



**Verified Carbon  
Standard**

## 2022 VERIFICATION REPORT



Document Prepared By GHD Services, Inc.

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|                      |                          |
|----------------------|--------------------------|
| <b>Project Title</b> | Davidson County Landfill |
| <b>Version</b>       | 3.0                      |
| <b>Report ID</b>     | 12589759-RPT-2-Rev2      |

|                      |                                                                       |
|----------------------|-----------------------------------------------------------------------|
| <b>Report Title</b>  | <i>12589759-RPT-2-Anew-Davidson-2022-VCS Verification Report-Rev2</i> |
| <b>Client</b>        | Anew Environmental, LLC                                               |
| <b>Pages</b>         | 79                                                                    |
| <b>Date of Issue</b> | <i>September 13, 2024</i>                                             |
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|                            |                                                                                                                                                                                                                     |
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### Summary:

Anew Environmental, LLC engaged GHD Services Inc (GHD) to complete the verification of the Davidson County Landfill project (Project Activity and Verified Carbon Standard (VCS) ID: 2414 for the 01-January-2022 to 31-December-2022 Monitoring Period under the requirements of the VCS. The Project Activity is located in City, Lexington, North Carolina, United States. The Project is operated by Anew Environmental, LLC (Project Proponent).

The Project Activity (VCS ID: 2414) is located at 220 Davidson County Landfill Road, Davidson County in Lexington, North Carolina, United States. The Project Activity consists of a landfill gas (LFG) collection system and an electricity generator set designed to capture and combust methane generated within the Davidson County solid waste landfill. A back up flare is also connected to the LFG collection system to combust the LFG, as needed, when the engines are not operational. The LFG collection system includes a total of 102 wells.

The Project Activity achieves emissions reductions through the collection and destruction of the methane within the LFG via the electricity generator set or the flare that convert the methane to carbon dioxide, thereby preventing the release of methane to the atmosphere. The original baseline scenario of the Project Activity consisted of a landfill gas being vented into the atmosphere.

The Project Proponent utilized the Climate Action Reserve (the Reserve) US Landfill Protocol, Version 6.0, published June 8, 2022.

The scope of this verification is such that GHD, recognized as an independent third party Validation and Verification Body by the VCS (Registration Number 027), is responsible for reviewing the Project Activity's Monitoring Report, along with accompanying supporting materials and previous VCS Verification and Validation Reports. GHD utilized a risk-based analysis against the relevant requirements of both the interpretation from the VCS Program Guide, Version 4.4, and VCS Standard Version 4.5, as applicable.

As part of the verification process, GHD reviewed the completeness, conservativeness, and accuracy of the underlying evidence for the assumptions and claims made, and data sources used. The results of the investigation were then, together with the results of the review of other areas, combined to form the necessary input for the verification report and opinion.

The verification report and associated annexes document a total of fifty-seven (57) findings, which include:

- Forty (40) Corrective Action Requests (CAR)
- Seventeen (17) Clarification Requests (CL)
- Zero (0) Forward Action Requests (FAR)

Upon review of the documentation and explanations provided by the Project Proponent, all findings were closed in a clear and transparent manner. GHD completed the verification in accordance with the VCS Program Guide, Version 4.4, and VCS Standard, Version 4.5, in addition to the Reserve US Landfill Protocol Version 6.0. Based on the results of the verification, GHD is issuing a Positive Verification Opinion in regards to this Project Activity and Reporting Period. GHD therefore recommends/certifies that the registered Project Activity has obtained the reported emission reductions of 60,886 tonnes of carbon dioxide equivalent.

|          |                                                                                       |           |
|----------|---------------------------------------------------------------------------------------|-----------|
| <b>1</b> | <b>Introduction</b>                                                                   | <b>7</b>  |
| 1.1      | Objective .....                                                                       | 7         |
| 1.2      | Scope and Criteria .....                                                              | 8         |
| 1.2.1    | Verification Standards                                                                | 8         |
| 1.2.2    | Verification Criteria                                                                 | 8         |
| 1.2.3    | Project Boundary                                                                      | 9         |
| 1.2.4    | Geographical and Operational Boundaries                                               | 9         |
| 1.2.5    | Monitoring and Crediting Period                                                       | 10        |
| 1.2.6    | Use of this Report                                                                    | 10        |
| 1.2.7    | Use of Information and Communication Technology                                       | 10        |
| 1.3      | Level of Assurance.....                                                               | 10        |
| 1.4      | Summary Description of the Project .....                                              | 11        |
| 1.4.1    | Client Contact                                                                        | 11        |
| <b>2</b> | <b>Verification Process</b>                                                           | <b>11</b> |
| 2.1      | Method and Criteria.....                                                              | 11        |
| 2.1.1    | Strategic Analysis                                                                    | 11        |
| 2.1.2    | Assessment of Risk and Magnitude of Potential Errors, Omissions or Misrepresentations | 11        |
| 2.1.3    | Evidence-Gathering Plan                                                               | 12        |
| 2.1.4    | Verification Plan                                                                     | 12        |
| 2.1.5    | Quantitative Testing                                                                  | 12        |
| 2.1.6    | Materiality Level                                                                     | 12        |
| 2.1.7    | Verification Procedures                                                               | 13        |
| 2.2      | Document Review .....                                                                 | 15        |
| 2.2.1    | GHG Data and Information                                                              | 16        |
| 2.3      | Interviews.....                                                                       | 16        |
| 2.3.1    | Effectiveness of ICT                                                                  | 17        |
| 2.4      | Site Visits.....                                                                      | 17        |

|          |                                                                             |           |
|----------|-----------------------------------------------------------------------------|-----------|
| 2.4.1    | Project Boundary                                                            | 18        |
| 2.5      | Resolution of Findings .....                                                | 19        |
| 2.5.1    | Forward Action Requests                                                     | 19        |
| 2.6      | Eligibility for Validation Activities .....                                 | 19        |
| 2.7      | Verification Team and Independent Reviewer .....                            | 20        |
| 2.7.1    | Roles and Responsibilities                                                  | 20        |
| 2.7.2    | Qualifications                                                              | 20        |
| <b>3</b> | <b>Validation Findings</b>                                                  | <b>21</b> |
| 3.1      | Participation under Other GHG Programs .....                                | 21        |
| 3.2      | Methodology Deviations.....                                                 | 21        |
| 3.3      | Project Description Deviations.....                                         | 22        |
| 3.4      | Grouped Project .....                                                       | 22        |
| <b>4</b> | <b>Verification Findings</b>                                                | <b>22</b> |
| 4.1      | Project Implementation Status .....                                         | 22        |
| 4.1.1    | Additionality                                                               | 24        |
| 4.2      | Safeguards .....                                                            | 25        |
| 4.2.1    | No Net Harm                                                                 | 25        |
| 4.2.2    | Local Stakeholder Consultation                                              | 26        |
| 4.3      | AFOLU-Specific Safeguards .....                                             | 26        |
| 4.4      | Accuracy of GHG Emission Reduction and Removal Calculations .....           | 26        |
| 4.4.1    | Monitoring Parameters                                                       | 26        |
| 4.4.2    | Methods for Recording Monitoring Parameters                                 | 39        |
| 4.4.3    | Monitoring Requirements                                                     | 39        |
| 4.4.4    | Calculation of Emission Reductions                                          | 40        |
| 4.5      | Quality of Evidence to Determine GHG Emission Reductions and Removals ..... | 42        |
| 4.5.1    | Data Management                                                             | 43        |
| 4.5.2    | Instrument QA/QC                                                            | 43        |
| 4.6      | Non-Permanence Risk Analysis.....                                           | 44        |
| <b>5</b> | <b>Verification OPINION</b>                                                 | <b>44</b> |

|                                                |                               |           |
|------------------------------------------------|-------------------------------|-----------|
| 5.1                                            | Verification Summary .....    | 44        |
| 5.1.1                                          | Limitation of Liability ..... | 45        |
| 5.2                                            | Verification Conclusion ..... | 45        |
| <b>APPENDIX A: VERIFICATION PLAN</b>           |                               | <b>49</b> |
| <b>APPENDIX B: FINDINGS ASSESSMENT</b>         |                               | <b>50</b> |
| <b>APPENDIX C: DOCUMENTS REVIEWED</b>          |                               | <b>51</b> |
| <b>APPENDIX D: VERIFICATION REPRESENTATION</b> |                               | <b>52</b> |

# 1 INTRODUCTION

## 1.1 Objective

Anew Environmental, LLC (Project Proponent) engaged GHD Services Inc. (GHD) to complete the third-party greenhouse gas verification of the 2022 Monitoring Period (01-January-2022 to 31-December-2022) for the following Verified Carbon Standard (VCS) (Program) Project Activity:

- Davidson County Landfill (Project Activity) located in Lexington, North Carolina, United States, VCS Project ID: 2414

The Program requires the verification of the Monitoring Report for each monitoring period by an independent third-party accredited under ISO 14065 Greenhouse Gases –

Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition (ISO 14065). GHD Limited is accredited by ANAB under ISO 14065 as a greenhouse gas validation and verification body and under the VCS.

GHD completed the verification pursuant to the relevant requirements outlined in Section 1.2 as well as translational guidance from the UNFCCC CDM. As detailed in Section 4.1 of the VCS Standard, *“Verification is the periodic ex-post independent assessment by a validation/verification body of the GHG emission reductions and removals that have occurred as a result of the project during the monitoring period, conducted in accordance with the VCS Program rules.”*

The objective of the verification is to provide the Project Proponent and the Program with an opinion on whether the Project Monitoring Report (Report) for the monitoring period is free of material misstatements and that the information reported is accurate and consistent with the requirements of the Program. The objective of GHD, on behalf of the VCS, is to ensure that only Project Activities that meet the established criteria receive a positive and unconditional verification representation. Specifically, the criteria states that the registered Project must result in emission reductions that are:

- Relevant
- Complete
- Consistent
- Accurate
- Transparent
- Conservative

In the verification of this VCS Project, GHD used a risk-based verification approach to focus and determine the detailed scope of the verification. The VCS and the CDM are rules-based mechanisms; GHD has ensured that the emission reductions for the 2022 Monitoring Period were developed in accordance with the VCS Program Guide Version 4.4 and the VCS Standard Version 4.5.

## 1.2 Scope and Criteria

This Project Activity falls under Sectoral Scope 1 – Energy industries (renewable/nonrenewable sources) and Sectoral Scope 13 – Waste handling and disposal, for which GHD is accredited. GHD is responsible for reviewing the Monitoring Report including accompanying materials, the previous Validation Report, the registered VCS Project Description (PD), baseline assessment, and any supporting documentation. The following sections describe the scope of the verification.

### 1.2.1 Verification Standards

For the verification, GHD applied ISO 14064-3:2019 and the Program verification standards.

### 1.2.2 Verification Criteria

GHD applied the following verification criteria:

- ISO 14064 Greenhouse gases - Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements, ISO, April 2019 (ISO 14064-2)
- International Accreditation Forum Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes: Issue 2, July 2018 (IAF MD 4: 2018)
- VCS Program Guide, Verra: Verified Carbon Standard, dated 29 August 2023, Version 4.4 (VCS Program Guide) \*
- VCS Standard, Verra: Verified Carbon Standard, dated 11 December 2023, Version 4.5 (VCS Standard) \*
- VCS Validation and Verification Manual, Verra: Verified Carbon Standard, dated 19 October 2016, Version 3.2 (VCS VVM) \*
- VCS Project Description, 19-July-2021 reissued 5-November-2021 (VCS PD)
- US Landfill Protocol, Climate Action Reserve, Version 6.0, published June 8, 2022 (Protocol)

Note:

\* - Denotes change from Proposal/Verification Plan

### 1.2.3 Project Boundary

The Project is broken down into the following greenhouse gas Sources, Sinks and Reservoirs (SSRs) to be included, as defined in the US Landfill Protocol:

| SSR    | Baseline                                                                                       | Project                                                                                          |
|--------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| SSR 4  | Emissions from Waste Breakdown in Landfill –Methane (CH <sub>4</sub> )                         | Emissions from Waste Breakdown in Landfill – Methane (CH <sub>4</sub> )                          |
| SSR 5  | N/A                                                                                            | Emissions from Gas Collection System – Carbon Dioxide (CO <sub>2</sub> )                         |
| SSR 6  | N/A                                                                                            | Emissions from Supplemental Fuel – Carbon Dioxide (CO <sub>2</sub> ), Methane (CH <sub>4</sub> ) |
| SSR 7  | Emissions from Baseline LFG Boiler Destruction – Methane (CH <sub>4</sub> )                    | Emissions from Project LFG Boiler Destruction – Methane (CH <sub>4</sub> )                       |
| SSR 8  | Emissions from Emissions from Baseline LFG Electricity Generation – Methane (CH <sub>4</sub> ) | Emissions from Project LFG Electricity Generation – Methane (CH <sub>4</sub> )                   |
| SSR 9  | Emissions from Baseline LFG Flare Destruction – Methane (CH <sub>4</sub> )                     | Emissions from Project LFG Flare Destruction – Methane (CH <sub>4</sub> )                        |
| SSR 10 | Emissions from Upgrade of LFG – Carbon Dioxide (CO <sub>2</sub> )                              | Emissions from Upgrade of LFG – Carbon Dioxide (CO <sub>2</sub> )                                |
| SSR 11 | Emissions from Baseline LFG Pipeline or other NG end-use – Methane (CH <sub>4</sub> )          | Emissions from Project LFG Pipeline or other NG end-use – Methane (CH <sub>4</sub> )             |

GHD understands the following SSRs are applicable to the Project's 2022 monitoring period:

#### *Baseline emissions:*

- Emissions from Waste Breakdown in Landfill –Methane (CH<sub>4</sub>)

#### *Project emissions:*

- Emissions from Waste Breakdown in Landfill –Methane (CH<sub>4</sub>)
- Emissions from Gas Collection System – Carbon Dioxide (CO<sub>2</sub>)
- Emissions from Project LFG Electricity Generation – Methane (CH<sub>4</sub>)
- Emissions from Project LFG Flare Destruction – Methane (CH<sub>4</sub>)

### 1.2.4 Geographical and Operational Boundaries

The verification included the SSRs from the Project Site located at the following address\*:

Davidson County Landfill (gas plant)  
 220 Davidson County Landfill Rd.  
 Davidson County, Lexington, NC United States  
 27292

Note: \* Denotes change from verification plan

### 1.2.5 Monitoring and Crediting Period

The Project start date is May 20, 2009. The Project is currently within its second crediting period from January 1, 2022 to December 31, 2028.

The monitoring period for this verification for the Project is the first monitoring period within the Project's renewed crediting period and is from January 1, 2022 – December 31, 2022.

### 1.2.6 Use of this Report

The verification report will be prepared for the use of Client and the Program.

References from GHD's Verification Report must use the language in which the opinion was issued, and reference the date of issuance of GHD's Verification Report, the applicable verification period and the associated program for which the verification was conducted. The GHG assertion provided by GHD can be freely used by Client for marketing or other purposes other than in a manner misleading to the reader. The GHD mark shall not be used by Client in any way that might mislead the reader about the verification status of the organization. The GHD mark can only be used with the expressed consent of GHD and then, only in relation to the specific time period verified by GHD.

### 1.2.7 Use of Information and Communication Technology

As part of the verification process, GHD utilized information and communication technology (ICT) in accordance with IAF Mandatory Document for the use of Information and Communication Technology for Auditing/Assessment Purposes (IAF MD 4:2018) for various aspects of the verification, including conducting video/tele-conferencing with various personnel.

The decision to use ICT was permissible if GHD and Client agreed on using ICT. The agreed ICT method was MS Teams, Skype, Zoom, Google Meet, or Webex. By accepting GHD's proposal, Client agreed to the use of the afore mentioned ICT methods and their associated information security, data protection and confidentiality measures. Any other ICT method(s) were agreed to in writing (email) between GHD and Client prior to use. The parties did not agree to the use of an ICT method which either party does not have the necessary infrastructure to support. Throughout the entire verification process, including use of ICT, GHD abided by the confidentiality procedures.

## 1.3 Level of Assurance

GHD conducted this verification to a reasonable level of assurance.

## 1.4 Summary Description of the Project

The Project Activity (VCS ID: 2414) is located at 220 Davidson County Landfill Road, Davidson County in Lexington, North Carolina, United States. The Project Activity consists of a landfill gas (LFG) collection system and an electricity generator set designed to capture and combust methane generated within the Davidson County solid waste landfill. A back up flare is also connected to the LFG collection system to combust the LFG, as needed, when the engines are not operational. The LFG collection system includes a total of 102 wells.

The Project Activity achieves emissions reductions through the collection and destruction of the methane within the LFG via the electricity generator set or the flare that convert the methane to carbon dioxide, thereby preventing the release of methane to the atmosphere. The original baseline scenario of the Project Activity consisted of landfill gas being vented into the atmosphere.

### 1.4.1 Client Contact

Ms. Lucy Huang was GHD's Client contact for this verification.

# 2 VERIFICATION PROCESS

## 2.1 Method and Criteria

### 2.1.1 Strategic Analysis

To understand the activities and complexity of the Project, and to determine the nature and extent of the verification activities, GHD completed a strategic analysis. The strategic analysis involved consideration of the details of the Project Site and its operations, the Monitoring Report and its preparation, and the verification requirements per the Program. The information considered in the strategic analysis is documented in GHD's working papers and was used to inform the assessment of risks and the development of an evidence gathering plan.

### 2.1.2 Assessment of Risk and Magnitude of Potential Errors, Omissions or Misrepresentations

GHD conducted an assessment of the risk and magnitude of potential errors, omissions or misrepresentations associated with the Monitoring Report statement/assertion. GHD then identified areas where qualitative or quantitative errors could occur and assigned risks to the areas. The inherent and control risks were evaluated, and detection risks were established. The risks were identified as high, medium and low. The risk assessment was a

key input to developing an effective evidence gathering plan.

### 2.1.3 Evidence-Gathering Plan

GHD developed an Evidence Gathering Plan (EGP) for internal use based on review of the objectives, criteria, scope, and level of assurance detailed above, along with consideration of the strategic analysis and assessment of risks. The EGP was designed to lower the verification risk to an acceptable level and specified the evidence (data and information) to be reviewed as part of the verification in the evidence gathering activities. The EGP was reviewed and approved by the Lead Verifier prior to issuing the verification plan. The EGP is dynamic and was revised, as required, throughout the course of the verification. Any modifications to the EGP were reviewed and approved by the Lead Verifier, with the final EGP completed prior to issuing the final verification report and opinion.

### 2.1.4 Verification Plan

GHD developed a Verification Plan based on a preliminary review of the data initially provided. GHD submitted the Verification Plan to Client on November 17, 2023, prior to GHD's Site visit on November 28, 2023. GHD's Verification Plan was revised, as required, throughout the course of the verification to address questions or initial concerns with data originally provided.

A copy of the final Verification Plan is included in Appendix A.

### 2.1.5 Quantitative Testing

Quantitative data or raw data was made available to GHD. GHD used the data to recalculate and check the GHG emission calculations and assess the methodologies that were used in the development of the Monitoring Report.

### 2.1.6 Materiality Level

Based on the reported emission reductions (i.e. less than 300,000 tonnes of carbon dioxide equivalent [tCO<sub>2</sub>e]), the Project Activity is classified as a project, therefore the materiality was set at five (5) percent. In addition, a series of discrete errors, omissions, or misrepresentations of individual or a series of qualitative factors, when aggregated, was considered material.

