

VERRA REVIEW FINDINGS REPORT

This report includes findings identified during Verra’s post-registration review of the below-mentioned project. The review was conducted pursuant to Section 6 of the *VCS Registration and Issuance Process*.

The VVB must:

1. Address the findings and provide responses in this report for Verra’s review.
2. Attach supporting documentation as needed.

Confidential information may be provided as separate attachments and should be clearly designated as such.

This report may be shared with the relevant accreditation body.

Project and Relevant Assessment(s)	1721, ONIL Stoves Guatemala Uspantan VCS Validation (Validation Report Issued on 17 February 2022) for CP2: 20/12/2020 – 19/12/2030. VCS Verification (Verification Report Issued on 18 July 2023) for MP6: 01/10/2021 – 30/09/2022.
Verra Program(s)	Verified Carbon Standard (VCS) Program
VVB	KBS Certification Services Limited.
Lead Contact	Kaushal Goyal and Praveen Urs
Contact Information	director@kbscertification.com and praveen@kbscertification.com
References	VCS Standard, v4.7; VCS Program Guide, v3.7; ISO 14064

Date of First Issue	29 July 2024
Due Date for Responses	16 August 2024
Review Conclusion	Approved
Date of Final Issue	03 February 2025

FINDINGS

Finding 1 - Lack of clarity in the estimation of parameter ' $n_{new,y,i,j}$ ' (Efficiency of the improved cookstove type i and batch j during year y).

Issues

1. The raw data obtained from the lab/field measurement equipment have not been cross-checked to verify the final values submitted to Verra and VVB, which is necessary to confirm the absence of data inaccuracies and inconsistencies.
2. The project has not demonstrated how it complied with the second applicability condition of the methodology, which states “The project stove shall have specified high-power thermal efficiency of at least 25% per the manufacturer’s specifications and shall exclusively use woody biomass and can be single pot or multi-pot; in case of project stove replacing fossil fuel baseline stove, it shall exclusively use renewable biomass”.
3. In the 1st CP, the stoves were installed and their efficiency was first estimated 24%, however, at renewal, the same installed stoves increased their efficiency to 31.67% and PD does not provide justification for the increase.

Action Required

1. The VVB must assess how the $n_{new,y,i,j}$ value applied for monitoring period(s) is accurate, consistent and credible for monitoring period(s) under review.
2. The VVB must confirm that no project cookstoves with the thermal efficiency of less than 25% have been included in ERR calculations.
3. The VVB must provide an assessment of how they confirmed that the increase in stove efficiencies was justified and that stove thermal efficiency did not degrade over time.
4. The VVB must use objective evidence to independently assess information provided by the project proponent related to the value applied, and ensure that the monitoring report and verification report are updated to include this evidence and assessment.

Program Rule(s)

VMR0006 Methodology for Installation of High Efficiency Firewood Cookstoves, v1.1; Section 4

KPT Protocol listed by Clean Cooking Alliance; WBT Protocol or ISO 19867-1 listed by Clean Cooking Alliance

VCS Standard, v4.7, Sections 2.2.1, 3.16.3 - 3.16.5

Background

Refer Annexure I

VVB Response

1. The raw data sheets were verified by the verification team from the emails received by the third party to get the enough confidence after the project has received the findings under Article 6. It was noted that the last two vintages have resulted the efficiency less than 25%, which is the minimum efficiency threshold mentioned in the VMR0006, v 1.1. PP has excluded the ERs from the vintage 12 and 13 wherein the efficiency has been observed less than 25%. The total ERs have been adjected accordingly in the ER sheet. The calculation assessed correct by the project verification team.
2. PP has excluded the ERs from the vintage 12 and 13 wherein the efficiency has been observed less than 25%. The total ERs have been adjected accordingly in the ER sheet, the ERs from vintage 12 & 13 are considered zero, and adjusted in the total ERs. The calculation assessed correct by the project verification team and demonstrated in the revised ER sheet by the PP.
3. PP responded that the project was transitioned from CDM CPA to VERRA project and the validated efficiency under CDM POA RCP was 24% to 32% based on improvements made in design during implementation in previous years. VVB reviewed the validation report of the CDM POA and verified the information in conjunction with the issuance granted for the CPA in previous crediting period. It was observed that the efficiency under the CPA was verified up to 29.3% based on the WBT results, under the CDM issuance granted to the project. Therefore, the manufacturer's estimation of 31.67% efficiency for the upcoming new stoves for the ex-ante estimates was assessed reasonable. VVB would like to clarify here that the efficiency of project stoves is the monitoring parameter, therefore the estimations had no material impacts on the actual ERs. The clarification is therefore accepted.

Verra Response

The VVB has outlined how the stove efficiency was determined and the variation in the monitored values. Since the project was transitioned from CDM to Verra, the monitoring process employed under CDM procedures was adopted for Verra. Additionally, the monitoring requirement under CDM methodology and VMR0006 v1.1 is the same. Therefore, the efficiency of the stoves as determined is acceptable.

The VVB has also outlined that due to aging of the stove and degradation of stove efficiency, vintages 12 and 13 has a lower stove efficiency than the minimum of 25% as required by the applied methodology in order for the stoves to claim any carbon credits. For those vintages where the monitored efficiency was found to have dropped below 25%, those stoves have not claimed any emission reductions for that specific vintage. This is in line with the applied methodology.

The resulting emission reductions have been updated. The issue is closed.

