

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	4679
Project Name	Project Reignite: Turning Farm Waste to Climate Action
Review Type	Verification Approval
Program(s)	VCS Program
Verification Period	16 October 2023 to 30 June 2024
Project Proponent	SRCNatura Sure Pvt. Ltd.
Methodology	VM0044, v1.1
VVB	RINA Services S.p.A (RINA)
Assessment Criteria	VCS Standard, v4.7.
Date of First Issue	21 April 2025
Review Conclusion	[Approved]
Date of Final Issue	[24 June 2025]

FINDINGS

#	Finding Description	VVB Response	Status
1	<p>Incomplete Audit History Table</p> <p><u>Issue</u> The audit history table is not properly completed</p> <p><u>Action Required</u> 1. The VVB must ensure the MR is revised to indicate the project's audit history</p> <p><u>Program Rule(s)</u> VCS Monitoring Report Template, v4.4, Section 1.2 VCS Verification Report Template, v4.4, Section 4.1</p>	<p>Round 1</p> <p><u>PP Response</u> We request you to please note that we had uploaded the MR into the Verra project hub. The MR pdf document is generated directly from the project hub. As such, we as the PP had duly completed the details of audit history in the project hub; however, these details have subsequently not appeared in the MR pdf document. This is an issue with the project hub and as the PP, we have no control over it. We give below the audit history of the project, which is as follows: VCS Validation: October 2023 VVB: RINA ; number of years: <1 year VCS verification: 16/10/2023 to 30/06/2024: RINA; number of years: <1 year</p> <p><u>VVB Response</u> We confirm that both MR as well as VR were created by entering details on Verra's project hub. The PP completed their MR and RINA, after the completion of verification, prepared the VR and uploaded the same on the hub. The missing details in the MR document are due to some issue with the project hub as the PP had entered the required details in the hub correctly. For the sake of clarification, the PP has provided the audit history above which we also confirm as correct. Project Hub team has corrected it now and the revised MR is corrected.</p> <p><u>Verra Response</u> Section 1.2 of the MR is now appropriately completed</p> <p>Round 2</p> <p><u>VVB Response</u> (Pending)</p>	Closed

		<u>Verra Response</u> (Pending)	
		Round 3	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

#	Finding Description	VVB Response	Status
2	Incorrect Crediting Period		
	<p><u>Issue</u> The crediting period indicated in Section 1.7 is incorrect. The crediting period is stated as 7 years twice renewable in Section 1.1 and 1.9 of the registered VCS PD</p> <p><u>Action Required</u> The VVB must ensure the PP revises the MR to indicate the correct crediting period and type</p> <p><u>Program Rule(s)</u> VCS Monitoring Report Template, v4.4, Section 1.7 VCS Verification Report Template, v4.4, Section 4.1</p>	<p>Round 1</p> <p><u>PP Response</u> We hereby confirm that the project crediting period is just as it is mentioned in the registered VCS PD ie. “seven years, twice renewable”. We did choose that same option while completing the MR in the project hub. However, while generating the pdf document of the MR, the third option, i.e. “Other” has got selected automatically. This seems to be due to some issue with the project hub. We had chosen the same option as in the VCS PD.</p> <p><u>VVB Response</u> The verification team has checked the project hub and finds that the PP has correctly chosen the first option (“7 years twice renewable”) while completing Section 1.7 of the MR in the project hub. While generating the pdf document, the third option “Other” has got selected. The verification team agrees that this could be due to some issue with the project hub and no correction is warranted on the part of the PP. Project Hub team has corrected it now and the revised MR is corrected.</p>	Closed

		<u>Verra Response</u> The crediting period of 7 years twice renewable has been updated in line with the registered VCS PD	
		Round 2 <u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	
		Round 3 <u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

#	Finding Description	VVB Response	Status
3	SDG Reporting and Claims		
	<u>Issue</u> The following is incorrect in Section 1.12 of the MR: <ol style="list-style-type: none"> The last column in the table must include the actual quantified and verified contributions of the project activity since the project start date. The number of farmers (biochar producers) in the SDG table is reported inconsistently as 3,595 and 5,000. Additionally, 5,000 facilities are incorrectly applied in the spreadsheet calculations. 	Round 1 <u>PP Response</u> <u>Response to issue no. 1</u> We have revised the MR at section 1.12 to clarify the actual quantified contributions of the project activity, wherever possible, for the listed SDGs. It may please be noted, however, that it is not possible to provide quantified data of achievement for every SDG indicator, because the period for which the data is reported is much too small (only eight and a half months: 16/10/2023 to 30/06/2024) for benefits to be observed and quantified with precision. Considering the socially and environmentally beneficial nature of the project, however, these benefits would be evident	Closed

