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	3162
Project Name	Holistic development of North East India through clean energy access
Review Type	Registration Approval
Program(s)	VCS Program
Project Proponent	SDG13 Ventures Pte Ltd
Methodology	VMR0006.: Methodology for Installation of High Efficiency Firewood Cookstoves" Version 1.1
VVB	KBS Certification Services Pvt. Ltd
Assessment Criteria	VCS Standard, v4.4
Date of First Issue	10th April 2023
Review Conclusion	Closed
Date of Final Issue	18th June 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	Inconsistent total estimated ERs		
	Issue 1. Section 1.1 of the project description (PD) states that the estimated annual GHG emission reduction from the project is 8,096,480 tCO_2e, while Section 1.10 of the PD states that it's 7,902,040 tCO_2e. Action Required 1. The VVB must ensure that the PP reports consistent and correct information across all sections of the PD and provide an assessment on the same in relevant section of the VR. Program Rule(s) *VCS Project Description Template Version 4.2, Section 1.1, 1.10* *VCS Validation Report Template Version 4.2*	**Round 1** VVB Response This was a typo error made by the PP. The PP had corrected the value in the revised VCS PD, version 05 dated 12/06/2023. The PP has revised the value of estimated GHG emission reductions in the section 1.1 as 7,902,040 tCO_2e. The same has been cross checked by VVB in the ER sheet and reported in FVR and was found consistent (*The estimated average annual GHG emission reduction from the project is 790,204 tCO2e and the total GHG emission reduction estimated for the whole crediting period from the project activity is 7,902,040 tCO2e*). Verra Response No further action is required.	Closed

#	Finding Description	VVB Response	Status
2	Issues with fNRB		
	Issue 1. The PP does not apply the latest version of TOOL 30 to calculate the fNRB for the project. 2. The PP is applying the fNRB value of the entire country despite the project location being limited to the seven north eastern states only. Action Required 1. The VVB must ensure that the PP applies the latest TOOL 30 v4.0 to estimate the fNRB. 2. The VVB must ensure that the PP applies the state specific fNRB to each project instance based on its location. 3. The VVB must provide an assessment on the updated fNRB values (state specific) in relevant section of the VR. 4. The VVB is requested to share the spreadsheet used to calculate the fNRB value. Program Rule(s) *VCS Standard v.4.4, Section 3.1.2* *CDM TOOL 30, v4.0* *VCS Project Description Template* Version 4.2, Section 3.1, 3.3.6	**Round 1** VVB Response 1. The PP has applied version 03 of tool 30 which was the valid version at the time of conclusion of validation. The version 03 grace period was expired on 05th May 2023 and the validation was concluded much before from the expiry of the applied tool. The applicability of the version 3 can be traced from the below screenshot of UNFCCC website: Also refer the link below for supporting the grace period of version 03 of Tool 30 in conjunction with the screenshot: https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-30-v1.pdf/history_view Title: Calculation of the fraction of non-renewable biomass (220 KB) Version: 3.0 EB meeting report: EB 108 annex 11 Validity: From 14 Dec 2020 00:00:00 GMT until 7 Sep 2022 23:59:59 GMT Requests for registration can be submitted until 5 May 2023 23:59:59 GMT 2. Please note that the f_{nrb} is being calculated by the PP for the project regions only i.e. limited to the north eastern states of India. The clarification has been included. The fnrb sheets consolidated is also attached with the response which was checked by the VVB and found consistent with the VCS PD. 3. The assessment on the updated fNRB values has been further elaborated in the relevant section of VR. 4. The spreadsheet demonstrating the calculation for fNRB value, as submitted by PP and reviewed by VVB, shall be submitted along with additional documents to VERRA team. The applied calculations have been checked by the VVB and found consistent in line with the CDM tool 30, version 03.	Closed