Materiality was also assessed on a qualitative level, including conformance with the applicable Program and Protocol requirements. Non-conformance with Program requirements may have been considered a material error.

## 2.1.7 Verification Procedures

### 2.1.7.1 Conflict of Interest (COI) and Independence

GHD has undergone a thorough evaluation for conflict of interest (COI) and independence for this verification work. This included a review of other potential work conducted by GHD for Client and Project listed in the scope of work. We have confirmed that this verification work can be successfully completed without undue risk of impartiality and conflict of interest. We have assessed the following key aspects:

- Verification evaluation
- Team evaluation

GHD has rigorous COI and verifier competency evaluation procedures that are followed for every verification project. Our documented procedures ensure that all COI and independence criteria are properly evaluated. GHD's COI program ensures that both the company and the Project Team have no potential COIs.

GHD has also evaluated and approved our Verification Team's competencies. GHD sets competency requirements in terms of education, verification experience, and experience in the sector. GHD can attest that we have highly qualified staff with the appropriate technical expertise for the verification work.

GHD submitted the Verra Notice of Validation Verification Services (NOVS) Form on October 13, 2023 for a validation of the Project. However, GHD was later informed by the Project Proponent that the validation of the subsequent crediting period for the Project was already covered by the earlier Gap Validation that was conducted. GHD re-submitted the NOVS form on November 16, 2023 to notify Verra that GHD will instead conduct a verification for the first monitoring period within the crediting period which is the 2022 monitoring period.

### 2.1.7.2 Issues Communications

During the course of the document review and interviews, questions and clarifications were identified by the Project Team; these were communicated with Client either verbally, by email, or in an Issues Log. Client and/or Project staff had the opportunity to respond to identified issues prior to the completion of GHD's draft and final verification reports. Material issues identified by GHD were requested to be corrected by Client.

### 2.1.7.3 Independent Review

GHD conducted an independent review of the verification, which included a review of findings, emission calculations and opinion developed by the verification team.

#### 2.1.7.4 Methodologies Used to Assess/Verify Emissions Data

The verification procedures were used to assess the following:

- Accuracy and completeness of Monitoring Report
- Uncertainty of external data sources used
- Emission assumptions
- Accuracy of emission calculations
- Potential magnitude of errors and omissions

To sustain a risk-based assessment, the GHD Project Team identified and determined risks related to the GHG emissions during the desk reviews, site visit and the follow-up interviews as applicable. The GHD Project Team focused on the accuracy and completeness of provided information. The components of the document review and follow-up interviews were:

- Document Review:
  - Review of data and information to confirm the correctness and completeness of presented information
  - Cross-checks between information provided in the Monitoring Report and information from independent background investigations
  - Determine sensitivity and magnitude analysis for parameters that may be the largest sources of error
  - Comparison of reported emissions and emissions reductions with the previous monitoring period(s)
- Follow-up Interviews:
  - On-site site visit
  - Via telephone
  - Via email
  - Via ICT

The document review established to what degree the presented Monitoring Report documentation met the verification standards and criteria.

The GHD Project Team's document review during the review process comprised of, but was not be limited to, an evaluation of whether or not:

- The documentation is complete and comprehensive and follows the structure and criteria required by the Program.
- The monitoring methodologies are justified and appropriate.
- The assumptions behind the inventory are conservative and appropriate.
- The GHG emission calculations are appropriate and use conservative assumptions for estimating GHG emissions and emissions reductions.
- The GHG information system and its controls are sufficiently robust to minimize the potential for errors, omissions, or misrepresentations

- The Monitoring Plan clearly identifies the frequency of responsibility and authority for, monitoring, measurement, and data recording activities and sufficiently describes quality control/quality assurance/management control procedures

The GHD Project Team interviewed Project staff to:

- Cross-check information provided
- Test the correctness of critical formulae and calculations
- Review data management and recording procedures

GHD completed checks of data from point of collection (meter, scale, etc.), through the Project data management systems, then it's use in the development of the Monitoring Report. A sample of raw data was collected for checks and recalculations as applicable. Where errors or anomalies were identified that could lead to a material misstatement, GHD requested further raw data samples to assess the pervasiveness of the errors or anomalies, as applicable. GHD identified the source and magnitude of data or methodology errors or anomalies; however, as a verification body, GHD did not provide solutions to issues identified, where applicable.

GHD based the Verification Representation conclusion on the interaction of three key verification principles as follows:

1. Compliance with the monitoring plan
2. Accuracy
3. Quality of evidence

The Independent Reviewer completed a independent review of the Draft Verification Report and found no additional findings that required response from the Project Proponent.

## 2.2 Document Review

The VCS verification process relies heavily upon document review. The primary document for review is the 2022 Monitoring Report and registered PD. The Project Proponent provided GHD with the Monitoring Report and revisions as detailed below. The Project Proponent also implemented a project description deviation as described in Section 3.3 of this document, and updated the project PD:

| Document Date | Date Issued to GHD | Version Number          |
|---------------|--------------------|-------------------------|
| 24-Oct-2023   | 24-Oct-2023        | Monitoring Report V1    |
| 26-Oct-2023   | 26-Oct-2023        | Monitoring Report V 1.1 |
| 23-Nov-2023   | 28-Nov-2023        | Monitoring Report V 1.2 |
| 30-Nov-2023   | 04-Dec-2023        | Monitoring Report V 1.3 |
| 04-Dec-2023   | 05-Dec-2023        | Monitoring Report V 1.4 |

| Document Date                            | Date Issued to GHD                    | Version Number            |
|------------------------------------------|---------------------------------------|---------------------------|
| 13-Dec-2023                              | 15-Dec-2023                           | Monitoring Report V 1.5   |
| 19-Dec-2023                              | 19-Dec-2023                           | Monitoring Report V 1.6   |
| 08-Feb-2024                              | 08-Feb-2024                           | Monitoring Report V 1.7   |
| 11-July-2024                             | 17-July-2024                          | Monitoring Report V 1.8   |
| 13-Septembe-2024                         | 13-Septembe-2024                      | Monitoring Report V 1.9   |
| 19-July-2021 reissued<br>5-November-2021 | Retrieved from VCS<br>Registry by GHD | Project Description V 7.0 |
| 11-July-2024                             | 17-July-2024                          | Project Description V 8.0 |
| 13-Sept-2024                             | 13-Sept-2024                          | Project Description V 9.0 |

GHD reviewed the above submissions. GHD did not identify any issues in the Monitoring Report Version No. 1.9 and Project Description V 9.0.

During the document review, GHD became familiar with the Project Activity to ensure the Project Proponent accurately described the on-Site conditions within the Monitoring Report. During the document review, GHD completed the following:

- Review of the data and information presented to verify completeness
- Review of the VCS PD and Monitoring Report, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures
- Evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of emission reductions
- Review of the last revision of the previous verification and validation reports
- Review of operation licenses from local authorities
- Cross-check of available documentation with the registered VCS PD and Monitoring Report
- GHD followed the audit trails and data sets for specific indicators and cross-checked the applicable records

### 2.2.1 GHG Data and Information

As part of the verification process GHD requested and reviewed, additional documentation supplemental to the Monitoring Report. The list of documents reviewed for the verification is provided in Appendix C.

## 2.3 Interviews

Mr. Ben Gerber of the GHD Project Team visited the Site on November 28, 2023 during the verification of the 2022 Monitoring Report. During this portion of the verification process, GHD

was able to interview a series of Project stakeholders regarding various aspects of the Project Activity. The following Project Stakeholders were interviewed by GHD:

- Lucy Huang (Anew – Analyst II, Technical Climate Solutions, Project Proponent)
- James Margaritis (DTE – Regional Operations Manager)
- Kevin Humbert (DTE Vantage Gas Plant Operator for Davidson County Landfill Gas Plant)
- David Moore (DTE)

During the site visit, GHD personnel interviewed participants about the Project regarding an overview of the process, review of major emission sources, the Project boundary and the data management system in place at the Facility. Through this inspection, GHD was able to verify that personnel responsible for the Monitoring Report preparation were sufficiently trained and qualified.

### 2.3.1 Effectiveness of ICT

GHD discussed with Client the availability of ICT technologies. Client agreed to the use of ICT by accepting GHD's proposal. GHD reviewed and confirmed the effectiveness of these techniques. MS Teams was used primarily for the Project kick-off call. GHD assessed that the ICT techniques were effective in supporting the verification activities.

## 2.4 Site Visits

In addition to interviewing Project stakeholders as per Section 2.3 of this report, the GHD Project Team completed the following:

- A walkthrough of the Site and observation of the Project Activity's implementation/operation status
- Interview personnel with knowledge of the Project Activity and its implementation/operation to cross-check information provided; interviews may be conducted during the Site Inspection but may also be completed or continued by way of telephone or email. Details of the interviews are provided in Section 2.3 above
- Inspection of all monitoring equipment and a review of calibration and inspection data
- Request of information from personnel either not made previously available or deemed necessary following site walkthrough or following interviews
- Review of compliance related to the Project Activity and the registered VCS PD
- GHD reviewed each major component of the Project Activity including the electricity generation engines, flare, metering equipment, supervisory control and data acquisition (SCADA) system and landfill gas extraction wells and associated piping

GHD focused on the key areas identified as follows:

- An assessment of the implementation and operation of the Project Activity as per the registered VCS PD

- A review of information flows for generating, aggregating, and reporting the monitoring parameters
- Interviews with relevant personnel to confirm that the operational and data collection procedures are implemented in accordance with the monitoring plan in the VCS PD
- A cross-check between information provided in the Monitoring Report and data from other sources such as plant log books, inventories, purchase records, or similar data sources
- A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the VCS PD
- A review of calculations and assumptions made in determining the GHG data and emission reductions
- An identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters
- An inspection of physical and organizational aspects of the Project Activity

GHD visited the following location and verified that the Project Activity is located at:

Davidson County Landfill (gas plant)

220 Davidson County Landfill Rd.

Davidson County, Lexington, NC

27292

United States

The Site is located at coordinates 35.836708°N , -80.173958°W

### 2.4.1 Project Boundary

GHD reviewed the Project operations to confirm that all emission sources and sinks are included in the Report. Specifically, GHD completed the following:

- Conducted an in-person site visit and interviewed personnel
- Reviewed data management systems
- Reviewed process flow diagram

GHD understands the Project boundary for the Project must conform to Table 4.1 of the Protocol. Project's emission sources, sinks and operations are well defined. The Project has reported emissions from the sources described in Section 1.2.3. During the in-person site visit, GHD confirmed that all applicable baseline and project emission sources and sinks were included in the Monitoring Report.

GHD confirmed that prior to Project implementation, there was no LFG destruction activities at the site.

## 2.5 Resolution of Findings

The Verification findings are categorized either as a Corrective Action Request (CAR), Forward Action Request (FAR), or as a Clarification Request (CL).

The GHD Project Team raised CARs in this Assessment if:

- The Project Proponent had made errors in assumptions or in the Project documentation that directly influenced the Project results
- The VCS requirements deemed relevant for verification of the Project Activity were not met
- There was a risk that the Project would not be registered by the VCS or that emission reductions cannot be monitored, calculated, verified, and/or certified
- The Project Proponent made mistakes that would influence the ability of the Project Activity to achieve relevant, complete, consistent, accurate, transparent, and conservative emission reductions
- The VCS requirements have not been met

When issued, FAR's highlight issues related to Project implementation that require review during the subsequent verification of the Project Activity. FAR's do not relate to the VCS requirements for registration and thus do not require any formal response from the Project Proponent. No FARs were issued during this verification.

CLs were issued to the Project Proponent if the GHD Project Team determined that the information provided by the Project Proponent was insufficient, unclear or not transparent enough to establish whether the applicable requirements are met.

Each CAR and CL raised by GHD was presented in individual rows of a table that comprised the findings assessments. the Project Proponent was required to complete the appropriate responses and to provide, where necessary, documentation as evidence of their assumptions and/or responses. The final Version of the Findings Assessment is provided in Appendix B.

A summary of the final results of the Findings Assessment is presented as follows:

| Finding Category | Number of Findings |
|------------------|--------------------|
| CL               | 17                 |
| FAR              | 0                  |
| CAR              | 40                 |
| TOTAL            | 57                 |

### 2.5.1 Forward Action Requests

No FARs were raised during the course of the verification.

## 2.6 Eligibility for Validation Activities

Validation activities were not performed as part of this verification.

## 2.7 Verification Team and Independent Reviewer

### 2.7.1 Roles and Responsibilities

**Lead Verifier/Technical Expert – Ben Gerber** – Mr. Gerber led the verification and was responsible for development of the verification plan. Mr. Gerber reviewed the risk assessment and evidence gathering plan, recalculation of raw data, data management and draft findings. Mr. Gerber reviewed and signed the verification opinion and verification report. Mr. Gerber conducted an in-person site visit of the Project site.

**Verifier – Angela Kuttemperoor** – Ms. Kuttemperoor developed and revised the verification plan and evidence gathering plan, developed a risk assessment, recalculated raw data, reviewed management of data, and prepared draft findings and the draft verification report.

**Independent Reviewer/Technical Expert – Gordon Reusing** – Mr. Reusing conducted an independent review of the risk assessment, evidence gathering plan, working papers, verification plan, verification report, and findings. Mr. Reusing approved the issuance of the opinion.

### 2.7.2 Qualifications

The team member qualifications are detailed below.

| Ben Gerber, MCC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Role: Lead Verifier |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <p><b>Professional Summary</b>   Ben holds a Master of Climate Change degree from the University of Waterloo. Ben has been a verifier since 2018, completing various GHG assurance work in numerous jurisdictions throughout North America including Ontario, Alberta, California and other voluntary markets. Ben has experience conducting GHG assurance work for a variety of industrial sectors including iron and steel production, electricity generation, manufacturing, petroleum importation, ethanol production and food production. Ben has also conducted offset verifications and validations under the Climate Action Reserve, Verra (VCS), and the American Carbon Registry.</p> <p>In addition to GHG assurance services, Ben has been a technical expert on project teams providing advisory services to Canadian provinces preparing to develop provincial offset programs. This work involved analysis of the various carbon offset programs and regulations in place throughout North America and the provision of recommendations related primarily to offset protocol applicability and program feature design.</p> |                     |

| Angela Kuttemperoor, E.I.T.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Role: Verifier |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| <p><b>Professional Summary</b>   Ms. Kuttemperoor is an Air Engineer-In-Training with GHD's Greenhouse Gas Assurances Services Team and has 2 years of experience in greenhouse gas verification work. Ms. Kuttemperoor has a Bachelor's of Environmental Engineering (co-op) from the University of Guelph. Ms. Kuttemperoor has experience as a verifier under the Ontario Emissions Performance Standards program and federal Output-based Performance Standards program. Ms. Kuttemperoor has expertise in voluntary offset project validations and verifications</p> |                |

| Angela Kuttemperoor, E.I.T.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Role: Verifier |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| <p>conducted under the Climate Action Reserve, American Carbon Registry and Verified Carbon Standard for landfill gas destruction and ozone-depleting substances destruction projects. Ms. Kuttemperoor has experience with compliance offset verifications for ozone-depleting substances conducted under the California Air Resources Board. Ms. Kuttemperoor has experience in verifications conducted under the Carbon Offsetting and Reduction Scheme for International Aviation.</p> |                |

| Gordon Reusing, P. Eng., M.Sc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Role: Independent Reviewer |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| <p>Professional Summary   Mr. Reusing is a greenhouse gas (GHG) Lead Verifier, Lead Validator, and Independent Reviewer with extensive experience including GHG programmes in Alberta, British Columbia, Ontario, Quebec, Nova Scotia, California, and programs operated by the United Nations Framework Convention on Climate Change (UNFCCC) Clean Development Mechanism (CDM), The Gold Standard, The Climate Registry (TCR), the Carbon Disclosure Project (CDP), and Verra: Verified Carbon Standard (VCS). He has completed numerous GHG quantification studies for the oil and gas sector, including upstream, midstream and downstream facilities. Mr. Reusing has conducted GHG verifications as a Lead Verifier, Technical Expert and Independent Reviewer in many jurisdictions, including, but not limited to, the Alberta Carbon Competitiveness Incentive Regulation (CCIR), Ontario Regulations, British Columbia Greenhouse Gas Reduction (Cap and Trade) Act, (B.C. Reg. 272/2009), and Quebec Regulation R.Q.c.Q 2, r.15 (Quebec Regulation).</p> |                            |

## 3 VALIDATION FINDINGS

### 3.1 Participation under Other GHG Programs

The Project was originally registered with the Climate Action Reserve (CAR)'s voluntary offset program registry for its first crediting period. The Project was registered under CAR as the 'Davidson County Landfill Gas Destruction Project' with CAR ID 468 and was listed with CAR on June 25, 2009. The Project claimed credits under the CAR registry from June 12, 2009 to December 31, 2014. As established with Project registration with CAR, the Project start date is May 20, 2009. As confirmed through review of the CAR registry, the current status of the project listing on the CAR registry is 'successfully registered but is no longer monitoring, reporting, or verifying emission reductions/removals with the Reserve.'

GHD verified that the Project Proponent has not claimed GHG emission reductions in emissions trading programs or any other mechanism that includes GHG allowance trading, including the ACR offset registry.

### 3.2 Methodology Deviations

No methodology deviations were applied for the current Project monitoring period.

### 3.3 Project Description Deviations

As the methodology version used for the 2022 Monitoring Report was updated to Landfill Gas Protocol Version 6.0, from Version 5.0 in the original registered Project Description V8.0, a project description deviation was applied for the 2022 Monitoring Report. GHD reviewed document *US Landfill Protocol, Summary of Changes from Version 5.0 to Version 6.0*, Climate Action Reserve, dated June 8, 2022 and confirmed that there were no significant changes between the methodologies with respect to offset project calculations, monitoring requirements or the Monitoring Report. Per the Section 3.4.1 of the CAR landfill methodology, the project was re-assessed for meeting performance standards of the updated methodology revision version 6.0. Per the Summary of Changes, there were no changes to the performance standard test in the updated version. GHD confirmed that the test has not changed and the project continues to meet the performance standard test requirements of the methodology and adheres to the applied methodology revision. GHD identified the project description deviation to have no impact on the project, in transferring to the use of the latest version of the Climate Action Reserve Landfill Gas Protocol.

Furthermore, on July 11, 2024, the Project Proponent updated Section 3.1 of an update revision of the Project Description (version 8.0) to list the new methodology used, in accordance with section 3.21.2 of VCS standard for updating methodology version. On September 13, 2024, the Project Proponent further updated the VCS PD to include all requirements associated with the updated methodology version in Section 4.0 and 5.0. GHD notes that there were no significant changes in requirements between the methodologies however that the original version of the VCS PD did not have Section 4.0 and 5.0 populated. Section 3.3 was updated by the Project Proponent to include a minor clarification about non-eligibility for a zero-credit reporting period. A description of the methodology version change was added into a new Section 3.6.1 of the VCS PD. GHD confirmed that all updates were consistent with the applied methodology version and were appropriate.

### 3.4 Grouped Project

The Project is not a Grouped Project.