<p>3. SDG 4 and SDG 14, along with their associated indicators, are not included in Section 1.17 of the VCS PD.</p> <p>4. It is unclear how the SDG 6 Indicator 6.6 is attributable to the activities under the project.</p> <p>5. In Section 4.1 of the VCS VR, the numbering of all SDG indicators is incorrect. Furthermore, SDGs not included in the registered VCS PD are mentioned in the monitoring report.</p> <p><u>Action Required:</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the total verified contributions are indicated in the last column of the SDG table. 2. The VVB must ensure consistent reporting of the number of farmers and biochar production sites. 3. The VVB must ensure that only SDGs indicated in the approved VCS PD are included in the MR. 4. The VVB must ensure only SDGs directly attributable to the project activity can claim achievement. 5. The VVB must ensure the SDGs and their indicators are correctly numbered, and only SDGs in the approved and registered VCS PD are included in the MR and VR. 6. The VVB must revise the VR accordingly. <p><u>Program Rule(s)</u> VCS Monitoring Report Template, v4.4, Section 1.12 VCS Verification Report Template, v4.4, Section 4.1</p>	<p>only over a longer time horizon of three to ten years into the future. We will continue to track the positive benefits from the project on a regular basis and report them whenever such benefits are perceptible.</p> <p><u>Response to issue no. 2</u> We would like to clarify that the number 3595 pertains to the actual number of farmers in the project activity that have produced the biochar during the current monitoring period 16/10/2023 to 30/06/2024; whereas the number 5000 is the total number of farmers that are participating in the project. We trust that answers the first part of Verra's query.</p> <p>We regret the error in the emission reduction spread sheet by which the number of farmers has been incorrectly applied as 5000. We have corrected this error by revising this number to 3595, which is the actual number of farmers that have produced the biochar during the current monitoring and reporting period.</p> <p><u>Response to issue no.3</u> The SDG indicators 4 and 14 are not a part of the registered VCS-PD. They had been included in the MR by mistake. We have now deleted these two parameters from the MR.</p> <p><u>Response to issue no.4</u> SDG indicator 6.6 represents the changes in the extent of water related ecosystems over time. The PP hereby states that the growth of water hyacinth and ipomea carnea lead to the growth and proliferation of these species in a water body such as a lake or a pond, which has an undesirable effect on the aquatic life in the water body. The project activity treats these two species as waste biomass to be used for the production of biochar in fields. As more and more of this biomass is used for biochar making in fields, the lakes/water bodies that were previously full of water</p>	
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		<p>have participated in the project. However, not all of the 5000 farmers have produced biochar during this monitoring period.</p> <p>The verification team also has reviewed the revised emission reduction spread sheet submitted by the PP to check that the error in reporting of the farmers (5000 in place of 3595) has been rectified. The team confirms that the same has been done.</p> <p><u>Response to issue no.3</u></p> <p>The verification team has reviewed the revised MR submitted by the PP to confirm that the SDG indicators 4 and 14 had been removed from the PD. The same was found to have been done; therefore, the team has accepted the changes made.</p> <p><u>Response to issue no.4</u></p> <p>The verification team during its site visit has observed first- hand how biochar is produced from biomass waste of plant species such as water hyacinth and ipomea carnea and can confirm that the use of these plants in the project activity does contribute towards an improvement in the ecosystem of the water bodies in which this species is ordinarily found. During the site visit, the team has observed how the removal of ipomea carnea has had a beneficial effect on the water ecosystem as the water is rendered free from the harmful effects of this vegetative species. The verification team therefore agrees that the SDG indicator 6.6 is relevant to the project activity.</p> <p><u>Response to issue no.5</u></p> <p>The Verra review reviewer’s comments are noted and accepted. RINA has revised its VR at section 4.1. The following corrections have been made:</p> <p>SDG 2.3.1: Description of the indicator is corrected to “Volume of production per labour unit by classes of farming/pastoral/forestry enterprise size”;</p>	
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		<p>SDG 2.4.1 (“Proportion of agricultural area under productive and sustainable agriculture”) is also added that was earlier missing;</p> <p>SDG 3.9.2 (“Mortality rate attributed to unsafe water, unsafe sanitation and lack of hygiene (exposure to unsafe Water, Sanitation and Hygiene for All (WASH) services)”) is explained with more clarity.</p> <p>SDG 4.3.1, 4.4.1 & 4.6.1: these three indicators have been deleted from the VR, as these indicators are not a part of the registered VCS-PD.</p> <p>SDG 14.1: This indicator has been deleted from the VR, as it is not a part of the registered VCS-PD.</p> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> 1. Quantifiable SDGs attributed to the project activity for the first monitoring period are included in the last column of the table 2. 3595 production facilities of the 5000 farmers are considered in the spreadsheet 3. SDG 4 and SDG 14 have been deleted 4. According to the VCS PD (page 18), biochar application leads to reduction in use of chemical fertilizers, absorbs contaminants as well as conserves water. The reporting in the MR is not consistent with the PD 5. The SDG indicators not in the registered monitoring plan have been excluded from Section 4.1 of the VR <p>Round 2</p> <p><u>VVB Response</u></p> <p>The PP has reported in the MR about the effect of their project on the use of chemical fertilizers in SDG 6 Indicator 6.3. These references can be found at</p> <ol style="list-style-type: none"> 1. Section 1.12 of the MR (page 12 of the pdf document) 2. Section 2.1.1 of the MR (page 19 of the pdf document) 	
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		<p>However, at both these places, the MR only reconfirms what has been stated by the VCS PD, viz., that the project has the (positive) impact of reducing chemical fertilizer use. Thus, we see that the MR is consistent with the PD.</p> <p>Thus, VVB found it to be correct and hence the finding is closed.</p> <p>Hope that the query is now resolved.</p>	
		<p><u>Verra Response</u></p> <p>The reporting of SDG 6 on the impact of chemical fertilizer use is deemed to be sufficient, and no further action is required.</p>	
		<p>Round 3</p>	
		<p><u>VVB Response</u> (Pending)</p>	
		<p><u>Verra Response</u> (Pending)</p>	