	VCS Validation Report Template Version 4.2	<u>Verra Response</u> The VVB must justify how a reasonable level of assurance was attained if the PP has referred to data from year 2011 and 2019 instead of the latest version of the State of Forest report. The VVB must ensure that the FNRB value of updated as per the latest available data. **Response:** PP Response: Round 2: PP would like to clarify that the 2011 data was used to derive the value of H as per the para 14 of the CDM Tool 30, version 3. Para 14 lays down: 14. The total consumption of woody biomass (H) is calculated using the following equation, accounting for all consumption within the applicable area (not only wood fuel but also timber and industrial consumption): $H = HW \times N + CE + NE$ Equation (3) Where: *HW* = Average consumption of wood fuel per household, including fuelwood and charcoal, in the applicable area in the relevant period (tonnes//household) The value was again compared with the state forest reports 2019, wherein the statewide data was provided for computing the value of H. The 2011 data was compared with the latest data of 2019 and it was concluded that the if the value of 'H' is determined with the 2019 data, the f_{nrb} will be increased from 87.48% to 89.92%. Therefore, the application of 2011 data over 2019 data considered as conservative. Here PP would also like to reiterate that the 2021 state forest report has no reporting of values of parameters included to compute 'H'. WE had therefore not used the 2019 data in the final f_{nrb} calculations. The fnrb tool 30 allows the data vintage up to year 2000 therefore the consideration of 2011 data after demonstrating the conservativeness over 2019 data gives a reasonable level of assurance. Refer the screenshot of section 4 of the Tool 30, version 3 wherein the data vintage cap has	

been given year 2000 (not before that) in case the most recent data is not available. In our case the recent data was available was 2019 data but the use of 2011 data was showing more conservative
results.

Fnrb sheet with both the values are attached herewith.

4. Data and parameters

Data / Parameter table 1.

Data / Parameter:	*HW*
Data unit:	tonnes/household
Description:	Average consumption of wood fuel per household, including fuelwood and charcoal, in the applicable area in the relevant period

Source of data:	Use one of the following options: (a) Approved standardized baselines valid for the applicable area; or (b) Official statistics or reports or peer-reviewed literature; or (c) Results of a sampling survey conducted as per the latest version of "Standard for sampling and surveys for CDM project activities and programmes of activities"; or (d) Default values adopted by the CDM Executive Board (e.g. a default value of 0.5 tonnes/capita per year under AMS-II.G.). The most recent available historical data shall be used. However, the vintage of the above data shall not be before year 2000
Measurement procedures (if any):	-
Monitoring frequency:	-
QA/QC procedures:	If national studies or government data are used, cross-check the values with global data (e.g. Global Forest Resources Assessment by the FAO, other UN data) and provide justification for any differences
Any comment:	-

VVB Response:

VVB is in accordance with the clarification stated by PP above and reiterates that it has assessed the Fraction of non-renewable biomass (fNRB) following the procedures outlined in the tool to calculate the fraction of NRB, "Tool 30: Calculation of the fraction of non-renewable biomass version 03" ,referred in the CDM methodology AMS-II. G, version 12.
The tool allows the data vintage up to year 2000 therefore the consideration of 2011 data to calculate fNRB (87.48%) after demonstrating the conservativeness over 2019 data (89.92%)

		gives a reasonable level of assurance. **Verra Response Round 2:** The 2011 data of 'Non energy application of wood' (Cell C31 of each workbook in the spreadsheet) cannot be traced back to table 7.4.6 of the India state of Forest Report, 2011. The VVB must ensure that they provide a detailed reference of this data for each of the states so that this value can be traced back for every state. Additionally, the VVB must provide an assessment on how the indicated in the spreadsheet was derived. Non energy application of wood (NE) 394500 t	
		Round 3	
		VVB Response VVB has confirmed that PP has updated the f_{NRB} excel sheet (Version 3.0) dt 29 March 2024 by incorporating Table 7.4.6 from the India State of Forest Report, 2011 and detailing through the note to ensure better transparency. The following changes in the work sheet is as follows: 1) For Arunachal Pradesh worksheet – the changes are reflected in cell C37 for "**Non energy application of wood**". The value under cell C37 is a calculated value and the notification is now clearly provided under cell E 37 2) For Arunachal Pradesh worksheet – the changes are reflected in cell C37 for "**Non energy application of wood**". The value under cell C37 is a calculated value and the notification is now clearly provided under cell E 37 3) For other remaining NE states like (Meghalaya, Manipur, Mizoram, Nagaland, Sikkim & Tripura), the "**Non energy application of wood**" is calculated under cell C32 of worksheet name "Consolidated_Data". The calculations are done from the collective values taken from the row no. 22 of the table 7.4.6 of forest report 2011. As per the information provided on the page 5, Paragraph 12 of Tool 30 mentioning that "*Cubic meters (m3) instead of tonnes (t) of wood may be used for estimation of f_{NRB} values, as long as the same unit and the same conversion factor (e.g. wood density, moisture content) are consistently used for estimation of both the total consumption of woody biomass (H) and the renewable biomass available (RB).*", the assessment team confirms that the calculation for the 'non-energy application	

