information and update the VR as needed.	Closed

		Round 2 <u>VVB Response</u> PE_{power,y} is the sum of PE_{EC,y} and PE_{FC,y}, the project does not use any fossil fuel (back up emergency generator), thus PE_{FC,y} = 0 tCO_{2e} and PEEC_y is calculated as per same has been verified through on site visit, PP updated details in section 4.2 of revised PD and same has been updated in section 3.3.6 of VR. <u>Verra Response</u> Clarification has been provided. This finding is closed.	
16	Updated version of IPCC Guidelines to be used <u>Issue</u> The PD uses the <i>2006 IPCC Guidelines for National Greenhouse Gas Inventories</i> values for the emission reduction calculations, while the updated <i>2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories</i> is available. <u>Action item</u> 1. The VVB must ensure that the project proponent uses data from the <i>2019 Refinement to the 2006 IPCC Guidelines</i> for the ex-ante values used in the emission reduction calculations. 2. The VVB must validate that the values for the emission reduction calculations used by the project proponent have been sourced from the most recent available IPCC Guidelines. <u>Program Rule(s)</u> <i>2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories</i>	Round 1 <u>VVB Response</u> VVB has ensured that PP to use the 2019 IPCC guidelines for the National Greenhouse Gas Inventories values for the emission reduction calculations and validated the the emission reduction calculations. <u>Verra Response</u> IPCC 2019 guidelines have been applied. This finding is closed.	Closed

17 Further clarification on the calculation of the ex-ante grid emission factor			
	<u>Issue</u> In Section 4.1 of the PD, for the calculation of the OM (Simple OM, ex-ante), the 3 year-generation weighted average has been used while as per TOOL07, v.07.0 para. 42 a) (for off-grid power plants), a single calendar year within the five years prior to the time of submission of the PD for validation must be used. <u>Action Required</u> 1. The VVB must require the project proponent calculate the OM as per para. 42 a) of the TOOL07, v.07.0. 2. The VVB must validate this information and update the VR as needed. <u>Program Rule(s)</u> TOOL07 v.07.0, para. 42 a)	Round 1 <u>VVB Response</u> In section 4.1 of PD, PP has calculated the OM and VVB has validated the parameters as per para. 42 a) of the TOOL07, v.07.0.	
		<u>Verra Response</u> The OM calculation has been updated. This finding is closed.	
		Closed	

18 Further clarification on leakage			
	<u>Issue</u> The PD does not clearly explain how the digestate is treated in order to exclude Lecompost. <u>Action Required</u> 1. The VVB must ensure that the project proponent describes how the digestate is treated and update the PD as needed. 2. The VVB must validate this information and update the VR as needed.	Round 1 <u>VVB Response</u> The leakage due to composting digestate is zero. The project activity does not involve composting of digestate or anaerobic decay of digestate disposed in a SWDS or subjected to anaerobic storage, such as in a stabilization pond. Therefore, leakage emissions associated with the anaerobic digester is not accounted for the project. The waste animal manure from biogas plant converted to compost by aerobic treatment.	
		Closed	

	<u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 4.3 VCS Validation Report Template v.4.2, Section 3.3.6	<u>Verra Response</u> VVB has confirmed that leakage due to composting digestate is zero. This finding is closed.	

19	Further clarification under Section 5.1 of the PD		
	<u>Issue</u> Section 5.1 of the PD: (a) Includes a MCF which corresponds to anaerobic lagoon while the pre project scenario is compost under aerobic conditions; (b) Does not indicate the value for Wdefault for both cattle types. (c) Includes BoLT, Nda and VSLT which are monitored parameters (and does not explain how the value of 2.6kg/hd/day has been calculated). <u>Action item</u> 1. The VVB must ensure that the project proponent addresses issues a to c above under Section 5.1 of the PD. 2. The VVB must validate this information and update the VR as needed. <u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 5.1 VCS Validation Report Template v.4.2, Section 3.3.6	Round 1	Closed
		<u>VVB Response</u> 1. PP has corrected the pre project scenario and MCF which corresponds to anaerobic lagoon is validated as per that. 2. In section 5.1, PP has included the parameters in PD and VVB has validated the parameters as per applied methodology and corrections are done in VR. 3. The value of VS _{default} has been corrected and it is taken from Default values from tables 10 A-4 of 2019 IPCC Guidelines for National Greenhouse Gas Inventories volume 4 Chapter 10 are applied. 4. VVB has validated the required parameters in section 3.3.	
		<u>Verra Response</u> The value applied for VS _{default} from tables 10 A-4 of 2019 IPCC Guidelines for National Greenhouse Gas Inventories volume 4 Chapter 10 is for Buffalo whereas livestock defined in PD is milking/dry cow. Further it is not clear if the value considered is for dry matter basis.	

