



Verification Report

CAR674 Oneida Herkimer Landfill Ava, NY

Reporting Period: July 15, 2023 – July 14, 2024

Prepared for:

Oneida Herkimer Solid Waste Authority

August 27, 2025

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1.0 Introduction

Oneida Herkimer Solid Waste Authority (OHSWA) contracted TÜV SÜD America, Inc. (TÜV SÜD), to perform the verification of the CAR674 Oneida Herkimer Landfill Ava, NY project (Project) for the reporting period spanning July 15, 2023 to July 14, 2024 to the Climate Action Reserve (Reserve) U.S. Landfill Project Protocol Version 5.0 (Protocol). The Project involves greenhouse gas (GHG) emission reductions from the capture and destruction of landfill gas (LFG) near Ava, NY at the Oneida Herkimer Regional Landfill (Landfill). The Project is currently in its second crediting period, spanning from July 15, 2020 to July 14, 2030.

1.1 Project Background & Site Description

The Oneida Herkimer Landfill is an active municipal landfill with three methane flares owned and operated by OHSWA with an adjacent landfill gas to energy (LFGTE) facility owned and operated by Waste Management Renewable Energy (WMRE). The project became operational in 2010, and the LFGTE facility became operational in 2012. The project currently consists of multiple LFG extraction wells, with associated collection piping, blowers, engines, and flares. Blowers are used to extract the LFG and send it to two Caterpillar G3520C engines for destruction. TÜV SÜD confirmed that the project is not a bioreactor.

1.2 Responsible Parties

Project Developer and Landfill owner: Oneida Herkimer Solid Waste Authority (OHSWA)
Owner of flares: Oneida Herkimer Solid Waste Authority
Landfill gas-to-energy owner: Waste Management Renewable Energy
Consultants: Environmental Attribute Advisors and Barton & Loguidice (B&L)

Environmental Attribute Advisors aids in the carbon credit sale and management. They communicate with engineers at Barton & Loguidice who conduct emission reduction calculations, complete Project documentation, and aid in the verification process. OHSWA is responsible for the preparation and fair presentation of the GHG statement in accordance with the criteria listed below in Table 1.

1.3 Verification Team

TÜV SÜD is responsible for expressing an opinion on the GHG statement based on the verification. The TÜV SÜD verification team consisted of the following individuals who were selected based upon verification experience and knowledge of landfill gas destruction projects.

Lead Verifier: Ashley Emery
Team Members: Kelli Miller, Masury Lynch
Senior Internal Reviewer: Garrett Heidrick

1.4 Objectives

The goal of the verification activities was to ensure that the claimed GHG emission reductions were complete, consistent, accurate, transparent, and permanent and that the Project was in compliance with the Reserve's Project additionality, monitoring, and reporting requirements. Furthermore, the verification activities ensure that the data provided to TÜV SÜD is well documented and free of any material errors or omissions.

1.5 Scope

The scope of the verification consisted of the following independent and objective activities:

- Review the reporting period's Project Monitoring Plan;
- Review the Project data acquisition and quality control procedures;
- Review the Project's baseline emissions and confirm the baseline and Project boundaries;
- Review the Project's evidence of environmental and regulatory requirements to ensure that the Project is additional;
- Review the Project's emission reduction calculations;
- Review the Project documents and data against the criteria listed in Table 1;
- Conduct a site visit at the Landfill;
- Issue requests for additional documentation, clarifications, non-material findings, and corrective actions as necessary; and
- Issue a verification report, verification opinion, and list of findings to OHSWA and the Reserve.

1.6 Verification Criteria

Table 1 – Summary of Verification Criteria

Criteria	Details
Standard of Verification	• CAR Landfill Project Protocol, Version 5.0 (April 2019) • Reserve Offset Program Manual (April 2024) • The Reserve Verification Program Manual (February 2021) • Policy Memo: Use of Global Warming Potential Values for All Offset Protocols (July 2022)
Verification Process	• ISO 14064-3:2019 "Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas statements"
Level of Assurance	Reasonable assurance
Materiality	99% accuracy level (less than 1% error) because total annual emission reductions are greater than 100,000 tCO ₂ e.