		of wood' is determined by the following formula: Non-energy application of wood (tonnes) = Quantity of wood used in house construction, furniture, and agriculture implements (Million Cubic Metre) × Wood Density (kg/m^3) Furthermore, because of the increase in fNRB and the higher value of H, PP has chosen the conservative value of 0.5 kg/m^3 instead of 0.7 kg/m^3 . The VVB has accepted the approach of conservativeness and same has been incorporated in the section 3.3.8 of FVR page 43, dated-11-April-2024, version 04.	
		Verra Response This finding is closed based on VVB's confirmation.	

#	Finding Description	VVB Response	Status
3	Continued stove usage		
	Issue 1. Section 1.11 and other sections of the PD indicate that the lifetime of the stove is 7 years. However, the PP does not assert how continued usage of the stoves will be ensured after the end of their lifetime. Action Required 1. The VVB must ensure that the PP includes information regarding the continued usage of stoves after the end of their lifetime. They must also provide an assessment of the same in relevant sections of VR.	Round 1 VVB Response It has been assessed by VVB that the stoves are planned to be distributed in a phased wise manner, divided into 5 phases with the distribution of 50,000 ICS in each phase. Each distributed cook stoves in project will claim the VCUs up to the stated lifetime 7 years only. As the crediting period of the project is reported to be of 10 years, hence after the completion of 7 years, the batches which completed its life (Phase 1,2 and 3) will be excluded from the project and only that batch which have the remaining lifetime (batch 4 and 5) will continue to be part of the project..	Closed

<table>
<tr>
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<td>Program Rule(s)
VCS Project Description Template Version 4.2, Section 3.1
VCS Validation Report Template Version 4.2</td>
<td>.
<table>
<tr><td>Phase-I</td><td>Year-1</td><td>50,000</td><td>ICS</td></tr>
<tr><td>Phase-II</td><td>Year-2</td><td>50,000</td><td>ICS</td></tr>
<tr><td>Phase-III</td><td>Year-3</td><td>50,000</td><td>ICS</td></tr>
<tr><td>Phase-IV</td><td>Year-4</td><td>50,000</td><td>ICS</td></tr>
<tr><td>Phase-V</td><td>Year -5</td><td>50,000</td><td>ICS</td></tr>
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The stoves which are distributed in year 1 shall not claim the credits once it meets its 7-year lifetime tenure . and the same process shall be applied for each respective phase. Any ICS will not claim the ERs beyond the lifetime of 7 year, so only iCS distributed in phase 4 & 5 will contribute in ERs till the end of the crediting period.
VVB has cross verified that this is in line with the requirement of the applied methodology VMR0006- Methodology for Installation of High-Efficiency Firewood Cookstoves,ver 1.1, section 9.1, which states that *“Technologies aged beyond their useful lifetime, as established in the usage survey, are removed from the project and no longer credited”*
The ER sheet has been adequately designed for clarity. The revised ER sheet by the PP shall be attached with the response.
VVB confirms that the VCS PD has been now updated to include this clarity and found consistent.
The verification report has been further elaborated in this regard under section 3.1.

Verra Response
This finding is closed based on VVB’s confirmation.</td>
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#	Finding Description	VVB Response	Status
4	Missing information		
	Issue 1. The PP has not provided the KML file since it is a grouped project. 2. The PP does not provide details on the mechanism for on-going communication with local stakeholders in section 2.2 of the PD. 3. Section 5.3 of the PD does not include the organizational structure, responsibilities and competencies of the personnel that will be carrying out monitoring activities. Action Required 1. The VVB must ensure that they update section 1.12 of PD as per the VCS Standard requirements and provide an assessment about the same in the VR. 2. The VVB must ensure that the PP includes information on the mechanism for on-going communication with local stakeholders in the PD and assess the same. 3. The VVB must ensure that section 5.3 of the PD is updated as per the template instructions. Program Rule(s) *VCS Standard v4.4, Section 3.5.1, 2.2 and 5.2* *VCS Project Description Template Version 4.2, Section 1.12* *VCS Validation Report Template Version 4.2, Section 3.1*	Round 1 VVB Response 1. KML file was uploaded during the listing and available on the project webpage in VERRA registry. The kml file is attached herewith again. 2. VCS PD is updated and the methods of on-going communication with local stakeholders are incorporated in section 2.2 of the VCS PD. The same has been cross checked by the VVB and was found consistent with VCS standard,v4.4. 3. Organization chart has been included in the revised VCS PD, version 5 dated 12/05/2023 with regard to the responsibilities are also mentioned therein. The VVB has crosschecked the same and was found consistent as per VCS project description template, version 4.2. Verra Response No further action is required	Closed