## 4 VERIFICATION FINDINGS

### 4.1 Project Implementation Status

The Project's first crediting period upon transfer to the Verra registry was January 1, 2015 until December 31, 2021 and was validated during a gap validation for the Project. The

Project's second 7-year crediting period, as twice renewable, for the Project is from January 1, 2022 to December 31, 2028 and is also covered by the gap validation that was conducted. Therefore, the VCS has registered the Project into its second crediting period under VCS, without the requirement for validation of the renewed crediting period, as normally required.

The Project Activity received its Validation Representation with the VCS dated 14 May 2021, with the Gap validation report re-issued on November 1, 2021. The Project Activity was registered utilizing Climate Action Reserve US Landfill Protocol, Version 5.0, published 24 April 2019. The Project's start date is May 20, 2009 as evidenced by the historic monitoring data provided.

The Project's second crediting period does not exceed the total allowable crediting period that was established during the Project's original registration under the CAR registry, of 10 years for each crediting period (twice renewable) starting on May 20, 2009 and ending on May 19, 2029, as required under VCS.

Monitoring data was provided for the 2022 Monitoring Period related to the destruction of LFG from the Davidson County Landfill in engine generator set and flare. GHD verified that the data collected for the 2022 Monitoring Period was in accordance with the monitoring requirements of the registered VCS PD. The engine generator set, and flare actively destroyed LFG during this Monitoring Period. GHD's review of the monitoring plan and monitoring systems confirmed that the Project Activity is operating according to the monitoring plan, and the data collection methods and monitoring systems implemented at the Project Activity are robust.

Starting with the 2021 monitoring period and including the current 2022 monitoring period, methodology deviations that were in place during the monitoring periods prior to 2021 were removed and no methodology deviations were in place for the Project Activity for the current 2022 monitoring period. Unlike previous monitoring periods, operational data was available for the flare and emission reductions are claimed for LFG destroyed by both the engine and flare, with no applicable methodology deviations.

Duke Energy purchases electricity generated from the Project, per the "Renewable Energy Power Purchase Agreement" between Duke Energy Carolinas, LLC and Davidson Gas Producers, LLC. Duke Energy generates Renewable Energy Credits (RECs) from the electricity generated by the Project. The Project Activity supports sustainable development as it involves renewable energy generation.

GHD notes that the registered Project Description, original Monitoring Report and VCS registry all indicated that Element Market Emissions, LLC was the Project Proponent for the project. However, during the verification, GHD was informed that due to company merger Element Market Emissions, LLC had transitioned to Anew Environmental, LLC in 2022. GHD verified the details of the merger by reviewing the new Anew website and statement

about the merger found at the following link: [Element Markets and Bluesource Formally Merge to Create Anew™ | Anew Climate](#). Upon request from Verra, GHD and PP updated all project and verification documents to reference the new name of the PP, Anew Environmental, LLC. GHD notes that the Verra registry does not yet indicate the updated name of the Project Proponent.

Furthermore, the Project Proponent has updated Section 3.1 of the Monitoring Report to clarify that the Project only involves one electricity generator set and provided further details on operational shutdowns during the monitoring period, causes and impacts on credits claimed. The Monitoring Report was further revised to indicate the value of non-operational hours per destruction device during the reporting period and the duration that both devices were simultaneously non-operational due to maintenance.

Based on a review of project information, GHD determined that there are no material discrepancies between project implementation and the VCS PD.

#### 4.1.1 Additionality

VCS Standard (v4.5) Additionality Requirements section 3.14.1 requires that Projects demonstrate regulatory surplus at validation and each project crediting period renewal. Although validation was not conducted or required for the crediting period renewal for which the current monitoring period applies, GHD verified additionality for the new crediting period.

As per the CAR US Landfill Protocol, Projects must demonstrate additionality by satisfying the Performance Standard Test and the Legal Requirements Test as described below:

##### 4.1.1.1 The Performance Standard Test

The Project involves the following project activity:

- Installation of a landfill gas collection and control system (LFGCCS) and a new qualifying destruction device at an eligible landfill where landfill gas (LFG) has never been collected and destroyed prior to the project start date.

GHD verified that the landfill did not have a historic LFGCCS prior to the Project start date through interviews with the Project personnel and review of historic documentation. GHD notes that the Project destroys LFG through a flare and, two electricity generation engines.

As a result, GHD determined that the Project meets the applicable requirements of the Performance Standard Test.

##### 4.1.1.2 The Performance Standard Test

There are several United States Environmental Protection Agency (EPA) regulations for municipal solid waste (MSW) landfills that impact eligibility on this Project as part of the Legal Requirement Test, including the following:

- New Source Performance Standards (NSPS) for MSW Landfills, codified in 40 CFR 60 subpart WWW – Targets landfills that commenced construction or made modifications after May 1991
- New Source Performance Standards (NSPS) for MSW Landfills, codified in 40 CFR 60 subpart XXX
- Emission Guidelines (EG) for MSW Landfills, codified in 40 CFR 60 subpart Cc. – Targets existing landfills that commenced construction before May 30, 1991, but accepted waste after November 8, 1987
- The National Emission Standards for Hazardous Air Pollutants (NESHAP), codified in 40 CFR 63 subpart AAAA – Regulates new and existing landfills

As per the site's Solid Waste permit, the capacity of landfill exceeds the 2.5 million cubic meter ( $m^3$ ) threshold and evidences a partially filled and approved-for-construction design capacity of 3,423,125 cubic yards (CY) ( $2,617,167m^3$ ) with the approved construction of Area 3 of the Phase 2 approval.

GHD reviewed the Non-Methane Organic Compound Emission Rate Tier 2 Sample Report for the landfill. The Tier 2 sampling conducted by the site in April 2019 detailed projected NMOC emissions of 12.8 Mg/year for 2022, which is below the 35 Mg/year threshold specified in the NSPS for municipal solid waste (MSW) landfills contained in 40 CFR Part 60, Subpart XXX. As only one criteria set forth in the NSPS Guideline was met which includes the design capacity criteria, mandatory LFG collection system installation is not required. This standard is intended to identify and address landfill sites that may result in harm to the environment.

## 4.2 Safeguards

### 4.2.1 No Net Harm

The Project Proponent did not identify any negative environmental and socio economic impacts for the Project Activity. GHD reviewed the following permits as provided by the Project Proponent, to verify the Project's regulatory compliance:

- State of North Carolina Department of Environmental Quality Division of Waste Management Solid Waste Section, Facility Permit No. 2906-MSWLF-2008, Permit Approval to Construct & Operate, Davidson County Landfill, valid from issuance date of November 26, 2018 to expiration date of December 8, 2068.
- State of North Carolina Department of Environmental Quality Division of Air Quality, Permit No. 10408T01, Air Quality Permit, valid from effective date of April 23, 2020 to expiration date of March 31, 2025.
- North Carolina Environmental Management Commission, Department of Environment and Natural Resources, Division of Air Quality, Air permit No. 10059R03, valid from effective

date April 6, 2015 to expiration date of March 31, 2023. (Permit authorizing construction and operation of air control devices including a landfill gas-fired engine generator set (1.6 MW rating) and landfill gas collection system with a candlestick flare).

Additionally, GHD performed a search of the US Environmental Protection Agency Enforcement and Compliance History Online (ECHO) database on December 10, 2023 and identified the site's National Pollutant Discharge Elimination System (NPDES) permit as issued under the Clean Water Act (CWA) No. NCG120038.

Through review of the ECHO database, GHD did not identify any non-compliances under the Clean Air Act (CAA), CWA or Solid Waste permits for the Project or any further regulatory non-compliances. GHD verified that the site does retain all permits applicable to the Project and that all permits were current thorough the duration of the 2022 monitoring period.

#### 4.2.2 Local Stakeholder Consultation

The Project Proponent engages in the public comment period requirement for obtaining and renewing the Title V Air Permit for the Project. The Air Permit application process includes a 30-day public comment period and 45-day EPA review. The comment period and Air Permit are publicized in local newspaper and online by The North Carolina Division of Air Quality.

#### 4.3 AFOLU-Specific Safeguards

The Project Activity is not an Agriculture, Forestry and Other Land Use (AFOLU) project; therefore, there are no AFOLU-Specific safeguards.

#### 4.4 Accuracy of GHG Emission Reduction and Removal Calculations

##### 4.4.1 Monitoring Parameters

The following is a list of the monitoring parameters that the Project Proponent monitor and record throughout the crediting period in order to calculate the claimed emission reductions for the specific Monitoring Period:

|                  |                                                                                                      |
|------------------|------------------------------------------------------------------------------------------------------|
| DATA / PARAMETER | Flowrate of landfill gas                                                                             |
| Data unit        | <i>scfm</i>                                                                                          |
| Description      | <i>Flowrate of landfill gas delivered to qualifying destruction device at 60 degrees F and 1 atm</i> |
| Source of data   | <i>Measured continuously by project flowmeter and recorded</i>                                       |

|                                                                 |                                                                                                                                                             |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description of measurement methods and procedures to be applied | <i>Flowrate is measured continuously by 2 flowmeters (one for flare and one for engine) and recorded every 15 minutes or less by an Emerson ROCLINK 809</i> |
| Frequency of monitoring/recording                               | <i>Continuously recorded at least every 15 minutes</i>                                                                                                      |
| Value applied                                                   | <i>Average flowrate is approximately 136.39 scfm for the flare, and 507.75 scfm for the engine.</i>                                                         |
| Monitoring equipment                                            | <i>Engine Flowmeter – Fisher RSP1C – SN: 4691177<br/>Flare Flowmeter - Fisher RSP1C – SN: 4691608</i>                                                       |
| QA/QC procedures to be applied                                  | <i>All flowmeters are calibrated annually by a third party per manufacturer's guidance. As found, as left and percent drift are measured and recorded.</i>  |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>                                                                                                                    |

|                                                                 |                                                                                                                                                         |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | Methane Concentration                                                                                                                                   |
| Data unit                                                       | <i>Scf CH<sub>4</sub> / scf LFG (%)</i>                                                                                                                 |
| Description                                                     | <i>Methane fraction of landfill gas destroyed</i>                                                                                                       |
| Source of data                                                  | <i>Continuous gas analyzer</i>                                                                                                                          |
| Description of measurement methods and procedures to be applied | <i>Methane concentration is measured continuously using a gas analyzer and recorded every 15 minutes or less by an Emerson ROCLINK 809.</i>             |
| Frequency of monitoring/recording                               | <i>Continuously recorded at least every 15 minutes</i>                                                                                                  |
| Value applied                                                   | <i>Average methane concentration is approximately 49.01% for the flare, and 49.63% for the engine.</i>                                                  |
| Monitoring equipment                                            | <i>Gas analyzer - Siemens Ultramat 23 - SN:N1-AG-902</i>                                                                                                |
| QA/QC procedures to be applied                                  | <i>Gas analyzer is calibrated annually by a third party per manufacturer's guidance. As found, as left and percent drift are measured and recorded.</i> |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>                                                                                                                |

|                                                                 |                                                                                                                                                                                                  |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | Thermocouple Temperature                                                                                                                                                                         |
| Data unit                                                       | <i>Degrees F</i>                                                                                                                                                                                 |
| Description                                                     | <i>Temperature of flare during destruction of methane gas</i>                                                                                                                                    |
| Source of data                                                  | Thermocouple                                                                                                                                                                                     |
| Description of measurement methods and procedures to be applied | <i>Temperature of the flare is measured continuously using the flare thermocouple and recorded every 15 minutes or less by an Emerson ROCLINK 809.</i>                                           |
| Frequency of monitoring/recording                               | <i>Continuously recorded at least every 15 minutes</i>                                                                                                                                           |
| Value applied                                                   | <i>Thermocouple temperature consistently above 500 degrees F</i>                                                                                                                                 |
| Monitoring equipment                                            | <i>Flare thermocouple</i>                                                                                                                                                                        |
| QA/QC procedures to be applied                                  | <i>Thermocouple is monitored and cleaned as necessary.</i>                                                                                                                                       |
| Purpose of data                                                 | <i>Prove operability of the flare</i>                                                                                                                                                            |
| Operational activity                                            | <i>As noted above, the thermocouple temperature confirms the operability of the flare. In addition, the site includes all necessary operable safety shut off valves and procedures in place.</i> |
| Notes                                                           | <i>Flare data has been used in the 2022 monitoring period</i>                                                                                                                                    |

|                                                                 |                                                                                                                                                                                                                   |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | Power Generation                                                                                                                                                                                                  |
| Data unit                                                       | <i>kWh</i>                                                                                                                                                                                                        |
| Description                                                     | <i>Power generation from engine generator set</i>                                                                                                                                                                 |
| Source of data                                                  | Power purchase reports from Duke Energy                                                                                                                                                                           |
| Description of measurement methods and procedures to be applied | <i>Methane is destroyed in generator engine located at the Davidson Landfill, and the power is purchased by Duke Energy. Duke records the kWh purchased and provides DTE with report of kWh every 15 minutes.</i> |
| Frequency of monitoring/recording                               | <i>kWh recorded every 15 minutes</i>                                                                                                                                                                              |
| Value applied                                                   | <i>Average kWh output is approximately at 1529.62 kWh</i>                                                                                                                                                         |

|                                |                                                                                                                                  |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Monitoring equipment           | <i>Power generation is measured from meters at Duke Energy and is also measured with the Emerson ROCLINK 809</i>                 |
| QA/QC procedures to be applied | <i>Equipment is subject to Duke's standard operating procedures</i>                                                              |
| Purpose of data                | <i>Prove operationality of the engines</i>                                                                                       |
| Operational activity           | <i>As noted above, the recorded power data being generated by the engine indicates the generator set is in fact operational.</i> |

|                                                                 |                                                                                                            |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | Fossil Fuel Usage                                                                                          |
| Data unit                                                       | <i>Pounds of propane, gallons of gasoline, and gallons of diesel</i>                                       |
| Description                                                     | <i>Fossil fuel used for project activity</i>                                                               |
| Source of data                                                  | Operating records                                                                                          |
| Description of measurement methods and procedures to be applied | <i>DTE maintains records of fossil fuel used for project activity</i>                                      |
| Frequency of monitoring/recording                               | <i>Once per reporting period</i>                                                                           |
| Value applied                                                   | <i>2022 propane = 40 pounds/year<br/>2022 gasoline = 22 gallons/year<br/>2022 diesel = 15 gallons/year</i> |
| Monitoring equipment                                            | N/A                                                                                                        |
| QA/QC procedures to be applied                                  | N/A                                                                                                        |
| Purpose of data                                                 | <i>Calculation of project emissions</i>                                                                    |

|                  |                                                           |
|------------------|-----------------------------------------------------------|
| Data / Parameter | All relevant permits and regulatory documents             |
| Data unit        | N/A                                                       |
| Description      | <i>Tier 2 Reports, Title V permits, operating permits</i> |
| Source of data   | Landfill staff and regulatory agencies                    |

|                                                                 |                                          |
|-----------------------------------------------------------------|------------------------------------------|
| Description of measurement methods and procedures to be applied | N/A                                      |
| Frequency of monitoring/recording                               | <i>Annually</i>                          |
| Value applied                                                   | N/A                                      |
| Monitoring equipment                                            | N/A                                      |
| QA/QC procedures to be applied                                  | <i>Review by Anew Environmental, LLC</i> |
| Purpose of data                                                 | <i>Demonstrate regulatory compliance</i> |

|                                                                 |                                             |
|-----------------------------------------------------------------|---------------------------------------------|
| Data / Parameter                                                | GWP                                         |
| Data unit                                                       | $tCO_2/tCH_4$                               |
| Description                                                     | <i>Global Warming Potential for Methane</i> |
| Source of data                                                  | IPCC Fifth Assessment Reports               |
| Description of measurement methods and procedures to be applied | N/A                                         |
| Frequency of monitoring/recording                               | N/A                                         |
| Value applied                                                   | 28                                          |
| Monitoring equipment                                            | N/A                                         |
| QA/QC procedures to be applied                                  | N/A                                         |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>    |

|                  |                                                             |
|------------------|-------------------------------------------------------------|
| Data / Parameter | OX                                                          |
| Data unit        | <i>unitless</i>                                             |
| Description      | <i>Factor for the oxidation of methane by soil bacteria</i> |

|                                                                 |                                          |
|-----------------------------------------------------------------|------------------------------------------|
| Source of data                                                  | Default value in Landfill Protocol V6.0  |
| Description of measurement methods and procedures to be applied | N/A                                      |
| Frequency of monitoring/recording                               | N/A                                      |
| Value applied                                                   | 0.1                                      |
| Monitoring equipment                                            | N/A                                      |
| QA/QC procedures to be applied                                  | N/A                                      |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i> |

|                                                                 |                                         |
|-----------------------------------------------------------------|-----------------------------------------|
| Data / Parameter                                                | EF <sub>FF</sub>                        |
| Data unit                                                       | kgCO <sub>2</sub> /gal propane          |
| Description                                                     | <i>Emission factor for propane</i>      |
| Source of data                                                  | Default value in Landfill Protocol V6.0 |
| Description of measurement methods and procedures to be applied | N/A                                     |
| Frequency of monitoring/recording                               | N/A                                     |
| Value applied                                                   | 5.72                                    |
| Monitoring equipment                                            | N/A                                     |
| QA/QC procedures to be applied                                  | N/A                                     |
| Purpose of data                                                 | <i>Calculation of project emissions</i> |

|                  |                                 |
|------------------|---------------------------------|
| Data / Parameter | EF <sub>FF</sub>                |
| Data unit        | kgCO <sub>2</sub> /gal gasoline |

|                                                                 |                                         |
|-----------------------------------------------------------------|-----------------------------------------|
| Description                                                     | <i>Emission factor for gasoline</i>     |
| Source of data                                                  | Default value in Landfill Protocol V6.0 |
| Description of measurement methods and procedures to be applied | N/A                                     |
| Frequency of monitoring/recording                               | N/A                                     |
| Value applied                                                   | 8.778                                   |
| Monitoring equipment                                            | N/A                                     |
| QA/QC procedures to be applied                                  | N/A                                     |
| Purpose of data                                                 | <i>Calculation of project emissions</i> |

|                                                                 |                                         |
|-----------------------------------------------------------------|-----------------------------------------|
| Data / Parameter                                                | EF <sub>FF</sub>                        |
| Data unit                                                       | kgCO <sub>2</sub> /gal diesel           |
| Description                                                     | <i>Emission factor for diesel</i>       |
| Source of data                                                  | Default value in Landfill Protocol V6.0 |
| Description of measurement methods and procedures to be applied | N/A                                     |
| Frequency of monitoring/recording                               | N/A                                     |
| Value applied                                                   | 10.206                                  |
| Monitoring equipment                                            | N/A                                     |
| QA/QC procedures to be applied                                  | N/A                                     |
| Purpose of data                                                 | <i>Calculation of project emissions</i> |
| Data / Parameter                                                | EF <sub>EL</sub>                        |
| Data unit                                                       | lbsCO <sub>2</sub> /MWH                 |

|                                                                 |                                                            |
|-----------------------------------------------------------------|------------------------------------------------------------|
| Description                                                     | <i>CO<sub>2</sub> emission factor for electricity used</i> |
| Source of data                                                  | eGRID 2021 database – SRVC region                          |
| Description of measurement methods and procedures to be applied | N/A                                                        |
| Frequency of monitoring/recording                               | N/A                                                        |
| Value applied                                                   | 639.67                                                     |
| Monitoring equipment                                            | N/A                                                        |
| QA/QC procedures to be applied                                  | N/A                                                        |
| Purpose of data                                                 | <i>Calculation of project emissions</i>                    |

