



VCS VERIFICATION REPORT

GUIZHOU XINTIAN CMM POWER
GENERATION PROJECT

(VCS PROJECT ID: 2762)



Report ID	CTISC-NC-CBN-202505007
Project title	Guizhou Xintian CMM Power Generation Project
Project ID	2762
Verification period	01-03-2022 to 31-03-2025
Original date of issue	05-12-2025
Most recent date of issue	09-03-2026
Version	01.1
VCS Standard	4.7

Version	
Client	Climate Bridge (Shanghai) Ltd.
Prepared by	CTI Certification Co., Ltd. Address: F8-A CTI Building, No.4 LiuXianSan Road, Xin'an Street, Bao'an District, 518101, Shen Zhen, China Tel: +86 10 65580012 Email: linshunrong@cti-cert.com Website: http://www.cti-cert.com/certification
Approved by	Zhou Lu
Work carried out by	Team Leader: Dezheng TONG Team Member: Qixin ZHANG Technical Reviewer: Shunrong LIN Expert for Technical Review: Shu'e JIANG

Summary:

CTI Certification Co., Ltd. (CTI) has performed the verification of the emission reductions reported for the project activity "Guizhou Xintian CMM Power Generation Project" (VCS Project ID: 2762) for the monitoring period 01-03-2022 to 31-03-2025, to review and determine the monitored reductions in GHG emissions that have occurred as a result of the project activity. These emission reductions are claimed as Verified Carbon Units (VCU) under the Verified Carbon Standard (VCS) version 4.7.

The verification was performed on the basis of VCS Program Guide version 4.4 and VCS Standard version 4.7 for the VCS projects, as well as criteria given to provide for consistent project operations, monitoring and reporting. The verification was conducted by means of document review, follow-up interviews and site inspections, and the resolution of outstanding issues. The assessment team identified 2 CLs, 1 CAR or FAR in this monitoring period.

In CTI's opinion, the GHG emission reductions reported for the project in the monitoring report (version 3.0 dated 09-03-2026) are fairly stated. The GHG emission reductions of the period were calculated correctly on the basis of approved methodology ACM0008 "Abatement of methane from coal mines" (Version 08.0) and the monitoring plan contained in the Joint PD&MR (version 02.1 dated 29-08-2022).

CTI does not assume any responsibility towards the issuance and utilization of the VCUs hereby verified and certified. Request for issuance of VCUs shall be made by the project proponent to an approved VCS Program Registry based on the requirements set out under the most recent version of the VCS Program Guidelines clause on VCS Registration.

The verification of reported emission reductions is based on the information made available to CTI and the engagement conditions detailed in this report. CTI cannot be held liable by any party for decisions made or not made based on this report.

Hence, CTI is able to certify that the emission reductions from the "Guizhou Xintian CMM Power Generation Project" during the period amount to 1,058,186 tCO₂e.

CONTENTS

1 INTRODUCTION	5
1.1 Objective	5
1.2 Scope and Criteria	5
1.3 Level of Assurance	6
1.4 Summary Description of the Project	6
2 VERIFICATION PROCESS	7
2.1 Method and Criteria	7
2.2 Document Review	7
2.3 Interviews	8
2.4 Site Visits	9
2.5 Resolution of Findings	11
2.6 Eligibility for Validation Activities	11
3 VALIDATION FINDINGS	12
3.1 Methodology Deviations	12
3.2 Project Description Deviations	12
3.3 New Project Activity Instances in Grouped Projects	18
3.4 Baseline Reassessment	18
4 VERIFICATION FINDINGS	19
4.1 Project Details	19
4.2 Safeguards and Stakeholder Engagement	21
4.3 Accuracy of Reduction and Removal Calculations	34
4.4 Quality of Evidence to Determine Reductions and Removals	50
4.5 Non-Permanence Risk Analysis	50
5 VERIFICATION OPINION	51
5.1 Verification Summary	51
5.2 Verification Conclusion	52
5.3 Ex-ante vs Ex-post ERR Comparison	52
APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION	54
APPENDIX 2: <ABBREVIATIONS>	55

APPENDIX 3: <COMPETENCE OF TEAM MEMBERS AND TECHNICAL REVIEWERS>	56
APPENDIX 4: <REFERENCES>	60
APPENDIX 5: <CORRECTIVE ACTION REQUESTS, CLARIFICATION REQUESTS AND FORWARD ACTION REQUESTS>	64
APPENDIX 6: <ENGAGEMENT WITH THE RELEVANT GOVERNMENT AUTHORITIES TO VERIFY THE AUTHENTICITY OF THE CARBON PROJECT>	70

1 INTRODUCTION

Climate Bridge (Shanghai) Ltd. has commissioned CTI Certification Co., Ltd. (CTI) to carry out the verification and certification of emission reductions reported for the "Guizhou Xintian CMM Power Generation Project" (the project) for the period 01-03-2022 to 31-03-2025. This report contains the findings from the verification and includes a verification statement for the verified carbon units.