#	Finding Description	VVB Response	Status
5	Justification of assumptions.		
	Issue 1. No section of the PD provides a justification on why the ex-ante value of $B_{y=1,new,i,j,survey}$ is assumed as 1.35 t 2. The ER sheet provides calculation for the first 7 years (i.e., lifespan of ICS). The PP does not provide any justification on how the ex-ante emissions of year 8, 9 and 10 were assumed. Action Required The VVB must ensure that the PP updates the PD with the above sought justifications. They must also provide an assessment of the same in relevant sections of VR. Program Rule(s) *VCS Project Description Template Version 4.2* *VCS Validation Report Template Version 4.2*	**Round 1** VVB Response 1. $B_{y=1,new,i,j,survey}$ is assumed as 1.35 t for ex-ante based on professional and sectoral experience and shall be monitored by the PP ex-post. The PP has a vast portfolio of ICS projects under various GHG schemes. The results are based on the experience of PP on the infield monitoring in the other GHG projects in India including the VCS projects. This would correspond to ~5 Tonnes/HH/Year of baseline consumption which is reasonable in Indian context and North Eastern states. Notwithstanding, the actual value will be subject to monitoring and reflect in the ex-post emission reductions. Therefore, for the calculation of ex-ante ERs, the PP's reasonable assumption is applied which was cross checked by the VVB and was found satisfactorily. The justification of the same has also been included in the section 5.1 of the updated VCS PD, version 5 dated 12/05/2023. .2. VVB likes to state that the emission figures for year 8, 9,and 10 are not assumed but the calculated figures based on ex-ante parameters shown in section 5.1 of PDD which are available at the time of validation and considering the number of stoves that would exist in this period. It has been reported by PP and also assessed by VVB that each distributed cook stove in the project will claim the VCUs up to the stated lifetime 7 years only. As the crediting period of the project is reported to be of 10 years, hence after the completion of 7 years, the batches which completed its life (Phase 1,2 and 3) will be excluded from the project and only that batch which have the remaining lifetime (batch 4 and 5) will continue to be	Closed

part of the project._The stoves which are distributed in year 1 shall not claim the credits once it meets its 7-year lifetime tenure . and the same process shall be applied for each respective phase. Any ICS will not claim the ERs beyond the lifetime of 7 year, so only iCS distributed in phase 4 & 5 will contribute in ERs till the end of the crediting period.
The ER sheet has been adequately designed for clarity as evident from snippet below.

Emission Reduction Summary		Year	S
Year	Emission Reduction		1
Year 1	3,38,704		2
Year 2	6,18,715		3
Year 3	8,67,225		4
Year 4	10,87,766		5
Year 5	12,83,474		6
Year 6	11,18,432		7
Year 7	9,92,511		
Year 8	7,44,001	Year 1 batch excluded	
Year 9	5,23,460	Year 1 & 2 batches excluded	
Year 10	3,27,752	Year 1, 2 & 3 batches excluded	

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Verra Response
This finding is closed based on VVB's confirmation.