|                                                                 |                                                  |
|-----------------------------------------------------------------|--------------------------------------------------|
| Data / Parameter                                                | ER                                               |
| Data unit                                                       | tCO <sub>2</sub> e                               |
| Description                                                     | <i>Total Emissions Reductions</i>                |
| Source of data                                                  | Calculated                                       |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.1 in protocol</i> |
| Frequency of monitoring/recording                               | N/A                                              |
| Value applied                                                   | 2022-60,886                                      |
| Monitoring equipment                                            | N/A                                              |
| QA/QC procedures to be applied                                  | N/A                                              |
| Purpose of data                                                 | <i>Calculation of emissions reductions</i>       |

|                                                                 |                                                                                                                                                                   |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | BE                                                                                                                                                                |
| Data unit                                                       | tCO <sub>2</sub> e                                                                                                                                                |
| Description                                                     | <i>Baseline Emissions</i>                                                                                                                                         |
| Source of data                                                  | Calculated                                                                                                                                                        |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.3 in protocol (In the quantification spreadsheet, this is the summation of cells G11 in both flare and engine; 3564.4+57438.1)</i> |
| Frequency of monitoring/recording                               | N/A                                                                                                                                                               |
| Value applied                                                   | 2022-61,002.51                                                                                                                                                    |
| Monitoring equipment                                            | N/A                                                                                                                                                               |
| QA/QC procedures to be applied                                  | N/A                                                                                                                                                               |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>                                                                                                                          |

|                                                                 |                                                  |
|-----------------------------------------------------------------|--------------------------------------------------|
| Data / Parameter                                                | PE                                               |
| Data unit                                                       | tCO <sub>2</sub> e                               |
| Description                                                     | <i>Project Emissions</i>                         |
| Source of data                                                  | Calculated                                       |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.9 in protocol</i> |
| Frequency of monitoring/recording                               | N/A                                              |
| Value applied                                                   | 2022-116.19                                      |
| Monitoring equipment                                            | N/A                                              |
| QA/QC procedures to be applied                                  | N/A                                              |
| Purpose of data                                                 | <i>Calculation of project emissions</i>          |

|                                                                 |                                                                                               |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| Data / Parameter                                                | LFG <sub>adjusted</sub>                                                                       |
| Data unit                                                       | scf                                                                                           |
| Description                                                     | <i>Adjusted volume of LFG fed to the flare and engine</i>                                     |
| Source of data                                                  | Calculated from continuous flowrate (scfm)                                                    |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.2 in protocol</i>                                              |
| Frequency of monitoring/recording                               | N/A                                                                                           |
| Value applied                                                   | <i>Yearly Totals</i><br><i>2022-15,711,603 to flare</i><br><i>2022- 255,908,505 to engine</i> |
| Monitoring equipment                                            | N/A                                                                                           |
| QA/QC procedures to be applied                                  | N/A                                                                                           |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>                                                      |

|                                                                 |                                                                                                                     |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | CH <sub>4</sub> Dest <sub>PR</sub>                                                                                  |
| Data unit                                                       | tCH <sub>4</sub>                                                                                                    |
| Description                                                     | <i>Total methane destroyed by the project LFC gas collection and destruction system during the reporting period</i> |
| Source of data                                                  | Calculated                                                                                                          |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.4 in protocol</i>                                                                    |
| Frequency of monitoring/recording                               | N/A                                                                                                                 |
| Value applied                                                   | <i>Yearly Totals</i><br><i>2022-2,420</i>                                                                           |

|                                |                                          |
|--------------------------------|------------------------------------------|
| Monitoring equipment           | N/A                                      |
| QA/QC procedures to be applied | N/A                                      |
| Purpose of data                | <i>Calculation of baseline emissions</i> |

|                                                                 |                                                                                                  |
|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | Q                                                                                                |
| Data unit                                                       | <i>Scf CH4</i>                                                                                   |
| Description                                                     | <i>Total quantity of landfill methane sent to destruction device during the reporting period</i> |
| Source of data                                                  | Calculated                                                                                       |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.4 in protocol</i>                                                 |
| Frequency of monitoring/recording                               | N/A                                                                                              |
| Value applied                                                   | <i>Yearly Totals</i><br><i>2022-134,474,597</i>                                                  |
| Monitoring equipment                                            | N/A                                                                                              |
| QA/QC procedures to be applied                                  | N/A                                                                                              |
| Purpose of data                                                 | <i>Calculation of baseline emissions</i>                                                         |

|                                                                 |                                                                                                       |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | FF <sub>CO2</sub>                                                                                     |
| Data unit                                                       | <i>tCO2</i>                                                                                           |
| Description                                                     | <i>Total carbon dioxide emissions from the combustion of fossil fuels during the reporting period</i> |
| Source of data                                                  | Calculated                                                                                            |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.10 in protocol</i>                                                     |

|                                   |                                          |
|-----------------------------------|------------------------------------------|
| Frequency of monitoring/recording | N/A                                      |
| Value applied                     | <i>Yearly Totals</i><br><i>2022-0.40</i> |
| Monitoring equipment              | N/A                                      |
| QA/QC procedures to be applied    | N/A                                      |
| Purpose of data                   | <i>Calculation of project emissions</i>  |

|                                                                 |                                                                                                                     |
|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| Data / Parameter                                                | EL <sub>CO2</sub>                                                                                                   |
| Data unit                                                       | tCO <sub>2</sub>                                                                                                    |
| Description                                                     | <i>Total carbon dioxide emissions from the consumption of electricity from the grid during the reporting period</i> |
| Source of data                                                  | <i>Calculated from elec consumption records</i>                                                                     |
| Description of measurement methods and procedures to be applied | <i>Calculated using equation 5.11 in protocol</i>                                                                   |
| Frequency of monitoring/recording                               | N/A                                                                                                                 |
| Value applied                                                   | <i>Yearly Totals</i><br><i>2022-115.79</i>                                                                          |
| Monitoring equipment                                            | N/A                                                                                                                 |
| QA/QC procedures to be applied                                  | N/A                                                                                                                 |
| Purpose of data                                                 | <i>Calculation of project emissions</i>                                                                             |

|                  |                                                                                                                             |
|------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Data / Parameter | EL <sub>PR</sub>                                                                                                            |
| Data unit        | MWh                                                                                                                         |
| Description      | <i>Total electricity consumed by the project landfill gas collection and destruction system during the reporting period</i> |

|                                                                 |                                                                |
|-----------------------------------------------------------------|----------------------------------------------------------------|
| Source of data                                                  | <i>Monthly electricity bills</i>                               |
| Description of measurement methods and procedures to be applied | <i>Summed from utility bills provided by landfill operator</i> |
| Frequency of monitoring/recording                               | <i>Monthly</i>                                                 |
| Value applied                                                   | <i>Yearly Totals<br/>2022-399</i>                              |
| Monitoring equipment                                            | <i>Electricity meter</i>                                       |
| QA/QC procedures to be applied                                  | <i>N/A</i>                                                     |
| Purpose of data                                                 | <i>Calculation of project emissions</i>                        |

The GHD Project Team reviewed the monitored parameters and their frequency, equipment used, and description. The GHD Project Team also verified that the monitoring of the above parameters coincides with the Protocol and VCS guidance for the projected emission reductions. The parameters listed above are consistent with the registered VCS PD. The GHD Project Team also notes that the parameters available at validation detailed in the registered VCS PD have been applied appropriately.

GHD performed a re-calculation of all monitoring parameters and identified minor discrepancies in calculated parameters associated with the engine due to the Project Proponent including 1 hour of flow data on November 6, 2022 in the calculations, which was associated with unreasonable methane concentrations consisting of greater than 100% methane. This resulted in an immaterial 0.02% overreporting discrepancy in total emission reductions and minor immaterial discrepancies in monitoring parameters associated with the engine.

Furthermore, the Project Proponent has updated tables for parameters including 'Thermocouple Temperature' and 'Power Generation' in Section 4.2 of the Monitoring Report with an Operational Activity row, to describe evidence of operational activity for the destruction devices. Through review of the raw data, GHD confirmed that engine output (kW) and flare flame temperature (°F) are recorded by measurement devices every 15 minutes. This meets the monitoring requirement as specified in the Landfill Gas Protocol that the operational activity of the destruction device(s) must be monitored and documented at least hourly to ensure landfill gas destruction.

Furthermore, the methodology indicates that GHG reductions must not be accounted for

during periods that the destruction device was not operational. Through review of the raw data, GHD confirmed that the Project Proponent does not calculation emissions reductions from landfill gas destruction data associated with flare temperatures less than 500°F or no engine output, indicating no operation of the destruction devices, in accordance with Section 6.1 of the methodology.

GHD verified that operational activity has been demonstrated for the destruction devices, per methodology requirements.

#### 4.4.2 Methods for Recording Monitoring Parameters

Landfill gas (LF) from three separate areas of the landfill meet up near the gas plant and enter the gas plant in one line. The landfill gas normally goes to the engine which turns the generator to produce electricity. The gas flow rate to the engine and to the flare are measured separately in scfm with flow meters flare and a SCADA system that includes a PLC. The engine's operation is monitored using continuous electricity generation readings and the flare's operation is monitored using continuous thermocouple readings.

The Project Activity uses their internal SCADA system to record the monitoring parameters listed in Section 4.4.1 where the frequency of collection is continuous. Overall properties of the of the combined gas stream are monitored at the gas plant (delivery pressure, heating value, % methane, % oxygen). Methane concentration is recorded by a methane analyzer. If an issue is identified during the monitoring, the incoming streams are spot monitored as needed to determine the source of the potential issue. GHD confirmed that the SCADA system is backed-up on-Site and externally. GHD verified that the above noted parameters are recorded via the SCADA system.

#### 4.4.3 Monitoring Requirements

The Project Proponent collects the following monitoring data for the Site pursuant to Table 6.1 of the Protocol. Calculated or reference parameters specified in Table 6.1 of the Protocol were determined and used at the frequency specified based on operating data records. The following table outlines the instrument monitoring requirements for the Project:

| Instrument          | Unit                                                                   | Measurement Frequency                            | Measurement Temperature and Pressure | Operating Parameters          |
|---------------------|------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------|-------------------------------|
| Flow Meter (flare)  | Fisher Model RSP1C-GP3 flow meter (SN. 4691608), Instrument tag FT-200 | Measured continuously, recorded every 15 minutes | 60° F and 1 atm                      | Thermocouple readings >500° F |
| Flow Meter (engine) | Fisher Model RSP1C-GP3 flow meter (SN. 4691177), Instrument tag FT-100 | Measured continuously, recorded every 15 minutes | 60° F and 1 atm                      | Engine run time               |

| Instrument   | Unit                                                                                               | Measurement Frequency                            | Measurement Temperature and Pressure | Operating Parameters |
|--------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------|--------------------------------------|----------------------|
| Gas Analyzer | Seimens Ultramat 23 CH4 Analyzer, Model 7MB2335-3DR10-5AA1 (SN. N1-AG-902), Instrument tag AIT-100 | Measured continuously, recorded every 15 minutes | N/A                                  | N/A                  |

#### 4.4.4 Calculation of Emission Reductions

##### 4.4.4.1 Baseline Emissions

To quantify Baseline Emissions for the Project, the following methodology was used:

- US Landfill Protocol Version 6.0, Climate Action Reserve, dated June 8, 2022 (Protocol)

The calculation methodology was applied to the calculation of emissions from methane contained within LFG which is generated from the decomposition of solid waste from within the landfill and combusted during electricity generation or in a flare.

For this Project Activity the baseline emissions consist of those associated with the volume of LFG that is destroyed in the engine and flare to generate electricity.

The Baseline Emissions also include quantification of the fraction of methane in the LFG that would be oxidized in the top layer of the landfill in the baseline. GHD verified that the Project Proponent has applied the Baseline Emissions calculations appropriately and they are consistent with the VCS PD.

##### 4.4.4.2 Project Emissions

To quantify Project Emissions for the Project, the following methodology was used:

- US Landfill Protocol Version 6.0, Climate Action Reserve, dated June 8, 2022 (Protocol)

The calculation methodology for the project emissions was applied to the calculation of emissions from the following sources:

- Fossil Fuel Emissions – CO<sub>2</sub> – Generated from the combustion of fossil fuels (propane and gasoline)
- Electricity Consumption Emissions – CO<sub>2</sub> – Generated from the grid consumption of electricity within the Project Boundary

GHD verified that the Project Proponent has applied the Project Emissions calculations appropriately and they are consistent with the VCS PD.

##### 4.4.4.3 Leakage

No leakage effects are accounted for under the CAR US Landfill Protocol.

#### 4.4.4.4 Net GHG Emission Reductions or Removals

The net GHG emission reductions are simply calculated by subtracting the project emissions from the baseline emissions. GHD verified that this calculation has been performed appropriately by the Project Proponent for the 2022 monitoring period.

#### 4.4.4.5 Uncertainty Associated with the Calculation of Emissions

GHD did not identify any uncertainties associated with the calculation of the Baseline and Project emissions.

#### 4.4.4.6 Documentation

The Project Proponent provided a calculation spreadsheet to support applicable calculations. Additional documentation and information were provided by the Project Proponent to support the values used in the calculation spreadsheet.

#### 4.4.4.7 Default Values

GHD reviewed the appropriateness of the default values applied by the Project Proponent and determined that the default values applied were appropriate.

#### 4.4.4.8 Reporting Period Comparison

Previous reporting period emissions/credits were compared to current reporting period emissions/credits. GHD compared the offset credits from the previous reporting periods to the current reporting period. Any changes over 5% were identified and the reasons for the changes were investigated. GHD identified the following changes from the previous monitoring period for the Project:

- 24% increase in baseline emissions
- 9% increase in electricity consumption emissions
- 38% decrease in fossil fuel consumption emissions

The Project Proponent described that the significant increase in baseline emissions for the Project was attributed to the previous 2021 year missing flow data that spanned over various months. GHD confirmed that the previous 2021 monitoring period was based on a lower amount of flow data as missing for various months. Additionally, the Project Proponent indicated that flow was expect to increase over the 2022 monitoring period based on methane quality, where measurements indicating lower methane concentrations for the gas would result in to higher flows into the engine. The lower methane values are mostly weather-related eg. precipitation. The Project Proponent indicated that the fossil fuel consumption is based on the conditions of the site and may vary from year to year. Although the decrease in emissions is significant, the emissions number is minimal and consistent with the previous year. GHD verified that all year-over-year changes were consistent with Project operations.

#### 4.4.4.9 Summary of Errors, Omissions, Misstatements or Non-Compliances Identified

Quantitative materiality for GHG emissions reductions for this verification was set at plus or minus 5 percent of the total reported emissions reductions. The quantitative aggregated magnitude of offset errors, omissions, and misstatements for the 2022 Monitoring Report is 14.36 tCO<sub>2</sub>e (0.02) percent overreporting, which is less than the materiality threshold of 5 percent.

Materiality was also assessed on a qualitative level, including conformance with the applicable Program and Protocol requirements. The Project did not request any deviations and GHD did not identify any qualitative non-conformance with the Program or Protocol.

#### 4.4.4.10 Corrections Made to Monitoring Report

The Project Proponent made changes to the 2022 Monitoring Report based on the issues identified in the Verification Findings. Significant changes made included:

- Updates to emissions reductions calculations and Monitoring Report to include/exclude additional raw data for the monitoring period as available
- Updates to Monitoring Report to include/exclude additional monitoring parameter tables and revise values applied as applicable to the monitoring period
- Updates to Monitoring Report to update monitoring plan section in accordance with requirements within the US Landfill Protocol
- Updates to Monitoring Report to include calibration dates and identification numbers of all project instruments

#### 4.4.4.11 Follow up on Issues from Previous Verification

GHD has reviewed the issues from the previous 2021 monitoring period verification report. GHD observed that serial numbers on the calibration certificates for the flare and engine flow meters during the 2021 verification site visit were not matching numbers observed on the equipment at the site. For the current 2022 monitoring period verification, GHD confirmed that serial numbers of the flow meters matched what was observed at the site.

### 4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

GHD reviewed the quality of the evidence provided during the verification and requested additional evidence as required to further support the determination of emission reductions. Refer to Appendix B for additional details.

Through a review of each of the different sources of evidence provided by the Project Proponent, GHD was able to verify that the evidence clearly and transparently conveys the data generation, aggregation, recording, calculation, and final transposition into the 2022

Monitoring Report. The information is clearly conveyed by the Project Proponent from the metering through to the SCADA system, and the calculation spreadsheet. The instrument calibration documentation, 2022 Monitoring Report, raw data, and permitting documentation support the transparency and quality of the information provided by the Project Proponent.

#### 4.5.1 Data Management

From the SCADA system, the data is automatically transferred to an Emerson ROCLINK 809 (ROC). The data is then saved on a server operating Rockwell Software FactoryTalk Historian. All operating parameters and data are automatically captured by the data management system and are transmitted to DTE automatically on a periodic basis, at least once per day. The data is also stored on-site for a period of time as a backup. The gas plant operator has no access to what data is captured or transmitted, it is all automatically conducted. The gas plant operator ensures that the incoming gas has acceptable properties.

The plant manager sends a monthly report to the regional manager on the flow, CH<sub>4</sub>, and BTU's. Shevada (of DTE in Detroit) prepares a similar report for the Plant Manager to confirm as a double check. DTE is responsible for compiling data and sharing with the Project Proponent to facilitate emissions reduction calculation. Starting in 2021, the data is downloaded monthly and shared with the Project Proponent.

#### 4.5.2 Instrument QA/QC

The table below outlines the monitoring instruments for the project, the model and serial numbers, the relevant dates of manufacturer calibrations, and the field checks performed on the instruments throughout the reporting period:

| Instrument, Model, and SN.                                                                                                        | Date of Calibration                                                                                                                          | Field Checks                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Flare Flow Meter - Fisher Model RSP1C-GP3 flow meter (SN. 4691608), Instrument tag FT-200                                         | 12/16/2022 – Calibrations conducted annually per manufacturer specifications to 5% accuracy.<br><br>Date of previous calibration – 11/8/2021 | GHD confirmed that the end-of-reporting period field check that is required to be conducted for all monitoring equipment per the US Landfill Protocol was done within 2 months within the end of the reporting period (December 31, 2022) and was in the form of a third-party calibration for all monitoring equipment. GHD verified that the previous calibrations were done in 2021 and are following an annual calibration schedule. |
| Engine Flow Meter - Fisher Model RSP1C-GP3 flow meter (SN. 4691177), Instrument tag FT-100                                        | 12/16/2022 - Calibrations conducted annually per manufacturer specifications to 5% accuracy.<br><br>Date of previous calibration – 11/8/2021 |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Methane Analyzer - Seimens Ultramat 23 CH <sub>4</sub> Analyzer, Model 7MB2335-3DR10-5AA1 (SN. N1-AG-902), Instrument tag AIT-100 | 12/16/2022 - Calibrations conducted annually per manufacturer specifications to 5% accuracy.<br><br>Date of previous calibration –           |                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Instrument, Model, and SN. | Date of Calibration | Field Checks |
|----------------------------|---------------------|--------------|
|                            | 11/8/2021           |              |

During the verification, GHD performed a review of the monitoring frequency provided in the 2022 Monitoring Report for the monitored parameters and confirmed that it was consistent with the VCS PD and met the methodology instrument QA/QC requirements. Furthermore, the Project Proponent updated Section 4.3.2. of the Monitoring Report to include a table demonstrating the monitoring and calibration requirements being met for all instruments. GHD reviewed the calibration requirements and determined that the manufacturer calibration frequency requirements were met in the 2022 Monitoring Period.