1.1 Objective

Verification is the periodic independent review and ex-post determination by an accredited verification body of the monitored reductions in GHG emissions that have occurred as a result of the registered VCS project activity during a defined verification period.

A verification statement is the written assurance by a verification body that, during a specific period in time, a project activity achieved the emission reductions as verified.

The objective of this verification was to verify and provide a verification statement of emission reductions reported for the "Guizhou Xintian CMM Power Generation Project" for the period 01-03-2022 to 31-03-2025.

1.2 Scope and Criteria

The scope of the verification is:

- To verify that actual monitoring systems and procedures are in compliance with the monitoring systems and procedures described in the monitoring plan;
- To evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance about whether the reported GHG emissions reduction data is free from material misstatement;
- To verify that reported GHG emissions data is sufficiently supported by evidence.

The criteria of the verification are:

- VCS Program Guide (version 4.4) /64/
- VCS Standard (version 4.7) /63/ and other relevant requirements defined by Verra;
- The approved methodology ACM0008 (Version 08.0) /66/ applied by the project;
- All information and references relevant to the project activity's resulting in emission reductions.

The verification shall ensure that reported emission reductions are complete and accurate in order to be verified.

1.3 Level of Assurance

The verification report expresses a conclusion with a reasonable level of assurance about whether the reported GHG emissions reduction data is free from material misstatement. CTI applied a materiality threshold of 1% (for large projects with ER greater than 300,000 tCO₂e per year) with respect to emission or misstatements concerning reported quantities as per VCS standard (i.e. para 3.10.1 and 4.1.10 (4) of VCS Standard, version 4.7).

1.4 Summary Description of the Project

Sectoral Scope and Project Type

According to the VCS Program Guide (version 4.4) /64/ and Annex A of the Kyoto Protocol, the project is applicable under the following activity categories:

- Sectoral Scope: 1. Energy (Renewable/non-renewable); 8. Mining/mineral production
- Project type: CMM Power Generation Project

Project Background

Project title:	Guizhou Xintian CMM Power Generation Project
Project proponent:	Yonggui Energy Development Co., Ltd. Xintian Branch (China)
Project location:	Gantang Town, Qianxi County, Bijie City, Guizhou Province, People's Republic of China By checking online GPS map during site visit, it was verified the central coordinates of the project activity was 106°6'0.28" E and latitude of 27°6'22.20" N, consistent with that in the registered Joint PD&MR.
VCS Project ID:	2762
Applied methodology:	ACM0008 Version 08.0
VCS project crediting period:	26-09-2020 to 25-09-2030 (the 10-year fixed VCS crediting period)
VCU verification period:	01-03-2022 to 31-03-2025

2 VERIFICATION PROCESS

2.1 Method and Criteria

The verification was performed through means of the following three phases in accordance with the requirement of the Joint PD&MR (version 02.1 dated 29-08-2022), the applied methodology, and the VCS Standard (version 4.7) and other relevant VCS requirements:

- A desk review of the monitoring report and all support documents;
- Follow-up interviews with project stakeholders and site inspection;
- The resolution of outstanding issues and the issuance of the verification report and statement.

The following sections outline each step in more detail.

Based on the requirements of competency, experience and qualified sectoral scopes, CTI appointed a assessment team in accordance with CTI's internal procedures.

Function	Name	Technical competence	Task Performance*
Team Leader/Technical Expert	Dezheng TONG	1, 8, 10	☒ DR ☒ SV ☒ RP ☐ TR
Team Member	Qixin ZHANG	1,13	☒ DR ☒ SV ☒ RP ☐ TR
Technical Reviewer	Shunrong LIN	1, 3, 13, 14, 15	☒ DR ☐ SV ☐ RP ☒ TR
Expert for Technical Review	Shu'e JIANG	6, 8, 10	☒ DR ☐ SV ☐ RP ☒ TR

*DR=Document review; SV=Site visit; RP=Reporting; TR=Technical review

The verification of the emission reductions has assessed all factors and issues that constitute the basis for emission reductions from the project. These include:

- The emission reduction calculations and the relevant data records;
- The calibration and maintenance records for the monitoring instruments;
- The management systems to support the project operation and monitoring.

2.2 Document Review

In addition to the VCS monitoring report /1/, Joint PD&MR (version 02.1 dated 29-08-2022) /3/ and Emission Reduction Calculation Spreadsheet /2/, the following documents also were assessed as a part of the verification audit:

- Joint Validation & Verification Report, version 2.0 dated 30-08-2022 /4/;
- Monitoring Report of previous monitoring periods /5/;

- Verification Report of previous monitoring period /6/;
- Baseline and monitoring methodology ACM0008 applied by the project /66/;
- Relevant decisions, clarifications and guidance from the Verra /63/-/65/; and
- Other information and references relevant to the project activity.

The references used in the course of this verification are summarized in Appendix B.

During the desk review, CTI has applied standard auditing techniques to assess the quality of information provided. The following activities were performed:

- A review of the data and information presented to verify their completeness;
- A review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures; and

An 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.