#	Finding Description	VVB Response	Status
4	Methodology and PD Deviations		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> The MR does not include explanations and justifications for the proposed changes as required under Section 3.20 & 3.21 of the VCS Standard v4.7. The new parameter introduced in Section 4.2 of the MR, 'Moisture Content of Biomass (Additional Project Parameter)', is not included as part of the project description deviation. <p><u>Action Required</u></p> <ol style="list-style-type: none"> The VVB must ensure explanations and justifications are included for the proposed deviations. The VVB shall explain how it validated that the new parameter 'Moisture Content of Biomass (Additional Project Parameter)' is not part of the PD deviation. 	<p>Round 1</p> <p><u>PP Response</u></p> <p><u>Response to issue no.1</u></p> <p>We request the Verra reviewer to kindly refer to section 3.2.2 Project Description Deviations and 3.2.1 Methodology Deviations of the MR that has been revised by us in response to the reviewer's comments. In this section, the MR has stated, with due justification and explanation, the deviations in project description which are summed up as follows:</p> <ol style="list-style-type: none"> Methodology deviations in respect of the parameters "Moisture content of biochar" and "H:Corg ratio" in terms of the frequency of recording of these two parameters Use of an additional biomass waste type (cotton stalks) with justification on why its use, which had not been conceived in the registered VCS-PD, does 	Closed

