

PROJECT REVIEW REPORT

Project ID	2336
Project Name	<i>Energy Efficient Cook Stove Implementation in India</i>
Program(s)	VCS
Verification Period	<i>28 June 2019 – 27 June 2020</i>
Project Proponent	<i>Enen Green Services Private Limited</i>
Methodology	<i>VMR0006, Methodology for Installation of High Efficiency Firewood Cookstoves, Version 1.0</i>
Sectoral Scope(s)	<i>Sectoral Scope 3 – Energy demand</i>
Validation/Verification Body (VVB)	<i>LGAI Technological Center, S.A. (Applus+)</i>
Assessment Criteria	<i>VCS Standard, v4.1.</i>
Date of First Issue	<i>9 August 2021</i>
Date of Final Issue	<i>7 December 2021</i>

Summary:

An accuracy review of the *Energy Efficient Cook Stove Implementation in India* registration and verification approval request has been conducted by Verra in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised 8 assessment findings and 1 minor finding, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1. The 8 assessment findings must be addressed to the satisfaction of Verra. Please note, however, that where Verra finds consistent minor findings by the VVB in future reviews, minor findings shall be escalated to assessment findings.

This project review report will be made publicly available. Confidential information may be provided as separate attachments.

1. ASSESSMENT FINDINGS

Finding 1

The VCS Standard, v4.0 Sections 4.1.13-14 require the project proponent and the VVB to use the relevant template for reporting and adhere to all instructional text within the relevant template.

Both the project proponent and the VVB state that the estimated annual emission reductions achieved by the project are 55,890 tCO₂e/year in the project description and in the validation report. However, the estimated total emission reductions for 10 years crediting period are stated to be 614,785 tCO₂e.

Could the project proponent and VVB please explain how the estimated annual emission reductions of 55,890 tCO₂e/year were calculated considering that the emissions for the 10 years period are stated to be 614,785 tCO₂e.

PP Response: As ICS are distributed in different batches their ER will start from that time once they distributed. Therefore, based on implementation of ICS ER values in between year 1 and year 10 will change and average emission reduction will be 61,478 tCO₂e/year and overall emission reduction in 10 years will be 614,785 tCO₂e. The estimated annual emission reductions of 61,478 tCO₂e/year is corrected in updated Joint-PD/MR.

VVB Response: The project proponent has updated Joint-PD/MR as based on implementation of ICS ER values in between year 1 and year 10 will change and average emission reduction will be 61,478 tCO₂e/year and overall emission reduction in 10 years will be 614,785 tCO₂e. The estimated annual emission reductions of 61,478 tCO₂e/year are also corrected in updated FVR.

Verra Response: Given that the average estimated emission reduction was corrected in the revised documents provided, the finding is closed and no further action is required.

Finding 2

The VCS Standard, v4.1 Sections 3.16.4 and 3.16.8 requires the project proponent to take due account of all and any input received, and shall demonstrate to the VVB the action taken.

The project proponent and VVB closed all comments raised during the period of public comments. However, it was noticed that even when the comments were addressed, the statements made were not always substantiated with evidence. For example, as a response to comment number 5, the project proponent and VVB state that the beneficiaries do not have the capacity to purchase LPG bottles, however, there is no explanation on the assumptions or literature used to support such statements. Also, when a survey has been performed to substantiate the answer (for example, as an closure to comment number 6), not enough information on the survey was provided.

Could the project proponent and VVB please update the documents providing the evidence to support the statements used to close the comments received?

PP Response:

PP has updated response of public comments and included more specific references of literature and document references.

VVB Response: VVB updated his response based on supporting literature shared by PP.

Verra Response: Further justifications to the statements made when closing the comments were included in the revised Joint Project Description and Monitoring Report document. Thus, the finding is closed and no further action is required.

Finding 3

As per paragraph 3.16.3 of the VCS Standard version 4.1, the project proponent shall establish mechanisms for on-going communication with local stakeholders.

The project proponent did not provide information regarding the mechanism for on-going communication with the project stakeholders, as well as mechanism for grievances and comments on the project cookstoves. The project proponent shall establish a mechanism for on-going communication and reflect all comments received in the monitoring report. The VVB shall verify the effectiveness of the mechanism and how the project proponent addressed all comments received.

PP Response: As mentioned in section 2.2 of VCS PD and MR “During the stakeholder consultation Enen Green share draft PD and MR with stakeholders and keep a copy of draft PD and MR with local supplier and village head to collect comment from local stakeholders. So far no comments have been received from local stakeholders.” For ongoing communication with local stakeholder, users can record their grievance at local supplier or village head and this grievance directly taken care by project participants, same was communicated in stakeholder consultation meeting to local stakeholders.

