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	5336
Project Name	Shaoyang Xinning LFG Power Generation Project
Review Type	Registration & Verification
Program(s)	VCS
Verification Period	01-July-2023 to 28-February-2025
Project Proponent	Xinning Xinzhongshui Bio-energy Power Generation Co., Ltd.
Methodology	ACM0001, Flaring or use of Landfill Gas v19.0
VVB	Carbon Check (India) Private Ltd
Assessment Criteria	VCS Standard, v4.7,
Date of First Issue	26 Sept 2025
Review Conclusion	Approved
Date of Final Issue	09 DEC 2025

FINDINGS

1.	Verification of authenticity of government approvals		
	Issue Verra is seeking evidence of the credibility of the relevant government approvals submitted for the project activity. Action Required The VVB must independently assess objective evidence that confirms the carbon project is authorized by the relevant government authorities[1]. This verification should cover the following approvals, as applicable: a) Environmental Impact Assessment (EIA) b) Power purchase agreement c) Land lease agreement d) Commissioning certificate/approval for operation e) Latest pollution clearances The VVB must demonstrate compliance by taking one of the following approaches: 1 Direct confirmation from authorities- The VVB must • Contact the relevant government authorities[2] responsible for any two of the approvals listed above. • Submit evidence of confirmation from the relevant authorities to Verra for review. A notarised English translation of the confirmation by a certified translator must be provided. 2. Public record- The VVB must	**Round 1** VVB Response The VVB has elected to comply with Verra's evidence requirement under Option 2 (Public Record) by providing publicly available government records confirming that the project activity has received the requisite governmental authorizations. 1. **Environmental Impact Assessment (EIA) Approval**: The EIA approval decision, issued by Shaoyang Municipal Bureau of Ecology and Environment Xinning Branch is a publicly available document verified by the VVB. The document was translated by Shenzhen ODB Translation Co., Ltd., a certified translation service provider holding ISO 17100 accreditation. The VVB has cross-checked the translator's business license to confirm its validity. Based on this verification, the EIA approval is deemed authentic and demonstrates that the project activity has received government authorization in accordance with national environmental regulations. 2.**Pollution Clearance:** The VVB verified the corresponding Pollutant Discharge Permit issued by Shaoyang Municipal Bureau of Ecology and Environment, administered by the Ministry of Ecology	Closed

[1] Projects which can demonstrated authorization from Designated National Authority (DNA) of China, are exempted from the below requirements.

[2] The VVB should use the relevant government websites to confirm authorization for the projects. For example, if the project was in Weihai City and required approval from the local authorities, questions should be submitted via https://www.weihai.gov.cn/.

	• Provide publicly available government records related to any two of the approvals listed above. • Ensure that the records must clearly demonstrate that the carbon project has received government authorization. • If the records are not in English, a notarized English translation by a certified translator must be provided. Program Rule(s) VCS Standard v4.7, Section 1.2.1 and Section 3.7.1	and Environment of the People's Republic of China. The permit is valid from 13-July-2022 to 12-July-2028. The web pages and relevant screenshots were translated and certified by Shenzhen ODB Translation Co., Ltd. (ISO 17100 certified), and the translator's credentials have been cross-verified. As stipulated under Article 11 of the Regulation on the Administration of Permitting of Pollutant Discharges[3] (State Council Order No. 736, issued 24 January 2021), a pollutant discharge permit may only be issued to entities that have: 1. Obtaining an approval document for the environmental impact report (form) of the construction project in accordance with the law, or having completed filing procedures for the environmental impact registration form. (2) The discharge of pollutants shall comply with the requirements of the pollutant discharge standards, and the discharge of key pollutants shall comply with the requirements of the technical standards for applying for and issuing pollutant discharge permits, the approval document for the environmental impact report (form), and the requirement for the control of the total volume of key pollutants discharged; and if the production and operation venue of the pollutant discharge entity is located in a key area or river basin which fails to meet the national environmental quality standards, the pollutant discharge entity shall also comply with the special requirements of the relevant local people's government for improving ecological and environmental quality. (3) The use of a pollution prevention and control facility can achieve the compliance with the requirements for permitted concentration of discharge or conformity with the feasible	

