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	3115
Project Name	Sustainable Agricultural Practices for carbon sequestration by Organic and Natural farming groups
Review Type	Registration & Verification Approval
Program(s)	VCS Program
Verification Period	01 October 2017 – 31 December 2021
Project Proponent	Vedic Green Solutions (VGS) And Kanaka Management Services Private Limited (KMSPL)
Methodology	VM0017 - Adoption of Sustainable Agricultural Land Management, v1.0
VVB	EPIC Sustainability Services Private Limited
Assessment Criteria	*VCS Standard, v4.3*
Date of First Issue	22 February 2023

Date of Second Issue	29 January 2024
Date of Third Issue	02 August 2024
Date of Fourth Issue	24 June 2025
Review Conclusion	Closed
Date of Final Issue	26 September 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	**Calculations for estimating annual average and total GHG emission removals and reductions need to be clarified**		
	Issue The calculated annual ERRs across all project areas are neither traceable nor recalculable using the provided information. Action Required 1. Section 4.2 of the Joint Project Description & Monitoring Report (PDMR) must be updated to indicate how much ERRs result from an increase in soil organic carbon (SOC), an increase in woody biomass, and reduced emissions from synthetic fertilizer use, respectively.	**Round 1** VVB Response 1. The audit team has reviewed the updated Section 4.2 of the revised PD-MR. The ERRs resulting from the various SALM practices such as accumulation of soil organic carbon (SOC), increase in woody biomass, and reduced emissions from avoidance of synthetic fertilizer use for the project activity is summarised as per the requirements. 2. The calculations spreadsheet that aggregates the claimed GHG benefits submitted by PP was verified by the audit team.	Closed

	2. The VVB must ensure that the project proponent (PP) submits the calculations spreadsheets that aggregate the claimed GHG benefits for review. 3. The VVB must ensure that Sections 6.2, 6.3, and 6.5 of the PDMR and the calculation spreadsheets present the aggregation of parameters from modelled, measured, and monitored data (e.g., DBH, amount of crop residues returned to the soil) translates to the claimed ERRs. Program Rule(s) *VCS Standard, v4.3*, Section 2.2.1 *VCS Joint Project Description Monitoring Report Template*, *v4.1*, Sections 6.2 to 6.5	3. Audit team has verified that the Sections 6.2, 6.3, and 6.5 of the revised PDMR and the calculation spreadsheets present the aggregation of parameters from modelled, measured, and monitored data (e.g., DBH, amount of crop residues returned to the soil) translates to the claimed ERRs. Verra Response The GHG ERR calculation spreadsheet has not been submitted; only the monitoring data has been provided. Sections 6.2 and 6.3 have not been updated as requested. This finding cannot close. Action Required 1. The VVB must ensure that the PP submits the calculations spreadsheets that aggregate the claimed GHG benefits for Verra to review. 2. The VVB must ensure that Sections 6.2 and 6.3 of the PDMR include the aggregation of parameters from modelled, measured, and monitored data; this information provided is insufficient. Program Rule(s) *Registration and Issuance Process*, v4.3, Section 4.2.5 Background	

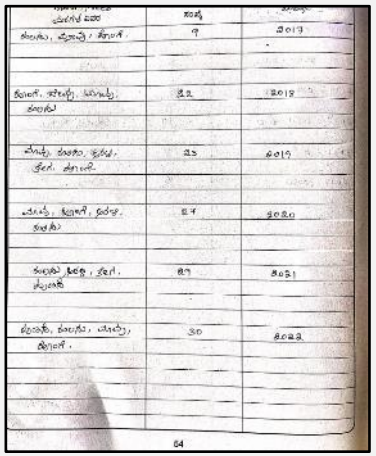
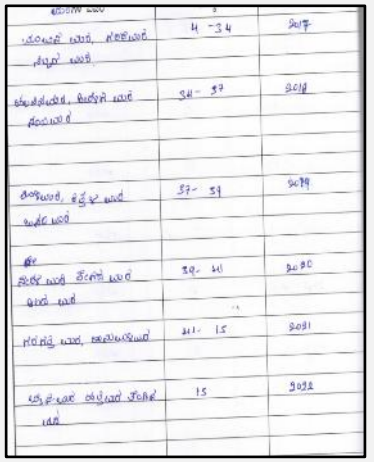
		An example for Action 2, Equation 1 (per Section II.4.6) and its components, at minimum the summation of baseline area and SOC density, should be included in Section 6.2.	
		Round 2	
		VVB Response 1. The EPIC audit team reviewed the spreadsheets that aggregate the calculations of the claimed GHG benefits for the SALM interventions implemented. The spreadsheets are submitted to Verra for review along with other supporting documents. In addition to these, the master sheets for the individual years' calculations of the claimed GHG benefits are also provided to Verra for review. 2. The sections 6.2 and 6.3 of the joint PD-MR are updated to include the equations of SOC density and other monitored data for the baseline emissions and project emissions as per applied methodology. 3. Section 3.4.6: Quantification of GHG emission reductions and removals is updated in the joint VVR based on the updated joint PD-MR.	
		Verra Response Section 4.1, 4.2, 6.2, 6.3 and 6.5 of the PDMR (and the ERRs spreadsheet have been updated, but still do not have sufficient information to reproduce the calculations or models to further determine the project's GHG ERRs and unclear input data/values used to determine the baseline and project emissions. This finding cannot be closed.	

		Issue 1. Section 4.1 of the PDMR has the following issues: a. Section 4.1.1 does not include any equations from the CDM A/R tool: Estimation of direct nitrous oxide emission from nitrogen fertilization version 1.0. b. Section 4.1.6 does not include equation 1 per VM0017 c. No ex-ante values were discussed and justified to establish the ex-ante estimation of baseline emissions. 2. Section 4.2 of the PDMR has the following issues: a. No information on how the changes in biomass of woody perennials was determined in line with AR-TOOL14. b. No inclusion of the relevant equations, default factors, etc used. c. Changes in SOC was modelled but no indication on actual data/input values used; the sample provided is insufficient. 3. Section 6.2 of the PDMR has the following issues: a. Emissions from use of fossil fuels in the baseline are deemed insignificant, also no inclusion of the emission factor used, equations, etc, b. Unclear why the project considers the emissions from fossil fuels insignificant. c. Further, the total project area is inconsistently	

		reported, i.e., 64000 ha referenced but Section 6.1 of the PDMR references 51,987 ha. 4. Section 6.3 of the PDMR has the following issues: a. No inclusion of any equations from TOOL07, including the default emission factor used. 5. Section 6.5 of the PDMR has the following issues: a. It's unclear whether the GHG ERRs generated were accurately determined by the project across the initial instances. 6. The GHG ERR spreadsheet has the following issues: 1. Insufficient information in the spreadsheet cells to demonstrate how the output values were derived for each respective activity. Action Required 1. The VVB must ensure that the PP updates Sections 4.1, 4.2, 6.2, 6.3 and 6.5 of the PDMR or the ERR spreadsheet to transparently report detail calculations and input data for all relevant baseline and project emissions, and resolve all 6 issues listed above. 2. The VVB must assess the updates accordingly and update the VVR as needed. Program Rule(s) *VCS Joint Project Description Monitoring Report Template, v4.1*, Sections 4.1 and 4.2, 6.2 to 6.5	

		Round 3 VVB Response **Issue 1.a.** The PP has updated Section 4.1.1 to include Equations 1, 2, and 3 from the CDM A/R tool: *Estimation of Direct Nitrous Oxide Emission from Nitrogen Fertilization*, Version 1.0. The source of the values applied for the calculation of GHG emissions due to fertilizer usage, as detailed in Section 4.1.1 of the PD&MR, was verified by the audit team and found to be acceptable. Consequently, the baseline emission factor (BEF) was calculated to be 0.38 tCO_2e/ha/year. Based on the assessment of the information in section 4.1.1. of the PD&MR, the audit team has updated Section 3.4.6 of the Joint Validation and Verification Report. **Issue 1.b.** The audit team reviewed Section 4.1.6 of the revised PD&MR and concludes that the PP has updated Section 4.1.6 to include Equation 1, as per the VM0017 methodology, to estimate the baseline soil organic carbon at equilibrium. Furthermore, information related to the RothC model and details on baseline calibration projections has been updated to indicate IPCC-wise seasonal RothC-modelled baseline equilibrium SOC data **Issue 1.c.** The audit team ensured that Section 4.1 of the PD&MR has been updated by the PP to include information on the ex-ante values, and justification is provided for each parameter used in the estimation of baseline emissions. BEF_t is estimated as the product of the total project area and the baseline emission factor. The adoption rate for the initial five years is assumed to be 90%, based on the baseline	

		survey conducted by the PP. Subsequently, the adoption rate is estimated to be 100% in the project. BENt = 0, BEBBt = 0, BRWPt = 0, BEFFt = 0, BRSt = 0 BEt = BEFt + BEFFt + BEBBt – BRWPt The audit team verified the ex-ante ERs sheet in the *Ex-ante_Ex-post* document and independently reproduced the calculations to conclude that the baseline ex-ante emissions are calculated as per Equation 3 in Section II (4.8) of the VM0017 v1.0 methodology. **Issue 2.a.** Section 4.2 of the PD&MR has been updated to include detailed information on the estimation of project emissions. Equations 12, 13, and 14 were used for the estimation of project removals due to changes in biomass of woody perennials, in accordance with the CDM A/R Tool 14: *Estimation of Carbon Stocks of Trees and Shrubs in A/R CDM Project Activities*. Only removals from new trees species planted as part of the project are considered for the estimation of project removals. The details related to the planted trees are recorded in farm diaries by the farmers. The audit team verified sample evidence from the farm diaries and found it to be consistent with the ABMS Agroforestry Monitoring data, which is used for the calculation of project removals. The verified farm diaries included information on farmers details, Crop details, area (ha), year and season of production, Irrigated/Rainfed, Organic or In conversion 1,2,3, Inputs details, Source of Input/Brand, Details of application – Time Quantity & Rate, Time of harvest, Actual Production, Details of transport of	

		harvested produce – Quantity & Mode, Other application details, Vehicles usage details, Livestock details, Agroforestry – Tree counts, species, area and year of planting. Field Officer inspections visit details and remarks, Harvest records. Weed management details, Soil fertility management details, Organic production farm-crop-area details, agricultural implements usage details etc.   <u>Samples from farm diaries indicating the details of tree species planted and managed by farmers on their croplands.</u> The audit team verified the calculations and allometric equations used in the IPCC sheet of the ABMS Monitoring Data – Agroforestry document and concludes that a planted area of 5,258 ha has been considered for the estimation of CO_2 sequestered by the growth of woody perennials across the three IPCC zones. The sources and scientific literature used for the estimation of above-ground biomass and below-ground biomass are appropriate.	