	<p>3. The VVB shall include detailed assessments of the deviations in the verification report (VR) in line with the requirements of the VCS Standard.</p> <p><u>Program Rule(s)</u> VCS Monitoring Report Template, v4.4, Section 3.21 VCS Verification Report Template, v4.4, Section 3.2 & 3.2 VCS Standard v4.7; Section 3.20 & 3.21.</p>	<p>not impact the applicability of the methodology, appropriateness of the baseline scenario and project additionality, as required by paragraph 3.21 of the VCS Standard v4.7</p> <p>c) The addition of an extra monitoring parameter “Moisture Content of Biomass” to the monitoring plan and how its addition would not impact the applicability of the methodology, appropriateness of the baseline and additionality of the project as required by paragraph 3.21 of the VCS Standard v4.7</p> <p><u>Response to issue no.2</u> We note the reviewer’s comment and have revised the MR at section 3.2.2 Project Description Deviations to include the additional parameter “Moisture Content of Biomass” (appearing further down in the MR at section 4.2 Data and parameters monitored). It may please be noted that the said parameter is not a part of the monitoring plan within the registered VCS-PD and has been added by us in the MR for the purpose of better control over the production process and eventually to also be able to improve the quality of the biochar that will be produced. For, the inclusion of this parameter in the monitoring plan serves to restrict the biochar production to only when the input biomass moisture content does not exceed 15%. We have observed through numerous trials conducted at the field level, that the quality of biochar produced is superior when the moisture content in the biomass waste is below 15%. Monitoring the moisture content of the biomass waste therefore ensures the integrity of the process as well as the quality of the biochar produced and is desirable from the point of view of the project. As the inclusion of this parameter constitutes an addition to the monitoring plan rather than a subtraction from it, we had not treated this as a deviation; since in our opinion, such an addition only adds to the efficacy of the monitoring plan and increases its</p>	
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		<p>effectiveness. However, we have noted the comments of the Verra reviewer and done the needful by amending section 3.2.2 of the MR.</p> <p><u>VVB Response</u> <u>Response to issue no.1& 2</u> The verification team has revised the VR in section 3.2 to add a justification for the PP’s inclusion of the additional monitoring parameter “Moisture content of Biomass” to the monitoring plan. It has been explained how the addition of this parameter would not affect the accuracy or completeness of the monitoring plan and also that it does not impact the applicability of the methodology, validity of the baseline scenario and additionality of the project. Hence, the verification team considers the project description deviations to be in line with the VCS Standard requirements at paragraphs 3.21.1 to 3.21.6. The verification team requests the reviewer to kindly note that as regards the deviation in the project description, viz., the use of cotton stalks as biomass feedstock for the biochar making process, this deviation is already justified in the VR at section 3.2 Project Description Deviations. Similarly, the VR has also explained that the deviation from the methodology VM 0044, viz., in respect of the parameters “Moisture content of biochar” and “H:Corg ratio” in terms of the frequency of recording of these two parameters do not negatively impact the quantification of the emission removals by the project activity; therefore, these deviations are also in line with paragraphs 3.20.1 to 3.20.3 of the VCS Standard v4.7</p> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> 1. Justification for the addition of the extra feedstock (cotton) and the change in frequency for H:Corg and moisture content of biochar have been added. 2. The Moisture Content of Biomass parameter introduced in Section 4.2 has been added in Section 3.2.2 and assessed accordingly by the VVB 	
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		Round 2	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	
		Round 3	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

#	Finding Description	VVB Response	Status
5	Monitored Parameters and the Monitoring Plan		
	<u>Issue</u>	Round 1	
	<ol style="list-style-type: none"> 1. The parameter $FC_{p,t,p}$ is both a fixed and monitored parameter in Sections 4.2 and 4.3 of the MR. 2. In Section 4.2, the H:Org values for Maize Cobs and Water Hyacinth are omitted. 3. In Section 4.3 of the MR, the moisture content and $FC_{p,t,p}$ are expressed as percentages in the parameter tables; however, they are defined as mean values (Step 1). 4. In Section 4.3 of the VR, regarding the assessment of monitored parameters MP_y and T_{prod}, the VVB states that "VVB physically verified the production sites and interviewed the farmers." However, no details of the VVB's own sampling or whether it visited all 3,595 biochar production sites are included. 	<u>PP Response</u> <u>Response to issue no.1</u> We hereby clarify that at the time of validation, the value of $FC_{p,t,p}$ was sourced as a default value from Table 4 of the IPCC (2019) publication <i>Appendix 4: Method for Estimating the Change in Mineral Soil Organic Carbon Stocks from Biochar Amendments: Basis for Future Methodological Development</i> . This initial value is also referred to in VM 0044 v1.1 section 9.1. The purpose of the initial default value is to be able to arrive at an estimation for the expected emission removal values. However, it has always been clear to us that the organic carbon content $FC_{p,t,p}$ is a parameter that would require an on-going monitoring, as this parameter is a variable and it is on the basis of this parameter that calculations of emission removals from the project would take place during its implementation. It may be noted that even the VM 0044 includes this parameter under both "Section 9.1-Data and parameters available at validation" (page 33 of VM 0044 v1.1) as well as	Closed
	<u>Action Required</u>		