## 4.6 Non-Permanence Risk Analysis

The Project Activity is not an Agriculture, Forestry, and Other Land Use (AFOLU) project, therefore a non-permanence risk analysis is not required.

# 5 VERIFICATION OPINION

## 5.1 Verification Summary

GHD has prepared this Verification Report for the Client and Program. The Client was responsible for the preparation and fair presentation of the Monitoring Report dated September 13, 2024 for the VCS in accordance with the Program criteria and engaging with a qualified third-party verifier to verify the Monitoring Report. Project GHG-related activity is detailed in Sections 1.2.3.

GHD's objective and responsibility was to provide an opinion regarding whether the 2022 Monitoring Report for the Project was free of material misstatement and that the information reported is a fair and accurate representation of the operations for the reporting period, and accurate and consistent with the requirements of the Program.

The criteria used by GHD for the verification of the Monitoring Report is detailed in Section 1.2.2. GHD completed the verification of the Monitoring Report in accordance with ISO 14064-3:2019. GHD completed the verification to a reasonable level of assurance.

Through the collection of LFG from the LFG collection system in the Davidson County Landfill, including blowers, and subsequent destruction of the LFG in an electricity generation engine and/or a back up flare, the Project Activity resulted in a reduction of GHG emissions that are relevant, complete, consistent, accurate, transparent and conservative.

Furthermore, the emission reductions generated by the Project Activity serve to contribute to

sustainable development, and will result in long term benefits to the mitigation of climate change.

### 5.1.1 Limitation of Liability

Because of the inherent limitations in any internal control structure, it is possible that fraud, error, or non-compliance with laws and regulations may occur and not be detected. Further, the verification was not designed to detect all weakness or errors in internal controls so far as they relate to the requirements set out above as the verification has not been performed continuously throughout the period and the procedures performed on the relevant internal controls were on a test basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

This verification was based on a risk-based approach that follows rigorous methodology with the expectation that it will capture the majority of errors with the potential for a material misstatement. However, GHD does not warrant or guarantee that all errors or omissions, including material issues, made by Client in its Report and/or assertion were identified by GHD.

The verification opinion expressed in this report has been formed on the above basis.

GHD's review of the 2022 Monitoring Report included only the information discussed above. While the review included observation of the systems used for determination of the 2022 Monitoring Report, GHD did not conduct any direct field measurements and has relied on the primary measurement data and records provided by Client as being reliable and accurate. No other information was provided to GHD or incorporated into this review. GHD assumes no responsibility or liability for the information with which it has been provided by others.

The information and opinions rendered in this report are exclusively for use by Client. GHD will not distribute or publish this report without Client's consent except as required by law or court order. The information and opinions expressed in this report are given in response to a limited assignment and should only be evaluated and implemented in connection with that assignment. GHD accepts responsibility for the competent performance of its duties in executing the assignment and preparing this report in accordance with the normal standards of the profession but disclaims any responsibility for consequential damages.

## 5.2 Verification Conclusion

Client reported 60,886 tonnes CO<sub>2</sub>e as the total emissions reductions for the 2022 reporting period for the Project. This includes the GHG emissions reductions resulting from the Project from January 1, 2022 – December 31, 2022. The quantitative aggregated magnitude of errors, omissions, and misstatements is discussed in Section 4.4.3.9.

Based on the verification procedures undertaken to a reasonable level of assurance, it is

GHD's opinion that the Monitoring Report is materially correct and is a fair and accurate representation of the Project's total attributable emissions reductions for the reporting period; and that the Monitoring Report was prepared, and emissions reductions were quantified in accordance with the Program. As a result, GHD is issuing a Positive Verification Opinion in regards to this Project Activity and will therefore be approving the Project Activity for registration with the VCS with no limitations or qualifications.

This Opinion is effective as of the date of this Verification Report.

The Verification Deed of Representation is provided in Appendix D.

Provided below is a summary of the emissions reductions:

**Verification period: From 01-January-2022 to 31-December-2022**

**Verified GHG emission reductions and removals in the above verification period, broken down by calendar year:**

| Year                                    | Baseline emissions or removals (tCO <sub>2</sub> e) | Project emissions or removals (tCO <sub>2</sub> e) | Leakage emissions (tCO <sub>2</sub> e) | Net GHG emission reductions or removals (tCO <sub>2</sub> e) |
|-----------------------------------------|-----------------------------------------------------|----------------------------------------------------|----------------------------------------|--------------------------------------------------------------|
| 2022 (01-January-2022-31-December-2022) | 61,002.51                                           | 116.19                                             | 0                                      | 60,886                                                       |
| Total                                   | 61,002.51                                           | 116.19                                             | 0                                      | 60,886                                                       |

| Year                                    | Ex-ante emissions reductions/removals | Achieved emissions reductions/removals | Percent difference | Justification for the difference                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------|---------------------------------------|----------------------------------------|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2022 (01-January-2022-31-December-2022) | 50,000                                | 60,886                                 | 17.9%              | <p>PD emissions reductions estimate was based on high-level preliminary information, compared to the emissions reductions calculated based on real data for the 2022 Monitoring Period, as indicated by the Project Proponent's justification.</p> <p>GHD notes that emissions reductions claimed for 2021 were closer to PD projected value (50, 000). Therefore, increase in emissions reductions for the</p> |

| Year  | Ex-ante emissions reductions/removals | Achieved emissions reductions/removals | Percent difference | Justification for the difference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------|---------------------------------------|----------------------------------------|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                                       |                                        |                    | 2022 monitoring period were assessed by reviewing changes between the 2021 and 2022 monitoring period. As detailed in Section 4.4.4.8 of the Monitoring Report, GHD verified that emissions reductions for 2021 was significantly reduced due to several months of missing flow which was not the case for the 2022 monitoring period. Although shutdowns did occur in 2022, they were for short periods and did not significantly reduce emissions reductions, as indicated in Section 3.1 Implementation Status, of the Monitoring Report. Based on this, it is expected that annual emissions reductions for the project in future reporting years that do not have long periods of shutdown or missing data may be significantly higher than the PD ex-ante emissions reductions estimate of 50,000 tCO <sub>2</sub> e. GHD verified that the difference between PD projections and emissions reductions claimed for the 2022 Monitoring Period is justified. |
| Total | 50,000                                | 60,886                                 | 17.9%              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

Should you have any questions on the above, please do not hesitate to contact us.

Regards



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Encl.

Copy to: Angela Kuttemperoor, GHD

# APPENDIX A: VERIFICATION PLAN

Our ref: 12589759-LTR-1

17 November 2023

Mr. Braulio Garcia  
Analyst II, Technical Climate Solutions  
Anew Environmental, LLC  
3200 Southwest Freeway, Suite 1310  
Houston, Texas  
77027

#### Verification Plan

**2022 Monitoring Report for Davidson County Landfill Project (VCS ID: 2414), Anew Environmental, LLC, Lexington, North Carolina, United States under the Verra: Verified Carbon Standard**

Dear Mr. Garcia

## 1. Introduction

Anew Environmental, LLC (Client) retained GHD Services Inc. (GHD) to undertake a verification of the Davidson County Landfill (Project) for the January 1, 2022 – December 31, 2022 monitoring period. The Project is located in Lexington, North Carolina, United States and follows the requirements of the Verra: Verified Carbon Standard (VCS) voluntary offset program (Program). The Project is listed under the VCS ID: 2414.

The Program requires verification of the Monitoring Report for the Project monitoring period(s) by an independent third-party accredited under *ISO 14065 Greenhouse Gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* (ISO 14065). GHD Limited is accredited by the ANSI National Accreditation Board (ANAB) under ISO 14065 as a greenhouse gas validation and verification body (VVB). GHD Limited is a VCS-recognized VVB for the voluntary offset program. The verification of this Project falls under VCS project-level sectoral scope 13 – Waste Handling and Disposal and 1 – Energy (renewable/non-renewable) for which GHD is accredited.

GHD has prepared this Verification Plan in accordance with ISO Standard *ISO 14064 Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions* (ISO 14064-3:2019) and with the Program requirements.

## 2. Verification Objective

The objective of the verification is to provide Client and the Program with an opinion on whether the Project Monitoring Report for the monitoring period is free of material misstatements and that the information reported is accurate and consistent with the requirements of the Program.

GHD is responsible for reviewing the Monitoring Report including accompanying materials, the previous Validation Report, and the VCS Project Description (PD) including the Monitoring Report, baseline assessment, and any supporting documentation.

Per the VCS VVM (Validation and Verification Manual), during verification VVBs must evaluate the Monitoring Report and assess the following:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated PD. This includes ensuring conformance with the monitoring plan.
- The extent to which GHG emission reductions and removals reported in the Monitoring Report are materially accurate.

### **3. Level of Assurance**

The verification will be conducted at a reasonable level of assurance.

Reasonable assurance is a high but not absolute level of assurance. Reasonable assurance provides a high level of confidence to intended users of verification opinions that the stated information is accurate and complete. If a verification opinion can be provided, it will be worded in a manner similar to "Based on our verification, the GHG emissions assertion is, in all material aspects, in accordance with the approved quantification methodologies."

### **4. Verification Standards**

For the verification, GHD will apply ISO 14064-3:2019 and the Program verification standards.

### **5. Verification Criteria**

GHD will apply the following verification criteria:

- ISO 14064 Greenhouse gases Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements, ISO, April 2019 (ISO 14064-2)
- ISO 14064 Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions, ISO, April 2019 (ISO 14064-3)
- International Accreditation Forum Mandatory Document for the Use of Information and Communication Technology for Auditing/Assessment Purposes: Issue 2, July 2018 (IAF MD 4: 2018)
- VCS Program Guide, Verra: Verified Carbon Standard, dated 29 August 2023, Version 4.4 (VCS Program Guide) \*
- VCS Standard, Verra: Verified Carbon Standard, dated 4 October 2023, Version 4.5 (VCS Standard) \*
- VCS Validation and Verification Manual, Verra: Verified Carbon Standard, dated 19 October 2016, Version 3.2 (VCS VVM) \*

- VCS Project Description, 19-July-2021 reissued 5-November-2021 (VCS PD)
- U.S. Landfill Project Protocol Version 6.0, Climate Action Reserve, dated June 8, 2022 (Protocol)

Note:

\* - Denotes change from Proposal

## 6. Verification Team and Independent Reviewer

### 6.1 Roles and Responsibilities

**Lead Verifier/Technical Expert – Ben Gerber** – Mr. Gerber will lead the verification and is responsible for development of the verification plan. Mr. Gerber will review the risk assessment and evidence gathering plan, recalculation of raw data, data management and draft findings. Mr. Gerber will prepare and sign the verification opinion and verification report. Mr. Gerber will conduct an in-person site visit of the Project site.

**Verifier – Angela Kuttemperoor** – Ms. Kuttemperoor will develop and revise the verification plan and evidence gathering plan, develop a risk assessment, recalculate raw data, review management of data, and prepare draft findings and the draft verification report.

**Independent Reviewer/Technical Expert – Gordon Reusing** – Mr. Reusing will conduct an independent review of the risk assessment, evidence gathering plan, working papers, verification plan, verification report, and findings. Mr. Reusing will approve the issuance of the opinion.

### 6.2 Qualifications

The team member qualifications are detailed below.

| Ben Gerber, MCC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Role: Lead Verifier |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| <p><b>Professional Summary</b>   Ben holds a Master of Climate Change degree from the University of Waterloo. Ben has been a verifier since 2018, completing various GHG assurance work in numerous jurisdictions throughout North America including Ontario, Alberta, California and other voluntary markets. Ben has experience conducting GHG assurance work for a variety of industrial sectors including iron and steel production, electricity generation, manufacturing, petroleum importation, ethanol production and food production. Ben has also conducted offset verifications and validations under the Climate Action Reserve, Verra (VCS), and the American Carbon Registry.</p> <p>In addition to GHG assurance services, Ben has been a technical expert on project teams providing advisory services to Canadian provinces preparing to develop provincial offset programs. This work involved analysis of the various carbon offset programs and regulations in place throughout North America and the provision of recommendations related primarily to offset protocol applicability and program feature design.</p> |                     |

| Angela Kuttemperoor, E.I.T.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Role: Verifier |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| <p><b>Professional Summary</b>   Ms. Kuttemperoor is an Air Engineer-In-Training with GHD's Greenhouse Gas Assurances Services Team and has 2 years of experience in greenhouse gas verification work. Ms. Kuttemperoor has a Bachelor's of Environmental Engineering (co-op) from the University of Guelph. Ms. Kuttemperoor has experience as a verifier under the Ontario Emissions Performance Standards program and federal Output-based Performance Standards program. Ms. Kuttemperoor has expertise in voluntary offset project validations and verifications conducted under the Climate Action Reserve, American Carbon Registry and Verified Carbon Standard for landfill gas destruction and ozone-depleting substances destruction projects. Ms. Kuttemperoor has experience with compliance offset verifications for ozone-depleting substances conducted under the California Air Resources Board. Ms. Kuttemperoor has experience in verifications conducted under the Carbon Offsetting and Reduction Scheme for International Aviation.</p> |                |

**Professional Summary** | Mr. Reusing is a greenhouse gas (GHG) Lead Verifier, Lead Validator, and Independent Reviewer with extensive experience including GHG programmes in Alberta, British Columbia, Ontario, Quebec, Nova Scotia, California, and programs operated by the United Nations Framework Convention on Climate Change (UNFCCC) Clean Development Mechanism (CDM), The Gold Standard, The Climate Registry (TCR), the Carbon Disclosure Project (CDP), and Verra: Verified Carbon Standard (VCS). He has completed numerous GHG quantification studies for the oil and gas sector, including upstream, midstream and downstream facilities. Mr. Reusing has conducted GHG verifications as a Lead Verifier, Technical Expert and Independent Reviewer in many jurisdictions, including, but not limited to, the Alberta Carbon Competitiveness Incentive Regulation (CCIR), Ontario Regulations, British Columbia Greenhouse Gas Reduction (Cap and Trade) Act, (B.C. Reg. 272/2009), and Quebec Regulation R.Q.c.Q 2, r.15 (Quebec Regulation).

## 7. Project Description

GHD understands that the Project's reportable GHG emissions sources include sources associated with landfill gas destruction and electricity generation. The Project Activity consists of a landfill gas (LFG) collection and control (GGCS) system and an electricity generator set designed to capture and combust methane generated within the Davidson County municipal solid waste landfill and generate renewable electricity. A back up flare is also connected to the LFG collection system to combust the LFG, as needed, when the engine is not operational. The GGCS consists of 77 vertical extraction wells that are connected to an engine and flare. The original baseline scenario of the Project Activity consisted of a landfill gas collection system with passive venting.

### 7.1 Client Contact

Mr. Braulio Garcia and Ms. Lucy Huang are GHD's Client contacts for this verification.

## 8. Verification Scope

The following sections describe the scope of the verification.

### 8.1 Project Boundary

The Project is broken down into the following greenhouse gas Sources, Sinks and Reservoirs (SSRs) to be included, as defined in the Program's Protocol:

| SSR     | Baseline                                                                                       | Project                                                                                          |
|---------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| SSR 4   | Emissions from Waste Breakdown in Landfill – Methane (CH <sub>4</sub> )                        | Emissions from Waste Breakdown in Landfill – Methane (CH <sub>4</sub> )                          |
| SSR 5   | N/A                                                                                            | Emissions from Gas Collection System – Carbon Dioxide (CO <sub>2</sub> )                         |
| SSR 6   | N/A                                                                                            | Emissions from Supplemental Fuel – Carbon Dioxide (CO <sub>2</sub> ), Methane (CH <sub>4</sub> ) |
| SSR 7 * | Emissions from Baseline LFG Boiler Destruction – Methane (CH <sub>4</sub> )                    | Emissions from Project LFG Boiler Destruction – Methane (CH <sub>4</sub> )                       |
| SSR 8   | Emissions from Emissions from Baseline LFG Electricity Generation – Methane (CH <sub>4</sub> ) | Emissions from Project LFG Electricity Generation – Methane (CH <sub>4</sub> )                   |
| SSR 9   | Emissions from Baseline LFG Flare Destruction – Methane (CH <sub>4</sub> )                     | Emissions from Project LFG Flare Destruction – Methane (CH <sub>4</sub> )                        |

| SSR      | Baseline                                                                              | Project                                                                              |
|----------|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| SSR 10 * | Emissions from Upgrade of LFG – Carbon Dioxide (CO <sub>2</sub> )                     | Emissions from Upgrade of LFG – Carbon Dioxide (CO <sub>2</sub> )                    |
| SSR 11 * | Emissions from Baseline LFG Pipeline or other NG end-use – Methane (CH <sub>4</sub> ) | Emissions from Project LFG Pipeline or other NG end-use – Methane (CH <sub>4</sub> ) |

GHD understands that SSR 7: Emissions from LFG boiler destruction, SSR 10: Emissions from Upgrade of LFG and SSR 11: Emissions from LFG Pipeline or other natural gas (NG) end-uses are not applicable to the Project or current monitoring period.

## 8.2 Geographical and Operational Boundaries

The Project is located at the following address:

Davidson County Landfill  
1242 Old Highway 29  
Thomasville, NC  
27360  
United States

## 8.3 Monitoring and Crediting Period

The Project start date is May 20, 2009. The Project's first crediting period was under the CAR registry. The Project's first crediting period upon transfer to the Verra registry was January 1, 2015 until December 31, 2021 and was validated during a gap validation for the Project. The Project's second 7-year crediting period, as twice renewable, for the Project is from January 1, 2022 to December 31, 2028.

GHD understands that the Project has already been registered into the second crediting period, due to the gap validation covering both the first and second crediting periods under VCS. GHD understands that the Project's second crediting period does exceed the total allowable crediting period that was established during the Project's original registration under the CAR registry, of 10 years for each crediting period (twice renewable) starting on May 20, 2009 and ending on May 19, 2029, as required under VCS.

The monitoring period for this verification for the Project is from January 1, 2022 – December 31, 2022.

## 8.4 Use of this Report

The verification report will be prepared for the use of the Client and the Program.

References from GHD's Verification Report must use the language in which the opinion was issued, and reference the date of issuance of GHD's Verification Report, the applicable verification period and the associated program for which the verification was conducted. The GHG assertion provided by GHD can be freely used by Client for marketing or other purposes other than in a manner misleading to the reader. The GHD mark shall not be used by Client in any way that might mislead the reader about the verification status of the organization. The GHD mark can only be used with the expressed consent of GHD and then, only in relation to the specific time period verified by GHD.

## 8.5 Use of Information and Communication Technology

As part of the verification process, GHD may utilize information and communication technology (ICT) in accordance with IAF Mandatory Document for the use of Information and Communication Technology for Auditing/Assessment Purposes (IAF MD 4:2018) for various aspects of the verification, including conducting video/tele-conferencing with various personnel up to full virtual site visits.