		Issue 2.b. The PP has updated Section 4.2 of the PD&MR to include all the equations and default values used for the estimation of project emissions due to fertilizer use, project removals from woody perennials and soil organic carbon. **Issue 2.c.** For the ex-ante estimation, the PP has utilized published research papers (Bhattacharya et al., 2013), which fall under same IPCC zones as that of the project area (Tropical Dry and Tropical Moist). The modelled TOC values for the 0–13 cm and 13–23 cm soil depths, with interventions such as the application of FYM, paddy straw, and green manure along with synthetic fertilizer data, were utilized for ex-ante SOC calculations. Section 4.2 of the PD&MR has been updated and includes detailed information on the input values used. The audit team verified the *SOC_AGRO_FOREST_CALC* sheet of the *Ex-ante_Ex-post* document and concludes that the PP has clearly demonstrated the input values used for the estimation of changes in SOC. Based on the verification of the information in section 4.2. of the PD&MR, the audit team assessment conclusion has been updated Section 3.4.6 of the Joint Validation and Verification Report. **Issue 3.a.** The PP has updated Section 6.2.5 of the PD&MR to include details on the emission factor used and relevant equations. The baseline emissions due to the use of fossil fuels are estimated using the equation stated in Section VI.2, *"Estimation of Emissions from the Use of Fossil Fuels in*	

		Agricultural Management" of the VM0017 v1.0 methodology, under the assumption that data on the amount of fuel combusted is available. The data on fossil fuel consumption is detailed in the PD&MR. **Issue 3.b.** In the project, the use of fossil fuels for agricultural management activities is recorded annually, and the data was submitted by the PP. The year-wise fossil fuel consumption data demonstrated that the consumption rate decreased in the project scenario, and the project activities do not foresee an increase in the use of farm machinery. Therefore, project emissions from the use of fossil fuels are deemed insignificant, as the average annual emissions resulting from fossil fuel use during the current monitoring period are lower than in the baseline scenario. **Issue 3.c.** To maintain consistency, the PP has updated the total project area details in the PD&MR. The project is implemented across 57,516 ha, of which the total crop area is 51,764 ha and the planted agroforestry area is 5,258 ha. The 51,764 ha of crop area is considered for all the ex-ante fertilizer and SOC calculations. **Issue 4.a.** The audit team ensured that Section 6.3 of the PD&MR has been updated by the PP to include detailed information on the equations and default emission factor used for the estimation of project emissions due to fertilizer use (PEF_t) in accordance with AR-TOOL07. **Issue 5.a.** The GHG ERs calculated have been accurately determined by the project across the initial instances	

		included in the project. With the inclusion of all project instances, the total project area is 57,516 ha. Of this, 51,764 ha is accounted as crop area and is considered for the calculation of project emissions due to fertilizer use (PEF_t) and project removals due to changes in soil organic carbon (PRS_t). Ten percent of the total project area, i.e., 5,752 ha, is considered as eligible agroforestry area. Of this, 5,258 ha has currently been planted under the project and is considered for accounting project removals from existing woody perennials ($PRWP_t$). The remaining 494 ha is part of the project area and is planned to be utilized for tree planting in the future. This unplanted 494 ha is not considered for GHG ER calculations. The audit team conducted interviews with the PP and reviewed the *Ex-ante_Ex-post* sheet and *Master ER Aggregate 2022* Excel document and confirms that the GHG ERs generated have been accurately determined by the project across the initial instances. **Issue 6.a.** The GHG ER (Ex-ante_Ex-post) sheet has been updated to include the sources used to demonstrate the calculation of output values for each respective activity. In the project, the major interventions include the use of organic fertilizers (crop residues, farmyard manure), the practice of mulching with crop residues, the use of cover crops, and agroforestry—all as part of sustainable agricultural land management practices. The values used in the Ex-ante_Ex-post calculation sheet are sourced from the following supporting documents:	

		1. **VM0017 Master ER Aggregate (2017–2022):** This document contains the ex-post calculations related to emissions from fertilizer use, biomass burning, removals from woody perennials and nitrogen-fixing species, fossil fuel usage, SOC removals, project leakage, and a summary of inputs and results. These values are directly used in the Ex-post ER sheet. 2. **ABMS Monitoring Data (Agroforestry and Fertilizers):** This document serves as the source of farmer-level data. In the ABMS Fertilizer Monitoring Data sheet, synthetic and organic fertilizer usage values are calculated for each IPCC zone (Tropical Dry, Tropical Moist, and Tropical Wet) for each year of the current monitoring period. These data are then used in the *VM0017 Master ER Aggregate (2017–2022)* sheet for estimating emissions from fertilizer use. 3. **RothC Model Files:** These files contain detailed input parameters such as IOM, clay content, and plant inputs used for model calibration and validation. The audit team verified all data related to RothC modelling and the GHG ER spreadsheet and concludes that the PP has adequately demonstrated the derivation of each respective activity in the project. Based on the assessment of information provided in Sections 4.1, 4.2, 6.2, 6.3, and 6.5 of the revised PD&MR, as well as the *Ex-ante_Ex-post* ER sheet and supporting evidence, the audit team has updated Section 3.4.6 of the Joint Validation and Verification Report.	

		Verra Response Sections 4.1, 4.2, 6.2, 6.3 and 6.5 of the PDMR and the GHG ERR spreadsheets have been updated. Issues 1, 2, 3, and 5 are now closed. Issue 6 remains open and a new issue is raised below. Issues 1. Section 6.3 of the PDMR lists Equation 6 of VM0017. However, the equation is not applied correctly to calculate project removals due to changes in SOC in GHG ERR spreadsheet. Specifically, the "VM0017 Master ER aggregate 2022 rev 5" sheet, "SOC tab", rows 16 – 21 do not reflect the quantification method in equation 6. See background for more information. 2. The GHG ERR spreadsheet does not include the details of how the project proponent obtained the SOC stock measurements of samples from 2016 – 2020. Only final measurement and modelled values are provided. Actions Required 1. The VVB must ensure that the project proponent updates the GHG ERR spreadsheet to reflect the correct quantification method for project removals due to changes in SOC per equation 6 of VM0017. 2. The VVB must share the GHG ERR spreadsheet (or updated GHG ERR spreadsheets) that shows how the SOC stock values from measured samples taken during 2016 – 2020 were obtained and derived across	

		each climate zone. 3. The VVB must assess the new spreadsheets (if any), updates made to the GHG ERR spreadsheet, and revised baseline, project and net GHG ERR values in PDMR. <u>Program Rules</u> VM0017, v1.0, Equation 6 <u>Background</u> An example of the incorrect calculation: In "VM0017 Master ER aggregate 2022 rev 5" sheet, "SOC tab", cell E6, the increase in SOC was calculated by the difference between the project scenario and baseline scenario SOC stock in 2022. The value was then used as the PRSt for all years in the monitoring period.	
		Round 4 <u>VVB Response</u> **<u>Response to the Action 1:</u>** The PP has revised the GHG ERR spreadsheet to incorporate the correct quantification method for project removals due to soil changes in Soil Organic Carbon (SOC), which is in line with the equation 6 of the VM0017 applied methodology. The EPIC audit team reviewed the revised joint PD & MR and the GHG ERR sheet, reproduced the calculation and confirmed that the quantification is in compliance with the applied methodology. The year-wise estimation of SOC change is calculated only to project	

		intervention years, using the previous year's value as per the equation 6. The project SOC removals were calculated in line with Equation 6 of VM0017. Equilibrium SOC stocks were estimated using Eq. 4, and the 20-year transition period specified in the methodology was applied (Eq. 5) to derive annual SOC values. Annual removals (PRSt) were then calculated as the difference between consecutive years' SOC (PSt – PSt-1), converted to tCO_2e using the 44/12 factor, and aggregated across all climate zones. Section 3.4.6 of the joint Validation and Verification report has been updated to include the assessment conclusion on the correct application of equation 6 for the quantification of project removals in accordance with the applied methodology VM0017. **Response for Action 2** The project proponent has provided an Excel spreadsheet "Conversion_%OC_SOC" demonstrating the calculation of percentage organic carbon (%OC) converted to soil organic carbon (SOC). The spreadsheet includes detailed information on soil type, IPCC classification, farmer ID and name, village, taluk, crop area, organic carbon values for both Rabi and Kharif seasons, the bulk density used (with source reference), and the subsequent conversion of %OC to SOC for each season. The source documents for the %OC values are laboratory	

		analysis reports. These lab reports have been provided by the project proponent for the selected farmers across the IPCC classifications. The EPIC audit team reviewed both the spreadsheet and the laboratory reports to verify data consistency and confirm that the measured SOC stock values for the period 2016–2020 can now be traced transparently to their source data. The following documents have been provided as part of this action item: 1. 3115_SALM project_VERRA resubmission\9_SOC_Reports\Lab_Reports 2. 3115_SALM project_VERRA resubmission\9_SOC_Reports\Conversion_%OC_SOC.xlsx Based on the review, the VVB confirms that the SOC stock values from measured samples for 2016–2020 are traceable, supported by verifiable laboratory reports, and are correctly reflected in the updated GHG ERR spreadsheet. **Response for Action 3:** The EPIC audit team has reviewed all updates made to the GHG ERR spreadsheet, along with all supporting documentation provided by the project proponent. The review confirmed that the proponent has updated the	

		baseline SOC values, project removals, uncertainty calculations and net GHG ERR values in the Project Description and Monitoring Report (PD & MR) to reflect the corrected quantification method. The Project Proponent has updated the "Ex_Ante_Ex_Post Sheet and VM0017-Master ER aggregate (2017-2022)" to record uncertainty quantification as per the approach provided in the applied methodology VM0017. The audit team verified the updated information in section 6.3 of the VCS PD&MR v1.7 and reproduced the uncertainty calculations in the "Uncertainty sheet of Ex_Ante_Ex_Post and SOC sheet of VM0017-Master ER aggregate (2017-2022)" document and concludes that the calculations are in line with equation 12-17 of section IV.2.8 of the applied methodology VM0017. The EPIC audit team reproduced the calculations to verify numerical accuracy and cross-checked the updated values against the source data and revised spreadsheets. The assessment confirmed that the updates are consistent with the applied methodology requirements and that the revised baseline, project, and net GHG ERR values are traceable. Accordingly, the section 3.1.11 of joint Validation and Verification Report (VVR) has been revised to incorporate these updated values and the associated assessment conclusions. All updated documents, along with the	

		revised VVR and supporting evidence, are submitted as part of this response.	
		Verra Response The VVB has shared and assessed updated GHG ERR spreadsheet and PDMR to reflect that correct application of equation 6 for quantification of project removals from SOC stock change. Further, the VVB has shared additional spreadsheets to demonstrate the calculation of SOC inputs from samples, along with soil laboratory results. This finding is now closed.	

2	**The KML file is inaccurate**		
	Issue The KML file does not show polygons demarcating the project areas, instead it presents location pins. Action Required The VVB must ensure that the PP updates the KML file to present polygons demarcating areas where project activities are implemented and GHG emissions reductions and removals are achieved. Note: No buildings, forest lands (other than resulting from the project activities i.e., agroforestry), or other non-eligible areas should be part of the demarcated project area in the KML file. Program Rule(s)	**Round 1** VVB Response The updated KML file has now been submitted by the PP for review. Audit team has reviewed the accuracy of the KML file and confirms that the individual farms have KML files demarcating the boundary of the area in the farm where the project activity is practiced. The KML file was cross verified with the farm area indicated in the monitoring sheets. The audit team also checked the KML files and confirmed that non-eligible areas such as buildings, forest lands other than project activities are not included in the farm boundary. VVB has verified that the KML is accurate for an eligible area of 65,066 ha comprising of 30,204 farmers.	Closed

	VCS Standard, v4.3, Sections 3.10.1 & 3.10.2	Verra Response The KML has been updated as requested to delineate the project areas. However, there are some areas appear to contain dense vegetation, which are non-project areas. Action Required 1. The VVB must clarify if these areas with dense vegetation are part of the project area. 2. The VVB must share a KML file that demarcates the eligible project area only. Program Rule(s) *VCS Standard, v4.3*, Sections 3.10.1 and 3.10.2 Background Below is an example of such dense vegetation areas, The placemarker is at 13°1'44.88"N, 77°10'30.67"E.	