2.0 Verification Activities Summary

The Verification process consisted of the following activities as outlined in the verification plan:

- TÜV SÜD completed a NOVA/COI form to identify any potential conflict of interest with the Project, OHSWA, WMRE, or B&L. The NOVA/COI form was submitted to the Reserve on September 27, 2024. The COI assessment revealed no conflicts of interest and was approved by the Reserve on October 3, 2024.
- TÜV SÜD held a verification opening meeting with OHSWA on October 14, 2024. During the opening meeting TÜV SÜD reviewed the verification objectives and process, reviewed the verification schedule, and requested the verification background documents.
- TÜV SÜD performed a strategic analysis and risk assessment of the received data and support documents in order to understand the scope and areas of potential risk in the GHG emissions reductions.
- TÜV SÜD developed a risk-based evidence-gathering plan based upon the strategic analysis and risk assessment. The verification plan and evidence-gathering plan were used throughout the verification and were revised as needed based upon additional risk assessments.
- A site visit was conducted at the Landfill on November 6, 2024. During the site visit TÜV SÜD performed key personnel interviews; inspected the Project equipment; and observed the onsite GHG management systems and data gathering, monitoring, and handling practices.

- TÜV SÜD performed a risk-based desktop review of the submitted verification documents. The desktop review included an assessment of the GHG calculation methods and inputs, source data completeness, GHG management and monitoring systems, evidence of regulatory compliance, and record retention practices.
- TÜV SÜD submitted requests for additional documentation, clarifications, non-material findings, and corrective actions, as applicable, to OHSWA and B&L throughout the verification.
- TÜV SÜD's senior internal reviewer conducted a review of the verification sampling, report, and statement.
- TÜV SÜD issued a final verification report, verification opinion, and list of findings.
- TÜV SÜD held an exit meeting with OHSWA and B&L.

3.0 Verification Findings

3.1 Assessment of the GHG Emission Reductions Project Operations

The Project currently collects landfill gas from the Landfill and destroys it via two engines and three flares. The LFG is pulled by blowers through a gas collection system that consists of vertical and horizontal wells and a leachate collection and removal system. TÜV SÜD confirmed that the landfill is not a bioreactor and does not re-circulate leachate nor add any liquid other than leachate in a controlled fashion to accelerate or enhance the anaerobic biodegradation of the waste.

3.2 GHG Project Boundary (sources, sinks and/or reservoirs)

The Protocol designates that carbon dioxide (CO₂) and methane (CH₄) are the only GHGs included in the Project boundary from both the baseline and Project activities. Project emissions must be deducted from baseline emissions to calculate GHG emission reductions. These GHG sources include CH₄ consumed by soil bacteria through natural oxidation, incomplete combustion of CH₄ in the engine, propane used to ignite the flares, and electricity use. The sources of GHG emissions reviewed during the verification of the Project are listed below in Table 2.

Table 2 – Summary of the Project GHG Sources, Sinks and Reservoirs

Activity	GHG Sources, Sinks & Reservoirs
Baseline	• SSR 4 – CH₄ emissions from waste breakdown in Landfill.
Project	• SSR 5 – CO₂ emissions from the gas collection system (resulting from the consumption of purchased electricity). • SSR 6 – CO₂ emissions from the combustion of supplemental fossil fuels (propane) used during operation and maintenance of the Project activity. • SSR 8 – CH₄ Emissions from Project LFG electricity generation • SSR 9 – CH₄ emissions from Project LFG flare destruction.

3.3 Project Eligibility Criteria

The Protocol specifies five eligibility rules that a Project must meet in order to register emission reductions with the Reserve: Location, Project Start Date, Project Crediting Period, Additionality, and Regulatory Compliance. Below is a summary of the Reserve eligibility requirements and the Project's compliance to each requirement.

Eligibility Rule 1: Location

The Project is a US-based landfill located in the town of Ava, NY. The Project therefore meets this eligibility requirement. TÜV SÜD confirmed this information with a site visit to the Project location.

Eligibility Rule 2: Project Start Date

The Landfill Project Protocol states a project start date is the date when CH₄ was first continuously destroyed in a qualifying destruction device at the site. TÜV SÜD reviewed a start-up letter from OHSWA to B&L confirming that the first continuous CH₄ destruction began on July 15, 2010 (the Project start date). A revised Project submittal form submitted to the Reserve on May 14, 2010 was also reviewed, which states that the first flare was installed on July 1, 2010.

Eligibility Rule 3: Project Crediting Period

The Project's first crediting period began on July 15, 2010 and ended on July 14, 2020. TÜV SÜD reviewed the second crediting period Project Submittal Form, which was submitted to the Reserve on January 7, 2020. The second crediting period began on July 15, 2020 and ends on July 14, 2030.

