



One Thomas Circle, NW
Suite 1050
Washington, DC 20005
www.terra.org

27 March 2024
Umang Agarwal
Grow Indigo Private Ltd
umang.agarwal@growindigo.co.in
cc-ed: usha.zehr@growindigo.co.in

**Project 2590, Regenerative agriculture in Rice-Wheat-Maize system for income generation:
Registration and Verification request denied**

Dear Umang Agarwal,

Verra has denied the VCS Registration and Verification for the project (monitoring period: 01 June 2019 – 31 May 2022) in accordance with Section 4.3 of the *Registration and Issuance Process*, v4.4. The project status has been updated to Registration and Verification Denied. Note the project has not been rejected.

Verra has deemed the project documentation unsatisfactory quality and/or not to conform with the VCS Program rules following Section 4.3.5(1) of the *Registration and Issuance Process*, v4.4, as follows:

- Failure to meet specific VCS requirements:
 - The project documents do not contain sufficient information to demonstrate land tenure and ownership.
 - The project documents do not contain sufficient information to demonstrate the project's baseline scenario and additionality in line with Sections 3.13.1 and 3.14.2 of the *VCS Standard*, v4.5.
- Unclear demonstration on productivity leakage using equations in Section 8.4.3 of *VM0042*, v1.0.
- No explanation and justification of relevant methodological choices (e.g., emission factors, default values, ex-ante values, approaches). Further, no estimation for the entirety of the first baseline period.
- Insufficient information in the GHG ERRs spreadsheet to derive the final values for key inputs (e.g., SOC stock change between baseline and project scenario).
- No sampling plan and no reference to stratifications made in project area(s).
- Insufficient VVB assessment on how sampling was carried out, and how key components of baseline scenario and additionality were verified.

For additional information, please see the "Further explanation" section below.

Next steps

The account holder may submit a new request no sooner than 27 June 2024 but before 27 March 2025, as follows:

1. Upload the revised project documents and annexes, including track-change versions to the Verra Registry. Ensuring that the following is included:
 - a. Demonstration and clear assessment of the baseline scenario.
 - b. Clear evidence that the project is additional.



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- c. Transparent and detailed information on all the methodological choices for baseline emissions, project emissions and removals, and leakage emissions, including an updated emission reduction calculation sheet.
- d. The Model Validation Report and IME assessment.
2. Upload a letter describing the actions taken by the project proponent and VVB to address the reasons for denial.
3. Submit a new Registration request via email to registry@terra.org.
4. Pay the "Project registration request review" fee.

The project will be rejected if a new request is not submitted within one year of denial or if the findings are not addressed to the satisfaction of Verra after two denials.

Further explanation

Verra identified the following issues during the completeness check:

1. Insufficient justification to demonstrate the project's baseline scenario, specifically, no schedule of activity provided, no supporting information and data hierarchy justification provided, no description of baseline stratification based on initial set of instances.
2. Insufficient information to demonstrate the project is additional. For example;
 - a. Barriers - insufficient evidence for each barrier referenced for the specific activity. The project mentions cultural, knowledge, financial, and technological barriers but only includes one reference for each activity (DSR and NT).
 - b. Common practice - no clear adoption rate calculation based on the methodology equation. No justification for hierarchy of data selected to establish adoption rate. Unclear whether common practice rates are stratified based on initial activity instances.
3. Insufficient information to demonstrate zero leakage; no information provided to explain or demonstrate how productivity for the respective crops (e.g., rice/wheat) in the project area(s) has not declined by more than 5%.
4. The Joint Project Description and Monitoring Report does not discuss the sampling and modelling plan as required per Sections 9.3.1 and 9.3.2 of the applied methodology, including any reference to stratification in project area(s). No information was presented on the 10-year baseline re-evaluation plan.
5. The Joint Project Description and Monitoring Report does not have sufficient data/values to allow a third-party to replicate the calculations, including SOC stock changes in baseline (and project scenario).

This letter will be made public on the Verra Registry.

Sincerely,

Ciara McCarthy
Director, NCS, VCS Program Management



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Suite 1050
Washington, DC 20005
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Verra

CC: Kaviraj Singh
Earthood Services Private Limited
info@earthood.in