#	Finding Description	VVB Response	Status
6	Issues with applicability conditions		
	Issue	Round 1	Closed

	1. PP's justification for applicability condition 1 of the methodology states, "The evidence of the same for the distributed ICS till this verification have been furnished to VVB and it can be evidenced that all users are HHs". This is not a verification request, and the distribution of ICS will tentatively begin from 1st June 2023. 2. The references provided to demonstrate applicability condition 4 is broken. Action Required 1. The VVB must assess the above statement and ensure that the PP provides the correct information in section 3.2 of the PD. 2. The VVB must ensure that the reference link to demonstrate applicability condition 4 is accessible. Program Rule(s) *VCS Project Description Template Version 4.2, Section 3.2, 4.4* *VCS Validation Report Template Version 4.2*	VVB Response 1. The typo error has been corrected by the PP in the section 3.2 of the revised VCS PD, version 5 dated 12/05/2023. 2. The VVB has cross checked and found that the PP has now corrected the weblink reference for applicability condition 4 in the revised VCS PD, version 5 dated 12/05/2023. . Verra Response No further action is required	

#	Finding Description	VVB Response	Status
7	Briquettes usage		
	Issue 1. PP's justification for applicability condition 5 of the methodology indicates the possibility of the stoves using briquettes in the project scenario. However, Section 4.4 of the PD does not discuss the process of ER estimation in that scenario. Action Required	Round 1 . VVB Response 1. The PP had erroneously mentioned the use of briquettes in VCS PD. The same has now been corrected in the revised VCS PD, version 5 dated 12/05/2023 which was cross-checked by the VVB and was found consistent in	Closed

	1. The VVB must ensure that the PP provides an explanation on calculation of ERs in case briquettes are used in the project scenario in section 4.4. of the PD. 2. The VVB must provide an assessment of the same in the relevant section of the VR. Program Rule(s) *VCS Project Description Template Version 4.2, Section 4.4* *VCS Validation Report Template Version 4.2*	section 4.4 of the revised VCS PD. 2. It has been assessed and pre-reported in sec 3.3.2. of VR that "through the remote interviews it is confirmed that the grouped project activity shall disseminate energy efficient biomass-based cookstoves to replace the baseline stoves and these stoves shall not be fired with any other type of fuel. Verra Response No further action is required.	

#	Finding Description	VVB Response	Status
8	Additionality		
	Issue The following issues should be addressed under the Project method to demonstrate additionality using TOOL 1, v7.0. 1. In step 2a, the PP does not determine if the project activity and the alternatives identified in Step 1 generate no financial or economic benefits other than CDM related income. Instead, they simply justify the method based on the project scenario. 2. In step 2b, the PP does not clearly demonstrate if there is at least one alternative which is less costly than the project activity. Action Required 1. The VVB must ensure that the PP addresses the above-mentioned issues in section 3.5 of the PD and provides a	Round 1 VVB Response 1. The PP has corrected the same in the revised VCS PD, version 5 dated 12/05/2023. The same was checked by the VVB and was found in line with the additionality tool 1, version 7.0. 2. The VVB has further elaborated the same in the section 3.3.5 of the VR. Verra Response No further action is required.	Closed

	clear and stepwise demonstration of additionality as per TOOL 1, v7.0. 2. The VVB must provide an assessment about the same in section 3.3.5 of the VR. Program Rule(s) *VCS Standard v4.4, Section 3.14* *CDM TOOL 1, v7.0* *VCS Project Description Template Version 4.2, Section 3.5* *VCS Validation Report Template Version 4.2, Section 3.3.5*		

#	Finding Description	VVB Response	Status
9	Parameter $B_{y,savings,l,j}$		
	Issue As per section 4.1 and the ER sheet, the PP uses equation 4 of the methodology to estimate parameter $B_{y,savings,l,j}$. Considering this, the following issues should be addressed. 1. There is no role of parameter B_{old} in estimating $B_{y,savings,l,j}$ but the PP has also referred to equation 6 of the methodology used to estimate $B_{old,adjusted}$ in Section 4.4 of the PD. 2. Section 4.1 of the PD does not clearly describe how the PP determines efficiency $n_{new,l,y}$ (i.e., water boiling test or sample survey). 3. The VVB assessment in section 3.3.6 of the VR regarding parameter $B_{y,savings,l,j}$ is not in line with section 4.1 of the PD. Action Required 1. The VVB must ensure that the PP updates Section 4.1 of the PD to provide clear and correct steps involved in estimation	Round 1 VVB Response: 1. The PP has now omitted the equation 6 from the revised VCS PD, version 5 dated 12/06/2023. The VVB has cross checked the same in the section 4.1 of the revised VCS PD and has confirmed that the equations and steps are correctly applied by the PP in line with the applied methodology "VMR0006- Methodology for Installation of High Efficiency Firewood Cookstoves Version: 1.1" in the estimation of parameter $B_{y,savings,l,j}$ 2. The PP has used the third party lab test report as per WBT methods issued by KIRDI to determine $n_{new,i,y}$. The VVB has cross checked and confirmed that the same has been elaborated in section 4.1 of the revised VCS PD, version 5 dated 12/06/2023. 3. The VVB further elaborated the assessment of the parameter $B_{y,savings,l,j}$ and confirmed that it aligns with	Closed