2.3 Interviews

On 26-08-2025 ~ 27-08-2025, CTI visited Yonggui Energy Development Co., Ltd. Xintian Branch performed on-site assessment. The key personnel of the project were interviewed or assisted the assessment team. Main topics of the interview cover implementation of the project construction, applicability of selected methodology, implementation of project monitoring, emission reduction calculation, etc.

The key personnel interviewed are summarized in the table below:

Interviewed personnel	Role	Organization	Subject
Mr. Li Gang	Staff	Yonggui Energy Development Co., Ltd. Xintian Branch (Xintian coal mine)	Operation of the project activity; Implementation of the monitor plan of the project activity; Status of Xintian coal mine; Management of Xintian coal mine; Data collection and data achievement; Calibration of meters and equipment maintenance; No net harm assessment; SDGs contribution.
Mr. Guo Songlin			
Mr. Wang Yu			
Ms. Yang Cuihua			
Ms. Chen Enyan			
Ms. Pan Juanjuan			
Mr. Zhang Yu			
Ms. Shi Xianzhi			
Mr. Li Wenwu			
Mr. Jiang Hai	Staff	Local Environmental Protection Bureau	The impact of the project activity; The complaint by local stakeholders; The stakeholder consultation during the operation of the project activity; SDGs contribution.
Mr. Lu Shixin	Villager	Daxi Village, Gantang Town	
Ms. Xian Wuyan	Villager	Daxi Village, Gantang Town	
Mr. Chen Kai	Villager	Daxi Village, Gantang Town	
Ms. Wei Bangcai	Villager	Daxi Village, Gantang Town	
Ms. Li Fumei	Villager	Daxi Village, Gantang Town	
Ms. Cao Qin	Project Manager	Climate Bridge (Shanghai) Ltd.	Data collection and ER calculation.

2.4 Site Visits

The assessment team performed the on-site verification (Gantang Town, Qianxi County, Bijie City, Guizhou Province, People's Republic of China) on 26-08-2025 ~ 27-08-2025. The interviewed personnel and objective are listed in above table.

Duration of on-site inspection: 26-08-2025 ~ 27-08-2025				
No.	Activity performed on-site	Site location	Date	Team member
1.	Opening meeting	Project proponent's office in	26-08-2025	Dezheng TONG

	Interview with PP Representative, local officers, local residents and Operation Staff	the project site		Qixin ZHANG
2.	On-site inspection Project site, Xintian coal mine, equipments etc., interviewing stakeholders	Project site	26-08-2025	Dezheng TONG Qixin ZHANG
3.	Documents check	Project proponent's office in the project site	26-08-2025	Dezheng TONG Qixin ZHANG
4.	Finding Summary	Project proponent's office in the project site	27-08-2025	Dezheng TONG Qixin ZHANG
5.	Close Meeting	Project proponent's office in the project site	27-08-2025	Dezheng TONG Qixin ZHANG

During the on-site assessment, CTI has applied standard auditing techniques to assess the quality of information provided, the implementation and current situation of the project activity, evaluate data management, QA/QC system, project technology and equipment, training provided, and monitoring etc.

The following aspects of the project activity have been verified:

- An assessment of the implementation and operation of the registered project activity is as per the Joint PD&MR;
- An assessment of the status and management of the landfill site is as per the Joint PD&MR;
- A review of information flows for generating, aggregating and reporting the monitoring parameters; and
- Interviews with relevant personnel to determine whether the operational and data collection procedures are implemented in accordance with the monitoring plan in the Joint PD&MR;
- A cross-check between information provided in the monitoring report and data from other sources such as plant logbooks and electricity sale receipts;
- A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the Joint PD&MR and the selected methodology;
- A review of calculations and assumptions made in determining the GHG data and emission reductions; and
- An identification that quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters.

The data presented in the monitoring report were assessed by review of the detailed project documentation and production records, as well as by interviews with personnel from the project

proponent Yonggui Energy Development Co., Ltd. Xintian Branch and observation of collection of measurements, observation of established monitoring and reporting practices and assessment of the reliability of monitoring equipment. This has enabled the assessment team to assess the accuracy and completeness of reported monitoring results, to verify the correct application of the approved monitoring methodology and the determination of the emission reductions.

2.5 Resolution of Findings

A corrective action request (CAR) shall be raised, where:

- i. Non-conformities with the monitoring plan or methodology are found in monitoring and reporting, or if the evidence provided to prove conformity is insufficient;
- ii. Mistakes have been made in applying assumptions, data or calculations of emission reductions which will impair the estimate of emission reductions;
- iii. Issues identified in a FAR during validation to be verified during verification have not been resolved by the project proponent.

A clarification request (CL) shall be raised if information is insufficient or not clear enough to determine whether the applicable VCS requirements have been met.

The assessment team identified 2 CLs and 1 CAR in this monitoring period.

2.5.1 Forward Action Requests

A forward action request (FAR) is issued for actions if the monitoring and reporting require attention and/or adjustment for the next monitoring period.