		Action item 1. The VVB must ensure that the project proponent addresses issue above under Section 5.1 of the PD. 2. The VVB must validate this information and update the VR as needed. Round 2 VVB Response The PP has updated value taken for VSdefault from table 10.13 A (New) of 2019 IPCC Guidelines for National Greenhouse Gas inventories volume 4 and values are considered on dry matter basis mentioned in section 5.1 of revised PD and same has been verified and included in section 3.3.6 of VR. Verra Response Justification has been provided. This finding is closed.	
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20	Missing monitoring parameters		
	Issue Section 5.2 of the PD does not include the monitoring of the <i>Bgburnt, wCH4, T, P, FE, flaring, parameters related to incremental transportation distances and fossil fuel (if applicable) and electricity consumption, VSLT, BoLT, ndy, on site inspections of farms, proper soil application of the residual wastes and Nda.</i> Action item 1. The VVB must ensure that the project proponent includes all the monitoring parameters under Section 5.2 of the PD. 2. The VVB must validate this information and update the VR as needed.	Round 1 VVB Response In section 5.2 of the PD, PP has mentioned that the parameters are not applicable as they are related to the incremental transportation distance and fossil fuels. Verra Response 1. On page 37 of PD, it is mentioned that Emission from electricity or fossil fuel consumption will be monitored during verification period. It is not clear how the parameters to monitor same are not applicable. 2. Para 34 of the methodology requires that “Where applicable, the proper soil application (not resulting in methane emissions) of the residual waste shall be monitored”.	Closed

	<u>Program Rule(s)</u> VCS Project Description Template v.4.2, Section 5.2 VCS Validation Report Template v.4.2, Section 3.3.8	3. Para 34 of the methodology requires that “The monitoring plan should include on-site inspections for each individual farm included in the project boundary where the project activity is implemented for each verification period”. 4. BGburnt,y is required to be monitored (Data Parameter table 5 of methodology) which states that The amount of biogas recovered and fuelled, flared or used gainfully shall be monitored ex post, using flow meters. 5. Further, parameter Nda,y is still included in section 5.1 of PD, whereas it should be a monitored parameter in line with the methodology. 6. It is not clear why Temperature and pressure of the biogas at the flow measurement site; Methane content in biogas (wCH4) are not applicable to be monitored in line with the applied methodology. Action item 1. The VVB must ensure that the project proponent includes all the monitoring parameters under Section 5.2 of the PD in line with the methodology. 2. The VVB must validate this information and update the VR as needed. Round 2 <u>VVB Response</u> 1. The parameter PEpower,y has been included in data and parameters monitor section 5.2 of revised PD and same has been updated in section 3.3.8 of VR. 2. The digestate is separated into solid and liquid by dewatering. The separated liquid is used as organic fertilizer due to its nutritional content and it is sold to nearby farmers for soil application in aerobic condition. The emission from the remining solid is evaluated under	
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		leakage emission and the parameter for emission monitoring has been documented in PD section 4.3. - The information regarding onsite inspection for each individual farm in the project boundary has been included in the monitoring plan in section 5.3 of revised PD. - PP has included parameter B_{Gburnt,y} in section 5.2 of revised PD and same has been verified and included section 3.3.8 of VR. - PP has updated parameter N_{da,y} in section 5.2 of revised PD and same has been verified and included in section 3.3.8 of VR. - PP has included parameters Temperature, pressure W_{CH4} and FE in section 5.2 of revised PD and same has been verified and included in section 3.3.8 of VR.	
		<u>Verra Response</u> The parameters have now been included. This finding is closed.	

21	Further assessment required on the verification of participation under other GHG programs		
	<u>Issue</u> Section 3.1 of the VR does not indicate how the VVB checked that the project does not participate under other GHG programs, besides the declaration by the PP. <u>Action item</u> The VVB must further elaborate how it verified that the project does not participate under other GHG programs, besides the declaration from the PP. <u>Program rule(s)</u> VCS Validation Report Template v.4.2, Section 3.1	Round 1 <u>VVB Response</u> In section 3.1 of VR, VVB has elaborated how it is verified that the project does not participate under other GHG programs. <u>Verra Response</u> VVB has provided assessment. This finding is closed.	Closed

22 Further clarification on FAR raised			
	<u>Issue</u> The nature of FAR1 remains unclear. <u>Action item</u> 1. The VVB must further elaborate FAR1 raised. <u>Program rule(s)</u> VCS Validation Report Template v.4.2	Round 1 <u>VVB Response</u> 1. During on site visit, it is found that the project owner is planning to increase the capacity of the biogas plant. To ensure the existing capacity of biogas plant does not go beyond the small-scale capacity the FAR was been raised. For next verification, future DOE is requested to note this point.	Closed
		<u>Verra Response</u> VVB has provided explanation on FAR raised. This finding is closed.	
23 Incorrect vintage reporting in validation conclusion			
	<u>Issue</u> The table under Section 5 of the VR report the vintages in full years while they must be reported in ranges (E.g., day-month-year to day-month-year). <u>Action item</u> 1. The VVB must report the vintages in ranges under Section 5 of the VR. <u>Program rule(s)</u> VCS Validation Report Template v.4.2, Section 5	Round 1 <u>VVB Response</u> 1. VVB has reported the vintages in ., day-month-year to day-month-year format.	Closed
		<u>Verra Response</u> The vintage year has been corrected. This finding is closed.	
		<u>VVB Response</u>	
		<u>Verra Response</u>	