	of parameter $B_{y,savings,l,j}$ at the same time justify the usage of parameter B_{old} if applicable. 2. The VVB must ensure that the PP describes, in Section 4.1 of the PD, how they determine the efficiency $n_{new,i,y}$. 3. The VVB must ensure that their assessment on parameter $B_{y,savings,l,j}$ aligns with the information in section 4.1 of the VR. Program Rule(s) *VCS Project Description Template Version 4.2, Section 4.1* *VCS Validation Report Template Version 4.2, Section 3.3.6*	the information in section 4.1 of the revised VR. Verra Response No updated assessment on $B_{y,savings}$ is included in section 3.3.6 of the VR. Section 4.1 of PD uses equation 4, whereas 3.3.6 of VR uses equation 3 and are therefore, inconsistent. The VVB must ensure that they provide an assessment on the calculation of the parameter $B_{y,saving,l}$ in line with equation used to estimate this parameter. **VVB Response:** The quantify of woody biomass saved($B_{y,savings,l,j}$) due to implementation of improved cook stoves has been estimated in the project activity using Equations 4 of applied approved methodology and the same is now updated in VR under section 3.3.6. **Verra Response:** This finding is closed based on VVB's confirmation.	

#	Finding Description	VVB Response	Status
10	Missing information in monitoring plan		
	Issue Section 5.3 of the PD does not include the data recording requirements described in Section 9.3 in VMR0006, v1.1. Action Required 1. The VVB must ensure that section 5.3 of the PD fulfils the data recording requirement outlined in section 9.3 of VMR0004, v1.1.	Round 1 VVB Response 1. The VVB has cross checked and confirmed that the PP has updated the VCS PD, version 5 dated 12/06/2023 in the section 5.3 with regard to the data recording requirement in line with VMR0004, v1.1. 2. The VVB has provided the assessment in section 3.3.8 of the revised and updated the VR.	Closed

	2. The VVB must provide an assessment on the same in section 3.3.8 of the VR. Program Rule(s) *VMR0006, v1.1, Section 9.3* *VCS Project Description Template Version 4.2, Section 5.3* *VCS Validation Report Template Version 4.2, Section 3.3.8*	Verra Response No further action is required.	

#	Finding Description	VVB Response	Status
11	Missing information in eligibility criteria		
	Issue Section 1.4 of the PD does not include a criterion on whether all project activity instances within ten kilometres of another instance of the same project activity and with the same project proponent shall be included in the same project. Action Required 1. The VVB must ensure that the PP includes the above-mentioned criteria in section 1.4 of the PD. 2. The VVB must provide an assessment on the same in section of the VR. Program Rule(s) *VCS Standard, v4.4, Section 3.6.8* *VCS Project Description Template Version 4.2, Section 1.4* *VCS Validation Report Template Version 4.2*	Round 1 VVB Response 1. The PP has revised the Section 1.4 of the VCS PD, version 5 dated 12/06/2023 which was cross checked by the VVB and found consistent with the requirements of section 3.6.8 of VCS standard, version 4.4. 2. The VVB has updated the same in the revised VR. Verra Response No further action is required.	Closed