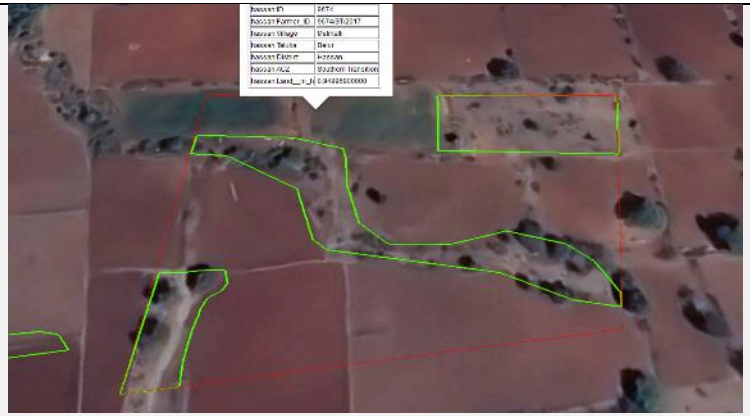
		 The following placemarkers are at 13° 3'10.01"N 77°12'18.44"E and 13° 3'3.41"N 77°12'25.06"E respectively.	

		 **Round 2** **Response for Action 1** Based on the observations from the onsite visit and the review of KML files, the EPIC audit team has confirmed that the dense vegetation is not a part of the eligible project area. During the field visit, several examples were found within the project area where trees are present on the bunds, and crops are grown within the coconut and mango plantations. Although these plantations may appear as dense vegetation, crops are indeed being cultivated within the project area. The EPIC audit team has collected evidence, such as photographs, to demonstrate that crops are grown inside the coconut plantations. Despite the appearance of dense vegetation in the coconut and mango plantations, the area where crops are grown is still considered part of the eligible	

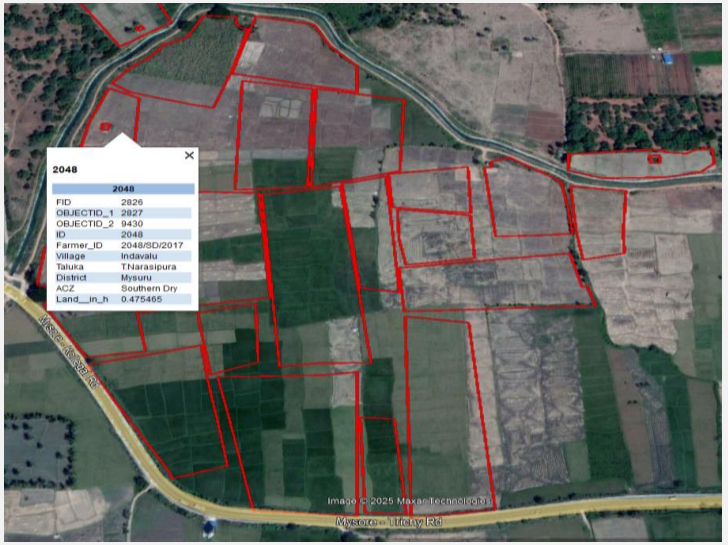
		project area. However, any dense vegetation within the project area that does not include crop cultivation has been demarcated as ineligible. Additionally, trees on the bunds also appear as dense vegetation. Therefore, bunds with a significant number of trees have been demarcated as ineligible.     Photos showing crops grown inside the coconut plantation	

		  Photos showing trees grown on the bunds appear as dense vegetation in the KML files, which are demarcated as ineligible. **Response for Action 2** The EPIC audit team has reviewed the KML files for all the project areas across different districts. These files clearly demarcate the eligible and non-eligible project areas. The KML files identifying the eligible project areas have been provided to Verra for review. The EPIC audit team conducted risk-based sampling and reviewed randomly selected Project Area KML files from all the districts. Based on the review, the EPIC audit team is of the opinion that the project properly demarcated the eligible and ineligible project areas. The ineligible project areas include non-cropping areas, dense vegetation existing before the start of the project, and any infrastructure, including roads. Samples of the project area delineating the eligible and ineligible project areas are provided below as references:	

		 The green demarcation is the in-eligible area with the dense vegetation	
		Verra Response The VVB has clarified the eligible and ineligible areas in the KML. However, this finding cannot be closed. Issue The KML submitted contains both ineligible and eligible project areas. Even though the KML file has colour demarcation of eligible and ineligible areas, ineligible projects areas must be excluded from the KML file submitted for simplicity. Action Required 1. The VVB must submit a KML file that demarcates the	

		eligible project areas **only**. Program Rule(s) *VCS Standard, v4.3*, Sections 3.10.1 and 3.10.2 **Round 3** <u>VVB Response</u> The PP has updated the project KML file to clearly demarcate only the eligible areas. The audit team applied a risk-based sampling approach and reviewed the project area KML file in Google Earth Pro across different districts. The KML file has been revised to include only eligible areas within the project boundary. All ineligible areas—such as buildings, farm ponds, roads, dense forest vegetation, and non-cropping areas that existed on farmers' land prior to the project start date (01/10/2017)—have been excluded from the project KML file. Thus, the project is in compliance with the requirements specified in Sections 3.10.1 and 3.10.2 of the VCS Standard v4.3. The KML file is submitted as supporting documentation for review. Samples of the project area, depicting only the eligible project areas, are provided below as references.	

		 Google Earth  2048 2048 FID 2826 OBJECTID_1 2827 OBJECTID_2 9430 ID 2048 Farmer_ID 2048/BD/2017 Village Indavalu Taluka TNarasipura District Mysuru ACZ Southern Dry Land__in_h 0.475465 Image © 2025 Maxar Technologies	

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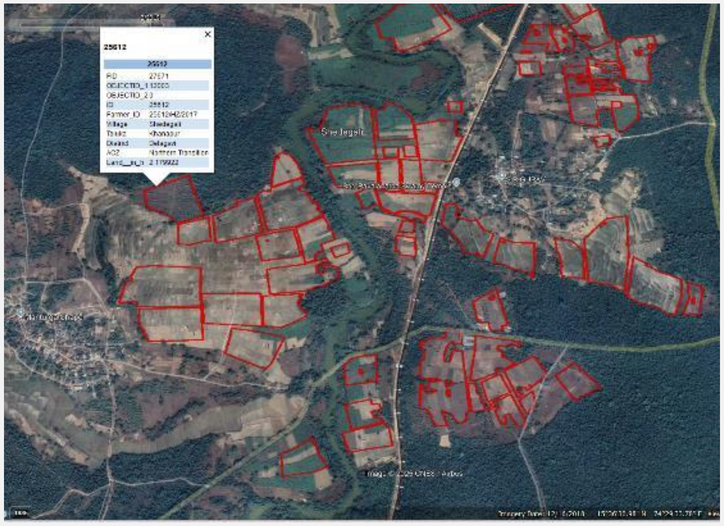
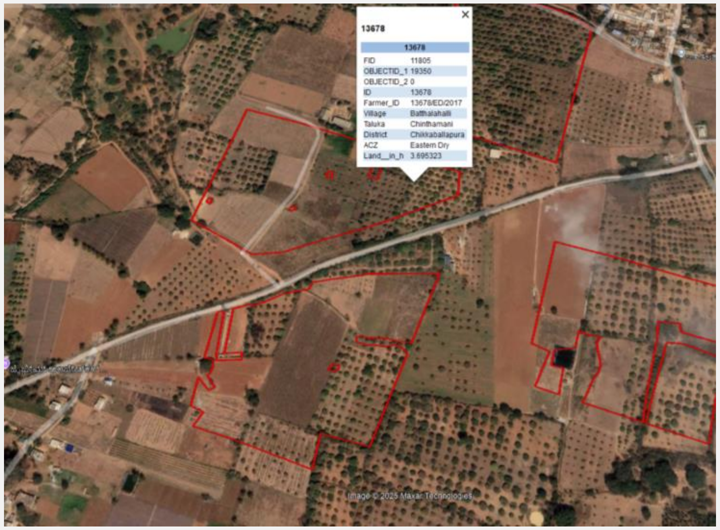
<td> 
  </td>
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		Verra Response The KML file has been updated to only include the project area. All ineligible areas have been removed. This finding is now closed.	

3	**Lack of justification for whether project activities convert native ecosystems to generate GHG credits**		
	Issue Section 1.3 of the joint PDMR fails to demonstrate that the project area has not been drained or converted to generate GHG credits. Action Required 1. The VVB must ensure that Section 1.3 of the PDMR is updated to: ● demonstrate that the project activities do convert native ecosystems to generate GHG credits; ● demonstrate that the paddy fields remain rice fields under the project scenario in of the PDMR. 2. The VVB must update the joint validation and verification report (VVR) to describe the assessment the above-mentioned eligibility criteria. Program Rule(s) *VCS Standard, v4.3*, Sections 3.2.4 and 3.2.5 Background Activities that convert native ecosystems to generate GHG credits are not eligible under the VCS Program.	**Round 1** VVB Response VVB has reviewed the information provided by the PP and the analysis of historical images going back more than 10 years using satellite data was undertaken to assess the cropping pattern in the paddy growing areas which had been included in the project activity. It was observed that paddy crop identified in the baseline scenario remains as paddy crop in around 3412 ha for around 1430 farmers as summarised below. In these cropping systems, there are no activities that drain the paddy field to be converted to other land uses. Following the normal crop cycle practised in the region, there is a brief period where the cultivable land is kept fallow or green manure crops (which are ploughed back in the soil) are grown, allowing the farmer to revert to the cultivation of paddy crop according to the season. For the other area of 4933.95 ha covering 2310 farmers the above requirements could not be conclusively established. Hence these areas have now been removed from the previous considered area and the updated KML file and calculations are submitted to the VVB for an revised eligible area of 65066 ha comprising 30,204 farmers.	Closed

		I. Crop System under the annual cycle "Paddy – Fallow – Paddy" is 2707.66 ha covering 1188 farmers (considered in the project activity) II. Crop System under the annual cycle "Paddy – Green manure crop – Paddy" is 704.56 ha covering 242 farmers (considered in the project activity). III. Paddy – Fallow- Other crop – 4933.95 ha covering 2310 farmers (removed from the project for the reasons as explained above).	
		Verra Response The VVB has provided an explanation on how they assessed the project area to ensure that native ecosystems have not been converted to generate GHG credits. While Section 1.3 of the PD has not been updated, this is sufficient and thus, the finding is now closed.	