[3] Regulation on the Administration of Permitting of Pollutant Discharges

		technology for pollution prevention and control. (4) The monitoring loci, indicators, and frequency, among others, of the self-monitoring plan comply with the national self-monitoring standards.Given that the project proponent holds a valid Pollutant Discharge Permit meeting these regulatory prerequisites, and that the current monitoring period falls within its validity, the VVB concludes that the project's operation and pollution performance are consistent with the applicable legal and environmental authorization requirements. The above mentioned translations on Article 11 has been done by lawinfochina.com which has been crosschecked by VVB to recognize as an authoritative source. Accordingly, based on the verification of the above public records and certified translations, the VVB confirms that the project activity has obtained credible and valid governmental approvals, satisfying Verra's requirement under VCS Standard v4.7, Section 1.2.1 and Section 3.7.1. Certified English translations, notarized and prepared by a qualified translation agency, have been submitted for review. Necessary changes has been made in the JVVR as well.	
		<u>Verra Response</u> The VVB has provided publicly available government records for two required approvals—the Environmental Impact Assessment (EIA) approval and the Pollutant Discharge Permit. Both documents were sourced from official government platforms, verified directly by the VVB, and supported with certified English translations from an ISO-17100 accredited translation agency.	

		The VVB also cross-checked the translator's credentials and confirmed that both approvals meet the national legal and regulatory requirements for project authorization. These records demonstrate that the project has received valid government authorization. No further action is required.	

2.	Sustainable Development Contributions		
	Issue As per Section 1.18 Table 1-2 of PD & MR, for the first monitoring period, the current contributions (11,257.770 MWh electricity, 6 employees, 54,194 tCO2e GHG reductions) alongside projected lifetime totals (86,999.34 MWh, 373,553 tCO2e), do not correctly show cumulative contributions. For this first monitoring period, cumulative contributions should equal the current contributions. Action Item The VVB must ensure that the project proponent updates the section 1.18 table 1-2 to clearly separate current contributions from cumulative contributions and provide all supporting evidence for reported SD indicators. Since this is the first monitoring period, cumulative contributions = current contributions + 0 (no previous period). In future periods, cumulative contributions should be updated by summing previous cumulative contributions with current period contributions. Program Rule(s) Section 118; VCS Joint Project Description & Monitoring Report Template, v4.4	**Round 1** VVB Response The VVB has verified that Section 1.18, Table 1-2 of the PD and MR now correctly presents cumulative contributions equal to the current contributions for this first monitoring period. Current and cumulative values are clearly separated, and supporting evidence for all reported SD indicators has been provided. Necessary changes has been made in the JVVR as well. Verra Response The VVB has confirmed that Section 1.18, Table 1-2 of the PDMR has been updated so that cumulative contributions match the current contributions for this first monitoring period. The table now clearly separates current and cumulative values, and supporting evidence for the reported SD indicators has been provided. The JVVR has also been updated accordingly. No further action is required.	Closed

3.	**$MCF_{default}$ Value Justification**		
	Issue The PP has applied MCF = 1 as per the CDM Tool 4 Emissions from solid waste disposal sites Version 08.1, assuming the landfill is a managed anaerobic SWDS. However, the PD &MR does not provide details or justification on how the landfill meets the required conditions (controlled waste placement, compaction, cover material/levelling, and no water table above the bottom of the SWDS). It is unclear how the VVB has cross-checked and confirmed that these conditions are satisfied to justify the application of MCF = 1. Action Required The VVB shall ensure that the PP provides clear evidence in the PD demonstrating that the landfill qualifies as a managed anaerobic SWDS as per the CDM Tool. The VVB must also identify and reference the specific documents, site inspection records, or technical studies reviewed to confirm the validity of applying MCF = 1. Program Rule(s) (Data / Parameter table 5), CDM Tool 4: Emissions from solid waste disposal sites Version 08.1	**Round 1** VVB Response Review of the FSR, staff interviews, and on-site observations confirmed that the landfill operates as an anaerobic managed solid waste disposal site with no groundwater above the base. The Landfill Operation and Management Manual verifies controlled waste placement with mechanical compaction and leveling, meeting the definition of a managed landfill. The site consists of a flat-bottom cell with no surface water at the lowest point and groundwater 5.2 m below the base, as shown by exploratory drilling. Effective fire-prevention measures are implemented, including landfill gas extraction and monitoring, ignition control, and fire-safety signage. Covering, compaction, and leveling are consistently applied. Based on these verifications, the project activity qualifies under Application A of Tool 04: Emissions from Solid Waste Disposal Sites, Version 08.1, and per paragraph 32 and Data/Parameter Table 5, a methane correction factor of MCF = 1 is applied. Cross-checking with Tool 04 confirms this value as correct for ex ante baseline emission determination. Detailed assessment has been provided in the revised JVVR. Verra Response The VVB has provided verification demonstrating that the landfill meets the conditions required for a managed anaerobic SWDS under CDM Tool 04. Evidence from the Feasibility Study Report, landfill operation manual, onsite inspection records, and geotechnical findings confirmed by VVB, controlled waste placement, mechanical compaction and leveling, cover practices, fire-prevention measures, and that the groundwater table lies below the base of the landfill. . The JVVR has been updated accordingly. No further action is required.	Closed