<ol style="list-style-type: none"> 1. The VVB must ensure the MR is revised to indicate if $FC_{p,t,p}$ is fixed or monitored. 2. The VVB shall ensure the PP includes H:Cog values for Maize Cobs and Water Hyacinth. 3. The VVB shall explain why the moisture content and $FC_{p,t,p}$ are expressed as mean values. 4. The VVB shall include details of the sampling approach deployed during the verification site visit or indicate if all 3,595 biochar production sites and 5,000 farmers were visited and interviewed. Furthermore, only one biochar producer was interviewed per the table in Section 2.3 of the VR. <p>The VVB shall update its report as needed.</p> <p>Program Rule(s) VCS Monitoring Report Template, v4.4, Section 4.2 & 4.3 VCS Verification Report Template, v4.4, Sections 2.3, 2.4 and 4.3</p>	<p>“Section 9.2- Data and parameters monitored” (page 36 of VM 0044 v1.1). We have also followed the same approach.</p> <p><u>Response to issue no.2</u> The PP would like to inform that during the reporting period 16/10/2023 to 30/06/2024, maize cobs and water hyacinth were not available to the PP as waste biomass for the biochar making process. As the quantity of maize cobs and water hyacinth was nil, their respective H:Cog ratios are not reported at section 4.2 of the MR.</p> <p><u>Response to issue no.3</u> In the MR at section 4.3 Monitoring Plan, at Step 1, the parameter of interest for $FC_{p,t,p}$ and moisture content is a mean value. The term ‘mean value’ has been derived from the CDM Standard for Sampling & Surveys for CDM project activities and PoAs (CDM EB 110). The same is defined under section 3 (Definitions) of that standard. The definition of ‘mean value’ is provided in the standard as below: <u>From the CDM Standard for Sampling & Surveys</u> “The distinction regarding different types of data (mean vs. proportion) is important when determining the size of the sample. “Mean (average) values” are derived from data that are often referred to as continuous variables, whilst “proportion (or percentage) values” are derived from data that are described as attributes, yes/no data or binary data. The following examples reflect different types of data when the determination of greenhouse gas (GHG) emission reductions achieved by a CDM project activity requires sampling: i) Mean value for a parameter such as the average annual hours of operation of light bulbs to estimate energy savings or the <u>average methane content in the biogas</u> recovered from biogas digesters. It can also be the efficiency of replaced equipment to estimate the characteristics of an equipment or a technology, or it may be an output/input of an equipment or technology.”</p>	
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		<p>The monitoring plan requires parameters $FC_{p,t,p}$ and moisture content to be determined as “mean values” in accordance with the definition as stated above; however, the values themselves are conveniently expressible as ‘percentages’, e.g. ‘percentage of moisture in the biochar’ (Moisture content) or “percentage of carbon in the biochar” (Carbon content).</p> <p>However, to avoid any confusion arising, we have revised the MR at section 4.3 and both these parameters (i.e. $FC_{p,t,p}$ and moisture content) have now been expressed as simple decimal fractions, rather than in terms of percentages.</p> <p><u>Response to issue no.4</u> We request the Verra reviewer to kindly refer to the response of the VVB to part (4) of this query, as it pertains to the VR.</p> <p><u>VVB Response</u> <u>Response to issue no.1</u> The verification team confirms that the parameter $FC_{p,t,p}$ is included under both the sections 9.1 (ex-ante parameters) and 92 (ex-post monitored parameters) of the VM 0044 methodology in its version 1.1. The registered VCS PD has also followed the methodology and included this parameter under section 5.1 (Parameters available at validation) and section 5.2 (Monitored parameters). The verification team is satisfied that the PP has duly monitored this parameter as per the frequency of monitoring defined in the registered VCS PD (“annually”) and using the sampling methodology stated in the PD at section 5.3 (Monitoring plan). $FC_{p,t,p}$ is included under section 4.1 of the MR because this section (“Data and parameters available at validation”) is a part of the MR standard template and is required to be reported as such. The verification team believes that the explanation offered would be accepted by the reviewer and the team therefore does not feel the necessity for the PP to make</p>	