4	**Project design does not consider project strata**		
	Issue In Section 1.4 of the PDMR, the following elements are unclear: • The agro-ecological zones (AEZ)/strata of the project area are not identified nor defined. • It is not clear whether all farmers across the regions are implementing all or some of the project activities.	**Round 1** VVB Response • The basis of classification of the agroecological zones are described in section 1.4 of the revised PD-MR. The monitoring data sheets (based on farm diaries) submitted by the PP has been verified by the audit team which indicate SALM activities included under this project are carried out across majority of the	Closed

	• Applicable baseline (t = 0) values for SOC stocks, inorganic fertilizer application rates, crop productivity and the amount of residue returned to the soil for the different farming fields (strata) are not specified. • Eligibility criteria for meeting SOC modelling requirements are not clarified. Action Required 1. The VVB must ensure that project area strata are clearly defined. 2. The VVB must ensure that Section 1.4 of the PDMR is updated to: a. clarify which activities are implemented in the different project areas/zones/strata; b. indicate the applicable baseline (t = 0) values for SOC stocks and inorganic fertilizer application rates for the different farming fields (strata); and c. lists the eligibility criteria for applying the SOC modelling tool. 3. The VVB must assess the updated project description and update the validation report as needed. Program Rule(s) *VCS Standard, v4.3*, Section 3.5.10, 3.5.11 *VCS Methodology VM0017, v1.0*, Section IV Background	farms in all the strata. Hence as the full monitored data sets are available, the calculations for the fertilizer application rates and the agroforestry removals was based on the field data from the farm diary. As per the methodological requirements, stratification is applied for quantification of the SOC stocks. The input SOC stocks at baseline (t = 0) have been estimated based on the field measurements across the different strata. The final SOC stock values have been modelled based on the RothC model using the appropriate input parameters. Agro ecological zone has the major influence on the soil organic carbon and hence this considered as the basis for the stratification. According to IPCC climate regions, the project activity instance is in tropical dry climate zone. PP has provided details on studies which have been selected to demonstrate that the application of the RothC model is appropriate and that the model is validated for similar AEZs/ climate regions. Hence VVB is of the opinion that the model can be applied to the project area. • A majority of the farmers (>90%) are implementing all the SALM interventions in the farms. The audit team has verified this based on the database provided. Where the	

	• Section IV of VM0017 recommends that the project proponent stratifies by crop system, tillage system, use of crop residues, application of manure and clay content of soils and relevant climatic variables as a minimum. As specified by Option 2 of VM0017's applicability conditions, RothC can only be applied for calibrated and validated regions and practice change respectively.	intervention is not applicable, it is indicated as zero. • Based on information and data submitted by the PP, audit team has verified that Applicable baseline (t = 0) values for SOC stocks has been provided in section 6 of the revised PD-MR. The inorganic and organic fertilizer application rates are also provided. The crop productivity and the amount of crop residue returned to the soil for the agro-ecological zones are summarised in the section 6 of the revised PD-MR. The field monitoring data for these parameters has been crosschecked by the audit team for accuracy. As per the updated PD-MR, the assessment opinion is provided in section 3.4 of the VVR. Verra Response The PP has included further details regarding the eligibility criteria in Section 1.4 of the PD-MR but issues remain. This finding cannot close. Issue Eligibility criteria for meeting SOC modelling requirements are not clarified. Action Required 1. The VVB must ensure that Section 1.4 of the PDMR is updated to:	

		a. clarify what SALM interventions the remaining 10% of farmers will be implementing. b. list the eligibility criteria for applying the SOC modelling tool. 2. The VVB must assess the updated joint PDMR and update the VR as needed. Program Rule(s) *VCS Standard, v4.3*, Section 3.5.10, 3.5.11 *VCS Methodology VM0017, v1.0*, Section IV	
		Round 2 VVB Response **Response for Action1** a. Based on the review of the monitoring data, onsite observations and interviews conducted during the visit, the EPIC audit team confirmed that 90% of the farmers are implementing all the SALM interventions, which include the use of organic fertilizers and agroforestry. The remaining 10% of the farmers are implementing either the use of organic fertilizers or agroforestry, but not both. The EPIC audit team verified during the onsite visit that these farmers practice one of the interventions (either agroforestry or the use of organic fertilizers), but not both. b. Section 1.4 is updated to include the eligibility criteria for applying the SOC modelling tool for the project activity. The EPIC audit team assessed the eligibility criteria and the assessment conclusion for	

		the eligibility criteria is provided in the section 3.1 of the Joint Validation and Verification Report. **Response for Action 2** The EPIC audit team reviewed the updated joint PD & MR, and the assessment opinion is provided in the section 3.1 of the joint VVR.	
		Verra Response Section 1.4 of the PDMR has been updated but Table 1 does not include any details on eligibility criteria for applying the SOC modelling for future instances. The VVB has updated Section 3.1 of the VVR to provide an assessment on the SALM interventions the remaining 10% of farmers will be implementing. However, issues still remain, this finding cannot be closed. Issue The PP did not update Table 1 include any details on eligibility criteria for applying the SOC modelling for future instances. The VVB has not included an assessment opinion for the eligibility criteria for applying the SOC modelling for future instances in Section 3.1 of the VVR. Action Required	

		1. The VVB must ensure the PP updates Table 1 of the PDMR and include the list of eligibility criteria for applying the SOC modelling for future instances. 2. The VVB must assess the updates in Section 1.4 of the PDMR accordingly. 3. The VVB must update Section 3.1 of the VVR to include an assessment opinion on the eligibility criteria for applying the SOC modelling for future instances. Program Rule(s) V*CS Joint Project Description Monitoring Report Template, v4.1*, Section 1.4 **Round 3** <u>VVB Response</u> **Response for Action 1:** The PP has updated Table 1 in the VCS PD&MR v1.6 to include the list of eligibility criteria for applying SOC modelling to future instances. **Response for Action 2:** The EPIC audit team assessed the information provided in Table 1 of the updated VCS Joint PD&MR regarding the eligibility criteria for applying SOC modelling to future instances. Based on this assessment, the EPIC audit team is of the opinion that the PP has adequately updated Table 1 to reflect the eligibility criteria required for the application of SOC modelling in future	

		project instances. Accordingly, the audit team confirms that the project is in compliance with the requirements specified in Sections 3.5.15 and 3.5.16 of the VCS Standard v4.3, as well as the applicability conditions outlined in the VM0017 methodology for the inclusion of new project activity instances. **Response for Action 3:** The EPIC audit team reviewed the updates in table 1 and has updated Section 3.1 of the VVR to include an assessment opinion on the eligibility criteria for applying SOC modelling to future instances. In the project, the PP has utilized farmers' farm diary data along with peer-reviewed literature relevant to the climatic conditions prevailing in the state of Karnataka. The project area is classified according to IPCC climatic regions—specifically Tropical Dry, Tropical Wet, and Tropical Moist—for Soil Organic Carbon (SOC) modelling. The Rothamsted Carbon Model (RothC) version 26.3 is used to estimate SOC changes both in the baseline scenario and under project interventions. Variable input data such as weather data, soil parameters, and land use and management information are used to run the RothC model. Peer-reviewed literature (Bhattacharyya et al., 2013, and Paramesh et al., 2022) has been selected to demonstrate the appropriateness and validation of the RothC model for IPCC climate zones prevalent in the project area. Based on interviews with the PP and the project management team, it is confirmed that	

		all future project activity instances (PAIs) will be categorized according to IPCC climatic zones and that the RothC model will be used for estimating changes in SOC carbon stocks. Verra Response Section 1.4 of the PDMR has been updated to include specific eligibility criteria for the use of SOC modelling for future instances. The section now specifies the biogeochemical model used, the practices changes implemented, and the climate conditions in which the instances must been. This finding is now closed.	

5	**Insufficient justification for the project start date**		
	Issue Section 1.8 of the PDMR defines the project start date as the date when the farmer associations adopt the practice of SALM and sign the agreement with the project developer. However, Section 3.1 of the VVR indicates that the practices were already adopted on the date of the agreement. Therefore, it is unclear whether the SALM activities began to be implemented prior to the signing of the agreement or at the same time. If the first case is true, it is unclear how the project start date is consistent with the VCS Program's definitions of project start date. If the latter, it is unclear what specific activities were implemented on October 1, 2017, and what evidence there is to support this. Action Required 1. Section 1.8 of the PDMR must be updated with a	**Round 1** VVB Response Section 1.8 of the VVR has been revised to clarify that the project start date is defined as the start of adoption of the SALM practices (application of organic manure in the farms/tree planting for agroforestry) by the farmer associations. This was also verified with the farm diary and cross checked with the farm association. October 1, 2017 is the earliest date of the adoption of the SALM practice by the farmers. Hence it is assessed by the audit team that the start date is in line with the VCS Program's definitions of project start date, no change in PDMR is applicable.	Closed

	clear justification of the earliest date of SALM practices; meeting the VCS Standard definition of "project start date." 2. In Section 3.1 of the VVR, the VVB must assess and demonstrate how the selected project start date is appropriate and meets the Standard's definition of the concept. Program Rule(s) *VCS Program Definitions, v4.2*	Verra Response The VVB has provided further evidence to support the project's start date. This finding is now closed.	

6	**Missing details to describe the project activities**		
	Issue Section 1.11 of the PDMR does not summarize important details about project management and planting activities, particularly the recommended tree planting densities and fertilizer application rates. Action Required VVB must ensure that section 1.11 of the PDMR summarizes the recommended tree planting densities and fertilizer application rates for the project areas in each region/stratum. Program Rule(s) *VCS Joint Project Description Monitoring Report Template, v4.1*, Section 1.11	**Round 1** VVB Response Section 1.11 of the PDMR has been updated to indicate the information on the project management for the SALM practices implemented. The summary of the information is provided by the audit team as below. Project management for Organic fertilizers application As verified from the information submitted by the PP, in the study area, the average recommended rate is around 3 tons / hectare for farmyard manure which is the major type of input for more than 95% of the farmers in the project area. For the other types the average recommended rate is round 0.4 tons / hectare. However due to the high subsidies associated with the use of chemical fertilizers, these actual rates applied are much lower. Hence the objective of the project is to encourage farmers to	Closed

		apply the recommended organic fertiliser application rates which ensures the effectiveness of SALM practices. Project management for Agroforestry As there is no specific guidance for trees planted per hectare for Agroforestry systems (Agri – horticulture – silviculture / boundary planting and scattered planting), the objective of the project is to plant following a planting density of 8-10 trees / hectare/ year with spacing of 3m between trees (considering the average area of the farm is 0.8 to 1 hectare). The project expects to achieve a crown cover of 30% per farm, in the next 7 -8 years. The audit team has reviewed literature with recommendations on the tree density and spacing in agroforestry systems and is of the opinion that the practices followed for the Agroforestry tree planting will ensure that the objective of achieving a healthy agroforestry system is achievable.	
		Verra Response The PP has updated Section 1.11 of the joint PDMR as requested. This finding is now closed.	

7	**Project longevity does not comply with VCS requirements and NPR tool is incorrectly applied**		
	Issue 1. The 25-year project lifetime stated in Section 1.10 of the PDMR is not acceptable for AFOLU projects under the VCS Standard.	**Round 1** VVB Response 1. Section 1.10 had incorrectly indicated the crediting period as 25 years whereas the actual is for a period	Closed

	2. The answer to question #2 in the Project Longevity section of the Non-Permanence Risk (NPR) assessment is unclear. It is not clear why all the risks are common to the entire project area/AEZ (70,000 ha). Action Required 1. The VVB must justify and describe how the project does not fail the risk assessment and is eligible for crediting, regardless of the fact that the project longevity is less than 30 years. 2. The VVB must ensure that the NPR report is updated to describe and justify how the risks are common throughout the project area. If risks are not common across entire project area, the VVB must ensure that the project proponent recalculates the risk rating by dividing the project's geographic area such that a single total risk rating can be determined for each project activity-AEZ combination or stratum. 3. The VVB must ensure that the project proponent recalculates the risk rating and consequently all the estimated net GHG ERRs: a. Indicating a credible and justified project lifetime in the Project Longevity Section of the NPR Tool; and b. following requirements stated in section 3.5.17 of the *VCS Standard, v4.3*. Program Rule(s) *AFOLU Non-Permanence Risk-Tool*, v4.0., Section 2.2.4	of 30 years. The agreement with farmers association has already been verified by the audit team which indicate a validity of 40 years which extends beyond the crediting period of the project. Hence the section 1.10 of the PD-MR is now updated to reflect the 30-year crediting period which is accepted by the audit team as appropriate. 2. PP has submitted the analysis of the risks identified for all the agro ecological zones based on past occurrences of instances which lead to significant loss of productivity. According to IPCC, the entire project region is classified as predominantly tropical dry climate zone. The risks mainly relate to the climatic conditions and the baseline survey indicated that mitigation measures are in place by the farmers to account for the identified risks such as drought, floods, water availability, insect /pests, and heatwaves. Overall, accounting for the past 10 years prior to start date, the loss on crop productivity due to such events is less than 5% which classifies it as low risk. The audit team has assessed the information submitted and is of the opinion that risks are not significant and are common across the agro climatic zones. Hence in this scenario, single total risk is considered appropriate for the entire project activity. 3. The audit team has verified the updated NPR to ensure that the risk rating and the estimated net GHG ERRs are in line with the requirements of the VCS standard	

	VCS Standard, v4.3, Section 3.5.7. Background ● Where AFOLU project longevity is less than 30 years, the project fails the risk assessment, and it is not eligible for crediting. ● Where a project is divided into more than one geographic area for the purpose of risk analysis, the project's monitoring and verification reports shall list the total risk rating for each area and the corresponding net change in the project's carbon stocks in the same area, and the risk rating for each area applies only to the GHG emissions reductions generated by project activity instances within the area.	Verra Response The project's crediting period has been updated in the joint PDMR. The VVB has clarified the project's longevity and provided an explanation for the risk in the project areas. This finding is now closed.	