CTI confirmed that there was no FAR identified in validation or previous verifications /4//6/, and no FAR was raised during this verification.

2.6 Eligibility for Validation Activities

The Joint PD&MR of the project activity was validated by TÜV NORD CERT GmbH on 30-08-2022 /3//4/ (<https://registry.verra.org/app/projectDetail/VCS/2762>). The proposed monitoring period 01-03-2022 to 31-03-2025 is the 2nd VCS verification.

As per 4.1.27 of VCS Standard version 4.7, Validation (including project crediting period renewal validation) and the first verification of a project (in a given project crediting period) may be undertaken by the same validation/verification body and a validation/verification body shall not verify more than six consecutive years of a project's GHG emission reductions or removals. CTI conducted 2nd (this) VCS verifications (with monitoring periods of 3.08 years, less than 6 years) of the project activity and therefore it is confirmed that 4.1.27 of VCS Standard version 4.7 have been met.

3 VALIDATION FINDINGS

3.1 Methodology Deviations

The validation process /4/ has assessed all factors and issues that constitute the basis for emission reductions from the project according to the applicable CDM methodology ACM0008 (Version 08.0) /63//66/. There was not any methodology deviation applied to this project. Details refer to section 4.1.

3.2 Project Description Deviations

By checking the registered Joint PD&MR /3/, it was mentioned that "It was planned that CMM power generators with a total capacity of 17.6 MW (2 × 0.5 MW, 7 × 0.6 MW, 2 × 1.2 MW and 10 × 1 MW) would be installed for the Project; power generators of 7.6 MW (2 × 0.5 MW, 7 × 0.6 MW, 2 × 1.2 MW) would be first installed, leaving the remaining 10 MW (10 × 1 MW) to be installed in a later stage depending on the CMM availability".

However, during site visit, it was confirmed that the power generators and the associated monitoring instruments have been upgraded. By checking JointPD&MR /3/ and the nameplates of equipment /19/, the detailed information of the previously used and currently installed equipment is listed as follows:

Equipment	Details	26-09-2020 to 28-02-2022 (MP1) 01-03-2022 to 31-03-2022 (MP2)	01-Apr-2022 to 31-03-2025 (MP2)
Power generators	Quantity	11	14
	Capacity	7.6 MW in total (2 × 0.5 MW, 7 × 0.6 MW, 2 × 1.2 MW), leaving the remaining 10 MW (10 × 1 MW) to be installed in a later stage.	14 MW in total (14 × 1 MW), leaving the remaining 3.6 MW to be installed in a later stage CMM supply is sufficient.
Bidirectional electricity meter	Quantity	1	2
	Position	At the power supply line out of the power plant	at the low voltage 10KV side of the 35kV substation
Gas analyzer	Quantity	1	3
	Position	CMM inlet of the power generators	CMM inlet (3 pipelines) of the power generators
Multiparameter	Quantity	1	3

Equipment	Details	26-09-2020 to 28-02-2022 (MP1) 01-03-2022 to 31-03-2022 (MP2)	01-Apr-2022 to 31-03-2025 (MP2)
measuring instrument for methane	Position	CMM inlet of the power generators	CMM inlet (3 pipelines) of the power generators

Through interviews with PP during the site visit and a review of the statement from PP /20/, it was verified that the equipment upgrades have improved the availability of CMM. Additionally, to match the upgraded equipment, the electrical system was also updated to connect to Guizhou Province's online power-monitoring system, and the coalbed-methane delivery pipeline was expanded from one to three pipelines to boost gas-transmission capacity.

As confirmed during the site visit and by checking Environmental Protection Completion Acceptance Monitoring Report Form /10/, the project has upgraded its generating units, raising total installed capacity from 7.6 MW to 14 MW. To support the up-rated units, the coal-bed-methane delivery infrastructure was expanded from a single pipeline to three, and the electrical system was synchronously upgraded to interface with Guizhou Province's online power-monitoring platform.

Pursuant to Article 37 of the Measures for the Administration of the Confirmation and Recordation of Investment Projects of Enterprises (2023 Revision)¹, a modification application is required only if the project involves: (1) a change in construction site; (2) a significant change in investment, construction scale or content; (3) material adverse economic, social or environmental impacts; or (4) any other major adjustment to the approved content.

As verified, the upgrade does not alter the construction site or plant boundary coordinates, and the current installed capacity remains within the 17.6 MW limit specified in the original approval, subject to future CMM availability, an additional 3.6 MW capacity may be considered. No additional land use or permanent structures are introduced. The generation technology (CMM-fired internal combustion engines) and operational model remain unchanged. Emission levels post-upgrade remain within the limits set out in the currently valid Pollutant Discharge Permit, and no new emission sources or sensitive receptors have been added. Additionally, Expert Review Opinion on Environmental Protection Acceptance for the Project /21/ concluded that the project has passed the environmental protection acceptance.

In conclusion, none of the conditions under Article 37 of the Measures is met. Therefore, the proposed equipment upgrade does not require re-approval or amendment of the original project approval.