Eligibility Rule 4: Additionality

Performance Standard Test

Prior to the Project activity, the Landfill was collecting and destroying LFG in passive flares located at leachate cleanouts and horizontal collector locations. TÜV SÜD confirmed this with Landfill staff during the site visit.

Thus, the Project passes the Performance Standard Test number 3a since it involves:

"Installation of a new qualifying destruction device at an eligible landfill where landfill gas was collected and destroyed at any time prior to the project start date using: a non-qualifying destruction device."

Limits on Credit Stacking

There is no evidence of credit stacking at the Project area, nor is there any indication the Landfill is receiving any type of mitigation credit other than offsets.

Legal Requirement Test

TÜV SÜD confirmed that there are currently no laws or ordinances requiring the Landfill to collect and destroy LFG. The Landfill is a municipal solid waste (MSW) Landfill that exceeds the design capacity of 2.5 million megagrams (Mg) or 2.5 million cubic meters as specified in the New Source Performance Standards (NSPS) codified in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart WWW and Subpart Cf. The Landfill is therefore subject to the requirements of the NSPS for MSW Landfills.

TÜV SÜD reviewed the most recent NMOC modeling results for the Landfill. The estimated NMOC emission rates for 2023 and 2024 of 12.39 Mg/year and 22.34 Mg/year, respectively, are below the 34 Mg/year threshold for a required gas collection and combustion system.

TÜV SÜD also reviewed the Project's Monitoring Plan which defines how the Project continues to exceed the Legal Requirement Test. Landfill personnel and their consultant, B&L, review local, state, and federal regulations prior to each verification period in order to confirm that there are no new requirements or laws that mandate the GCCS be in place. The Attestation of Voluntary Implementation form was also signed after the end of the reporting period and uploaded to the Reserve registry which states that the Project was implemented and established voluntarily.

During the review of the supporting evidence, TÜV SÜD did not observe any indication that the Landfill was mandated to destroy LFG. Additionally, there are no local, state, or federal requirements for the installation of a GCCS at the Landfill. Therefore, the results of the review indicated that OHSWA is following its Monitoring Plan procedures to assure that it passes the Legal Requirement Test.

Eligibility Rule 5: Regulatory Compliance

TÜV SÜD reviewed the procedures described in OHSWA's monitoring plan to ensure that the Project remains in compliance with all applicable local, state, and federal requirements. TÜV SÜD confirmed verbally during the site visit that Landfill staff are not aware of any instances of noncompliance during the reporting period. TÜV SÜD searched the Environmental Protection Agency's Enforcement & Compliance History Online (ECHO) database and found no evidence of noncompliance during the reporting period. TÜV SÜD also reached out to the Landfill's New York State Department of Environmental Conservation (NYSDEC) to confirm regulatory compliance, but no response was provided. NYSDEC performs quarterly compliance checks. TÜV SÜD reviewed the inspection reports and confirmed that no compliance issues were recorded during the inspections applicable to the reporting period.

TÜV SÜD also reviewed the Landfill's environmental and operating permits including the Landfill's air permit and municipal solid waste permit. The municipal solid waste permit expired during the reporting period. TÜV SÜD reviewed a letter from NYSDEC granting OHSWA an extension to continue operating under the terms of their existing permit. All other permits were in effect for the entirety of the reporting period.

During TÜV SÜD's review there was no evidence of noncompliance found, and the procedures for ensuring regulatory compliance in the Monitoring Plan were properly followed. Finally, TÜV SÜD confirmed signature of the Attestation of Regulatory Compliance, after the end of the reporting period, which was uploaded to the Reserve.

3.4 Ownership of Generated Emission Reductions

TÜV SÜD reviewed the Landfill Gas Rights Agreement between OHSWA and WMRE, which states that although WMRE owns the electricity generation facility, OHSWA retains the environmental attributes of the LFG, which includes emission reductions. TÜV SÜD also reviewed the completed Attestation of Title which was uploaded to the Reserve following the end of the reporting period.

3.5 Site Visit

A site visit was conducted for the current reporting period at the landfill in Ava, NY on November 6, 2024 by Masury Lynch and Kelli Miller. They interviewed Landfill staff, WMRE staff, and B&L consultants about the data systems in place, monitoring equipment, regulatory compliance, and QA/QC processes. During the site visit, Masury and Kelli toured the Project site and viewed the flares, electricity generation facility, propane tanks associated with flare operation, flow meters, and gas analyzers. Masury and Kelli confirmed that the equipment was functioning and in good condition.