8	**Inconsistent and insufficient information to demonstrate potential negative environmental and socio-economic impacts and mitigation measures**		
	Issue 1. Section 2.1 of the PDMR suggests that no significant negative environmental and socio-economic impacts, are expected and that no mitigation measures are required. However, Section 3.3.1 of the VVR indicates that the PP has taken adequate steps to mitigate the potential negative impacts. 2. Section 2.1 of the PD/MR does not show why no significant negative impacts are expected, while not 100% of the farmers identified positive impacts of the project.	**Round 1** VVB Response Section 2.1 of the PD-MR has been updated and submitted by the PP. The audit team has reviewed the results of the baseline survey submitted by the PP. The feedback from the farmers representing the different socio -economic groups indicated the various types of risks they face due to adoption of the SALM practices. The socio- economic analysis accounted for the land holding capacity, education, main occupation, family size, type	Closed

	3. It is not clear whether the implemented green harvesting activities do not violate workers' rights. Action Required 1. The VVB must ensure that Section 2.1 of the PD/MR is updated with a detailed description and justification of why no negative environmental and socio-economic impacts are expected. 2. The VVB must update Section 3.3.1 of the VVR to describe the evidence used to validate that no negative environmental and socio-economic impacts, are expected. The information in of the VVR must be consistent with the PD/MR. 3. The VVB must ensure that section 2.1 of the PD/MR justifies how all activities implemented including the green harvesting activities, do not negatively impact workers' rights. Program Rule(s) *VCS Standard, v4.3*, Section 3.17.2, *VCS Joint Project Description Monitoring Report Template, v4.1*, Section 2.1	of house and caste. The mitigation actions implemented by the project indicated a satisfactory level of outcome as indicated in the feedback provided during the ongoing stakeholder consultation. Around 94% of the farmers identified positive aspects of the project and identified no major environmental risk. The term green harvesting is applied to mainly sugarcane harvesting, in which machinery is used for harvesting instead of manual labour. It is verified by the audit team that, in the project activity there is no impact on this approach as both in the baseline and the project case the situation remained the same. The project focussed only on improving soil quality and agroforestry. Hence based on the information, it is the opinion of the audit team that the finding is satisfactorily addressed, no change to VVR is applicable Verra Response Section 2.1 of the joint PDMR has been updated to discuss the environmental and socio-economic impacts of the project. This finding is now closed.	

9	**Risks associated with the introduction of invasive and/or exotic species have not been assessed**		
	Issue The VVR does not specify if and how the VVB has assessed the introduction of non-native and potentially invasive species like Eucalyptus through project activities.	**Round 1** VVB Response Sections 2.1 and 2.3 of the PD-MR are updated and submitted by the PP.	Closed

	Action Required The VVB must: a. assess how Eucalyptus and all other planted tree species are not invasive in the project area and provide a corresponding assessment conclusion in section 3.2 of the VVR; b. ensure that Sections 2.1 and 2.3 of the joint PDMR are updated to justify how there is no harm from all potentially invasive species. Program Rule(s) *VCS Standard, v4.3*, Section 3.17.16 (2) Background Under the VCS program, projects are not allowed to introduce any invasive species or allow an invasive species to thrive through project implementation.	The audit team has reviewed the information and is of the opinion that tree species considered for the project activity are native species or naturalized species and no invasive species are considered for the Agroforestry practices. However, in response to VERRA finding, PP has opted to remove eucalyptus trees from the inventory data, for conservativeness and the revised sheets for A/R have been submitted. Hence based on the information, it is the opinion of the audit team that the finding is satisfactorily addressed. Verra Response The PP has updated Section 2.3 of the joint PDMR to clarify that only native species or naturalized species will be used in the project. The VVB has updated Appendix 3 of the VVR. This finding is now closed.	

10	**Nondisclosure of any ongoing or unresolved conflicts over property rights**		
	Issue Section 2.5 of the PDMR does not disclose if there are any ongoing or unresolved conflicts over property rights. Action Required The VVB must ensure that section 2.5 of the PDMR discloses and demonstrates whether there are any	**Round 1** VVB Response The audit team has reviewed Section 2.5 of the revised PD-MR submitted by the PP. Based on the information provided, it is observed that there are not any ongoing or unresolved conflicts over property rights in the project area. The	Closed

	ongoing or unresolved conflicts over property rights. If there are, the VVB must also ensure that the same section of the PDMR discusses how the project will mitigate/consider these conflicts and demonstrate they will not impact the implementation of the project. Program Rule(s) *VCS Standard, v4.3*, Section 3.17.16	declaration submitted by the PP also confirms this. The audit team has reviewed Section 1.4 of the PD-MR which has been updated to indicate that in order to confirm that the land is eligible, verification of the land title deeds will be done to ensure that there are no existing disputes for the land included under the project activity. Hence, the VVB is of the opinion that the updated PD-MR and supporting documents adequately address the finding. Verra Response The PP has updated Section 1.4 of the joint PDMR to include the information as requested. This finding is now closed.	

11	**AFOLU-Specific Safeguards incomplete**		
	Issue Section 2.5 the PDMR does not describe all the AFOLU Safeguards. Action Required 1. The VVB must ensure that Section 2.5 of the PD is updated to describe the following AFOLU Safeguards: a. the location of territories and resources which local stakeholders own or to which they have customary access; b. a description of the social, economic and cultural diversity within local stakeholder groups and the differences and interactions between the stakeholder groups; c. risks to local stakeholders due to project implementation and how the project will	**Round 1** VVB Response Section 2.5 of the PD-MR is updated with the AFOLU safeguards requirements and submitted to the VVB. 1a) In the context of this project, the location of the project clearly demarcating the territories is defined by the agricultural land owned by the farmer. The details of the same has been provided by PP which is verified by the audit team. 1b) the analysis of the social, economic and cultural diversity within local stakeholder groups and the differences and interactions between the stakeholder groups have been analysed based on the baseline survey and provided to the VVB. However, it is informed that the farmers association decide on the eligibility of the farmer based on the location of the land. Hence the association itself is representative of comprising of farmers from different socio-economic	Closed

	mitigate such risks (if not impacts are expected, evidence must be provided); d. how communication and consultation are performed in a culturally appropriate manner, including language and gender sensitivity, directly with local stakeholders or their legitimate representatives when appropriate; and e. statement that neither the project proponent nor any other entity involved in project design or implementation are be involved in any form of discrimination or sexual harassment. 2. The VVB must ensure that the project meets the requirements of AFOLU-Specific Safeguards and describe its assessment in Section 3.3.5 of the VR. Program Rule(s) *VCS Standard, v4.3*, Sections 3.17.10 to 3.17.18 *VCS Joint Project Description and Monitoring Report Template, v4.1*, Section 2.5	backgrounds based on the education, size of landholding, caste and family size. 1c) Based on the results of the baseline survey, the feedback from the farmers indicated the various types of risks they face due to adoption of the SALM practices. The mitigation actions implemented by the project indicated a satisfactory level of outcome as indicated in the feedback provided during the ongoing stakeholder consultation. 1d) the farmer associations coordinate the interaction with the farmers who are the stakeholders. As the associations represent the farmers and coordinate the stakeholder consultations it is ensured that communication and consultation are performed in a culturally appropriate manner, including language and gender sensitivity. The same was verified from feedback from the farmer which indicated an overall satisfactory outcome. 1e) The statement of declaration that neither the project proponent nor any other entity involved in project design or implementation are involved in any form of discrimination or sexual harassment has been provided by the PP and submitted to the VVB. As per the updated PD-MR, the assessment opinion is provided in section 3.3.5 of the VVR. Verra Response The PP has updated Section 2.5 of the joint PDMR as requested.	

		The VVB has updated Section 3.3.5 of the VVR to provide an assessment of the same. This finding is now closed.	

12	**Lack of supporting evidence used to demonstrate and verify the baseline and additionality**		
	Issue 1. Section 3.4 of the PDMR does not describe nor demonstrate how the identified alternatives to the project activity are in compliance with all the applicable legal and regulatory requirements. 2. The VVR does not describe how the documentary evidence used in determining the baseline scenario and demonstrate additionality is relevant, and correctly quoted and interpreted in the project description. Action Required 1. The VVB must ensure that Section 3.4 of the PDMR is updated with credible justification of how the baseline alternatives comply all the applicable legal and regulatory requirements. 2. The VVB must update section 3.4.4 and 3.4.5 of the VVR to include details (including sources of information) of any steps taken to cross-check data used to validate of the baseline scenario and additionality. Program Rule(s) *VCS Joint Project Description and Monitoring Report Template, v4.1*, Section 3.4, *VCS Joint Validation Verification Report Template, v4.1*, Section 3.4	**Round 1** VVB Response Audit team has reviewed the updated information in section 3.4 of the PD-MR in which the relevant laws (national and regional level) have been indicated to demonstrate that the identified alternatives to the project activity are in compliance with all the applicable legal and regulatory requirements. The identified alternatives in compliance with the laws are: 1. Land use will continue to be agricultural with unsustainable practices, which will lead to the loss in soil nutrients and degradation. 2. Adoption of sustainable agricultural land management practices without considering incentives from the carbon revenues. 3. Establishment of land with commercial tree plantation (Afforestation / Reforestation). VVB has cross checked the validity of the relevant laws and based on its local expertise and interview with farmers and farmers associations concluded that the baseline scenario and additionality are relevant and appropriate. Section 3.4 of the VVR has been updated to add the statement.	Closed

		Verra Response Sections 3.4 and 3.5 of the PD-MR have been updated, however, issues remain. This finding cannot close. Issue Section 3.4 is missing a substep. Further, the common practice analysis does not fully describe or compare other activities in the same geographical area(s) as required per Section 4 of Tool02. Action Required 1. The VVB must ensure Section 3.4 of the PD-MR is updated to include evidence that planned sale of VCUs were seriously considered in the decision to proceed with the project activity. 2. The VVB must describe, in detail, the steps taken to independently validate the common practice analysis with reference to specific cross-checks and references used (e.g., validating the differences between the project, checking the CDM and VCS project database, etc.). The VVB must ensure that Section 3.4 of the PD-MR is updated if needed. Program Rule(s) AR-TOOL02, v1, paragraphs 33, 34	