Additionally, the assessment team evaluated the impacts on the applicability of the methodology, the additionality, or the appropriateness of the baseline scenario as required by paragraph 3.21 of VCS Standard version 4.7.

¹ https://www.gov.cn/zhengce/2021-12/01/content_5752774.htm

Methodology ID	Applicability condition	Assessment and conclusion
ACM0008 version 08.0	This methodology applies to project activities that aim for the use and/or destruction of the methane extracted/obtained from a working or abandoned coal mine(s). The project activities include any of the following methods to treat the methane captured: (a) The methane is destroyed without energy production, for example through flaring; (b) The methane is used to produce energy. This may include electricity, heat, vehicle fuel, etc.	After equipment upgrades, the project still utilizes extracted low-concentration coal mine methane (CMM) to generate electricity. Waste heat from the generators is recovered by waste heat boilers to provide free hot water to the coal mine. Therefore, the project meets condition (b), and the deviation has no impact on this criterion.
ACM0008 version 08.0	Emission reductions can be claimed for displacing or avoiding energy from other sources	Following equipment upgrades, the project still utilizes extracted low-concentration coal mine methane (CMM) to generate electricity, replacing an equivalent amount of electricity that would otherwise be supplied by the CSPG grid, which is dominated by fossil fuel-fired power plants. Waste heat from the generators is recovered by waste heat boilers to provide free hot water to the coal mine, replacing an equivalent amount of heat energy previously supplied by waste coal-fired boilers. No emission reductions are claimed from waste heat recovery, which is conservative. Consequently, the applicability condition is met and the deviation has no impact on this criterion.
ACM0008 version 08.0	Methane used in the project activities shall be extracted using the following techniques: (a) Surface drainage boreholes to capture coal bed methane (CBM) or methane from open cast mines; (b) Underground boreholes in the mine, surface goaf wells, underground boreholes, gas drainage galleries or other goaf gas capture techniques, including gas from sealed areas, to capture coal mine methane (CMM);	By checking Environmental Protection Completion Acceptance Monitoring Report Form /10/ and via on-site investigation, it was validated the project uses CMM from "Underground boreholes in the mine to capture pre mining CMM" and "surface goaf well, underground boreholes, gas drainage galleries or other goaf gas capture techniques, including gas from sealed areas, to capture coal mine methane (CMM)". After the equipment upgrade the activity still does not extract or utilise coal-bed methane (CBM), ventilation-air methane (VAM) or abandoned-mine methane (AMM). Consequently, condition (b) remains satisfied and the deviation has no bearing on this criterion.

	(c) Mine ventilation system to dilute and remove ventilation air methane (VAM); (d) Surface drainage boreholes in the case of sealed abandoned mines or ventilation system in the case of ventilated mines to capture abandoned mine methane (AMM).	
ACM0008 version 08.0	The remaining share of the methane, to be diluted for safety reason, may still be vented.	By checking Statement from Xintian coal mine /58/, and interviewing the project owner and staff from Xintian coal mine during site visit, it was validated the project involves the capture and utilization of CMM for energy use at the operational Xintian coal mine where the baseline is the total atmospheric release of the methane. The remaining unused share of the methane is vented for safety reasons. Following the equipment upgrade, the baseline scenario remains unchanged. Consequently, the applicability condition is satisfied and the deviation has no bearing on this criterion.
ACM0008 version 08.0	In the case of open cast mines, in addition to the conditions listed above, project activities should meet the following requirements: (a) The mines should have had a working mining concession for at least three years prior to the start of project; (b) Only pre-mining drainage from wells placed within the area to be mined are eligible for crediting; (c) For the calculation of emission reductions, all provisions for CBM should be followed for the open cast mine methane.	During onsite investigation and interviewing staff from Xintian coal mine, it is confirmed the Xintian coal mine the project involved is not a case of open cast mine. The applicability condition is therefore irrelevant and the deviation has no bearing on this criterion.
ACM0008 version 08.0	The methodology does not apply to project activities with any of the following features: (a) Capture/use of virgin coal bed methane, e.g. methane extracted from coal seams for which there is no valid coal	By checking Environmental Protection Completion Acceptance Monitoring Report Form /10/, and via on-site investigation and interview, it is confirmed the project involves utilization of the extracted low concentration coal mine methane (CMM) to produce energy. The project does not involve capture/use of virgin