The decision to use ICT is permissible if GHD and Client agree on using ICT. The agreed ICT method will be MS Teams, Skype, Zoom, Google Meet, or Webex. By accepting GHD's proposal, Client agreed to the use of the afore mentioned ICT methods and their associated information security, data protection and confidentiality measures. Any other ICT method(s) will be agreed to in writing (email) between GHD and Client prior to use. The parties will not agree to the use of an ICT method which either party does not have the necessary infrastructure to support. Throughout the entire verification process, including use of ICT, GHD will abide by the confidentiality procedures.

## **9. Site Visits**

### **9.1 Site Visit Requirements**

According to VCS Standard version 4.5, a site visit that includes a visit to facilities and/or project areas shall be conducted at:

- Validation and project crediting period renewal validation
- Verification under the following circumstances:
  - 1) The first verification of the project after validation
  - 2) Verifications that include project baseline reassessments
  - 3) Verifications that assess a project description deviation where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario

Due to the Project entering a renewed crediting period under the VCS program, GHD will conduct an in-person site visit to the Facility.

### **9.2 Site Visit Agenda**

The site visit, if applicable, will generally adhere to the following agenda. Deviations from the proposed agenda may be necessary to respond to data gaps and or issues identified during the verification process:

- Opening Meeting - Introduction and sign in, safety review, and overview of verification process and expectations (key personnel need to be present).
- Overview of Project operations, including description of key emission sources.
- Assessment of eligibility and additionality criteria against the Project and Project boundary.
- Review of monitoring practices, quality control and quality assurance procedures, GHG data and emission calculations, and any personnel activities that have a potential to impact materiality.
- Review of meter calibration certificates and accuracy specifications for key meters.
- Interviews with key personnel and review of data collection process from meter through distributed control system or transcription and data entry, as applicable.
- Walkthrough to view Project boundaries, physical infrastructure, and equipment and measuring devices.
- Closing Meeting – Review issues identified and next steps.

## 10. Verification Schedule

The following presents a draft verification schedule: The overall verification process is expected to take approximately 6 weeks:

- Submit Verification Plan to Client – November 17, 2023
- Data checks and recalculations of Monitoring Report – November – December 2023
- Site Visit – November 28, 2023
- Review of data management, document retention and record keeping program – November – December 2023
- Submit issues log to Client and opportunity for Client to address issues and, if required, resubmit Monitoring Report – November – December 2023
- Independent review by Independent Reviewer – December 2023
- Issue Draft Verification Report and Opinion – On or before December 25, 2023
- Issue Final Verification Report and Opinion \* – On or before December 25, 2023

\* Project Proponent is responsible for submission of project documents to VCS to complete registration and issuance request

## 11. Strategic Analysis

To understand the activities and complexity of the Project, and to determine the nature and extent of the verification activities, GHD has completed a strategic analysis. The strategic analysis involves consideration of the details of the Project Site and its operations, the Monitoring Report and its preparation, and the verification requirements per the Program. The information considered in the strategic analysis is documented in GHD's working papers and was used to inform the assessment of risks and the development of an evidence gathering plan.

## 12. Assessment of Risk and Magnitude of Potential Errors, Omissions or Misrepresentations

GHD conducted an assessment of the risk and magnitude of potential errors, omissions or misrepresentations associated with the Monitoring Report statement/assertion. GHD then identified areas where qualitative or quantitative errors could occur and assigned risks to the areas. The inherent and control risks were evaluated, and detection risks were established. The risks were identified as high, medium and low. The risk assessment was a key input to developing an effective evidence gathering plan.

## 13. Evidence-Gathering Plan

GHD has developed an Evidence Gathering Plan (EGP) for internal use based on review of the objectives, criteria, scope, and level of assurance detailed above, along with consideration of the strategic analysis and assessment of risks. The EGP is designed to lower the verification risk to an acceptable level and specifies the evidence (data and information) that will be reviewed as part of the verification in the evidence gathering activities. The EGP was reviewed and approved by the Lead Verifier prior to issuing this verification plan. The

EGP is dynamic and will be revised, as required, throughout the course of the verification. Any modifications to the EGP will be reviewed and approved by the Lead Verifier, with the final EGP to be completed prior to issuing the final verification report and opinion.

## **14. Quantitative Testing**

Quantitative data or raw data will be made available to GHD. GHD will use the data to recalculate and check the GHG emissions reductions calculations and assess the methodologies that were used in the development of the Monitoring Report.

## **15. Materiality Level**

Based on the reported emission reductions (i.e. less than 300,000 tonnes of carbon dioxide equivalent [tCO<sub>2</sub>e]), the Project Activity is classified as a project, therefore the materiality will be set at five (5) percent. In addition, a series of discrete errors, omissions, or misrepresentations of individual or a series of qualitative factors, when aggregated, may be considered material.

Materiality will also be assessed on a qualitative level, including conformance with the applicable Program and Protocol requirements. Non-conformance with Program requirements may be considered a material error.

## **16. Verification Methodology**

The following provides a general overview of the verification methodology that will be conducted.

### **Conflict of Interest (COI) and Independence**

GHD has undergone a thorough evaluation for conflict of interest (COI) and independence for this verification work. This included a review of other potential work conducted by GHD for Client and Project listed in the scope of work. We have confirmed that this verification work can be successfully completed without undue risk of impartiality and conflict of interest. We have assessed the following key aspects:

- Verification evaluation
- Team evaluation

GHD has rigorous COI and verifier competency evaluation procedures that are followed for every verification project. Our documented procedures ensure that all COI and independence criteria are properly evaluated. GHD's COI program ensures that both the company and the Project Team have no potential COIs.

GHD has also evaluated and approved our Verification Team's competencies. GHD sets competency requirements in terms of education, verification experience, and experience in the sector. GHD can attest that we have highly qualified staff with the appropriate technical expertise for the verification work.

### **Kick-Off Call**

Upon award of the contract, GHD will conduct a kick-off call between Client and the GHD project team to review the verification process and objectives, Project operations, project schedule, site visit schedule and information requests.

## **Risk-Based Approach**

The GHD Project Team will use a risk-based assurance approach to focus and to determine the detailed scope of the verification.

The key risks associated with the GHG emission estimates are the elements that are critical for ensuring that an inventory is free of material misstatements:

- Based on the information provided in the Monitoring Report, the GHD Project Team will identify the key risks associated with the assumptions and claims made, and the data sources used.
- The completeness, conservativeness, and accuracy of the underlying evidence for the assumptions/claims made, and data sources used, will be reviewed. Assumptions/claims and data sources that are well identified and discussed in the report, that are substantiated with information from reliable references, and which are sufficiently controlled through the QA/QC plan should thus be given less emphasis because of a lower level of risk.
- The results of this investigation shall then, together with the results of the review of other areas, give the necessary input for the verification opinion.

Risks can be classified in risk categories (e.g., High, Moderate, and Low). A risk may be high, moderate or low depending on the issue's potential to cause a misstatement of the emissions. In addition, a non-compliance with Regulation can form a high-risk situation.

GHD has extensive experience in risk assessments. The classification of risk as high, moderate or low is largely subjective and will require the GHD Project Team's expert judgement. The designated GHD Lead Verifier has a thorough understanding of the risks and uncertainties applicable to the assignment.

If an issue is classified as high risk, appropriate Project staff shall clarify the situation, explain how the risk is reduced, and provide more information.

## **Documentation Review and Emissions Reductions Recalculations**

GHD will review the information provided for the Project and will conduct recalculations of the baseline, project emissions and emissions reductions. GHD will assess the quantitative discrepancy based on the recalculations and determine whether there are any material issues.

The components of the document review and follow-up interviews are detailed below.

- Document Reviews:
  - Review of data and information to confirm the correctness and completeness of presented information
  - Cross-checks between information provided in the Monitoring Report and information from independent background investigations
  - Determine sensitivity and magnitude analysis for parameters that may be the largest sources of error
  - Comparison of reported emissions and emissions reductions with previous reporting period(s)
- Follow-up Interviews:
  - On-Site
  - Via telephone
  - Via email

The document review shall establish to what degree the presented Monitoring Report documentation meets the verification standards and criteria.

The GHD Project Team will interview Project staff in order to:

- Crosscheck information provided.
- Review data management and recording procedures
- Test the correctness of critical formulae and calculations

GHD will complete data checks from the data source(s) (meter, scale, etc.) through the plant data management system to the Monitoring Report. A sample of raw data will be collected for recalculation. Should errors or anomalies be identified that could lead to a material misstatement, GHD will request further raw data samples to assess the pervasiveness of the errors or anomalies. GHD will identify the source and magnitude of data or methodology errors or anomalies but, as a verification body, GHD cannot provide solutions to issues identified.

### **Issues Communications**

During the course of the document review and interviews, questions and clarifications may be identified by the Project Team; these will be communicated with Client either verbally, by email, or in an Issues Log. Client and/or Project staff will have an opportunity to respond to identified issues prior to the completion of GHD's draft and final verification reports. Material issues identified by GHD must be corrected by Client. It is expected that Client and/or Project Owner will respond promptly to issues raised by GHD. Extensive correspondence to address issues that require additional effort from GHD may result in extra costs to the verification and will be discussed with Client.

### **Independent Review**

GHD will conduct an independent review of the verification, which will include a review of findings, emission calculations and opinion developed by the verification team.

### **Documentation and Deliverables**

GHD will prepare the following deliverables to document the verification services provided:

- COI document, if required by the Program
- Statement of Qualification (included in this proposal)
- Verification Plan (prior to site visit and after receiving relevant information)
- Draft Verification Report
- Final Verification Report
- Verification Opinion (included in Verification Report and/or using Program template)

### **Support of Verification Report Findings**

GHD will support and uphold the findings of the verification if the report is subject to an audit by the Program. If the Program requires follow-up information that is determined to be significant in nature or outside of the original scope of work, GHD may require additional budget to cover the response(s).

## 16.1 Verification Activities

The following sections outline the activities that may be included in GHD's verification process.

### ***Information/Records to be Reviewed***

Information/records to be reviewed by GHD include the following:

- Monitoring Report
- GHG Assertion
- Operational and control procedures and records for ensuring GHG data quality
- Documentation of GHG Sources, Sinks and Reservoirs
- Documentation of quantification methodology
- Documentation of monitoring and measurement systems

### ***Data Assessment and Management Systems***

GHD will review data assessment and management system documentation that describes the process of data collection, entry, calculation and management. GHD will review the following:

- Selection and management of GHG data and information
- Processes for collecting, processing, aggregating, and reporting
- Systems and processes to ensure accuracy
- Design and maintenance of the GHG data management system, including systems and processes that support it

GHD will assess the effectiveness of the data assessment and management system and determine areas of risk.

### ***Collection of Evidence***

GHD will collect physical, documentary, and testimonial evidence to verify the Project.

### ***Error Checking/Testing***

GHD will independently calculate the final emission reductions using Client's raw data to ensure that the correct methodology and raw data was used.

During the verification process, GHD will consider both quantitative and qualitative information on emission reductions. Quantitative data is comprised of the Monitoring Report and supporting data. Qualitative data is comprised of information on internal management controls, calculation and transfer procedures, frequency of emissions reports, and review and internal audit of calculations/data transfers.

### 16.1.1 Verification Findings

The verification conclusion will be based on the interaction of the VCS Program principles as follows:

1. Relevance
2. Completeness
3. Consistency
4. Accuracy
5. Transparency
6. Conservativeness

If during the verification of the Project Activity, the Verification Team identifies findings that need to be addressed to confirm that the Project Activity meets the VCS requirements, the Lead Verifier will issue a CAR, CL, and/or a FAR, as appropriate, to the Client via a findings assessment. Iterations of these requests will continue until such a time as the Lead Verifier can adequately resolve or "close out" the identified CAR(s), CL(s), and/or FAR(s), as applicable.

Each of these procedures is discussed in further detail below.

### ***Corrective Action Request (CAR)***

A CAR is issued during a verification if the VVB has identified a material discrepancy or non-conformance that the Client must address. More specifically, the CDM provides a standard that the VVB can use for the issuance of CARs, as detailed below, based on Section 9.1.3.2 of the CDM Validation and Verification Standard:

- Non-compliance with the registered monitoring plan, the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents is found in monitoring and reporting and has not been sufficiently documented by the Project Participant(s), or if the evidence provided to prove conformity is insufficient.
- Modifications to the implementation, operation, and monitoring of the registered CDM project activity has not been sufficiently documented by the Project Participant(s).
- Mistakes have been made in applying assumptions, data or calculations of GHG emission reductions or net anthropogenic GHG removals that will impact the quantity of emission reductions or removals.
- Issues identified in a FAR during the validation to be verified during the verification or the previous verification(s) have not been resolved by the Project Participant(s).

The above issues could result in the expected emission reductions not being realized.

The Lead Verifier will resolve or "close out" CARs only if the Client modifies the Monitoring Report or provides adequate additional explanations or evidence that satisfies the Verification Team's concerns and the VCS requirements. GHD is unable to issue a Verification Representation prior to the resolution of all CARs. The Verification Team reports on all CARs in the findings assessment and Verification Report.

### ***Clarification Request (CL)***

In general, a CL is a request for additional clarification made by the Verification Team to the Client when the Project Activity reporting, lacks transparency, is unclear, and further information is needed to determine whether the applicable requirements are met.

The Lead Verifier will resolve or "close out" CLs only if the Client provides adequate additional explanations or evidence that satisfies the Verification Team's concerns and the VCS requirements.

### ***Forward Action Request (FAR)***

A FAR is a request made during the validation to "identify issues related to project implementation that require review during the first verification of the proposed CDM project activity."

The Lead Verifier will address any FAR(s) raised from the validation during the verification, as required. In addition, FAR(s) may also require review in subsequent verifications. The Verification Team will report on all FARs in the findings assessment and Verification Report.

## 17. Closure

The Verification Plan is considered to be a dynamic document that may require modification and adaptation to project conditions as encountered during the completion of the verification process.

All of Which is Respectfully Submitted,

GHD



Ben Gerber  
Climate Change Specialist

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Copy to: Gordon Reusing, GHD

## APPENDIX B: FINDINGS ASSESSMENT

Issues Log

Revision 9  
Date September 13, 2024

Project Number  
Program-Specific Project ID  
Client  
Facility Name  
Regulation / Program  
Reporting Year

Exported Copy

12589759  
VCS ID 2414  
Anew Environmental, LLC  
Davidson County Landfill  
Verra: Verified Carbon Standard (VCS)  
2022-01-01 to 2022-12-31

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 1         | CL                                                                                             | The raw data includes a half hour time interval on the first day of every month at 10am, resulting in the data being voided (greater than 15 minutes). There is also a greater than 15 minute gap on March 13 at 3am. Please clarify the reason for the time interval discrepancies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Historically this has just been how the data was collected every month, and since the data is voided we are taking the conservative approach and the project should not be negatively impacted from a verification standpoint. I have however reached out to see if there are any specifics.<br><b>Anew response:</b> The 9:45am lines for the first day of each month has been updated in "2020 Davidson ER Calcs (Engine) V1.4.xlsx" and "2020 Davidson ER Calcs (Flare) V1.3.xlsx." There should be 15 minute intervals now for the first of every month. The greater than 15 minute gap on March 13 at 3am is due to daylight savings, which is why you see that discrepancy but does not impact the data. | Closed | N                               | N                                           | N/A                                |
| 2         | CAR                                                                                            | The raw data for January is starting at 10am on January 1, 2022. Please note that from review of the 2021 verification files, data from 12am on January 1, 2022 is available.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The January 2022 data has been updated in "2022 Davidson ER Calcs (Flare) V1.1.xlsx" and "2022 Davidson ER Calcs (Engine) V1.2.xlsx" V1.2 of the MR has been updated to reflect these changes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Closed | N                               | N                                           | N/A                                |
| 3         | CAR                                                                                            | Emissions calculations are including some January 2023 data. Please note that if the Jan 1, 2022 raw data is beginning at 12am, it would be consistent to include the raw data up until December 31, 2022 12 AM, and remove the early 2023 data.<br><br><b>GHD response:</b> Please note that the raw data should include Jan 1, 2023 12AM, which will incorporate data for Dec 31, 2022 11:45PM to Jan 1, 2023 12AM. Note that this issue does not change the calculated ERs however slightly affects the average flow rate/methane values listed in the monitoring parameters tables in the Monitoring Report.<br><br><b>GHD response:</b> The last 15 minutes of data up till 12AM on Dec 31, 2022 does not seem to be included as described. Please clarify. However, this does not impact materiality and correcting is optional. | Early 2023 data has been removed from "2022 Davidson ER Calcs (Flare) V1.1.xlsx" and "2022 Davidson ER Calcs (Engine) V1.2.xlsx". V1.2 of the MR has been updated to reflect these changes. <b>Anew response:</b> This has been updated in "2022 Davidson ER Calcs (Flare) V1.2.xlsx" and "2022 Davidson ER Calcs (Engine) V1.3.xlsx". V1.3 of the MR has also been updated to reflect these changes. <b>Anew response:</b> Non material so leave as is.                                                                                                                                                                                                                                                       | Closed | N                               | N                                           | N/A                                |
| 4         | CL                                                                                             | Please clarify whether there were any data substitutions within the reporting period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | No flow or methane concentration substitutions were made.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Closed | N                               | N                                           | Appendix D                         |
| 5         | CAR                                                                                            | Please note that the Summary tab in flare ER calcs file is not updated with the current reporting period emissions reductions, as found in the engine ER calcs file.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Summary tabs for "2022 Davidson ER Calcs (Flare) V1.1.xlsx" and "2022 Davidson ER Calcs (Engine) V1.2.xlsx" have been updated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Closed | N                               | N                                           | N/A                                |
| 6         | CL                                                                                             | Please describe how the project emissions fuel consumption for the engine is estimated (for propane, diesel and gasoline).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Like the previous year, received email assertion claiming the propane, gasoline and diesel consumption for the 2022 reporting period. Please find the document uploaded onto Egnyte titled "Fossil Fuel 2022 Attestation" in the Project Emissions folder.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Closed | N                               | N                                           | Section 5.2                        |

|          |                    |                             |                                       |
|----------|--------------------|-----------------------------|---------------------------------------|
| Revision | 9                  | Project Number              | 12589759                              |
| Date     | September 13, 2024 | Program-Specific Project ID | VCS ID 2414                           |
|          |                    | Client                      | Anew Environmental, LLC               |
|          |                    | Facility Name               | Davidson County Landfill              |
|          |                    | Regulation / Program        | Verra: Verified Carbon Standard (VCS) |
|          |                    | Reporting Year              | 2022-01-01 to 2022-12-31              |