		Round 2 VVB Response **Response to the Action 1.** ● Section 3.3 in the joint PD & MR is the project boundary and as per the template requirements, the joint PD & MR is updated. The project boundary is submitted by the PP as KML file which has been reviewed by VVB. The EPIC audit team reviewed the updated PD & MR and provided assessment conclusion in the section 3.4.3 of the joint VVR. ● The EPIC audit team has reviewed the updated information in section 3.4 of the PD-MR to include evidence that planned sale of VCUs were seriously considered in the decision to process with the project activity. The EPIC audit team reviewed the farmers agreement in which it clearly indicates about the benefit sharing. The revenue from the project activity is discussed with the farmers before signing the agreement with the farmers. The EPIC auit team interviewed farmers during the onsite visit and confirmed that the revenue from the project activity was seriously discussed and is the key point that farmers to decide to join the project. Hence the EPIC audit team is of the opinion that the project seriously considered the revenue from planned sale of VCUs as the project is mainly depends on the participation of the farmers. The section 3.4 of the PD & MR is updated to include evidence that planned sale of [VCUs] were	

		seriously considered in the decision to proceed with the project activity. The EPIC audit team provided the assessment conclusion in the section 3.4.4 of the joint VVR. **Response to the Action 1.** The EPIC audit team has reviewed the updated information in section 3.5 of the Joint PD & MR. The EPIC audit team assessed the details provided for common practice analysis in the updated joint PD & MR and provided the assessment conclusion in the section 3.4.5 of the joint VVR. The audit team reviewed the evidence and justification provided by the PP, which indicated that even though some schemes existed for adoption of organic farming methods, their acceptance and actual application was very low and showed a decreasing trend. The major reasons for this were the financial barrier, as there were no existing schemes with the benefits of carbon revenue. Hence this established that the implemented project activity is not a common practice.	
		Verra Response The VVB has provide an assessment opinion in Section 3.4.4 of the VVR. However, the assessment provided in Section 3.4.5 of the VVR is insufficient. This finding cannot be closed. Issue	

		No comparative analysis conducted by the project focusing on similar projects without carbon finance; other CDM or registered projects should be excluded. The VVB has not provided sufficient information on how it validated the common practice analysis that confirms the project is additional. Considering several scientific articles discusses sustainable agriculture in the state of Karnataka. Action Required 1. The VVB must ensure the PP demonstrates and justifies how the common practice analysis is in line with paragraphs 32 - 34 of TOOL02. The PP must update Section 3.5 of the PDMR and conduct a comparative analysis focusing on similar projects without carbon finance as required per the tool. 2. The VVB must describe, in detail, the steps taken to independently validate the common practice analysis with reference to specific cross-checks and references used, considering several articles discusses sustainable agriculture in the state of Karnataka. The VVB must ensure that Section 3.5 of the PDMR is updated as needed. Program Rule(s)	

		AR-TOOL02, v1, paragraphs 33, 34 **Round 3** VVB Response **Response to Action 1**: The PP has updated Section 3.5 and Appendix 3 of the VCS PD&MR v1.6 to include a detailed analysis of similar sustainable agricultural projects operating in the state of Karnataka without carbon finance, as required by AR-TOOL 02, v1, paragraphs 33 and 34. Projects implemented by both private and government entities have been considered for this comparative analysis. **Response to Action 2:** The audit team reviewed all sustainable agricultural projects functioning in Karnataka, regardless of project scale or implementing authority (private or government), and conducted a comparative analysis between Project 3115 and relevant government schemes and private initiatives. Section 3.4.5 of the VVR has been updated to reflect the results of the audit team's independent analysis based on all available references and public information on sustainable agricultural practices in Karnataka. The following government and private initiatives were verified by the audit team: 1. Paramparagat Krishi Vikas Yojana (PKVY) (https://pgsindia-ncof.gov.in/)	

		2. Gopalan Organics (https://www.gopalanorganics.com/gopalan-organic-who-we-are.php/) 3. Phalada Agro (http://phaladaagro.com/farmers/) 4. 24 Mantra Organics (https://www.24mantra.com/24-mantra-organic-our-organic-farmers/) 5. Sahaja Sambrudha (https://www.sahajasamrudha.org/sustainable-agriculture/) The state of Karnataka is recognized for various sustainable agriculture programs implemented by both the government and private sectors. However, the private initiatives implemented by commercial entities are focused on revenue generation in organic farming. Government schemes do not provide consistent financial support and resources to farmers to pursue long-term sustainable agriculture, while private initiatives are market-driven and generally lack long-term agreements with farmers. Moreover, these are small-scale initiatives that often focus on only one or two objectives, such as the use of organic fertilizers and/or prevention of biomass burning. The essential distinction between this project 3115 and other initiatives in Karnataka is that this project is implemented over a large area of 57,516 ha and provides smallholder farmers continued financial and technical	

		support over a long-term project agreement (30 years). The project features a consistent monitoring system to evaluate the performance of individual farmers and provide intensive assistance, which is essential for the sustainable implementation of the project. Unlike other initiatives, this project focuses on the holistic development of farmers and aims to create a value chain for farmers' produce. The project promotes the use of organic fertilizers, thereby gradually reducing the use of synthetic fertilizers, prevents biomass burning, encourages mulching using crop residues and agroforestry practice—objectives that are unique to this project. Periodic trainings on organic farming and agroforestry system are conducted for farmers and agricultural supplements are provided as part of the project. Unlike government and other private initiatives funded by the State of Karnataka and other institutions or investors, the implementation of Project 3115, spanning 57,516 ha, would not be feasible without carbon-based financing due to its distinct objectives and long-term project implementation goals. The audit team verified all data, rationales, assumptions, and publicly available information and concludes that the demonstration of additionality in the project is appropriate.	
		<u>Verra Response</u> Section 3.5 of the PDMR and Section 3.4.5 of the VVR	

		have been updated to include more demonstration and assessment of common practice in the state of Karnataka. This finding is now closed.	

13	**Mismatch in the presented emission sources**		
	Issue Section 3.3 of the PDMR includes CH_4 and N_20 emissions from application of organic fertilizers as emission sources in the project scenario, but Section 3.4.3 of the VVR excludes these sources. Action Required The VVB must ensure that Section 3.4.3 of the VVR is consistent with Section 3.3 of the PDMR. Program Rule(s) *VCS Joint Validation Verification Report Template, v4.1*, Section 3.4.3, and *Joint Project Description Monitoring Report Template, v4.1*, Section 3.3	**Round 1** VVB Response Section 3.4.3 of the VVR is updated now to include CH_4 and N_20 emissions from application of organic fertilizers as emission sources. Verra Response The VVB has updated Section 3.4.3 of the VR as requested. This finding is now closed.	Closed

14	**Unclear justification of insignificant leakage**		
	Issue Sections 1.18, 4.3 and 6.4 of the PDMR do not sufficiently describe how the increase in GHG emissions from increased use of non-renewable biomass resulting from the displacement of biomass used for energy (e.g., sugarcane burning) to agricultural inputs is insignificant. Thus, it is unclear on how the conclusion that leakage is insignificant was reached.	**Round 1** VVB Response: Baseline survey submitted by PP on use of non-renewable biomass such as sugarcane and paddy wastes generated in the farms was reviewed by the audit team. This concluded that such wastes are not used for any energy purposes such as for cooking or heating purposes as the households had already other means of fuels such as LPG or charcoal or	Closed

	Action Required 1. The VVB must ensure that the project proponent updates Sections 1.18, 4.3 and 6.4 of the PDMR to describe the rationale followed for demonstrating that leakage is *de minimis, including* the results of the Activity Baseline and Monitoring Survey (ABMS) that support the conclusion. 2. The VVB must update Sections 3.4.6 and 4.2 of the VVR to describe how the appropriateness of the leakage assessment has been validated. Program Rule(s) *VM0017 Methodology, v1.0*, Section III.2 and IV.2.6	firewoods, the usage of sugarcane and paddy wastes for cooking application is not practiced in the project region. These sugarcanes wastes were burnt in the open fields in the baseline and the paddy wastes are used as fodder for the cattle both in the baseline and in the project activity. Hence VVB is of the opinion that there is no impact on the leakage and is deemed not significant. However, to ensure that the leakage is considered in a conservative way, the avoidance of crop burning, has not been considered for the claimed GHG emission reductions. Verra Response The PP has updated Section 4.3 as requested to demonstrate that diversion of manure occurs within the project boundary and an insignificant amount of non-renewable biomass from outside the project area is used to replace the diverted biomass. This finding is now closed.	

15	**Inconsistencies in the NPRR**		
	Issue 1. "Financial Viability" risk rating is not well justified or contradictory: a. While factor c) = 1 was selected as a response to the first question (Q); the Non-Permanence Risk Report (NPRR) does not present a justification for the selected response and risk score. b. The rationale for factors h) (response to Q2) and i) (mitigation) is contradictory. While it is stated that "More than 80% of the funds are secured and the project has	**Round 1** VVB Response The findings have been addressed and the updated NPRR is resubmitted by the PP. The audit team has reviewed the revised NPRR and is of the opinion that the queries are satisfactorily addressed. Section 3.5 of the VVR is revised to describe all the documentation reviewed to assess the risk rating provided by the project proponent and to indicate how a reasonable	Closed

	also applied for a bank loan," it is also stated that "The project has not applied for any external funding but has demonstrated lines of credit that are accessible through bank loans." Therefore, it is unclear whether the project has secured 80% of the funds or whether it is mitigated by callable financial resources. 2. The "Opportunity Cost" risk assessment is inaccurate: a. An assessment of the net impact of the project on the social and economic well-being of the communities that derive their livelihoods from the project area is not provided to justify the net present value. b. The risk score assigned to factor d) is incorrect. It should be zero, not -2. 3. The "Project Longevity" risk score is inconsistent with the information provided in the PDMR (e.g., Section 1.10). Project longevity is not specified in the NPRR. 4. The "Land Tenure" mitigation factor g) is not well justified. It is unclear whether the project has implemented activities to resolve disputes. 5. "Community Engagement" risk factor b) is not well justified. While it is stated that "all the farmers who are part of the farmers associations have been consulted," it is unclear what percentage of households living within 20 km of the project boundary outside the project area, who are reliant on the project area, have been consulted. 6. The "Political" risk score is calculated incorrectly: a. The governance score is not calculated using The World Bank Institute Worldwide Governance Indicators.	level of assurance was reached. The updated information in the revised NPR report (V 1.4) and VCS-Risk-Report-Calculation-Tool-v4.0 along with the supporting documents for assigning the scores related to Project Management, Financial viability, Opportunity cost, project longevity, land tenure and community engagement and political risk were reviewed by the audit team. Verra Response The non-permanence risk report has been updated. However, there are still outstanding issues. Issue Section 3.5 of the VVR does not have sufficient information on how the VVB assessed the risk scores for each risk element. Action Required The VVB must update Section 3.5 of the VVR to include more information about how the VVB assessed each risk factor, including the following: 1. An assessment of all rationale, assumptions and justifications used to support the risk score 2. An assessment of any documentation and data provided to support the risk score Program Rule(s) *VCS Joint Validation and Verification Report Template, v4.1*, Section 3.5	

	b. The governance indicators are not averaged over the most recent five years of available data. Action Required 1. The VVB must ensure that the NPRR is updated to correct the risk ratings and include relevant justification for all internal and external risk factors and mitigating actions described in the "Issue" above. 2. The VVB must update Section 3.5 of the VVR to describe all the documentation reviewed to assess the risk rating provided by the project proponent and indicate how it has reached a reasonable level of assurance Program Rule(s) *AFOLU Non-Permanence Risk Tool, v 4.0,* Sections 2.2 and 2.3	**Round 2** VVB Response The EPIC audit team updated Section 3.5 of the VVR to include more information on the assessment conclusion for risk scores of each risk element. The detailed assessment of non-permanent risk is provided in the Appendix 03 of the joint VVR in the table format. The EPIC audit team has summarised in that table an assessment of all rationale, assumptions and justifications used to support the risk score. The EPIC audit team provided an assessment of the documentation and data provided to reach a reasonable level of assurance to support the risk score in that table in Appendix 03 of the joint VVR. Verra Response The VVB has updated Appendix 3 in the VVR with sufficient details. This finding is now closed.	