	mining concession; (b) Use CO₂ or any other fluid/gas to enhance CBM drainage before mining takes place; (c) Methane extraction from abandoned mines that are flooded due to regulation.	coal bed methane, the extraction or utilization of CBM, or the use of CMM from open cast mining, or abandoned mines. Following equipment upgraded, the situation remain unchanged. Applicability condition is not relevant and the deviation has no bearing on this criterion.
ACM0008 version 08.0	The methodology does not apply to project activities that involve use and/or destruction of CBM or OCM if the baseline scenario identification resulted in partial use and/or destruction of CBM or OCM.	By checking Environmental Protection Completion Acceptance Monitoring Report Form /10/, and via on-site investigation and interview, it is confirmed the project does not involve use and/or destruction of CBM or OCM. Following equipment upgraded, the situation remain unchanged. Applicability condition is not relevant and the deviation has no bearing on this criterion.
ACM0008 version 08.0	Emission reductions due to the use and/or destruction of CBM or OCM cannot be claimed if surface drainage to capture CBM or methane from open cast mine(s) is used within the project boundaries prior to the implementation of the project activity.	By checking Environmental Protection Completion Acceptance Monitoring Report Form /10/, and via on-site investigation and interview, it is confirmed the project does not involve use and/or destruction of CBM or OCM. Following equipment upgraded, the situation remain unchanged. Applicability condition is not relevant and the deviation has no bearing on this criterion.
Additionality	/	According to the Joint PD&MR /3/, the annual operating hours of the project activity were confirmed as 4,660 hours during the first monitoring period (pre-upgrade). Following the equipment upgrades, the installed capacity was increased to 14 MW. However, due to insufficient gas supply, 3–4 generating units remained idle each month during the second monitoring period. As recorded in the CMM Power Generation Statistics Table /26/, this resulted in an actual operating capacity of approximately 11 MW and corresponding annual operating hours of 4,941 hours. Both recorded figures are below the design value of 5,000 hours stipulated in the EIA Report /8/. According to Joint PD&MR /3/, the pre-upgraded IRR (after tax) was 3.61%. Environmental Protection Completion Acceptance Monitoring Report Form /10/ shows the total static investment was changed from 92,950,900 CNY to 92,000,000CNY. PP recalculated the IRR to reflect this change and also updated the annual O&M cost to match the new installed

		capacity. The assessment team reviewed the IRR spreadsheet and confirmed that the post-upgrade IRR (after tax) is 5.95%, below the 8% after-tax benchmark specified in the Economic Assessment Method and Parameters for Construction Projects (2006 Edition) (NDRC & Ministry of Construction, Fa Gai Tou Zi [2006] No. 1325) /14/. The assessment team has reviewed the IRR spreadsheet and confirmed the following: the total static investment has been updated, and the operation and maintenance (O&M) costs for Monitoring Periods 1 and 2 have been adjusted in line with the actual operating capacity. For the purpose of financial evaluation, a conservative approach has been applied, using pre-upgrade electricity generation and annual operating hours corresponding to the designed capacity of 17.6 MW, as documented in the Joint PD&MR. Based on this method, the calculated post-upgrade after-tax IRR is 5.95%, which remains below the 8% after-tax benchmark specified in the Economic Assessment Method and Parameters for Construction Projects (2006 Edition) (NDRC & Ministry of Construction, Document No. Fa Gai Tou Zi [2006] 1325) /14/. Additionally, the current IRR of 5.95% is based on actual investment and O&M costs only during the two monitoring periods, with the remaining years still using the 17.6 MW design values for electricity generation and operating hours. If the remaining 3.6 MW were to be installed later, total investment would rise while all other assumptions - including generation and hours - would remain unchanged at the original design levels. This would further lower the IRR below the current 5.95%. Consequently, it is concluded that the equipment upgrade does not compromise the additionality of the project activity.
Baseline Scenario	/	By checking Statement from Xintian coal mine /58/, and interviewing the project owner and staff from Xintian coal mine during site visit, it was validated the project involves the capture and utilization of CMM for energy use at the operational Xintian coal mine where the baseline is the total atmospheric release of the methane. The remaining unused share of the methane is vented for safety reasons. Following the equipment upgrade, the baseline scenario

		remains unchanged.
--	--	--------------------

The assessment team confirmed that the deviation has no impact on the applicability of the methodology, the additionality, or the appropriateness of the baseline scenario; that it is appropriately described and justified; and that the project remains in conformance with the VCS Program rules.

3.3 New Project Activity Instances in Grouped Projects

The project was not a grouped project; hence this clause is not applicable.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

Not applicable as the project does not undergo baseline reassessment during the monitoring period.