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		<p>any revision to the monitoring plan in respect of this parameter.</p> <p><u><i>Response to issue no.2</i></u></p> <p>The verification team during its site visit interviewed the PP’s representatives and project farmers and noted that during the current monitoring period, there was no availability of maize cobs and water hyacinth for biochar pit pyrolysis in the fields. Hence, the team agrees that the H:Corg ratios for these two biomass types could be omitted from the MR section 4.2 table.</p> <p><u><i>Response to issue no.3</i></u></p> <p>Parameters $FC_{p,t,p}$ and moisture content which represent the carbon content in biochar and moisture content in biochar respectively, can take on any value within a range of values, since by the very nature of measurement these parameters convey. It is therefore of interest to be able to determine the mean value of these two parameters from a set of readings taken for a particular batch of biochar. The registered VCS PD has applied the CDM Standard for Sampling & Surveys for project activities and PoAs, which has defined ‘mean value’ at paragraph 3 of that standard, Therefore the verification team accepts that it is appropriate to express these parameters as mean values (either percentages of moisture or carbon content) or in terms of numbers, as stated by the PP in the revised MR. (For example, a moisture content of 10% is also expressed as a number fraction (0.10) or carbon content of 70% is the same if expressed as 0.70)</p> <p><u><i>Response to issue no.4</i></u></p> <p>The verification team draws the attention of the reviewer to section 2.1 of the verification report, in which section details of the VVB’s sampling have been provided. We summarize the same as below:</p>	
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		<p>a. The verification team of RINA interviewed a total of ninety (90) farmers and had rounds of discussions with them.</p> <p>b. The 90 farmers were selected on a random basis. There was no special preference exerted while making this selection.</p> <p>c. Field visits (to each of the 90 farms owned by these farmers) were made during the site visit to assess the biochar production, its application and overall benefits from the project activity.</p> <p>d. The verification team surveyed the sampled production sites during which biochar production parameters such as $M_{p,y}$, T_{prod} were also confirmed by the team</p> <p>e. We did not visit all the 3595 farms where production of biochar had taken place, as this was not deemed necessary in view of the sampling methodology employed by us. Also, it would have been neither practical nor cost effective to visit every one of the 3595 sites. We may add that use of sampling is a standard alternate approach to use in such cases, which assures verification results of known precision and certainty.</p> <p>The sampling details have been adequately described at section 2.1 of the VR. However, they had not been cross-referred to at section 4.3.</p> <p>The table in section 2.3 of the VR has stated the name of only one of the 3595 farmers. Due to space constraints, it was not possible to list in the table all of the 90 farmers in the sample who were interviewed by us and whose farms we visited for the purpose of our verification assessment. However, this list appears as “Appendix IV- List of interviewed” to the VR.</p>	
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		<p>We have revised the VR at section 4.3 where a reference has been made to section 2.1 for details of sampling that was used during our verification. We believe, therefore, that we have addressed the reviewer’s concerns in this query.</p>	
		<p>Verra Response</p> <ol style="list-style-type: none"> 1. The parameter $FC_{p,t,p}$ appears as a fixed as well as monitoring parameter in the applied VCS methodology VM0044 2. Maize cobs and water hyacinth are feedstock included in the project description. The VVB shall ensure the feedstock are indicated and if no monitored values then assigned N/A or zero 3. The moisture content and $FC_{p,t,p}$ are determined as mean values and expressed as percentage values (decimals) in line with the methodology 4. Sampling was conducted by the VVB on 90 famers as now indicated in Section 2.1 and Appendix 5 	
		<p>Round 2</p> <p>VVB Response (Pending)</p> <p>The VVB team confirms that during the current monitoring period (16/10/2023 to 30/06/2024), there was no use of maize cobs and water hyacinth as raw biomass stock in any of the farms where the biochar was produced in pits. The project description in the VCS PD has included both these biomass types, only if they were to be used in making the biochar. Since these two types were not used in the current monitoring period, the MR has stated their quantities to be zero at section 4.2, 4.3 & 5.2. The VR also has confirmed the same, wherever these two biomass types have been referred to (section 4.3) their quantities have been stated as zero and for the organic carbon content values, there is a remark stating ‘N/A’.</p> <p>The use of biomass types maize cobs and water hyacinth is therefore, correctly described in the MR and VR. We hope that the query is now resolved.</p>	

