

# 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.

<b>Project ID</b>	2072
<b>Project Name</b>	<i>UK CowCredit project: A UK dairy initiative to reduce methane from enteric fermentation</i>
<b>Review Type</b>	Verification Approval
<b>Program(s)</b>	VCS Program
<b>Verification Period</b>	01 March 2020 to September 30 2022
<b>Project Proponent</b>	Mootral SA
<b>Methodology</b>	“VM0041 Methodology for the Reduction of Enteric Methane Emission from Ruminants through the Use of 100% Natural Feed Supplement”. V1.0
<b>VVB</b>	Carbon Check (India) Private Ltd.
<b>Assessment Criteria</b>	<i>VCS Standard, v4.3</i>
<b>Date of First Issue</b>	26 May 2023
<b>Review Conclusion</b>	Approved
<b>Date of Final Issue</b>	<i>13 July 2023</i>

## FINDINGS

#	Finding Description	VVB Response	Status
1	<b>Lack of clarity on number of cows added in the 12 project activity instances</b>		
	<p><u>Issue</u></p> <p>In Section 1.4 of the VR, the VVB states that “Around 3,843 cows were added in the second instance from 8th March 2022 till 30th September 2022”. However, Project Instance 2 had 292.17 average head (Cell O6) in the ERR spreadsheet and the average for all the 12 PAIs was 4,242.15 head. “</p> <p><u>Action Required</u></p> <p>The VVB shall assess the steps taken to verify the number of animals in each project activity instance during the monitoring period under consideration.</p> <p><u>Program Rule(s)</u></p> <p>N/A</p> <p>.</p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>Please refer the revised section 1.4 of the verification report, which assess the verification of the number of animals in each project activity instance during the monitoring period under consideration.</p> <hr/> <p><u>Verra Response</u></p> <p>The changes made in section 1.4 of the verification report has been reviewed and accepted. The finding is closed.</p>	Closed

#	Finding Description	VVB Response	Status
2	<b>Inconsistency in lactating cycle</b>		
	<u>Issue</u>	<b>Round 1</b>	

<p>Section 3.1 of the monitoring report mentions lactating cycle of 14 and 15 days. In section 4.1 of the verification report, the VVB only reports 15 days of lactation cycle between the start of the feeding and the start of the monitoring period.</p> <p>Further, the UK Project Monitoring ER calculation sheet did not consider the 15 days between the feeding start date and the monitoring start date of project activity instance 1 for both Group 1 and Group 2.</p> <p><u>Action Required</u></p> <p>The VVB is required to clarify whether the lactating cycle is 14 or 15 days. The VVB is required to ensure that this is consistent throughout the monitoring report.</p> <p>The VVB is required to explain how it verified that the 15 days lactating period is accounted for both groups in project instance 1 (Cell G4 &amp; Cell G5 of Tab UK Project Monitoring ER).</p> <p><u>Program Rule(s)</u></p> <p>N/A</p>	<p><u>VVB Response</u></p> <p>VVB wishes to clarify here that during on-site inspection, it was confirmed that each cow requires adaptation time for the product to reduce methane emissions. The 15 days of adaptation cycle as considered in the ER spread sheet to commence the emission reduction from a particular PI, is based on this adaptation time.</p> <p>Furthermore, we would like to submit here that PAI 1 is part of the program from 2019, therefore the cows don't need an adaptation time at the beginning of the monitoring period because they are already fed with the product for a long time. Based on this reason, the emission reduction for the PAI 1 was from day 1 (i.e., 1st of March 2020) and the same is deemed appropriate to the VVB and thus acceptable. The FVR has been revised to include this assessment. Also, the MR has been revised to make the information consistent (i.e., 15 days everywhere instead of 14 days). The same is deemed acceptable to the VVB.</p> <p><u>Verra Response</u></p> <p>Thank you for your response. However, it is unclear whether this 15-day lactating period was applied during the first monitoring period of the project, which had PAI 1. Looking at <i>Mootral Carbon Project _Dairy Farm Monitor_End Feb_Confidential_FINAL</i>, which provides the months only, in the beginning of the monitoring period starting in May 2019, the lactating cycle appears to be 11 days (refer to as rumen adaptation period). The lactating cycle days appear to vary throughout the monitoring period. The VVB must reply on the following:</p>	<p>Closed</p>
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		<ol style="list-style-type: none"> <li>1. The VVB must provide its assessment on how the lactating cycle days were accounted for from the start date of the project on 7 May 2019, and what it has done to address this.</li> <li>2. Further, the VVB must assess how the 11 days of the lactating cycle in the first monitoring period of PAI 1 have been accounted for in the second monitoring period given that it has not considered the 15 days lactating cycle for this PAI. It is also required to assess how this was addressed and whether it affects ER calculations.</li> </ol>	
		<p>Round 2</p>	
		<p><u>VVB Response</u></p> <p>VVB wish to clarify that adaptation time occurs when the PAI is joining the project for the first time. Therefore, it was applied at the start of the project for PAI n°1 and this was occurred during the first monitoring period and is not necessary for the second monitoring period because the cows remained fed with the supplement.</p> <p>For other PAIs, they join during the second monitoring period and 15 days were discounted from the number of days of feeding. Please refer to the registered VCS PD. “ VCS-Mootral-UK PDD -26 oct2020-V5” which shows how the adaptation time was computed at the beginning of the project for PAI n°1. Page 23, Table 3, line 3 shows the numbers of day of feeding per month for Instance 1.</p>	