3.6 GHG Monitoring and Management Systems

TÜV SÜD reviewed the data management systems during both desktop review and the site visit. TÜV SÜD completed the majority of the GHG management systems review during the site visit by observing the onsite procedures and interviewing the personnel responsible for the Project. The onsite review included an assessment of the Project data collection, processing and handling procedures, recordkeeping and data storage, quality control and assurance procedures, record retention systems, and a field tour of the Project equipment. The desktop review included a detailed review of the Project Monitoring Plan and its conformance to Protocol requirements. TÜV SÜD also confirmed that the Project was implemented according to the Monitoring Plan.

The primary Project data include the LFG flow to the engines and flares, methane content of the LFG, engine operation, and flare operation. During the reporting period, the LFG flow was continuously measured by several different flow meters, including five Thermal Instrument Company (TIC) flow meters and one ABB flow meter. TÜV SÜD confirmed when each meter was used for each destruction device. All flow meters internally correct for temperature and pressure at 60°F and 1 atm. Table 3, below, summarizes the flow meters used during the reporting period.

Table 3 – Summary of Flow Meter Locations

Manufacturer	Serial Number	Dates in Service
Thermal Instrument Company	2010175	7/15/2023 - 8/2/2023 (flare 26) 11/3/2023 - 2/5/2024 (flare 25) 6/5/2024 – 7/14/2024 (flare 26)
Thermal Instrument Company	2011156	7/15/2023 - 11/3/2023 (flare 25) 2/5/2024 - 7/14/2024 (flare 25)
Thermal Instrument Company	2014201	8/2/2023 - 6/5/2024 (flare 26)
Thermal Instrument Company	2020374	7/15/2023 - 12/29/2023 (flare 27) 1/31/2024 - 5/30/2024 (flare 27)
Thermal Instrument Company	2022019	12/29/2023 - 1/31/2024 (flare 27) 5/30/2024 – 7/14/2024 (flare 27)
ABB Totalflow	267CS6502016255	7/15/2023 – 7/14/2024 (engine flow)

All monitored data is recorded continuously by a Yokogawa data recorder. The methane content of LFG sent to the flares was measured continuously by a Landtec Biogas 3000 gas analyzer (SN G300695), which was used to measure methane content of LFG sent to the flares. A loaner gas analyzer (SN G300919) was used while G300695 underwent its annual factory calibration. The methane content of LFG sent to the engines was measured continuously by an ABB Model NGC8203 gas analyzer (SN T112455143).

During the desktop review, TÜV SÜD reviewed the data storage and retention policies of OHSWA and verified they were in conformance with the Protocol requirements and documented in the Monitoring Plan. All data is kept for a period of ten years after the information is generated or seven years after the last verification.

3.7 Instrument QA/QC

TÜV SÜD reviewed evidence that the flow meters and methane analyzers met instrument QA/QC requirements as outlined in the Protocol for cleaning, inspection, and calibration. The Project Monitoring Plan describes the procedures for instrument field checks and calibrations. These procedures in the Monitoring Plan are in compliance with the Protocol requirements. Landfill staff performed quarterly checks on the entire LFG destruction system, which includes the flow meters and CH₄ analyzers. These quarterly checks ensure that all pieces of equipment are functioning properly, and equipment is fixed or calibrated in a timely manner, if necessary.

The TI flow meters for the flares were inspected on 7/13/2023, 10/24/2023, 2/2/2024, 2/7/2024, 5/9/2024, and 8/7/2024. The Landtec analyzer for the flares was inspected on 7/18/2023, 10/19/2023, 1/30/2024, and 5/9/2024. A temporary loaner Landtec analyzer was employed from 11/10/2023 to 11/27/2023 while the main analyzer was sent in for calibration. Calibration records for the loaner analyzer show it was within 5% accuracy on its 11/7/2023 calibration. As shown below in

Table 4, the ABB flow meter and analyzer for the engines was inspected and calibrated on 6/27/23, 8/24/23, 12/14/23, 2/16/24, 5/15/24, and 8/22/24.

TÜV SÜD reviewed calibration and accuracy check documentation for the flow meters and methane analyzers. Table 4 summarizes how each meter satisfied the Protocol's calibration and accuracy check requirements.