Finding 2 – Determination of the proportion of installed cookstoves operating within the period not transparent

Issues

1. The proportion of operational cookstoves within the monitoring period(s) is reported to be 100%. This is likely unrealistic, given the minimal probability of 100% stove operation without breakages and abandonment over their lifetime. The project documentation does not transparently provide the measures put in place for on-time stove maintenance support for repairs and replacement.
2. The verification report does not provide a sufficiently detailed assessment of how the proportion of

operational cookstoves was verified with cross-checking of on-ground monitoring raw data.

3. The monitoring report(s) does not provide sufficient information on how the samples for determining stoves in operation were selected and the sampling process used.

Action Required

1. The VVB must assess and confirm the completeness, conservativeness and accuracy of the corrective MRV practices and sampling procedures related to determining the proportion of operational cookstoves within the monitoring period(s) under review.
2. The VVB must cross-check the value(s) used in ERR calculations with the on-ground monitoring raw data, project database, sales record and maintenance/repair logbook to confirm the accuracy and consistency of the value.
3. The VVB must use objective evidence to independently assess information provided by the project proponent related to the corrective value applied, and ensure that the monitoring report and verification report are updated to include this corrective method, evidence and assessment.

Program Rule(s)

VCS Standard, v4.7, Sections 3.16.3 - 3.16.5

Background

Refer Annexure I

VVB Response:

1. After the questions raised during the Section 6 review by VERRA on the appropriateness of the claimed operational rate, VVB again asked the PP to establish the survey reliability by providing them the 11 samples chosen online by using the online randomizer on a recorded call from the entire base of the project. The entire database was selected to crosscheck the appropriateness of original sampling undertaken by the PP and to provide the enough confidence to verification team.
The samples were selected in presence of all VVBs which were involved in the periodic verifications. The same samples were used as a crosscheck by all VVBs in their respective monitoring period. Out of 11, the higher samples were given from the oldest vintage and then in the descending orders. PP was asked to submit the data stamped photos and videos of the resampling.

Operational stove percentage was used to calculate number of stoves in operation ((Ny,i,j) year wise as below falling under the MP was:

Year	Operational stoves
Year 2021	6,274
Year 2022	5,869

PP has compared among:

- a) initial MP survey operational rate (97.63%)
- b) Secondary data (91.3%) of other stoves with same models in other regions and
- c) Verra 6.1 2024 survey results.

The most conservative values were applied based on the latest surveys and the ERs were adjusted accordingly by the PP. The ERs are now reduced from 90,392 tCO_{2e} to 28,557 tCO_{2e}.

2. As states above based on the recent survey insisted by the VVB across each age group, the ERs are adjusted accordingly based on the operational rate. The approach as stated above was assessed most conservative therefore accepted.
3. As stated by the PP and verified by the VVB that the original sampling at the time of Rfl was meeting the 95/10 confidence/precession which was established in the spreadsheet submitted to VVB at the time of verification. Now PP has revised the results based on the most conservative approach therefore the approach has been accepted based on the evidence shared viz. photos, videos, survey results.

Verra Response

The VVB has re-checked the documentation and submissions from the PP on the revised usage rates of project stoves. The VVB acknowledges that at the time of the verification, there was material information, which was not made available to the VVB, that had an impact on the overall emission reductions by the project for the monitoring periods for MP6: 01/10/2021 – 30/09/2022.

The VVB has reviewed the material information presented by the PP and based on the new information, the usage rate determined is lower than the one which was verified initially. The VVB reviewed the usage rate for the surveys which were carried out in 2024 and using the value obtained, an annual deration to previous years was applied with a fixed linear loss rate to arrive at usage rates for previous years. This form of backward extrapolation was considered conservative. The revised value was determined by following sound statistical procedures, whereby survey sampling was robust, and survey findings correctly analysed reviewed and found to be reliable.

In addition, the VVB also reviewed other similar cookstove projects within the region and established that they are using an average usage rate of 91.3%.

By opting for deration method to determine the usage rate from the value established in 2024 to determine the applicable values for 2021 and 2022, the VVB and the PP ensured that the values determined were conservative. VVB assessed that the approach is considered conservative and does not lead to overestimating emission reductions.

The resulting changes have been updated, and the Monitoring Reports and the Verification Reports have been revised.

The issue is closed.

ANNEXURE I

Background

The VVB must assess the accuracy, conservativeness, relevance, completeness, consistency, and transparency of the information provided by the project proponent, determine whether information/data provided by the project proponent is reliable, credible and complete, and base their findings and conclusions on objective evidence.

To assess the claims and assumptions in the MR, the VVB must not be limited to evidence provided by the project proponent and must describe all steps taken and sources of information used to cross-check the information contained in the MR. In doing so, the VVB must apply the means of verification required by the relevant Verra Standard, CDM accreditation standards and normative ISO documents, and standard auditing techniques, including, but not limited to:

- a. Document review involving cross-checks between the information provided in the MR, raw data and information from sources other than those used; if available, the VVB's sectoral or local expertise; and, if necessary, independent background investigations; and
- b. Follow-up actions (e.g., on-site inspection and telephone or email interviews), including:
 - i. Interviews with relevant stakeholders in the host country, such as personnel with knowledge of the project design and implementation.
 - ii. Cross-checks between information provided by interviewed personnel (i.e., by checking sources or other interviews) to ensure that no relevant information has been omitted.