#	Finding Description	VVB Response	Status
12	Lack of clarity on the appropriateness of local stakeholder consultation		
	Issue Section 2.2 of the PD states that the PP announced the consultation publicly. However, the project covers seven states, and the announcement was given in the regional newspaper of Meghalaya state only. Moreover, the announcement was in English and only two local stakeholders were present. Action Required Given that the project will distribute 250,000 stoves to mostly rural or rural-urban households, the VVB must clarify how the consultation helped maximize participation from stakeholders and allow stakeholders to evaluate impacts, raise concerns about potential negative impacts, and provide input on the project design. Program Rule(s) *VCS Standard, v4.4*, Section 3.18.13 *VCS Project Description Template Version 4.2, Section 2.2* *VCS Validation Report Template Version 4.2, Section 3.2.2*	Round 1 VVB Response The PP has used the news paper advertisement which is one of the methods to invite the local stakeholders, the email and personal invitations were also sent to various stakeholders to the regions. The same has been cross checked by the VVB and was found consistent. Also, VVB has confirmed that English is widely spoken language. Therefore, purposefully the English news paper with wide ridership was selected for the advertisement. The PP has now included the additional names of stakeholder consultation. Moreover the local NGOs/organizations are also falls in the category of local stakeholders which was cross checked by the VVB and found to be in line with definition of stakeholders in the CDM glossary of terms. The consultation will also be undertaken as of SD VISTA as part of ongoing consultations as this project is to be developed as SD VISTA. Verra Response No further action is required.	Closed

#	Finding Description	VVB Response	Status
13	Inconsistent details of third-party report on stove efficiency		
	Issue	Round 1	Closed

	Section 3.1 of the VR states that the VVB validated that the third-party efficiency test report via interview and review. However, the third-party (KIRDI) appears to only operate in sub-Saharan Africa, while the project takes place in India. Action Required 1. The VVB is requested to clarify the appropriateness of the stove efficiency report if the third-party does not operate in India. 2. The VVB is requested to share the stove efficiency test report with Verra. Program Rule(s) *VCS Standard, v4.4*, Section 4.1.2 *VCS Project Description Template Version 4.2, Section 3.1* *VCS Validation Report Template Version 4.2* Background The efficiency of the new stoves is 38%, which is determined via a water boiling test (WBT) conducted by a third-party organization, KIRDI stove testing centre.	VVB Response 1. The VVB has checked the appropriateness the use of third-party (KIRDI) which has been used for lab test as per the WBT methods given in ISO 19867 test sequence protocol. The tests are universally accepted. Also, WBT tests are undertaken in the laboratory conditions and adequate correction factors used to compute the heat transfer as per the principle of heat transfers in the field conditions. These tests are already accepted by the VERRA & other GHG programmes in the Indian and South Asian conditions. VVB has cross checked the same in similar recently registered VCS project 2999 in Nepal by PP, VCS 2553 in India. 2. The stove efficiency test report is now been shared by the VVB. Verra Response This finding is closed in light of the VVB assessment and confirmation of the claim.	

#	Finding Description	VVB Response	Status
14	Unclear validity of the conditions prior to project and baseline scenario		
	Issue	Round 1	Closed

	Sections 3.1 and 3.3.4 of the VR state refers to an article on the firewood consumption in the Indian Himalayan region. However, most of the data referenced is from a 2011 census. Action Required Given that the project activity is taking place in 2023, the VVB must clarify the appropriateness and validity of the information presented in the article to establish the conditions prior to project activity and baseline scenario. Program Rule(s) *VCS Standard, v4.4*, Section 4.1.2 *VCS Validation Report Template, v4.2, Section 3.1 and 3.3.4*	**VVB Response** The PP has now updated relevant sections of VCS PD which is also supported with the latest data available in the public domain. Revised VCS PD, version 5 dated 12/06/2023 was cross checked in this regard and was found satisfactory. The latest Niti Ayog data is also included in the VCS PD, version 5 dated 12/06/2023 by the PP to further support the old data. As additional assessment based on VERRA Review observations, VVB has crosschecked and reconfirmed the data against latest available research paper of 2020- "Firewood consumption and extraction from community forests in East Khasi Hills District, Meghalaya: Its impact on woody species diversity and population structure" which reconfirms that , firewood was the main fuel used to suffice domestic needs. The other research paper in the context of Nagaland titled "Domestic Firewood Consumption Pattern and Degradation of Forest Cover: A Case Study of Mokokchung Town, Nagaland". VVB has also assessed the recent government data (Niti Ayog) from the report, "NORTH EASTERN REGION DISTRICT SDG INDEX REPORT & DASHBOARD 2021-22" was also cross checked which re-affirms that the project targets the distribution in the districts of North Eastern states wherein the access to clean cooking fuel is less than 30%.	
		Verra Response This finding is closed in light of the VVB assessment and confirmation of the claim.	