16	**Risks related to the use of agrochemicals and their effects to the environment and local community not justified nor assessed**		
	Issue 1. Section 2.1 of the PDMR does not justify the use of agrochemicals. 2. Section 3.3.1 of the VVR does not specify if and how the VVB has assessed management of organic/inorganic fertilizers, chemical pesticides, biological control agents and other inputs and their possible adverse effects not assessed.	**Round 1** VVB Response Section 2.1 of the PD-MR is updated and submitted by the PP. From the information provided by the PP (survey of farmers), it was observed by the audit team that the use of chemical	Closed

	Action Required 1. The VVB must ensure that Section 2.1 of the PDMR is updated to justify the use and effect of all applied agricultural and/forestry products (chemical and/or biological). 2. The VVB must update section 3.3.1 of the VVR with a corresponding assessment conclusion. Program Rule(s) *VCS Standard, v4.3*, Section 3.17.16 *VCS Project Description Template, v4.1*, Section 2.1	pesticides, biological control agents and agro chemicals remained similar based on usage data in the baseline and project monitoring. This is due to the reason that they are specific to the crop type and not the SALM practices adopted. Audit team notes that the ultimate goal of the project is to reduce the agrochemicals usage and adopt organic practices to minimise its risk on the environment and on the local community. During project scenario the increase in the usage of organic inputs demonstrate the increased SOC or microorganisms in soil, earthworms, and honey bee as biological indicators which have minimal risks and improve the overall biodiversity in the project area. Hence audit team is of the opinion that the query is addressed satisfactorily.	
		Verra Response Section 2.1 of the joint PDMR has been updated, but issues remain; this finding cannot be closed. Issue Section 3.3.1 of the VVR does not specify if and how the VVB has assessed management of organic/inorganic fertilizers, chemical pesticides, biological control agents and other inputs and their possible adverse effects not assessed. Action Required 1. The VVB must update section 3.3.1 of the VVR with a corresponding assessment conclusion.	

		Program Rule(s) *VCS Standard, v4.3*, Section 3.17.16 *VCS Joint Project Description Monitoring Report Template* , Section 2.1 **Round 2** VVB Response The EPIC audit team updated the section 3.3.1 of the VVR to include the assessment conclusion on possible adverse effect of management of organic/inorganic fertilizers, chemical pesticides, biological control agents and other inputs. The EPIC audit team validated the impact of input management practices in both the baseline and project scenarios. The negative impacts of these inputs in the baseline scenario are significantly higher compared to the project scenario. <u>Verra Response</u> The VVB has updated Section 3.3.1 of the VVR. This finding is now closed.	

17	**Monitoring plan and procedures not sufficiently described**		
	Issue Section 5.3 of the PDMR does not provide the required details to ensure the robustness of the monitoring plan. Action Required	**Round 1** VVB Response The Internal inspection and monitoring report is used for internal auditing and QA/QC, According to the procedures	Closed

	1. The VVB must ensure that the project proponent updates Section 5.3 of the PDMR to describe: a. The policies for oversight and accountability of monitoring activities. b. The procedures used for internal auditing and QA/QC. c. The implementation of sampling approaches. 2. The VVB must update Section 3.4.8 of the VVR with an assessment of the updated monitoring plan. Program Rule(s) *VCS Standard, v4.3*, Section 3.15	adopted by the PP, a minimum of 20% samples are analysed each year for any deviations from the farm diary records as part of internal quality check. Deviations if any are corrected during the inspection. The samples of the filled inspection report submitted by the PP for this monitoring period was also reviewed by the audit team. Hence audit team is of the opinion that the query is addressed satisfactorily. As per the methodological requirements, stratification is applied for the input parameters related to soil modelling such as baseline (t = 0) values for SOC stocks. Agro ecological zone has the major influence on the soil organic carbon and hence this considered as the basis for the stratification. The crop productivity and the amount of residue returned to the soil for the different strata is monitored for all farms across all the Agro ecological zones and no sampling approach applies.	
		Verra Response The PP has updated Section 5.3 of the joint PDMR, but issues remain; this finding cannot be closed. Issue The PDMR does not provide sufficient information on the sampling approach and design undertake by the project. The VVB has not updated Section 3.4.8 of the VVR as requested.	

		Action Required 1. The VVB must ensure Section 5.3 of the PD-MR is updated to include more information about the sampling design per Sections IV.1.1b and IV.2.4 of VM0017, v1.0. Specifically, a. Describe the sampling design per the CDM's *General Guidelines For Sampling and Surveys For Small-Scale CDM Project Activities*, and b. The data/parameters monitored as part of the Activity Baseline and Monitoring Survey (ABMS) for Roth-C model application. 2. The VVB must update Section 3.4.8 of the VVR with an assessment of the updated monitoring plan. Program Rule(s) *VCS Standard, v4.3*, Section 3.15 VM0017, v1.0, Sections IV.1.1 and IV.2.4	
		Round 2	
		VVB Response **Response for Action 1:** Section 5.3 of the PD-MR has been updated to include information on the sampling design in the monitoring plan. The EPIC audit team reviewed the updated section and confirmed that there are several interventions in the project, including organic fertilizer use for avoidance of chemical fertilizer emissions, estimation of accumulated Soil Organic Carbon and agroforestry. interventions related to fertilizer usage and agroforestry; the PP conducted monitoring of all the project areas (full data census). The farmers are	

		maintaining a farm diary in their individual farm fields, where the quantity of fertilizers applied, and the tree saplings planted were recorded. The same is recorded in the monitoring data sheets. This concludes that for these two interventions, the PP is monitoring the entire project area for the current monitoring period. The EPIC audit team deems that having data from all the project areas provides an overall better accuracy than using sampled data. This is validated as a methodology deviation related to monitoring. However, as per the applied methodology, the EPIC audit team raised a FAR (refer to Appendix 01 of the VVR) for the project for the next verification to use the proper sampling standard criteria and describe the sampling design for future monitoring in the monitoring plan. For SOC changes, it is difficult to monitor the entire project area. Hence, the project used the CDM's General Guidelines for Sampling and Surveys for Small-Scale CDM Project Activities. As per this tool, 49 samples are monitored across agro-ecological zones for the Activity Baseline and Monitoring Survey (ABMS) for Roth-C model application. Application of sampling design at 95% confidence and 10% precision was done which is acceptable. **Response for Action 2** The EPIC audit team updated section 3.4.8 of the VVR with an assessment conclusion of the updated monitoring plan. PP considered this change a methodology deviation for the current monitoring period and the EPIC audit team provided assessment conclusion for the methodology deviation under the section 3.4.7 of the joint VVR.	

		Verra Response Issue 1. The methodology deviation for conducting a full census for fertilizer use and agroforestry is justified. However, it isn't clear which specific data/parameters pertaining to agroforestry was monitored. Further, the monitoring methods for data/parameters on $Area_{i,t}$, $FC_{j,t}$, $PA_{C,mc,t}$, $PP_{C,Mc,t}$, $PR_{C,mc,t}$, and $PM_{C,C,mc,t}$, are not mentioned nor accounted for by the project. 2. The PDMR does not provide sufficient information on the sampling approach and design undertaken by the project for SOC. For example, no information on how the stratification and sample size calculation. 3. The VVB has not provided sufficient details in Section 3.4.8 of the VVR as requested. No assessment on how the sample size was determined and/or the appropriateness of the sample size selected by the project. Action Required 1. The VVB must ensure the PP clarifies the specific monitored data/parameters for agroforestry is included in Section 5.2 of the PDMR. 2. The monitoring methods for data/parameters on Areai,t, FCj,t, PAC,mc,t, PPC,Mc,t, PRC,mc,t, and	

		PMC,C,mc,t, (i.e., ABMS or direct monitoring) must also be included in Section 5.2 of the PDMR. 3. The VVB must ensure that Section 5.3 of the PDMR is updated to include more information about the sampling design, specifically, how the stratification and sample size was determined. 4. The VVB must update the VVR with a clear assessment opinion on the sample size selected. Program Rule(s) *VCS Standard, v4.3*, Section 3.15 Background The VVB must ensure to provide an assessment opinion and clearly state whether the deviation improves the accuracy of the ERRs and does not negatively impact their conservativeness. **Round 3** <u>VVB Response</u> **Response for Action 1 & 2:** The EPIC audit team reviewed Section 5.2 of the joint PD&MR and confirms that the PP has included a clear and comprehensive list of agroforestry-specific data and parameters to be monitored in the project. The specific monitored parameters for agroforestry include: root-to-shoot ratio for tree species j (Rj), diameter at breast height of agroforestry trees (DBH), and above-ground biomass calculated using the allometric equation method f(DBH).	

		Furthermore, Section 5.2 of the PD&MR has been updated to reflect the monitoring methods for parameters such as Areai,t, FCj,t, PAC,mc,t, PPC,Mc,t, PRC,mc,t, and PMC,C,mc,t, as required by the applied methodology. All listed parameters are monitored using the Activity Baseline and Monitoring Survey (ABMS) – a full census approach. The audit team verified farm diary samples and confirmed that all data related to the listed parameters are recorded annually by farmers in their respective farm diaries. The farmers data are verified by agricultural field officers, who are responsible for conducting periodic inspections. Additionally, these data were cross verified in the ABMS monitoring sheets (Fertilizer and Agroforestry). The ABMS sheets record data including farmer details, crop area, biomass production, harvested annual dry matter, major and minor crops, crop production, fertilizer usage (organic and synthetic), farmyard manure application, amount of crop residue, agroforestry species, amount of woody perennials, area under agroforestry, tree count, DBH, and others. **Response for Action 3:** The EPIC audit team reviewed the sampling design and confirms that Section 5.3 of the joint PD&MR now includes detailed information on the stratification approach and sample size determination. Stratification is based on USDA soil orders and IPCC climatic zones which adequately cover the heterogeneity of the project area. For the SOC estimation, the CDM sampling tool was applied yielding total of 361 samples across the zones. To increase accuracy and account for any potential sampling errors, PP collected 397 samples in total. These samples	

		were checked against actual field data to ensure that the collected data were reliable, and the variation is within a standard deviation of 15%, which is within acceptable limits. The EPIC audit team concluded that the sampling approach described in the joint PD&MR is statistically appropriate and representative of the entire project area. The CDM sampling tool was used to select samples across IPCC zones. The audit team reviewed the stratification and selected samples and confirms that the sample selection represents the entire project area for calculating SOC changes. Section 3.4.8 of the Joint VVR has been updated accordingly. **Response for Action 4:** The EPIC audit team reviewed the stratification and sampling approach in detail and updated Section 3.4.8 of the joint VVR to reflect the assessment conclusion on the selected sample size.	
		<u>Verra Response</u> Section 5.2 of the PD/MR has been updated to include the monitored data/parameters for calculating emissions from agroforestry activities, and more information about the monitoring methods of data/parameters listed in Issue 2. Section 5.3 of the PDMR has also been updated to include more information about the sampling design. The VVB has assessed these updates in the VVR. This finding is now closed.	