		<p><u>Verra Response</u></p> <ol style="list-style-type: none"> The two types of feedstock were not used in the current monitoring period, the MR has stated their quantities as zero in sections 4.2, 4.3 & 5.2 Section 4.3 of the verification report has been updated indicating that no maize cobs and water hyacinth were applied a feedstock during the monitoring period. 	
		Round 3	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

#	Finding Description	VVB Response	Status
6	Level of Assurance		
	<p><u>Issue</u> A reasonable level of assurance was achieved at verification. However, the approver of the verification and the report is not indicated.</p> <p><u>Action Required</u> 1. The VVB shall include the approver of the verification as part of the team</p> <p><u>Program Rule(s)</u> VCS Verification Report Template, v4.4, Section 1.3 VCS Standard v4.7; Section 4.1.2.</p>	<p>Round 1</p> <p><u>PP Response</u> As the query pertains to the VR.</p> <p><u>VVB Response</u> We have included the name of the approver of the verification report on the front page of the report in the table against “Approved By”. The name of the approver (Ms. Laura Severino) is also included as part of the verification team in the table at section 1.3 of the report (Level of Assurance).</p> <p><u>Verra Response</u> The team and approver have been included in the title page and Section 1.3</p> <p>Round 2</p> <p><u>VVB Response</u> (Pending)</p>	Closed

		<u>Verra Response</u> (Pending)	
		Round 3	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

#	Finding Description	VVB Response	Status
7	Interviews and Site Visit		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> In Section 2.3 of the VR, only one biochar producer out of 3,595 active producers was interviewed during the three-day site visit. It is unclear how the views of one farmer represent the views of all farmers/biochar producers. In Section 2.4, the VVB does not include all the sites visited as required by the VCS VR template. <p><u>Action Required</u></p> <ol style="list-style-type: none"> The VVB must ensure that all farmers and field officers interviewed, as well as production points indicated in Section 2.4, are included in the table in Section 2.3 and the interview questions. The VVB shall include details of sampling, and all sites visited along with their corresponding interviews from the three-day site visit. <p><u>Program Rule(s)</u></p>	<p>Round 1</p> <p><u>PP Response</u> The query pertains to the VR.</p> <p><u>VVB Response</u> <i>Response to issue no.1</i> We clarify hereby that the verification team has interviewed not just one, but a total of 90 farmers as a representative sample of the 3595 farmers who have produced the biochar in their fields. The sampling approach used by RINA has been explained in detail at section 2.4 of the report and is also cross-referred to at section 4.3 of the revised report. A complete list of names of the interviewed farmers is also provided in Appendix IV to the VR. The interview questions put to the 90 selected farmers have been summarised in Appendix IV. The verification team can confirm that the sample of 90 farmers is representative enough for the total of 3595 farmers producing biochar in the project.</p> <p><i>Response to issue no.2</i></p>	Closed

	<p>VCS Verification Report Template, v4.4, Section 2.3 & 2.4</p>	<p>The verification team requests the reviewer to please note that sufficient details regarding the VVB sampling are already provided in section 2.4 of the VR and have been cross-referred to at section 4.3 for better linkage of the same. Additional details such as</p> <ul style="list-style-type: none"> -names of the 90 farmers interviewed -standard questions put to the interviewed farmers by the verification team have been provided in Appendix IV to the VR. The VR itself has been revised to include the details that were missing from its previous version (names of villages and interview questions). The names of the villages of the 90 farmers have already been mentioned at section 2.4 of the VR. <p>Verra Response</p> <ol style="list-style-type: none"> 1. An additional list of sampled and interviewed farmers has been proffered in the Appendix 5 of the VCS Verification Report 2. Section 2.4 has been completed and updated with further details of the VVB site visit locations in the project area (Odisha) <p>Round 2</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p> <p>Round 3</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p>	
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#	Finding Description	VVB Response	Status
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8	Assessment of the Methodology and PD Deviations		
	<p><u>Issue</u> In Section 3.1 & 3.2, the VVB does not assess the proposed methodology and project description deviations in line with the requirements of Sections 3.20 & 3.21 of the VCS Standard v4.7</p> <p><u>Action Required</u> 1. The VVB assessment of all proposed methodology and project description deviations shall be in line with the requirements of Section 3.20 of the VCS Standard v4.7</p> <p><u>Program Rule(s)</u> VCS Verification Report Template, v4.4, Section 3.1 & 3.2 VCS Standard v4.7; Section 3.20 & 3.21</p>	<p>Round 1</p> <p><u>PP Response</u> The query pertains to the VVB.</p> <p><u>VVB Response</u> The verification team has reviewed sections 3.1 and 3.2 of the VR in response to the query. We have made a revision to the VR that we believe now fully addresses paragraphs 3.20 and 3.21 of the VCS Standard v4.7. The same are explained below.</p> <p>Paragraph 3.20.1: The deviation from the methodology is in terms of the frequency of monitoring of the two parameters, viz., moisture content of biochar and H:Corg ratio. As per paragraph 3.20.1, deviations from the methodology are permitted where they relate to data and parameters available at validation, data and parameters monitored, or the monitoring plan. Since the deviation relates to a change in the frequency of monitoring, it is permissible under the standard.</p> <p>Paragraph 3.20.2: The requirement here is that the deviations from the applied methodology are permissible if they do not negatively impact the conservativeness of quantification of GHG removals., except where they increase the accuracy of the quantification. The change in frequency of the monitoring plan is in respect of the two monitoring parameters moisture content and the H:Corg ratio. Also, the change is from 'batch-wise monitoring' to 'monthly monitoring' for the moisture content of biochar and from 'batch-wise' to 'annual'. For the H:Corg ratio, the change is from 'batch-wise monitoring' to 'annual' monitoring. In both cases, the sampling approach is based on the CDM Standard for Sampling & Surveys of CDM project activities. Samples are drawn randomly, reducing the possibility of any bias or preference. The sampling is based on defined confidence interval and is tested for reliability of results.</p>	<p>Closed</p>