VVB Response: VVB checked with stakeholder about grievance reporting process, and they confirm that they were communicated in stakeholder consultation process about grievance reporting process. No grievance reporting found in current monitoring period which is verified from copy of grievance register.

Verra Response: The project proponent included further clarification on the mechanism for ongoing communication with project stakeholders and the VVB checked that the mechanism was in place and that no grievance was reported during the monitoring period. Thus, the finding is closed and no further action is required.

Finding 4

The VCS Standard, v4.1 Sections 4.1.13-14 require the project proponent and VVB to use the relevant template for reporting and adhere to all instructional text within the relevant template. The Project proponent and VVB shall address all the applicability criteria of the applied methodology in the joint

project description and monitoring report and in the validation and verification report.

It was noticed that the project proponent did not address the requirement set out in the methodology that states "applicability criteria number 8 and 9 of AMS II-G version 11.1 shall be applicable in addition to the above".

The project proponent needs to include an assessment of the missing applicability criteria as per the requirement criteria in number 8 and 9 of AMS II-G version 11.1. The VVB is required to assess the applicability criteria and the validity of any assumptions or data applied.

PP Response: PP has included AMS II G version 11.1 para 8 and 9 applicability criteria under section 3.2 Applicability of Methodology in revised VCS PD and MR.

VVB Response: VVB has assessed the applicability criteria number 8 and 9 of AMS II G version 11.1 and checked supporting documents as well to verify the details.

Verra Response: The missing applicability criteria was included in the revised version of the Joint Project Description and Monitoring Report document, and this was correctly assessed by the VVB. Thus, the finding is closed and no further action is required.

Finding 5

The VCS Standard, v4.1 Sections 3.12.3, when developing the baseline scenario, assumptions, values and procedures shall be selected that help ensure that net GHG emission reductions and removals are not overestimated.

In the joint project description and monitoring report the project proponent states that the household size shall be determined using credible references / literature or target population specific surveys. However, it's not clear how the project proponent determined the value applied of household size (there is just a reference to a survey from 2011 in Section 5.1 of the joint project description and monitoring report). Also, there is an inconsistency in the value used to determine the size of the household, as the joint project description and monitoring report (page 24) states the applied value is 4.8 and the VVB (VR page 31) applies 5.

The project proponent is required to complete the joint project description and monitoring report with the assumptions used for the determination of the household size, and correct the inconsistency in the value applied. The VVB is required to provide an assessment on the determination of the household size and on whether the data sourced from the 2011 census is appropriate and the most recent data available.

PP Response: PP would like to clarify Census data is government-approved data and this survey conducted by government through government volunteers. Census 2011 is latest available data of Indian government. As per Census 2011 report average household size is 4.8 person per household, there is error in VVB report.

VVB Response: VVB team agreed with PP response, Census 2011 report is latest available report and it's published by Indian government. This survey is most authentic survey which is conducted by Indian government. The VR has been amended to correct the inconsistency on the parameter's value.

Verra Response: The VVB states that the data used to establish the household size is based on a governmental census conducted in 2011 and that the data is the most authentic report available and it's the latest census conducted. However, it was noticed that there are other sources that are also based on governmental data, which are more updated and result in more conservative estimations, such as <https://dhsprogram.com/pubs/pdf/FR339/FR339.pdf> (end of page 17) that states that the average household size is 4.6. The VVB is required to provide further justification on why the value applied is the most appropriate and how it is aligned to the VCS Conservativeness principle from the VCS Standard V4.1 Section 2.2.1. The finding is not closed.

PP Response: Based on discussion with VERRA team on 26/11/2021 PP has adopted latest data of National Family Health Survey (NFHS-4) 2015-16. PP has updated average household size based on NFHS-4 2015-16 as 4.6 and updated calculation in ER sheet as well.

VVB Response: VVB team confirms that PP has updated reference of average household size fixed parameter and adopted National Family Health Survey data published in 2015-16, which is a most conservative available data. PP has adopted average household size 4.6 and updated the MR and ER sheet. Therefore, VVB has also updated joint validation and verification report accordingly.

Verra Response:

The project proponent applied the value of the household size of 4.6 as per the information available from 2015-2016, which is also the most conservative value. Thus, the finding is closed and no further action is required.

Finding 6

The VCS Standard, v4.1 Sections 4.1.13-14 require the project proponent to use the relevant template for validation and verification reporting and adhere to all instructional text within the relevant template.