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 7         | CL                                                                                             | Please confirm whether the diesel fuel used is biodiesel. Project emissions calcs use the biodiesel emission factor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | This has been corrected to Distillate Fuel Oil No. 2 in V1.2 of the MR and "2022 Davidson ER Calcs (Flare) V1.1.xlsx" and "2022 Davidson ER Calcs (Engine) V1.2.xlsx"                                                                                                                                                                                                                                                                                                                                                 | Closed | N                               | N                                           | Appendix B                         |
| 8         | CL                                                                                             | Please provide evdidence that flow meters standardize temperatures to 60°F.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | As provided in the previous year, the flow meters are designed to configure to standard conditions of 60°F and 1 atm, and email confirmation of this has been uploaded to the Data folder on egnyte.                                                                                                                                                                                                                                                                                                                  | Closed | N                               | N                                           | Section 6.1                        |
| 9         | CL                                                                                             | Please clarify where the calibration certificates for the flow meters and methane analyzers demonstrate instrument calibration to 5%.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | This is indicated by the as founds and as lefts along with percentages on the calibration records.                                                                                                                                                                                                                                                                                                                                                                                                                    | Closed | N                               | N                                           | Section 6.2                        |
| 10        | CAR                                                                                            | Please clarify the reason for the large range in the hourly methane concentrations measured eg. 0 to >100 % based on the raw methane concentration data.<br><br><b>GHD response:</b> This is indicated in the raw data tab of the flare and engine ER calcs, column I (CH4). For example on 11/6/2022 from 1-1:45 AM, CH4 concentrations are >100% and data is not voided.<br><br><b>GHD response:</b> We observe that the associated methane concentrations are voided however, the associated flow for those days are not voided as evidenced by column S. This creates an immaterial discrepancy of 14 tons (0.02%) overreporting. Correcting is optional. | Please elaborate on where this is demonstrated. <b>Anew response:</b> The >100% CH4 concentrations are voided. Please see column L in the Raw Data tab of each calculator. Therefore this should not impact the quantification of the emissions. The reason for some variations in CH4 data is due to the system readjusting due to daylight savings changes, as well as instances where there is a power outage the gas analyzer will have to restart. <b>Anew response update:</b> Leave as immaterial discrepancy. | Closed | N                               | N                                           | N/A                                |
| 11        | CAR                                                                                            | Monitoring Report Thermocouple Temperature parameter table statement typo, where 'flare data has been used for 2022 crediting period' should be monitoring period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Closed | N                               | N                                           | N/A                                |
| 12        | CAR                                                                                            | Monitoring Report Power Generation parameter table states that kWh recorded every 30 minutes, however raw data indicates measuring of the data every 15 minutes. It also states that the data is from Power purchase reports from Duke Energy, however is it also measured with the Emerson ROCLINK 809, as with the other parameters eg. flow rate to destrcution device, methane concentration, etc.? If required, please also update Monitoring Plan section of Monitoring Report.                                                                                                                                                                         | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Closed | N                               | N                                           | N/A                                |
| 13        | CAR                                                                                            | Monitoring Report Fossil Fuel Usage parameter table should include fuels applicable to the reporting period including gasoline, diesel and propane and associated units. Units should align with 'value applied' section of table.                                                                                                                                                                                                                                                                                                                                                                                                                            | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Closed | N                               | N                                           | N/A                                |
| 14        | CAR                                                                                            | Monitoring Plan indicates that 'in 2022 until project conclusion, the data will be downloaded monthly and shared with Element Markets. In 2022 until project conclusion, the Project will seek emissions reductions from the flare and the engines.' Project Description document indicates that this requirement commenced with the 2021 reporting period.                                                                                                                                                                                                                                                                                                   | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Closed | N                               | N                                           | N/A                                |

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|----------|--------------------|-----------------------------|---------------------------------------|
| Revision | 9                  | Project Number              | 12589759                              |
| Date     | September 13, 2024 | Program-Specific Project ID | VCS ID 2414                           |
|          |                    | Client                      | Anew Environmental, LLC               |
|          |                    | Facility Name               | Davidson County Landfill              |
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|          |                    | Reporting Year              | 2022-01-01 to 2022-12-31              |

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 15        | CAR                                                                                            | <p>Monitoring Report section 5.1Baseline Emissions annual totals table and section 4.2Data and Parameters Monitored does not include parameters for flare including CH4Desti, Qflare. Please clarify or revise to add the parameters.</p> <p><b>GHD Response:</b> Note that in the LFGadjusted parameter table, it should include a flow quantity for the flare and engine separately or include the total for the flare plus engine. Description should change to 'adjusted volume of LFG fed to flare and engine.'</p> <p>As no parameter table is included for CH4Dest flare, either exclude the parameter table for CH4Destengine from the Monitoring Report or add in the paramter table for CH4Dest flare. The latest response from Anew notes that the CH4DestPR is covering the total methane destroyed either way. Please ensure that the revision also made consistently in the parameter table in Section 5.1 Baseline emissions.</p> | <p>The Q value has been corrected to identify as the Q for the project. Since the QPR and the CH4DestPR would account for the total GCCS, don't think it's necessary to include additional flare specific parameters.</p> <p><b>Anew Response:</b> The following have been revised in V1.4 of the MR. The engine quantity has been included in the LFGadjusted parameter table. The CH4Destengine has also been excluded from the report. All revisions have been reflected in the Section 5.1 table.</p> | Closed | N                               | N                                           | Section 6.4                        |
| 16        | CL                                                                                             | Please note that the the Monitoring Report title page and Section 1.3 Project Proponent has EM and not Anew. EM is also found throughout the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | We have not transitioned our name under Verra from EM to Anew just yet, so all of our documents will remain with the EM name for now. The only items updated are the anewclimate emails and website.                                                                                                                                                                                                                                                                                                      | Closed | N                               | N                                           | N/A                                |
| 17        | CL                                                                                             | Please confirm whether the appropriate contact and contact information as provided on the Monitoring Report title page and Section 1.3 Project Proponent is Heather Rogers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | This will remain as Heather Rogers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Closed | N                               | N                                           | N/A                                |
| 18        | CAR                                                                                            | Please note on the Monitoring Report title page that the Report ID and date of issue should align.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Closed | N                               | N                                           | N/A                                |
| 19        | CL                                                                                             | Please reconfirm the number of wells at the Project site as described in the Project details section of the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Yes, totals are correct and were confirmed at the site visit.                                                                                                                                                                                                                                                                                                                                                                                                                                             | Closed | N                               | N                                           | N/A                                |
| 20        | CAR                                                                                            | Please include the units of the quantity of emissions reductions stated in the Project details section of the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Closed | N                               | N                                           | N/A                                |
| 21        | CAR                                                                                            | On the Monitoring Report, Section 1.2Sectoral Scope and Project Type, please update project sector from Sector 1 Energy to Sector 1 Energy Industries (renewable/nonrenewable sources) in alignment with the VCS scope descriptions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | This has been corrected in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Closed | N                               | N                                           | N/A                                |
| 22        | CAR                                                                                            | In Section 1.6Project Crediting Period of the Monitoring Report, please update section to reflect current Project status and state the current Project crediting period. Please include reason for a validation of the renewed crediting not being required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>This has been updated in V1.3 of the MR.</p> <p>We have begun updating our other LFG projects within our portfolio and decided to make that change for this project as well. From version 5.0 to version 6.0 there aren't really any differences either apart from the opportunities for third crediting periods.</p>                                                                                                                                                                                  | Closed | N                               | N                                           | N/A                                |
| 23        | CL                                                                                             | Please clarify reason for transition to US Landfill verison 6.0 from version 5.0.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Closed | N                               | N                                           | N/A                                |
| 24        | CL                                                                                             | Please confirm the source of information for the quantity of emissions reductions associated with 'Contributions Over Project Lifetime' total as listed in Table 1: Sustainable Development Contributions of the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The value has been updated to reflect the total issued amount on the Verra Registry.                                                                                                                                                                                                                                                                                                                                                                                                                      | Closed | N                               | N                                           | N/A                                |
| 25        | CL                                                                                             | Please additionally clarify whether any local stakeholder consultation occurred for the current Project in Section 2.2 Local Stakeholder Consultattion of the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No additional consultations were required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Closed | N                               | N                                           | N/A                                |
| 26        | CAR                                                                                            | In Section 4.1Data and Parameters Available at Validation table of the Monitoring R                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | This has been added in V1.3 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Closed | N                               | N                                           | Section 6.4                        |

Revision

Date

9

September 13, 2024

Project Number

Program-Specific Project ID

Client

Facility Name

Regulation / Program

Reporting Year

12589759

VCS ID 2414

Anew Environmental, LLC

Davidson County Landfill

Verra: Verified Carbon Standard (VCS)

2022-01-01 to 2022-12-31

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                      | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 27        | CL                                                                                             | Please provide the permits and Tier 2 documentation associated with the Project                                                                                                                         | The permits have been uploaded to the 'Permits" folder and the Tier 2 documentation has been uploaded in the "Tier 2" folder.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Closed | N                               | N                                           | Section 3.5                        |
| 28        | CL                                                                                             | Please provide ownership and offset title documentation for the Project                                                                                                                                 | The ownership and offset title documentation has been uploaded to the "Ownership" folder.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Closed | N                               | N                                           | Section 2.3                        |
| 29        | CL                                                                                             | Please clarify how the estimate for Ex-ante emissions reductions/removals was obtained as listed in Section 5.4 of the Monitoring Report.                                                               | Based on high level estimates of what was produced in previous years in addition to our overall experience with LFG projects.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Closed | N                               | N                                           | N/A                                |
| 30        | CAR                                                                                            | Monitoring Report Section 5.1 Baseline Emissions includes value for the emissions reductions generated by the Proejct instead of the baseline emissions.                                                | This has been corrected to the baseline emissions in V1.4 of the MR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Closed | N                               | N                                           | N/A                                |
| 31        | CAR                                                                                            | Per the Project's gap validation report, per the requirements of the CAR Protocol, a separate Monitoring Plan document is required. Please provide or create per section 6 Monitoring, of CAR protocol. | The Project's gap validation wording for a separate Monitoring Plan was meant to indicate separate from the submitted PD for the gap validation. The Monitoring Plan has been included in a separate document from the PD, and is instead presented in the Monitoring Report. The CAR protocol also does not have any requirements to have a completely separate document for just the monitoring plan itself. Instead, the Monitoring Plan is included in the Monitoring Report. This has been true for all other projects we have successfully completed under the protocol. The Monitoring Report section has been bolstered with additional information to also address the finding #32 below. All to say, the wording was meant to be interpreted as separate from the PD submitted, but not necessarily a separate stand alone document entirely (included in the Monitoring Report). | Closed | N                               | Y                                           | Section 6/8.2                      |

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|----------|--------------------|-----------------------------|---------------------------------------|
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| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Explanation/Response                                                                                                                                                                                                                      | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 32        | CL                                                                                             | <p>Per Section 6.2 of CAR Protocol, please confirm the following requirements:</p> <p>All gas flow meters and continuous methane analyzers must be:</p> <ul style="list-style-type: none"><li>■ Cleaned and inspected on a regular basis, as specified in the project’s monitoring plan, with activities and results documented by site personnel. Cleaning and inspection procedures and frequency must, at a minimum, follow the manufacturer’s recommendations</li><li>■ Field checked for calibration accuracy by a third-party technician with the percent drift documented, using either a portable instrument (such as a pitot tube) or manufacturer specified guidance, at the end of – but no more than two months prior to or after – the end date of the reporting period30</li><li>■ Calibrated by the manufacturer or a certified third-party calibration service per manufacturer’s guidance or every 5 years when calibration frequency is not specified by the manufacturer</li></ul> | <p>This has been addressed in section 4.3 of V1.4 of the MR.</p>                                                                                                                                                                          | Closed | N                               | Y                                           | Section 6.2                        |
| 33        | CAR                                                                                            | Please note Monitoring Report Section 4.3.7Davidson Monitoring Equipment Calibration Schedule, title does not match the content of the section.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | This has been addressed in section 4.3.7 in MR V1.5                                                                                                                                                                                       | Closed | N                               | N                                           | N/A                                |
| 34        | CAR                                                                                            | Note that Monitoring Report Section 4.2Data and Parameters Monitored, kWh output parameter should be calculated based on outputs when engine is operational eg. excluding all 0 output values.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | This has been addressed in section 4.2 in MR V1.5.                                                                                                                                                                                        | Closed | N                               | N                                           | Section 6.4                        |
| 35        | CAR                                                                                            | Note that Monitoring Report Section 4.2Data and Parameters Monitored, BE parameter table, Description of measurement methods and procedures to be applied section, values to be updated based on current ER calculations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | This has been addressed in section 4.2 in MR V1.5.                                                                                                                                                                                        | Closed | N                               | N                                           | Section 6.4                        |
| 36        | CAR                                                                                            | <p>Note that Monitoring Report Section 4.2Data and Parameters Monitored, LFGadjusted parameter for engine as calculated by GHD is approx 30 000 000 scf higher than value in MR (2022- 225,716,830 to engine)</p> <p><b>GHD Response:</b> Please note that the value in the MR contains an error and does not match the latest ER calc file which has (255,908,505 scf) to the engine.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>This has been addressed in section 4.2 in MR V1.5. However, the value we are seeing is assoicated with the sum in cell E176 in the 5.2 Weekly tab. <b>Anew response update:</b> This has been corrected in section 4.2 in MR V1.6.</p> | Closed | N                               | N                                           | Section 6.4                        |
| 37        | CAR                                                                                            | Note that Monitoring Report Section 4.2Data and Parameters Monitored,Q parameter as calculated by GHD is approx 5000 Scf CH4 higher than value in MR (2022- 134,381,610). Value also found in the parameter table in Section 5.1 Baseline emissions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | This has been addressed in section 4.2 in MR V15. However, the value we are seeing is associated with cell F1110 in the 5.4 Daily Methane Flare tab and cell F1109 in the 5.4 Daily Methane Engine tab.                                   | Closed | N                               | N                                           | Section 6.4                        |
| 38        | CAR                                                                                            | Note that Monitoring Report Section 4.2Data and Parameters Monitored,EL PR parameter table is essentially duplicated, once with parameter EL PR and the other with parameter Electricity Purchased , both tables include value applied of 399 MWh.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | This has been addressed in section 4.2 in MR V1.5. The duplication has been removed.                                                                                                                                                      | Closed | N                               | N                                           | Section 6.4                        |
| 39        | CAR                                                                                            | Please update Appendix A and B of the Monitoring Report to reference latest versions of ER calcs for flare and engine.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | This has been updated in the Appendix in MR V1.6.                                                                                                                                                                                         | Closed | N                               | N                                           | N/A                                |

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|----------|--------------------|-----------------------------|---------------------------------------|
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|          |                    | Client                      | Anew Environmental, LLC               |
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| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
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| 40        | CL                                                                                             | GHD observes a 24 % increase in baseline emissions, 9% increase in electricity consumption and 38% decrease in fossil fuel consumption from the previous reporting period. Please provide reasons for the year over year changes.                                                                                                                                                                                                                                                                                                                                                                                                                                | There are a few things that may factor into this. Firstly, the previous year had some missing flow data that spanned over a few months, thus decreasing the credit generation and makes it seem as though this year has greater credit generation when that is not really the case. The increased baseline and electricity consumption may be a result of increased flow over the year as well. This is dependent on methane quality. If the facility sees a decrease in methane quality - the lower the methane value the more gas the engine will consume, thus increasing flows. The lower methane values is mostly weather/rain related. As for fossil fuel consumption, as demonstrated during the site visit, this may vary from year to year depending on site needs, but as was seen on site, very little fossil fuel will typically be used on site. | Closed | N                               | N                                           | N/A                                |
| 41        | CAR                                                                                            | Update Table 1: Sustainable Development Contributions of the Monitoring Report to contain most current calculated ERs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | This has been updated in Table 1 in MR V1.6.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Closed | N                               | N                                           | N/A                                |
| 42        | CAR                                                                                            | As per section 3.21.2 of VCS Standard, a project description deviation shall be applied when a methodology version is updated. Due to using an updated Landfill Gas Protocol (V6) from the V5 listed in the PD, please include details of the project description deviation, in Section 3.2.2 of the MR.                                                                                                                                                                                                                                                                                                                                                         | This has been updated in section 3.2.2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Closed | N                               | N                                           | N/A                                |
| 43        | CAR                                                                                            | Per sub points (3) & (4) under section 3.21.2 of VCS Standard, please update the current version of the PD for the project, to list the current version of the methodology (v6) being applied.<br><br><b>GHD Response:</b> Please note that updated PD has an updated revision number (8.0), but not an updated date of issue. Please revise.                                                                                                                                                                                                                                                                                                                    | The PD has been updated to reference the new methodology - see VCS-Project-Description-Davidson-v8.0.<br><b>Anew:</b> Updated with revised date of issue.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Closed | N                               | N                                           | N/A                                |
| 44        | CAR                                                                                            | MR template requirements require that sufficient information is provided on baseline, project and leakage emissions to allow the reader to reproduce the calculation. Complete details have not been provided in the MR which would allow reader to replicate the results. In the results tables provided in Section 5.1 and 5.2 of the MR, please include calculation results of all of the parameters used within the calculations.                                                                                                                                                                                                                            | This section has been updated to include additional parameter values. A note has also been added to refer to section 4.2 for related parameters as well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Closed | N                               | N                                           | N/A                                |
| 45        | CAR                                                                                            | Table 6.1 of the methodology requires demonstration of the operational status of each destruction device, which is not included in section 4.2 of the MR. Please include parameter 'operational activity' in section 4.2 of MR.                                                                                                                                                                                                                                                                                                                                                                                                                                  | Included additional disclaimer for operability in new rows for "Power Generation" and "Thermocouple Temperature" tables in section 4.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Closed | N                               | Y                                           | Section 6.4                        |
| 46        | CAR                                                                                            | As per VCS monitoring template, information on “the operation of the project activity(s) during this monitoring period, including any information on events that may impact the GHG emission reductions or removals and monitoring” is required to be provided under section 3.1. It was noted that there were corresponding periods of time when both flare and engines were non-operational (e.g. 15th January 2024 – 29th January 2024) resulting in impact on emission reduction from project activity, however, these events have not been described. Please update section 3.1 of the MR with all information required as per the VCS template guidelines. | Updated section 3.1 with additional details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Closed | N                               | N                                           | N/A                                |

|          |                    |                             |                                       |
|----------|--------------------|-----------------------------|---------------------------------------|
| Revision | 9                  | Project Number              | 12589759                              |
| Date     | September 13, 2024 | Program-Specific Project ID | VCS ID 2414                           |
|          |                    | Client                      | Anew Environmental, LLC               |
|          |                    | Facility Name               | Davidson County Landfill              |
|          |                    | Regulation / Program        | Verra: Verified Carbon Standard (VCS) |
|          |                    | Reporting Year              | 2022-01-01 to 2022-12-31              |