18	**Missing information on some steps to assess quantification methods for ERR**		
	Issue	**Round 1**	Closed

	Section 3.4.6 of the joint VVR does not include information on how the VVB assessed the calibrated and validated model. Action Required In section 3.4.6 of the VVR, the VVB must describe how they concluded that: a. The documentation used as the basis for assumptions and data sources used in the modelling tool are conservative. b. The studies demonstrating model validity are applicable for all agroecological zones (AEZ)/project areas. If the model has not been calibrated and validated for the entire project area and all project activities, the VVB should ensure that the validation studies used can demonstrate that the following two conditions are met: i. the model is validated for at least 50% of the total project area where the project area covers up to 50,000 ha or at least 75% of the total project area where project area covers greater than 50,000 ha; and ii. the area for which the model is validated generates at least two-thirds of the total project. Program Rule(s) *VCS Joint Validation Verification Report Template, v4.1*, Section 3.4.6, *VM0017 Methodology, v1.0*, Section 1.2	VVB Response The monitoring data sheets (based on farm diaries) submitted by the PP has been verified by the audit team which indicate SALM activities included under this project are carried out across majority of the farms in all the strata. Hence as the full monitored data sets are available, the calculations for the fertilizer application rates and the agroforestry removals was based on the field data from the farm diary. As per the methodological requirements, stratification is applied for quantification of the SOC stocks. The input SOC stocks at baseline (t = 0) have been estimated based on the field measurements across the different strata. The final SOC stock values have been modelled based on the RothC model using the appropriate input parameters. Agro ecological zone has the major influence on the soil organic carbon and hence this considered as the basis for the stratification. The conservativeness of the modelled values was verified by the crosscheck with the soil testing results, which indicated higher SOC value compared to the modelled value. The crop productivity and the amount of residue returned to the soil for all the farms has also been quantified in the monitoring sheets submitted by PP. No sampling approach was applied for these parameters. Verra Response This finding cannot close. Issue	

		The VVB has not updated Section 3.4.6 of the VVR as requested; the VVR must be updated. Further, the VVB's response above does not address the action items. Action Required In section 3.4.6 of the VVR, the VVB must describe how they 1. Arrived at a conclusion and how they assessed the model calibration and validation to be accurate: 2. The documentation used as the basis for assumptions and data sources used in the modelling tool are conservative. Program Rule(s) *VCS Joint Validation Verification Report Template, v4.1*, Section 3.4.6, *VM0017 Methodology, v1.0*, Section 1.2	
		Round 2 VVB Response **Response for Action 1:** Section 3.4.6 of the joint VVR is updated to include assessment conclusion of the calibration of the Roth C Model for its accuracy. The variable input data used for modelling SOC includes monthly rainfall, monthly evaporation, mean air temperature, clay content of the soil, decomposability of the incoming plant material (DPM/RPM ratio), and soil cover. Detailed information on the values applied and their data sources is provided in the SOC Modelling Standard Operating Procedure (SOP). The EPIC audit team reviewed the standard operating	

		procedure for the RothC model application in the project. The procedure includes detailed steps for outlining the necessary data sources and providing instructions for running the RothC model. The team's assessment confirmed that the methodology used by the PP to calibrate the RothC model is appropriate. The project used input data according to agro-climatic zones for weather parameters and the DPM/RPM ratio. The audit team validated the accuracy of the input data and the model's predictions by comparing predicted values with field values, demonstrating the reliability of the RothC model in estimating SOC changes. For example: • Predicted value for the year 2021: 21.5 tC/ha • Field value for the year 2021: 22.96 tC/ha The methodology employed by the PP for calculating and modelling Soil Organic Carbon (SOC) using the RothC model is appropriate. The procedure, as outlined in the SOC Modelling SOP, ensures accurate data calibration and reliable predictions. The validation by the EPIC audit team confirms that the RothC model effectively estimates SOC changes, as evidenced by the predicted and field values. The soil modelling SOP sample submitted by PP which is reviewed by VVB is submitted to VERRA. **Response for Action 2:** The EPIC audit team reviewed the data sources used in the modelling tool and confirmed that, all the documentation and data sources are appropriate and are from credible sources. PP developed “Soil Modelling SOP sample” where in it is	

		clearly explained about the data sources and the documentation used in the calibration of Roth C Model.	
		Verra Response The VVB provided an assessment in Section 3.4.6 of the VVR. However, this finding cannot be closed. Issue The VVB has not provided an assessment on any studies demonstrating the model is validated for 1) at least 50% of the total project area where the project area covers up to 50,000 ha or at least 75% of the total project area where project area covers greater than 50,000 ha; and 2) the area for which the model is validated generates at least two-thirds of the total project. The SOP does not include any information regarding this. Action Required 1. The VVB must update Section 3.4.6 of the VVR to include a full assessment on the any studies demonstrating model validity and whether the model is applicable for AEZ across the entire project area. The VVB must ensure all relevant project documents are updated as needed, including the	

		SOP. Program Rule(s) *VCS Joint Validation Verification Report Template, v4.1,* Section 3.4.6 VM0017, v1.0, Section 1.2 **Round 3** <u>VVB Response</u> The EPIC audit team reviewed the peer-reviewed journal articles provided by the PP and confirmed that the RothC model is validated and applicable to the entire project area. Following the recent revision, the project area has been classified according to IPCC climatic zones as Tropical Dry (82% of the area), Tropical Moist (16.33%), and Tropical Wet (1.67%). The audit team reviewed the selected research studies and concluded that their application to demonstrate the RothC model's appropriateness is justified, as the studies were conducted in the same IPCC zones as the project area. Specifically, Bhattacharya et al. (2013) covers Tropical Dry and Tropical Moist zones, while Paramesh et al. (2022) addresses Tropical Wet and Tropical Moist zones. The model applicability has thus been demonstrated in alignment with these IPCC climatic zones. Additionally, the EPIC audit team reviewed the revised Standard Operating Procedure (SOP) submitted by the PP,	

		which outlines the procedures for model calibration and validation. The SOP provides detailed information on the methodologies, datasets, and processes used to ensure the accuracy of the model outputs. Section 3.4.6 of the joint VVR has been updated to include a comprehensive assessment of model calibration, validation, and applicability, incorporating references to the supporting studies and the sources used for input parameters in the model calibration and validation process.	
		Verra Response Section 3.2 of the PDMR has been updated to demonstrate how the project meets the model applicability condition (f), via Option 1. Further, Appendix 1 has been added to describe in detail how the model was calibrated and validated, and how the uncertainty was calculated. Section 3.4.6 of the VVR has been updated to assess the applicability condition and model calibration and validation. This finding is now closed.	

19	**Missing overall conclusion on accuracy and completeness of project description**		
	Issue Per Section 3.1 of the VVR, the VVB has not provided an overall conclusion regarding whether the information in the PDMR is accurate, complete, and provides an understanding of the nature of the project. Action Required	**Round 1** VVB Response Section 3.1 of the VVR, is updated to provide an overall conclusion regarding that the information in the PDMR is accurate, complete, and provides an understanding of the nature of the project.	Closed

	The VVB must under Section 3.1 of the VVR provide an overall conclusion regarding whether the descriptions and justifications in the PDMR are accurate, complete, and provides an understanding of the nature of the project. Program Rule(s) *VCS Joint Validation Verification Report Template, v4.1*, Section 3.1		
		Verra Response The VVB has updated Section 3.1 of the VVR as requested; this finding is now closed.	

20	**Unclear sampling procedures for validation and verification of the project details**		
	Issue During the site inspection, a total of 37 out of the 32,514 farmers were visited across the different ecological zones. However, it is unclear whether the sample is representative for the project. Action Required In Section 2.4 of the VVR, the VVB must justify how interviewing only 37 out of the 32,514 farmers involved in the project was sufficient to reach a reasonable level of assurance on the conclusions from interviewing the stakeholder groups. Program Rule(s) *VCS Joint Validation Verification Report Template,* v4.1, Section 2.4	**Round 1** VVB Response As COVID was prevalent in some areas during the site inspections, VVB could not visit sites as per the plan and has visited 37 sites (farmers) across the zones which posed lesser risk. However, audit team also conducted video interviews and telephonic calls of 30 farmers (remote audit) on July 15th 2022. In the previous VVR, only the number of farmers who were actually visited (37 nos) were indicated, now the revised VVR also includes the farmers who were audited remotely (video interviews and telephonic calls)So the final sampled farmers are 67 that includes on-site (37 nos) and remote audit (30 nos). The details are provided in section 2.4 of the revised VVR.	Closed
		Verra Response The VVB updated Section 2.4 of the VVR to further clarify the sample size/ number of farmers interviewed during the audit. This finding is now closed.	

21	**Incomplete VVR summary section**		
	Issue The summary section of the VVR does not provide the number of findings raised during validation and verification nor describe any uncertainties associated with the validation and verification process. Action Required The VVB must update the summary section of the VVR with this missing information. Program Rule(s) *VCS Standard VVB Manual,* v3.2, Section 4.	**Round 1** VVB Response The summary section of the VVR is now updated to provide the number of findings raised during validation and verification and describe any uncertainties associated with the validation and verification process. Verra Response The VVB has updated the Summary section in the VVR as requested. This finding is now closed.	Closed

22	**Incomplete discussion on the assessment of the eligibility criteria for new instances, baseline and additionality**		
	Issue 1. Section 3.1 of the VVR does not provide an assessment regarding the validation of the eligibility criteria for new instances. 2. Section 3.1 of the VVR does not provide a complete assessment of the baseline and additionality. Action Required 1. The VVB must update section 3.1 of the VVR with this missing information.	**Round 1** VVB Response Section 3.1 of the VVR is now updated to provide detailed assessment regarding the validation of the eligibility criteria for new instances and assessment of the baseline and additionality. Verra Response The VVR has not been updated as requested; issues remain,	Closed

	2. The VVBs must perform the assessment of baseline and additionality separately for each project activity /AEZ/stratum as applicable. Program Rule(s) *VCS Standard, v4.3*, Section 4.1.22	thus, this finding cannot be closed. Issue Section 3.1 of the VVR does not provide an assessment regarding the validation of the eligibility criteria for new instances, including the appropriateness of the baseline and additionality criteria. Action Required The VVB must update section 3.1 of the VVR with an assessment of the eligibility criteria for grouped projects. The VVB must include an assessment of baseline and additionality criteria separately for each project activity /AEZ/stratum as applicable. Program Rule(s) *VCS Standard, v4.3*, Section 4.1.22 *VCS Joint Validation and Verificaiton Report Template, v4.1*. Section 3.1 **Round 2** VVB Response Section 3.1 of the joint VVR is updated to include the assessment conclusion on the eligibility criteria for grouped projects. The assessment conclusion for baseline and additionality criteria for future project activity instances are provided in the joint VVR. Verra Response The VVB has updated Section 3.1 of the VVR with sufficient details regarding the eligibility of future	

		instances. This finding is now closed.	

23	**Missing cited supporting documents**		
	Issue Section 3.5 of the VVR cites two excel spreadsheets that are not submitted for review but critical for assessing the accuracy of the calculated GHG benefits. Action Required The VVB must ensure that project proponent provides the updated risk calculation tool results and the "monitoring data," spreadsheets for Verra's review. Program Rule(s) *VCS Joint Validation Verification Report Template,* v4.1, Section 3.5	**Round 1** VVB Response Monitoring data spreadsheets (ABMS sheets) and risk calculation tool spreadsheet (labelled Confidential) submitted by the PP is attached along with the VVB response. Verra Response The PP has provided the risk calculation tool results and the "monitoring data," spreadsheets as requested. This finding is now closed.	Closed