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24 August 2020

Zhiwen Gao
Climate Bridge
Block B, Level 24
Jiangong Mansion
33 Fushan Road
Pudong New Area
Shanghai, 200120

Dear Zhiwen Gao,

This letter is in reference to your exemption request submitted to Verra on 13 August 2020. It is our understanding that you are requesting an exemption from Section 4.1.20 of the *VCS Standard, v4.0* for project 2098, Nanhai MSW II Incineration Project. Section 4.1.20 of the *VCS Standard, v4.0* states that a validation/verification body (VVB) may not verify more than six consecutive years of a project's GHG emission reductions or removals.

Based on the information provided to Verra, it is understood that the project proponent intends to verify emission reductions for the period 1 March 2015 – 31 December 2018. The project's VCS crediting period is 1 June 2011 – 31 May 2021, and the project is registered with the Clean Development Mechanism (CDM). The project issued Certified Emission Reductions (CERs) from the period 27 February 2012 – 28 February 2015. In order to ensure the project's monitoring periods are contiguous with no time gaps between monitoring periods, as required by Section 3.4.4 of the *VCS Standard, v4.0*, the project proponent intends to verify a 1 June 2011 – 31 December 2018 period, a total of seven years. Due to the prohibitive cost of contracting two separate VVBs, per the requirement in Section 4.1.20 of the *VCS Standard, v4.0*, the project proponent has requested an exemption from the requirement.

This exemption is granted with the understanding that the project will not issue Verified Carbon Units (VCUs) for the dates 1 June 2011 – 27 February 2012, though the emission reductions achieved during this time period shall be assessed by a VVB as part of the project's verification. Please note that such decisions are made by Verra on a case-by-case basis and do not form the basis of, or set a precedent for, future exemption request approvals or denials.

When submitting verification documents, the project proponent must present a copy of this letter to Verra. This letter will be uploaded to the Verra registry as a public document.

Sincerely,

A handwritten signature in black ink, reading "Naomi Swickard". The signature is fluid and cursive, with the first name "Naomi" and last name "Swickard" clearly distinguishable.

Naomi Swickard
Chief Program Officer, Verra