4.	**Data & Parameters**		
	Issue 1. In Section 6.1 of the PD & MR, the parameter SPECflare is not included, as per CDM TOOL06 ("Project emissions from flaring," v04.0, Data/Parameter table 2) requires that manufacturer's flare operating specifications (temperature, flow rate/heat flux, and maintenance schedule) be documented. 2. Section 6.2 of the PD & MR does not include the parameter ρreg,y (Fraction of LFG that is required to be flared due to a requirement in year y), which ACM0001 (v19.0) explicitly requires to be monitored. 3. As per Section 7.2 (Data/Parameter Table 10) of CDM Tool 4, the parameter **fy** (Fraction of methane captured at the SWDS and flared, combusted, or used in another manner that prevents methane emissions to the atmosphere in year y) is a monitored parameter; however, the Project Proponent has treated **fy** as a fixed ex-ante parameter under Section 6.1 of the PD & MR. Action Required 1. The VVB shall ensure that $SPEC_{flare}$ is included in the PD & MR with manufacturer's operating specifications (flow rate, temperature, maintenance schedule) as required by TOOL06. 2. The VVB must ensure that ρreg,y is included in the PD & MR monitoring plan in accordance with ACM0001 requirements. 3. The VVB must ensure that **fy** is treated as a monitored parameter in the PD & MR monitoring plan in accordance with CDM Tool 4, rather than as a fixed ex-ante parameter. Program Rule(s)	**Round 1** VVB Response 1. The VVB confirms that the SPECflare has been appropriately included in the PD and MR, along with the manufacturer's operating specifications such as flow rate, temperature, and maintenance schedule, in line with the requirements of TOOL06. 2.The parameter, "ρreg,y " has been incorporated into the monitoring plan in section 6.2 within the PD and MR in accordance with the requirements of ACM0001. 3. PP has revised the PD&MR and the parameter, "fy" has been correctly classified as a monitored parameter in the PD and MR, consistent with the approach outlined in CDM Tool 4. Necessary updates have also been incorporated in the JVVR to reflect the corresponding revisions made in the PD and MR. Verra Response The VVB has confirmed that the parameter SPECflare has been included in the PDMR with the manufacturer's operating specifications, including flow rate, temperature, and maintenance schedule, as required by TOOL06. The parameter ρreg,y has been incorporated into the monitoring plan in accordance with ACM0001, and fy has been correctly treated as a monitored parameter rather than a fixed ex-ante value, consistent with CDM Tool 4. No further action is required.	Closed

	TOOL06: Project emissions from flaring, V4.0 TOOL 04: Emissions from solid waste disposal sites ACM0001, Flaring or use of Landfill Gas v19.0		

5.	**Use of outdated default values for baseline parameters**		
	Issue The PP has applied 2006 default values from CDM Tool 04 for decay rate (kj) and degradable organic carbon fraction ($DOCj$). The VCS Standard (v4.7, Section 3.15.5) requires that the most recent version of a data source be used at validation and verification. Action Required The VVB shall ensure that the PP; 1. Update the value for $DOCj$as per TABLE 2A.2 (NEW) of chapter 2 : 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories 2. Update the value for kj using TABLE 3.3 of chapter 3, 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. 3. Recalculate baseline emissions with the updated values. Program Rule(s) Section 3.15.5; VCS Standard v4.7	**Round 1** VVB Response 1. The PP has referred to Table 2A.2 of Chapter 2: 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories for updating the parameter "DOCj" in PD&MR. The VVB reviewed the referenced source and confirms that no revisions to the default "DOCj" values in the MSW category have been introduced in the 2019 Refinement w.r.t data in PD&MR. 2.The PP has referred to Table 3.3 of Chapter 3 in the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories for updating the parameter "kj" in PD&MR. The VVB reviewed the referenced source and confirms that no revisions to the default kj values have been introduced in the 2019 Refinement w.r.t data in PD&MR. 3. The reference has been updated; however, as there are no changes in the applied parameter values, the baseline emissions remain unchanged. Verra Response The VVB has verified that the project proponent updated the reference for DOCj and Kj to the 2019 Refinement to the 2006 IPCC Guidelines. Upon review, no changes to the default values for the MSW composition in China were introduced, and the baseline emissions remain unchanged. No further action is required.	Closed