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                               | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 47        | CAR                                                                                            | The description of implementation status in section 3.1 of the MR, mentions the presence of two engine generator sets. However, as per registered PD, the project design includes one engine-generator set,. Please ensure that project components are clearly listed in section 1.1 and current implementation status of the project activity mentioned under section 3.1 of MR.                                                                                                                                                                                                                                                                          | This has been corrected in section 3.1                                                                                                                                                                                                                                                                                                                                                             | Closed | N                               | N                                           | N/A                                |
| 48        | CAR                                                                                            | in section 4.2 of MR, the source of data for fossil fuel consumption is ‘operation records’. No further details on measurement instruments, process and frequency have been mentioned. Please include all details with respect to monitoring of fossil fuel consumption in Section 4.2 of the MR.                                                                                                                                                                                                                                                                                                                                                          | Updated section 4.2 with additional details                                                                                                                                                                                                                                                                                                                                                        | Closed | N                               | N                                           | N/A                                |
| 49        | CAR                                                                                            | Calibration details of instruments used for monitoring various parameters during the current reporting period has not been provided. Please add details of calibration of all monitoring instruments used during the current reporting period in Section 4.3.2 Calibration Reporting of the MR.<br><br><b>GHD Response:</b> Please include identification numbers of the instruments and dates of calibration in this section as well as confirmation that the end-of-reporting period field check/third-party calibraiton was conducted for all instruments.                                                                                              | Updated section 4.3.2 with additional details<br><br><b>Anew:</b> A table has been included to show the calibration information requested.                                                                                                                                                                                                                                                         | Closed | N                               | Y                                           | Section 6.2                        |
| 50        | CAR                                                                                            | Please clarify information regarding DTE's instrument cleaning schedule in the MR. Per section 4.3.2 Calibration Reporting, it indicates that no calibration or cleaning/inspection requirements are specified by the manufacturer. Please confirm that cleaning is done on a regular basis as per Section 6.2 of the Protocol and provide information in the MR.                                                                                                                                                                                                                                                                                          | Updated section 4.3.2 with additional details                                                                                                                                                                                                                                                                                                                                                      | Closed | N                               | Y                                           | Section 6.2                        |
| 51        | CAR                                                                                            | The ex-ante estimated emission reduction value as per PD is 50,000 t CO2/ annum. However, 60,000 tons CO2 is reported and applied in the calculation of percent difference in section 5.4 of the MR. Please correct the ex-ante reported value in the MR and provide revised justification for the increase.<br><br><b>GHD Response:</b> GHD's re-calculation of the percent change (17.9%) is slightly lower than reported. Please review/revise.<br><br>If possible, please provide any more specific reasons for the large difference from the PD projected emissions, such as related to project implementation/operational activity for this project. | Updated in section 5.4<br><br><b>Anew:</b> The percent change has been updated. In the justification, referenced the terms flow and methane data to make it more specific. However, other than the fact the PD had high level estimates based on general information vs specific information in the actual reporting period, there isn't much other explanation as to the difference between them. | Closed | N                               | N                                           | N/A                                |
| 52        | CAR                                                                                            | Details of on-going stakeholder communication during current monitoring period have not been provided in the MR Section 2.2. Please include detials of communication with stakeholders as well as process of receiving continuous feedback undertaken during current reporting period per VCS Standard Section 3.18 and 3.18.5.                                                                                                                                                                                                                                                                                                                            | Added additional details in section 2.2.                                                                                                                                                                                                                                                                                                                                                           | Closed | N                               | N                                           | N/A                                |
| 53        | CAR                                                                                            | MR does not display page number, which is originally included in the VCS MR template. Please ensure that MR template is not altered and include document page numbers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Page numbers have been included                                                                                                                                                                                                                                                                                                                                                                    | Closed | N                               | N                                           | N/A                                |
| 54        | CAR                                                                                            | Dates are not mentioned in the required format throughout the MR. Please revise per VCS template requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Corrected formatting                                                                                                                                                                                                                                                                                                                                                                               | Closed | N                               | N                                           | N/A                                |
| 55        | CAR                                                                                            | Please note that the Version Number, Report ID and Date of Issue for the revised Monitoring Report are not updated within the title page section of the Monitoring Report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <b>Anew:</b> Title page has been updated with this information.                                                                                                                                                                                                                                                                                                                                    | Closed | N                               | N                                           | N/A                                |

|          |                    |                             |                                       |
|----------|--------------------|-----------------------------|---------------------------------------|
| Revision | 9                  | Project Number              | 12589759                              |
| Date     | September 13, 2024 | Program-Specific Project ID | VCS ID 2414                           |
|          |                    | Client                      | Anew Environmental, LLC               |
|          |                    | Facility Name               | Davidson County Landfill              |
|          |                    | Regulation / Program        | Verra: Verified Carbon Standard (VCS) |
|          |                    | Reporting Year              | 2022-01-01 to 2022-12-31              |

| Issue No. | Clarification Requests (CL) / Corrective Action Requests (CAR) / Forward Action Requests (FAR) | Issues / Questions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Explanation/Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Status | Possible effect on materiality? | Possible non-conformance with the Protocol? | Applicable Section of the Protocol |
|-----------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|---------------------------------|---------------------------------------------|------------------------------------|
| 56        | CAR                                                                                            | <p>It is noted that Section 3.1 of the Project Description Document (VCS PD) was updated to include reference of revised methodology version; however the change of methodology version has not been discussed under Project Deviation section of the VCS PD as required by section 3.21.2, subpoint 4 of VCS Standard, v4.5. Sections 4 and 5 of VCS PD related to quantification of emission reductions and monitoring have not been updated as per requirements of Version 6.0 of methodology. Please includes the change in version of applied methodology under the VCS PD project deviation section and update all relevant sections of the VCS PD (eligibility, GHG Quantification, monitoring, etc) to align with requirements of the current methodology version.</p> <p><b>GHD Response:</b> Please add a 'Project Description Deviation' heading within Section 3.6 Methodology Deviations of teh VCS PD and include the PD deviation details under that for additional clarity. Please update Sections 4 and 5 of the VCS PD to remove 'not applicable' and replace with the associated information from the US Landfill Protocol 6.0 as follows:</p> <p>a) For section 4.0, this would include the quantification methodologies and equations required per the Protocol (as included in the MR Section 5) however actual measured/calculated values as reported in the MR are not requiried. State that the information aligns with the updated methdoology verison 6 per the PD deviation, for clarity.</p> <p>b) For section 5.0, please update section 5.1 of of the VCS PD to align with details reported in Section 4.1 of the MR, Section 5.2 of the VCS PD ot align with section 4.2 of the MR. and Section 5.3 of the VCS PD to align with section 4.3 of the MR. The sections in the VCS PD can be the same as the MR except actual measured values are not to be included.</p> | <p>Acknowledged the methodology change in section 3.6 of the PD "VCS-Project-Description-Davidson V9.0_TRACKCHANGES.doc". Can you provide additional context for the updates required in eligibility, GHG quantification and monitoring? Based on our understanding, the protocol's V5.0 and V6.0 for these sections remained essentially the same. Under the published U.S._Landfill_Protocol_V6.0_Summary_of_Changes.pdf, there are no changes noted for GHG Quantification. There are two new notes about eligibility rules and Project Monitoring, where I have now added in notes to in the updated PD.</p> | Closed | N                               | N                                           | N/A                                |
| 57        | CAR                                                                                            | <p>A note is included in section 3.1 of the MR on intermittent instances of non-operation of flares and engines. However, details of non- operational hours have not been included.</p> <p>Please include value of non-operational hours during the monitoring period for each destruction device (monthly or annually aggregated values) in Section 3.1 of the MR.</p> <p><b>GHD Response:</b> Please update MR to include the value of non-operational hours per each destruction device, currently the reported value is not separated for each.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Added a line in section 3.1 of "2022 Monitoring Report V1.9_TRACKCHANGES.doc" to reference the number of hours where the devices were non-operational.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Closed | N                               | N                                           | N/A                                |

## APPENDIX C: DOCUMENTS REVIEWED

**APPENDIX C - DOCUMENT REVIEW REFERENCE LIST**  
**Anew Environmental, LLC**  
**Davidson County Landfill Project, 2022 Verification**

Page 1 of 1

| No. | Document Title                                                                | Description                                                                                                             |
|-----|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| 1   | 2022 Monitoring Report V1.0 10192023                                          | Monitoring Report and revisions                                                                                         |
|     | 2022 Monitoring Report V1.1 10262023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.2 11232023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.3 11302023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.4 12042023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.5 12132023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.6 12192023                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.7 02082024                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.8 07112024                                          |                                                                                                                         |
|     | 2022 Monitoring Report V1.9 09132024                                          |                                                                                                                         |
| 2   | VCS-Project-Description-Davidson V7.0                                         | Project Description and revisions                                                                                       |
|     | VCS-Project-Description-Davidson V8.0                                         |                                                                                                                         |
|     | VCS-Project-Description-Davidson V9.0                                         |                                                                                                                         |
| 3   | 2022 Davidson ER Calcs (Engine) V1.0                                          | Emissions Reductions Calculations for Engine                                                                            |
|     | 2022 Davidson ER Calcs (Engine) V1.1                                          |                                                                                                                         |
|     | 2022 Davidson ER Calcs (Engine) V1.2                                          |                                                                                                                         |
|     | 2022 Davidson ER Calcs (Engine) V1.3                                          |                                                                                                                         |
|     | 2022 Davidson ER Calcs (Engine) V1.4                                          |                                                                                                                         |
| 4   | 2022 Davidson ER Calcs (Flare) V1.0                                           | Emissions Reductions Calculations for Flare                                                                             |
|     | 2022 Davidson ER Calcs (Flare) V1.1                                           |                                                                                                                         |
|     | 2022 Davidson ER Calcs (Flare) V1.2                                           |                                                                                                                         |
|     | 2022 Davidson ER Calcs (Flare) V1.3                                           |                                                                                                                         |
| 5   | Davidson Data Jan-Mar 2023                                                    | Raw continous monitoring data - flow rate and methane concentration of landfill gas to flare and engine for destruction |
|     | DavidsonCredits 2 2022                                                        |                                                                                                                         |
|     | DavidsonCredits 3 2022                                                        |                                                                                                                         |
|     | DavidsonCredits 2022 Collated                                                 |                                                                                                                         |
|     | DavidsonCredits Jan 2022                                                      |                                                                                                                         |
|     | DVD 4 2022                                                                    |                                                                                                                         |
|     | DVD 5 2022                                                                    |                                                                                                                         |
|     | DVD 6 2022                                                                    |                                                                                                                         |
|     | DVD 7 2022                                                                    |                                                                                                                         |
|     | DVD 8 2022                                                                    |                                                                                                                         |
|     | DVD 9 2022                                                                    |                                                                                                                         |
|     | DVD 10 2022                                                                   |                                                                                                                         |
|     | DVD 11 2022                                                                   |                                                                                                                         |
|     | DVD 12 2022                                                                   |                                                                                                                         |
|     | Collated Data                                                                 |                                                                                                                         |
| 6   | January 2022                                                                  | Purchased electricity invoices                                                                                          |
|     | February 2022                                                                 |                                                                                                                         |
|     | March 2022                                                                    |                                                                                                                         |
|     | April 2022                                                                    |                                                                                                                         |
|     | May 2022                                                                      |                                                                                                                         |
|     | June 2022                                                                     |                                                                                                                         |
|     | July 2022                                                                     |                                                                                                                         |
|     | August 2022                                                                   |                                                                                                                         |
|     | September 2022                                                                |                                                                                                                         |
|     | October 2022                                                                  |                                                                                                                         |
|     | November 2022                                                                 |                                                                                                                         |
|     | December 2022                                                                 |                                                                                                                         |
| 7   | Fossil Fuel 2022 Attestation                                                  | Fossil Fuel Attestation                                                                                                 |
| 8   | WO2827_16DEC22_Cals_Davidson (1)                                              | 2022 Monitoring Equipment Calibrations                                                                                  |
|     | WO2827_16DEC22_AIT_Davidson (2)                                               |                                                                                                                         |
|     | WO2827_16DEC22_AIT_Davidson                                                   |                                                                                                                         |
| 9   | WO2592_CALS_Rev1                                                              | 2021 Monitoring Equipment Calibrations                                                                                  |
| 10  | Standardized Temp Confirmation (1)                                            | Standard Temperature Attestation                                                                                        |
|     | Davidson Gas Producers GHG Offset PSA - 10-20-2020_Redacted                   | Project Ownership documentation                                                                                         |
|     | Landfill Gas Rights Agreement, Davidson County_redacted_v2                    |                                                                                                                         |
|     | Power Purchase Agreement, Duke Energy redacted_v2                             |                                                                                                                         |
| 11  | Davidson Gas Producers Air Permit April 2015                                  | Project Permits                                                                                                         |
|     | Final Permit Title V 10408T01 04232020                                        |                                                                                                                         |
|     | Solid Waste Permit 2906_DavidsonMSWLF_PTO_Ph2_Area3_Cell1_FID1257854_20181126 |                                                                                                                         |
| 12  | Davidson County Tier 2 2019                                                   | Tier 2 documentation                                                                                                    |

## APPENDIX D: VERIFICATION REPRESENTATION

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VCS VERIFICATION DEED OF REPRESENTATION

BY

GHD SERVICES INC.

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DAVIDSON COUNTY LANDFILL

VCS ID: 2414

**THIS DEED OF REPRESENTATION** is made on September 13, 2024 <sup>1</sup>

**BY**

GHD Services, Inc., [Gordon.Reusing@ghd.com](mailto:Gordon.Reusing@ghd.com), 455 Phillip Street, Waterloo, Ontario N2L 3X2, Canada (as **VVB**)

**THIS DEED WITNESSES** as follows:

1. **INTERPRETATION**

1.1 In this Deed:

**"Accountholder"** means the holder of an account in the Verra Registry;

**"AFOLU"** means agriculture, forestry and other land use;

**"GHG"** means greenhouse gas;

**"GHG Program"** means a formal or organized program, scheme or arrangement for the recognition of activities leading to Reductions or Removals, or the crediting or issuance of instruments representing, or acknowledging, Reductions or Removals;

**"Project"** means DAVIDSON COUNTY LANDFILL;

**"Project Crediting Period"** means the time period for which GHG emission reductions or removals generated by the Project are eligible for issuance as VCUs (the rules with respect to the length of such time period and the renewal of the project crediting period are set out in the *VCS Standard*);

**"Project Ownership"** means the legal right to control and operate the project activities. Distinct from proof of right;

**"Project Proponent"** means the individual or organization that has overall control and responsibility for the Project, or an individual or organization that together with others, each of which is also a Project Proponent, has overall control or responsibility for the Project. The entity(s) that can demonstrate Project Ownership in respect of the Project. For the avoidance of doubt where an individual executes this Representation in their capacity as an authorized office holder of the company who is the Project Proponent, this Representation is made by the company, not the authorized office holder;

**"Reduction or Removal"** means a reduction or removal of one tonne of CO<sub>2</sub>e caused by the activities of a Project during the Project Crediting Period. Refer to the VCS Program Definitions for the full definitions for "GHG Emissions Reduction (Reduction)" or "Carbon Dioxide Removal (Removal)";

**"Validation/Verification Body" or "VVB"** means an organization approved by Verra to act as a validation/verification body in respect of providing validation and/or verification services in accordance with the VCS Program Rules;

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<sup>1</sup> **Drafting note:** Fill in yellow highlighted text. Remove all highlight formatting before submission.

**"VCS Program"** means the GHG Program operated by Verra which establishes the rules and requirements that operationalize the VCS to enable the validation of GHG projects and the verification of GHG emission reductions and removals;

**"VCS Program Rules"** means the rules and requirements set out in the *VCS Program Guide*, the *VCS Standard* and the other VCS Program documents, as such rules and requirements may be updated from time to time;

**"Verification Report"** means the written report of verification covering the Reductions or Removals generated by the Project from 1-JANUARY-2022 to 31-DECEMBER-2022 and prepared by the VVB in accordance with the VCS Program Rules; and

**"Verified Carbon Unit" (VCU)** means a unit issued by, and held in the Verra Registry representing the right of an Accountholder in whose account the unit is recorded, to claim the achievement of a Reduction or Removal that has been verified by a validation/verification body in accordance with the VCS Program Rules. Recordation of a VCU in the account of the Accountholder at the Verra Registry is *prima facie* evidence of that Accountholder's entitlement to that VCU.

**"Verra Project Database"** means the database that provides public access to all project and VCU information, including retirement and tracking of the AFOLU pooled buffer account (and serves similar functions for other Verra programs);

- 1.2 **"Verra Registry"** means the registry used by Verra that ensures all required Project and program documents have been submitted, maintains accounts of VCUs, issues and ensures the seamless flow of VCUs between registry accounts, and maintains custody and records of VCU legal ownership; Documents referred to in this Deed but not defined shall be the VCS Program documents, as updated from time to time, to which the relevant term relates.

## 2. REPRESENTATIONS

- 2.1 I am the Validation/Verification Body in relation to the verification of the Project.

- 2.2 I hereby represent and warrant that:

- 2.2.1 I have independently verified the Reductions **or Removals** generated by the Project in accordance with the VCS Program Rules;
- 2.2.2 In relation to any validation findings and conclusions provided in the Verification Report, I have independently validated the Project's compliance with the VCS Program requirements as set out in the VCS Program Rules; and
- 2.2.3 All factual information that I provide in relation to this Deed or have provided in the Verification Report is to the best of my knowledge following due inquiry true, accurate and complete in all material respects and I have not made or provided, and will not make or provide, false, fraudulent or misleading statements or information in relation to this Deed or the Verification Report.

- 2.3 I hereby acknowledge and agree that:

- 2.3.1 The following persons may rely on and enforce the terms of this Deed:
- (a) Verra;
  - (b) each person who is an Accountholder holding VCUs relating to the Project at any given time;

- (c) each person on whose behalf VCUs relating to the Project were retired by an Accountholder; and
  - (d) each of the successors and assigns of those persons listed in clauses 1.1.1(a), 1.1.1(b) or 2.3.1(c);
- 2.3.2 Neither Verra, nor any of its respective affiliates, directors, employees, agents, licensors and/or contractors, shall be liable with respect to any claims whatsoever arising out of this Deed or erroneous information within the Verification Report submitted to the Verra Registry for indirect, consequential, special, punitive or exemplary damages, including, without limitation, claims brought against Verra by Accountholders, Project Proponents, other Validation/Verification Bodies or any other third party. This paragraph shall apply regardless of any actual knowledge or foreseeability of such damages;
- 2.3.3 I have read, understood and will abide by the VCS Program Rules; and
- 2.3.4 Verra has an absolute right to amend any of the VCS Program Rules at any time and shall not bear any liability for loss or damage or liability of any kind sustained by the Validation/Verification Body or any other party involved in the Project in any way under the VCS Program as a consequence of such amendment.

### **3. GOVERNING LAW AND JURISDICTION**

This Deed is governed by and interpreted in accordance with English law, and the English courts shall have exclusive jurisdiction to settle any dispute arising from or connected with this Deed including a dispute regarding the existence, validity or termination of this Deed or the consequences of its nullity.

### **4. SOVEREIGN IMMUNITY**

To the extent that the Validation/Verification Body enjoys any right of immunity from set-off, suit, execution, attachment or other legal process with respect to its assets or its obligations under this Deed, the Validation/Verification Body waives all such rights to the fullest extent permitted by law.

### **5. COUNTERPARTS**

This Deed may be executed in any number of counterparts, each of which when executed and delivered is an original and all of which together evidence the same deed.

### **6. DELIVERY**

This Deed is delivered on the date written at the start of the Deed.

**EXECUTION PAGE<sup>2</sup>**

**This Deed has been executed as a deed and is delivered and takes effect on the date stated at the beginning of it.**

**Executed as a deed by GHD SERVICES INC. acting by a director/duly authorised signatory in the presence of a witness**

  
\_\_\_\_\_  
Signature of director/duly authorised signatory

ERIK MARTINEZ \_\_\_\_\_ Name of director (in BLOCK CAPITALS)

**In the presence of:**

  
\_\_\_\_\_  
Signature of witness

CAROL BRAVO \_\_\_\_\_ Name of witness (in BLOCK CAPITALS)

455 Phillip Street, Waterloo, \_\_\_\_\_ Address of witness

Ontario, N2L 3X2, Canada \_\_\_\_\_

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<sup>2</sup> **Drafting Note:** Execution blocks may be adjusted to reflect local law requirements, e.g., if a company seal is required in relation to the execution of a deed by a company pursuant to the laws in its jurisdiction of incorporation.