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:
Audit history	The audit history mentioned in the MR has been confirmed to be correct through checking registered Joint PD&MR (version 02.1 dated 29-08-2022) /3/ and information on the VERRA website (https://registry.verra.org/app/projectDetail/VCS/2762).
Double counting and participation under other GHG programs	CTI checked public information from the UNFCCC website, REC Mechanism database of China, Chinese Emission Trading System, Gold Standard Registry and interviewed with project proponent during site visit, it is confirmed that except VCS scheme, the project has not been participated or been rejected under any other GHG programs since validation. The same has been confirmed through interviewing with project proponent and statement issued by project proponent.
No double claiming with emissions trading programs or binding emission limits	As per Notice on Strengthening the Management of Greenhouse Gas Emission Reports for Power Generation Enterprises during 2023–2025 issued by Ministry of Ecology and Environment of the People's Republic of China on 14-Oct-2023 /54/, China has a national emissions trading scheme covering thermal power generation industry (including Thermal Power Generation, Cogeneration and Biomass Power Generation with Fossil Fuel Blending). And as per Notice on the Issuance of the Work Plan for the Expansion of the National Carbon Emission Trading Market to Cover the Steel, Cement, and Aluminum Smelting Industries issued by Ministry of Ecology and Environment of the People's Republic of China on 20-03-2025 /55/, China marks a significant step in the expansion of the national carbon emission trading market, which will include the steel, cement, and aluminum smelting industries. Therefore, the assessment team confirmed that the project activity is not included the mandatory emission control scheme and there is no emission cap enforced for the project owner. Besides, the assessment team checked the REC Mechanism database of China, Chinese Emission Trading System (Chinese ETS) and Chinese Certified Emission Reduction Mechanism, and found that the project activity is not accredited / registered under REC mechanism, Chinese ETS, or CCER mechanism. Thus, the assessment team concluded that the project activity is not involved on other emissions trading programs or other binding limits.
No double claiming with other forms of environmental credit	The assessment team checked the REC Mechanism database of China, I-REC database and confirmed that there are no other forms of environmental credits applied or issued for the project activity. The emission reduction resulted from the project during this monitoring period would only apply for VCUs.

Supply chain (scope 3) emissions double claiming	The purpose of the project is to utilize the extracted low concentration coal mine methane (CMM) to produce electricity, replacing same amount of electricity that will be supplied by CSPG dominated by fossil fuel-fired power plants. For this project activity, GHG emission reductions come from avoiding CO₂ emissions from those fossil fuel-based power plants connected to the grid and avoiding GHG emissions from releasing low concentration coal mine methane (CMM) into atmosphere at Xintian coal mine, and does not happen in a supply chain. Therefore, it is confirmed that the Supply Chain (Scope 3) Emissions are not applicable for the project activity.
Sustainable development contributions	By checking registered Joint PD&MR (version 02.1 dated 29-08-2022) /3/, Staff Roster /16/, China's National Plan on Implementation of the 2030 Agenda for Sustainable Development and 17 SDGs defined by UNDP, interviewing with stakeholders during site visit, the assessment team confirmed that the project activity would contribute sustainable development in the region and China's Sustainable Development Goals (SDG). The specific sustainable development goals that the project activity could achieve have been listed as follows: - SDG13 "Take urgent action to combat climate change and its impacts": the project aims to utilize low-concentration coal mine methane (CMM) that would otherwise be vented into the atmosphere, thereby reducing greenhouse gas emissions and air pollution in the surrounding area, minimizing odour nuisance, and lowering health risks for local residents. This contributes to achieve one of China's stated sustainable development priorities "Actively adapt to climate change and strengthen resistance capacity to climate risks in agriculture, forestry, water resources and other key fields, as well as cities, coastal regions and ecologically vulnerable areas". During this monitoring period, total GHG emission reductions were 1,058,186 tCO₂e, which has been verified through checking ERs Calculation Spreadsheet /2/. By checking emission reductions of previous monitoring period through VERRA website, it is confirmed that the cumulative emission reductions were 1,408,659 tCO₂e since the project start date. - SDG 9 "Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation": the project utilizes low-concentration coal-mine methane (CMM) that would otherwise be vented for electricity generation, reducing CO₂ emissions per tonne of raw coal and replacing high-carbon captive generation. This strengthens climate-resilient energy infrastructure, lowers the carbon intensity of the coal value chain to advance sustainable industrialisation, and commercialises a low-concentration CMM safe-firing technology that is now ready for replication. By checking Raw Coal Production Statistics Table /24/, it was verified the mine produced 3,513,359 t of raw coal and the project achieved 1,058,186 tCO₂e of verified emission reductions during this monitoring period, lowering the mine's CO₂ intensity by 0.30 tCO₂e per tonne of coal produced. - SDG 8 "Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all":

	by checking Staff Roster /16/, it was verified the project activity increases 30 long term employment opportunities (15 males and 15 females) for the management, operation and maintenance of the power plant. This contributes to one of the China's actions for promoting sustainable developing, "Increase labor force participation rate through implementation of the classification policy. Vigorously enforce the Law on Promotion of Employment".
Additional information relevant to the project	- Leakage management for AFOLU projects According to the methodology, the leakage of the project is zero, thus the leakage management is not applicable to the project. - Commercially sensitive information No commercially sensitive information has been excluded from the public version of the project description. - No additional relevant information that may have a bearing on the eligibility of the project, the reductions or removals, or the quantification of the project's reductions or removals.