The project proponent is required to describe the sampling calculation of the parameters determined by sampling, such as the determination of the "Adjustment factor to account for any continued use of pre-project devices" and "Number of operating devices". Within others, the project proponent shall provide the number of samples surveyed, the method used to select the samples from the database, how the survey was carried out, the achieved confidence / precision level, etc. The VVB is required to assess all information provided by the project proponent.

PP Response: PP has added survey sample size calculation in section 5.3 of revised VCS PD and MR. PP has also defined how he determined "Adjustment factor to account for any continued use of pre-project devices" and "Number of operating devices" through survey.

VVB Response: VVB team verified sample size calculation from third party survey report, it was calculated in report as well, PP has included same calculation in Joint PD and MR. VVB team also verified survey questionnaire which includes all questions related to ICS unique id, name of beneficiary, installation date, usage of any traditional cookstove, quantity of fuel use per month, operational status of ICS.

Verra Response:

Information on the sample size calculations were included in the revised Joint Project Description and Monitoring Report document, and the VVB confirmed that the is aligned to the third-party report and that the margin of error obtained was less than 10%. The finding is closed, and no further action is required.

Finding 7

The VCS Standard, v4.1 Sections 4.1.13-14 require the project proponent to use the relevant template for validation and verification reporting and adhere to all instructional text within the relevant template.

It is noted that in Section 2.1 of the joint project description and monitoring report, the project proponent states “No negative impact of project activity” without providing explanations or assessment to support the statement.

The project proponent is required to include an assessment in Section 2.1 of the joint project description and monitoring report, including any potential negative environmental and socio-economic impacts and the steps taken to mitigate them. The VVB is required to assess the information provided by the project proponent.

PP Response:PP has updated text in section 2.1 of Joint VCS PD and MR. No potential negative environmental and socio-economic impacts have been identified by the project proponent. The project activity promotes environmental and socio-economic well-being. Also, project activity generated local employment which supports upliftment of socio-economic status of region.

VVB Response: VVB team confirms that there is no potential negative environmental and social economic impacts of the project activity.

Verra Response: The revised Joint Project Description and Monitoring Report document includes further information on Section 2.1. The finding is closed, and no further action is required.

Finding 8

The VCS Standard, v4.1 Section 3.6 require the project proponents to demonstrate that they have the legal right to control and operate project or program activities.

It is noted that in Section 1.8 of the joint project description and monitoring report, the project proponent states “The improved cook stoves technology installed at site of each of the project activity as part of the project activity are under ownership of respective Green Tech Environment.” However, the project proponent does not provide evidence of project ownership, in accordance with the VCS program specifications on project ownership.

The project proponent is required to provide the evidence of the project ownership, in line with the requirements of the VCS Standard, v4.1, and the VVB is required to assess the proof provided by the

project proponent.

PPresponse:Project implementor (Green Tech Environment) received carbon waiver from ICS users at the time of distribution of ICS devices. Carbon waiver declaration mentioned that Green tech environment can claim emission reduction of ICS devices for the life time of devices and user has no objection. Sample carbon waiver documents submitted to VVB.

VVB Response: VVB team verified carbon waiver and ICS distribution records to check ownership of project activity and found appropriate.

Verra Response: The revised Joint Project Description and Monitoring Report document includes further information on the project ownership. The finding is closed and no further action is required.

2. MINOR FINDINGS

Finding 1

The VCS Standard, v4.0 Sections 4.1.13-14 require the VVB to use the relevant template for validation and verification reporting and adhere to all instructional text within the relevant template.

The VVB must provide a revised version of the joint project description and monitoring report document with all required information from the “Other Entity”, given that the document provided does not contain information on contact person, title and telephone number.

PP Response: PP has included other entity Greentech Environment contact person details, title and telephone number.

VVB Response: VVB has updated Joint validation and verification report template and also confirms that PP has included other entity (Greentech Environment) contact person details, title and telephone number in joint PD and MR.

3. ASSESSMENT CONCLUSION

On 9 August 2021, Verra conducted a review of the registration and verification approval request for project ID 2336, Energy Efficient Cook Stove Implementation in India, the results of which can be found above. The project review report was sent to LGAI Technological Center S.A. with eight assessment findings and one minor finding. On 14 September 2021, Verra received responses to the findings above, which were not enough to close all findings. After holding a conference call on 26 November 2021, and receiving further responses on 3 December 2021, Verra could close all findings.

On 7 December 2021, Verra closed all assessment findings and no further action was required.