Table 4 – Summary of Project Equipment Calibrations

Meter Type	Serial Number	Accuracy Check	Within +/- 5% Accuracy?	Calibration Frequency	Calibration Date(s)
TI flow meter	2010175	8/7/2024	Yes	18 months	8/10/22, 8/18/23, 2/16/24
TI flow meter	2011156	8/7/2024	Yes	18 months	11/8/22, 11/17/23
TI flow meter	2014201	6/25/2024	Yes	18 months	5/25/22, 6/5/23, 6/25/24
TI flow meter	2020374	5/9/2024	Yes	18 months	1/10/22, 1/3/23, 1/15/24
TI flow meter	2022019	8/7/2024	Yes	18 months	2/7/22, 2/7/23, 2/7/24
Landtec analyzer	G300695	8/8/2024	Yes	12 months	3/30/22, 7/8/22, 11/16/22, 4/19/23, 7/18/23, 10/19/23, 11/21/23, 1/30/24, 5/8/24, 8/8/24
Landtec analyzer (loaner)	G300919	11/7/2023	Yes	12 months	11/7/23
ABB flow meter	267CS6502016255	8/22/2024	Yes	5 years	6/27/23, 8/24/23, 12/14/23, 2/16/24, 5/15/24, 8/22/24
ABB analyzer	T112455143	8/22/2024	Yes	5 years	6/27/23, 8/24/23, 12/14/23, 2/16/24, 5/15/24, 8/22/24
Elkins ENV200	1503201	N/A	Yes	12 months	11/22/22, 11/17/23
Elkins ENV200	1901203B	N/A	Yes	12 months	10/12/22, 9/28/23

All accuracy checks were found to be within the Protocol required +/-5% accuracy threshold and an accuracy check was performed for each relevant device within two months of the end of the reporting period. The Landtec analyzer was checked for accuracy on 8/8/2024; the TI flow meters were checked for accuracy on 1/15/2024 (2020374), 6/25/2024 (2014201), and 8/7/2024 (2010175, 2011156, and 2022019); and the ABB analyzer and flow meter were checked for accuracy 8/22/2024. As shown in Table 4, all devices were compliant with Protocol requirements regarding accuracy checks and calibrations.

3.8 Assessment of GHG Emission Reductions Calculations

The emission reduction calculation assessment included a review of Project assumptions, raw data inputs, and accuracy of calculations. TÜV SÜD assessed the completeness of the raw data and how

the data are transferred to the calculation spreadsheet. TÜV SÜD reviewed the formulas and raw data inputs for accuracy and compliance with Protocol requirements.

The Project data consisted of raw data in the form of spreadsheets of continuous engine and flare flow, continuous LFG concentration, and the emission reduction calculation workbook. TÜV SÜD compared raw data in the spreadsheets to the respective daily sums, then compared those data and the CH₄ readings to the calculation workbook. TÜV SÜD confirmed operational activity of the engines by checking that the kwh and/or MMBtu output was positive and operational activity of the flare using thermocouple readings above 500°F supplied in the raw data. TÜV SÜD confirmed that a 93.6% destruction efficiency was assigned to the Project's lean burn engines and a 96% destruction efficiency was assigned to the Project's open flares. TÜV SÜD confirmed that the proper discounts for oxidation factors and handheld CH₄ readings as required.

TÜV SÜD reviewed OHSWA's pre-project destruction calculations for the passive flares and confirmed that they followed all Protocol requirements.

TÜV SÜD reviewed source documentation for Project emissions from purchased electricity and propane consumption, confirmed that appropriate emission and conversion factors were used, and reviewed the use of Protocol equations for Project emissions in OHSWA's calculation workbook.

In 2023, data substitution was applied to methane data for flares 25 and 26 on 12/4 for approximately two hours. In 2024, data substitution was applied to methane data for flares 25 and 26 on 2/7 for approximately one and a half hours. Additionally, data substitution was applied to methane data for flare 27 in 2024 on: 2/5 through 2/6 for approximately 27.5 hours, 2/28 through 2/29 for approximately 20 hours, and 6/6 for approximately one and a half hours. TÜV SÜD independently confirmed the appropriate data substitution methodology was applied as described in Appendix D of the Protocol.

