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	3616
Project Name	Recycling Roadways for Carbon Emission Reductions - Midstate Reclamation and Trucking
Review Type	Verification Approval Requested
Monitoring Period	26 September 2021 to 31 December 2024
Program(s)	VCS
Project Proponent	Global Emissionairy, LLC
Methodology	VM0039: Methodology for Use of Foam Stabilized Base and Emulsion Asphalt Mixtures in Pavement Application, version 1.1
VVB	SustainCert S.A
Assessment Criteria	VCS Standard Version 4.7
Date of First Issue	25 September 2025
Review Conclusion	Verification Approved
Date of Final Issue	27 October 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	**Grievance Redress Procedure**		
	Issue 1. Section 2.1.5 of the monitoring report does not describe the actions that will be taken in the case where a grievance has been received. Action Required 1. The VVB must ensure that the grievance redress procedure is described on actions that will be taken to resolve the grievance. Program Rule(s) *VCS Monitoring Report Template, Section 2.1.5*	**Round 1** VVB Response (Pending) The project proponent has revised section 2.1.5 of the MR to include a description of the actions taken in the case a grievance has been received. The project proponent also provides the reference of the grievance redress procedure and communication channel in section 2.1.4 of the MR, which is the company website. VVB confirmed that the Grievance Redress Procedure is provided and communicated on the company website. Verra Response No further action is required. **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	CLOSED

2	**Methodology Deviation**		
	Issue 1. Section 3.2.1 of the Monitoring Report does not justify the deviation to use lime as a stabilizing agent, nor does it explain how this affects the methodology's applicability or the conservativeness of the quantified greenhouse gas emission reductions. The verification report has not included the VVB's assessment of the addition of lime as a stabilizing agent. Action Required 1. The VVB must ensure that a justification is included in the monitoring report, and an assessment is provided of the justification. Program Rule(s) *VCS Verification Report Template, Section 3.1* *VCS Monitoring Report Template, Section 3.2.1*	**Round 1** VVB Response (Pending) The project proponent has revised section 3.2.1 of the Monitoring Report, justifying the use of quicklime as a stabilizing agent. This deviation does not affect the applicability conditions of methodology VM0039 v1.1 as the project activity instance still applies the asphalt emulsion production by the CIR process. In addition, PP has revised section 4.1.1 with the value of 1.25 kgCO2e/kg for the quicklime emission factor according to the ecoInvent database. This value is higher than the value of 1.15 kgCO2e/kg in the initial version of MR and the emission factor of Portland Cement of 0.922 kgCO2e/kg, resulting in a lower emission reduction by the project activity. Therefore, VVB determine that the use of quicklime does not affect the conservativeness of the quantification of project emission reductions. PP has revised section 3.2.1 of MR to provide further justification on the impacts of this deviation on the methodology applicability and conservativeness. PP has revised the MR with the new emission reduction value of this monitoring period. The revision of the quicklime emission factor and related calculation are assessed by the VVB by checking the emission reduction calculation sheet. VVB confirms that the revisions are correct and consistent in the MR and the ER sheet. VVB has revised the verification report section 3.1 to provide an assessment on this deviation.	CLOSED

		Verra Response The justification is sufficient. No further action is required.	

3	Clarification for material emission factor		
	Issue 1. In the registered PD, under the EFm, crushed rock, sand and manufactured aggregates were reported as material. In the MR, quicklime is added, and the other material has been removed. A clarification must be reported why these materials are not reported. Action Required 1. The must ensure that a clarification is provided on why these materials were omitted from the MR. Program Rule(s) VCS Monitoring Report Template, v4.4	**Round 1** VVB Response (Pending) Project proponent clarified that these materials were not used in this monitoring period. To keep consistent to the registered PDMR, the project proponent has included the emission factors for crushed rock, sand, and manufactured aggregates in the updated MR. Project proponent has provided clarification in section 4.1.1 of the MR on why the materials were not used in this monitoring period. Verra Response No further action is required.	CLOSED

4	Greenhouse gas emission reduction calculation spreadsheet		
	Issue 1. The GHG ERR calculation spreadsheet is not uploaded to the registry.	**Round 1** VVB Response (Pending) The project proponent has prepared the ERR calculation spreadsheet and will submit it along with revised documents.	CLOSED

	Action Required 1. The VVB must ensure that the PP submits the appropriate ERR calculation spreadsheet along with the revised documents. Program Rule(s) *Registration and Issuance Process, v4.3, Section 4.4*	Verra Response No further action is required.	

5	**Clarification on new project activity instances**		
	Issue 1. Section 3.3 of the monitoring report has reported there are no new instances that occurred in this monitoring period. However, in the summary description, the monitoring report reports that in the current monitoring period the first and last instance occurred on 07-05-2022 and 12-09-2024. These instances must be reported in the MR, and it must be demonstrated how they meet the criteria for inclusion on new project activity instances. Action Required 1. The VVB must ensure that the PP corrects the inconsistent reporting of project activity instances that occurred in the current monitoring period. Program Rule(s) *VCS Monitoring Report Template, v4.4, Section 3.3*	**Round 1** VVB Response (Pending) The project proponent has revised section 3.3 of the Monitoring Report in line with VCS Monitoring Report Template v4.4, demonstrating the project activity instances comply with the eligibility requirements of the VCS Standard v4.7 and applied methodology. Verra Response No further actions is required.	CLOSED

6	Data and parameters available at Validation		
	Issue In section 4.1.1, the value EFm for cement is different from the fixed value in the registered PD. No justification or comment from the VVB is reported on why the value has changed. Action Required 1. The VVB must ensure that the PP provides a reasonable justification on why the EFm value for cement has been changed from the fixed parameter at validation. 2. The VR must explain how the VVB determined that the new value is conservative in accordance with *Section 3.20.2* of the *VCS Standard v4.7* Program Rule(s) *VCS Monitoring Report Template, v4.4, Section 3.3* *VCS Standard v4.7, Section 3.20.2*	**Round 1** VVB Response (Pending) 1. PP has revised the MR section 4.1.1 with the use of value 0.922 kgCO2e/kg for the emission factor of Portland Cement, which is consistent with the value in the registered PD. PP has applied the value of 0.922 kgCO2e/kg in the emission reduction calculation and it results in a lower emission reduction of this monitoring period from 89,810 tCO2e to 89,606 tCO2e. PP has revised the MR with the new emission reduction value. The revision of the Portland Cement emission factor and related calculation are assessed by the VVB by checking the emission reduction calculation sheet. VVB confirms that the revisions are correct and consistent in the MR and the ER sheet. 2. In the initial version of the MR, PP justified the use of the value of 0.919 kgCO2e/kg for EFm Cement as this was the most up-to-date value based on the Environmental Product Declaration (EPD). As the new EFm value 0.919 kgCO2e/kg is lower than the validated value of 0.922 kgCO2e/kg in the registered PD, it results in a lower project emission and thus a higher emission reduction. VVB determined that the use of the new value will affect the conservativeness of the emission reduction quantification. Therefore, PP has revised the EFm Cement to 0.922 kgCO2e/kg. VVB confirms that the use of 0.922 kgCO2e/kg is conservative and consistent with the registered PD, as well as complies with Section 3.20.2 of the VCS Standard v4.7. VVB has provided the same assessment in the revised VR.	CLOSED

		Verra Response The justification is sufficient. No further action is required.	