		<p>For the first month, in May 2019, feeding occurred for 11 days for a month of 31 days. It means that credit computing started on the 21<sup>st</sup> of May which is 15 days after the official start of the project stated in section 1.8 of the PDD ( ie the 7<sup>th</sup> of May 2019).</p>	
		<p><u>Verra Response</u></p> <p>Based on your indication of table 3, line 3 of the VCS-Mootral-UK PDD -26 oct2020-V5, the days between the project start date and the days when the computing of credits started are equal to 14 days. However, during this monitoring period the days between the new project activity instances and the computing of credits is 15 days. The VVB must ensure that the correct number of days is applied. Please note that this is the final round of findings.</p>	
		<p>Round 3</p>	
		<p><u>VVB Response</u></p> <p>Project proponent has revised the monitoring report to clarify the counting of the adaptation time in section 3.1 of the monitoring report. The revision in section 3.1 of the MR is as below:</p> <p>“the accounting for GHG reduction started on day 15 after the start of the feeding, considering that 14 days is the time</p>	

		<p>required for diet adaptation. Most research indicates that ruminant total-tract digestibility ordinarily adjusts to diet within 10 to 14 days [1]”</p> <p>This is in line with the accounting method used in the previous verification.</p> <p>To ensure consistency, Project proponent has checked the number of days for each instance in the second verification. Three (03) PAI out of all were modified (Farm n°2, Farm n°4, Farm n°11) and calculations of emissions have been revised by the Project proponent accordingly. The revised emission reduction value is 2,994 tCO<sub>2</sub>e instead of 2,989 tCO<sub>2</sub>e as submitted in the previous round. The revised monitoring report and emission reduction spread sheet has been checked and changes deemed appropriate to the VVB. The final verification report has been revised accordingly.</p> <p>Please find attached the revised monitoring report (V7), a new ER spread sheet (V4) and the revised FVR along with this response.</p>	
		<p><u>Verra Response</u></p> <p>The justification and changes made have been reviewed and accepted. The finding is closed.</p>	

#	Finding Description	VVB Response	Status
3	<b>Missing information on Eligibility Criteria including capacity limits/cluster requirements for grouped projects</b>		
	<p><u>Issue</u></p> <p>The monitoring report does not have information on how the project meets the cluster requirements after including the new instances as per section 3.6.9 of the VCS Standard v4.4. Section 3.4 of the verification report does not include the required eligibility criteria information on cluster requirements in the requirements and VVB assessment columns.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB is required to provide an assessment of how the project activities meet cluster requirements in section 3.4 of the verification report.</li> <li>2. The VVB must ensure that the PP updates the monitoring report and the VVB must base its assessment on the updated monitoring report.</li> </ol> <p><u>Program Rule(s)</u></p> <p>Section 3.6.16 and 3.6.16, VCS Standard v4.4 Section 3.6.9, VCS Standard v4.4</p>	<p><u>Found 1</u></p> <p><u>VVB Response</u></p> <p>As per section 3.6.9 of the VCS Standard v4.4,</p> <p><i>“Where a capacity limit applies to a project activity included in the project, no project activity instance shall exceed such limit. Further, no single cluster of project activity instances shall exceed the capacity limit, determined as follows:</i></p> <ol style="list-style-type: none"> <li>1. <i>Each project activity instance that exceeds one percent of the capacity limit shall be identified.</i></li> <li>2. <i>Such instances shall be divided into clusters, whereby each cluster is comprised any system of such instances such that each instance is within one kilometer of at least one other instance in the cluster. Instances that are not within one kilometer of any other instance shall not be assigned to clusters.</i></li> <li>3. <i>None of the clusters shall exceed the capacity limit and no further project activity instances shall be added to the project that would cause any of the clusters to exceed the capacity limit.”</i></li> </ol> <p>We wish to submit here that the applied methodology i.e. VM0041, version 01 does not specify any capacity limit to the project and thus this requirement would not be applicable to the subject project and its instances. The FVR (section 3.4) has been updated accordingly.</p> <p><u>Verra Response</u></p>	<p>Closed</p>

		<p>Thank you for your response. <i>Section 3.6.9 of the VCS Standard v4.4</i> is a requirement for all grouped projects such as project 2072. The VVB must provide an assessment of how the project activities meet cluster requirements in section 3.4 of the verification report.</p>	
		<p>Round 2</p>	
		<p><u>VVB Response</u></p> <p>VVB has now assessed the compliance of <i>requirements of section 3.6.9 of the VCS Standard v4., in section 3.4 of the revised verification report. Please refer the revised FVR.</i></p>	
		<p><u>Verra Response</u></p> <p>Thank you. The changes made have been reviewed and accepted. The finding is closed.</p>	