		<p>Therefore, a change in the frequency of monitoring to an annual frequency has no adverse impact on the quantified GHG removals and whether or not the samples are tested batch-wise or annually makes no difference to the accuracy of quantified values of emission removals. The change in monitoring frequency does not impact the quantification of the GHG removals negatively and it meets the paragraph 3.20.2</p> <p>Paragraph 3.20.3: This paragraph accepts methodology deviations at the time of validation or verification. Since the current assessment is a verification activity, the requirements of this paragraph are met</p> <p>Paragraph 3.21.1: Deviations from project description are allowed at verification. The current assessment is also a verification; therefore, this requirement is met</p> <p>Paragraph 3.21.2: The requirements of this paragraph are applicable if the deviation in project description has any impact on the applicability of the methodology, the appropriateness of the baseline scenario or the additionality of the project itself. As the deviation in our case is regarding the use of cotton stalks as a waste biomass to produce biochar, it is related only to an operational aspect of the working of the project. At the time of the validation of the project activity, the use of cotton stalks had not been envisaged. As the project was getting implemented, however, the use of cotton stalks as an additional feedstock to produce biochar was identified and therefore its use was started. The use of cotton stalks satisfies the applicability condition of VM 0044 at section 4, however, as explained below:</p> <ol style="list-style-type: none"> 1) Cotton stalk is a purely biogenic waste from the cotton plant 2) In the baseline scenario, the cotton stalks would have met the same fate, just as the other biomass types used in the project activity, viz., they would have either been subject to open field burning or left to decay. This is because it would not have been possible to put them to any other practical use. 	
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		<p>applicable in the present case</p> <p>Paragraph 3.21.4: The project description deviation (i.e. the use of cotton stalks as an additional biomass waste type in the process) is under the verification body’s assessment; therefore, the requirements in paragraph 3.21.4 are taken care of</p> <p>Paragraph 3.21.5: The PP has not used the project description deviation to set a precedent. Hence, this paragraph does not apply in the present case</p> <p>Paragraph 3.21.6: We confirm that RINA is accredited to conduct both validation as well as verification. We are eligible and qualified to conduct an assessment of the project description deviation, since we are an accredited body for Verra GHG project validations also.</p> <p>The other project description deviation is about the addition of extra parameter “Moisture content of biomass stock” to the monitoring plan. It is already stated in our response to Query No. 4 that this deviation is in the manner of adding an extra parameter to the monitoring plan. It has no effect on the other parameters that are already a part of the existing plan and will continue to be so. The addition of an extra parameter will not have any negative impact on the emission removal quantification. If anything, it will improve process control and the quality of biochar output from the project; both of which are positive benefits that will accrue.</p> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> 1. The VVB has provided sufficient assessments of the proposed methodology and project description deviations in Section 3.1 and 3.2, in line with Sections 3.20 and 3.21 of the VCS Standard v4.7 	
		Round 2	

		<u>VB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	
		Round 3	
		<u>VB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	