TÜV SÜD independently recalculated project emissions, baseline emissions, and overall GHG emission reductions using electricity consumption documentation and raw flow and CH₄ concentration data provided by OHSWA. TÜV SÜD compared their results to OHSWA's results to determine if the reported GHG emission reductions were materially correct. TÜV SÜD found no material misstatement in the final Project GHG emission reductions calculations. Materiality was calculated according to the equation for calculating percent error in the Reserve's Verification Program Manual: $\text{abs}((\text{stated reductions} - \text{verified reductions}) / \text{verified reductions}) * 100$. TÜV SÜD determined that the Project's percent error for GHG emission reductions was 0.24%, calculated as follows: $\text{abs}((242,419.58 - 241,830.34) / 241,830.34) * 100$. Therefore, percent error was below the materiality threshold of 1%.

3.9 Variances

The Project applied for a variance for missing the QA/QC requirement that all gas flow meters and continuous methane analyzers are field checked for accuracy by a third-party technician within two months of the end of the reporting period. The Project's technical consultant, Barton & Loguidice, performed the field check and are not considered a third-party. The Reserve approved the variance on May 12, 2025 under the following conditions:

1. The verifier confirms that the field checks performed by Barton & Loguidice for the flow meters (SN: 2010175, 2022019, and 2011156) have "as found" and "as left" conditions within the $\pm 5\%$ accuracy threshold;
2. The verifier confirms that Barton & Loguidice has the technical training/capacity to accurately carry out the field checks;
3. The verifier confirms that the monitoring plan is updated to indicate that the technical consultant is not considered to be a third party; and
4. The verifier confirms that all other QA/QC requirements are met.

TÜV SÜD confirmed that all conditions of the variance were met.

4.0 Verification Results

OHSWA provided sufficient evidence and documentation of its emission reductions, data collection procedures, and monitoring and quality control procedures. The verification process focused on verifying the emission reduction calculations and the source data used to quantify the emission reductions in accordance with the Reserve Landfill Project Protocol 5.0. The following is a summary of the verification results.

The Project reported emission reductions of 242,419 metric tons of CO₂e from July 15, 2023 to July 14, 2024. During final review, TÜV SÜD identified no material misstatements in the data or emission reductions calculations. Table 5 defines the emission reductions verified for the reporting period. During the verification process, TÜV SÜD made requests for material findings, non-material findings, additional documentation, and clarifications to complete the verification. OHSWA sufficiently addressed all requests. The details of these requests are documented in TÜV SÜD's List of Findings provided to the Reserve and OHSWA.

5.0 Verification Opinion

TÜV SÜD conducted the verification of the CAR674 Oneida Herkimer Landfill Ava, NY (Project) according to the requirements found in ISO 14064-3:2019. The objective of this verification was to ensure that the GHG statement is materially correct and conforms to all relevant criteria. The GHG statement is the responsibility of OHSWA. A summary of the GHG statement is as follows:

- GHG-related activity: Methane destruction at the Oneida Herkimer Landfill
- GHG statement: 7/15/2023 – 7/14/2024
- Criteria:
 - CAR Landfill Project Protocol, Version 5.0 (April 2019)
 - Reserve Offset Program Manual (April 2024)
 - The Reserve Verification Program Manual (February 2021)
 - Policy Memo: Use of Global Warming Potential Values for All Offset Protocols (July 2022)

The data and information supporting the GHG statement were historical in nature.

Based upon TÜV SÜD's review, the GHG statement does not meet all requirements of the criteria including Protocol Section 6.2 QA/QC requirements for third party field checks within two months of the end of the reporting period. A variance was granted for missing this requirement.

TÜV SÜD has ensured OHSWA's effective use of controls related to the GHG statement. TÜV SÜD concludes that there is sufficient and appropriate evidence to support OHSWA's GHG statement and is issuing a Modified Opinion.

TÜV SÜD confirms that the GHG statement has been prepared:

- Without material discrepancy,
- In accordance with all applicable criteria, except for those listed in Section 3.9, and
- Verified to a reasonable level of assurance.

The verified emission reductions are listed in Table 5.

Table 5 - Emission Reductions (MT CO₂e) Verified for July 15, 2023 – July 14, 2024

Year	Baseline Emissions	Project Emissions	Pre-Project Deductions*	Emission Reductions
2023	116,180	93	3,285	116,087
2024	126,439	107	3,787	126,332
Total	242,619	200	7,072	242,419

Note: Due to rounding, individual values might not equal totals and values are not representative of raw data used in the emission reductions calculation.

**Pre-project deductions are included in the Baseline Emissions calculations. They are stated here for transparency purposes.*

Lead Verifier Signature



Ashley Emery

Senior Internal Reviewer Signature



Garrett Heidrick