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	The assessment team has checked the registered Joint PD&MR /3/ and confirm that the stakeholder identification has been conducted as per the VCS standard version 4.7. People or groups who might be impacted by a project, including residents nearby the project site and workers in the project activity and Xintian coal mine. Local residents can also be workers of Xintian coal mine. Therefore, local residents nearby the project site, the local government, and employees of the project and the Xintian coal mine, are identified as stakeholders of this project.
Legal or customary tenure/access rights	By checking EIA Approval /9/ and Project Approval /7/, it is confirmed the project activity has been approved by local government. The assessment team confirmed that as per Measures for Public Participation in Environmental Impact Assessment /53/, the government gives the legal right to the project proponent to access the stakeholders and consider their advice. On the other hand, people are voluntary to participate the consultation. By checking Xintian Coal Mine Methane Cooperative Development Agreement signed between Yongmei Group Co., Ltd. and the Project Proponent /12/, it is confirmed that PP has the legal right to use the collected CMM. Therefore, it was verified the project activity does not violate any legal or customary tenure/access rights to territories and resources, including collective and conflicting rights, held by stakeholders, indigenous people (IPs), local communities (LCs), and customary rights holders.
Stakeholder diversity	By checking registered Joint PD&MR /3/, Joint Val&Ver Report /4/, it

and changes over time	was verified the stakeholder involved in the project has been correctly identified in the Joint PD&MR, who were relevant local residents, workers, government officials. Consider there are no change for the project since the validation and the project is implemented as the design mentioned in the registered Joint PD&MR /3/, the stakeholder diversity and changes over time is highly unlikely. The same kind of stakeholders have been identified for this monitoring period, which is verified to be reasonable.
Expected changes in well-being	Following expected changes in well-being has been identified and confirmed to be correct through the site visit: Economic well-being – as justified in the above sections, the project activity will increase employment opportunities for the operation of the project activity. Environmental well-being – as justified in the above sections, the project aims to utilize low-concentration coal mine methane (CMM) that would otherwise be vented into the atmosphere, thereby reducing greenhouse gas emissions and air pollution in the surrounding area, minimizing odour nuisance, and lowering health risks for local residents.
Location of stakeholders	The project is located at Gantang Town, Qianxi County, Bijie City, Guizhou Province, People's Republic of China. PP identified local residents nearby the project site, local authorities and staff working for the project activity and Xintian coal mine as stakeholders, which is considered to be reasonable by the assessment team.
Location of resources	By checking Xintian Coal Mine Methane Cooperative Development Agreement signed between Yongmei Group Co., Ltd. and the Project Proponent /12/, it is confirmed that PP has the legal right to use the collected CMM. By checking EIA Approval /9/ and Project Approval /7/, it is confirmed the project activity has been approved by local government. Therefore, it is confirmed that the territory and resources occupied by the project fall within the boundaries of the Xintian coal mine, where no identified stakeholders legally own or use.

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	Via site inspection, it is confirmed during the monitoring period, a opinion book /18/ has been put in the office of the project, which is used to collect stakeholders' views about the project. Through interviewing the project proponent during site visit, it is confirmed the comments in the book were checked on a regular basis, and the responses to comments would be recorded in case of any inputs/grievances. In addition, review of the questionnaire records /17/ shows that PP conducts stakeholder surveys on a periodic basis.
Date(s) of stakeholder consultation	By checking Joint Val&Ver Report /4/, it was verified local stakeholder consultation surveys were conducted in August 2019

	and April 2021 by the project proponent. A survey was conducted through distributing and collecting responses to a questionnaire to collect comments from local residents. The questionnaire includes a brief summary of the project activity, including the project design and other relevant key information. In total 50 questionnaires were collected respectively in August 2019 and April 2021. By checking Stakeholder Consultation Questionnaires /17/, it was verified a stakeholder consultation survey has been conducted by PP on 10-04-2022, 01-05-2023 and 01-06-2024 during this monitoring period. Local residents nearby the project site, the local government, and employees of the project and the Xintian coal mine participated in the survey. Additionally, a opinion book /18/ has been put at the project proponent office to collect comments from stakeholders.
Communication of monitored results	By checking Stakeholder Consultation Questionnaires /17/, it was verified no negative comments has been received during Stakeholder Consultation Survey on 10-04-2022, 01-05-2023 and 01-06-2024 during this monitoring period. Through checking the opinion book /18/ during site visit, it is confirmed a Grievance Book has been put at the project proponent office. No comments has been identified in the Grievance Book during this monitoring period. Through checking records from the project proponent and via interviewing staff from the project proponent, it is confirmed no comments has been received in email or phone call channel. The same has been confirmed through interviewing stakeholders during site visit. Besides, via interviewing with staff from local Environmental Protection Bureau during the site visit, it is confirmed by the assessment team that during the implementation stage of this monitoring period, local authority has conducted spot checks on the implementation of the project periodically as per the request from the local governments' regulations, there were no negative comments or issues from the local stakeholders during this monitoring period, the project passed all the periodic spot checks by local government.
Consultation records	By checking Joint Val&Ver Report /4/ and Stakeholder Consultation Questionnaires /17/, it was verified questionnaires have been distributed to collect comments from stakeholders. During site visit, it was verified a opinion book was put in the office of the project, which is used to collect stakeholders' views and comments about the project. PP checked the comments in the book, email or phone call channel on a regular basis, and record responses in case of any inputs/grievances. Every stakeholder can make comments by opinion book or contact information.
Stakeholder input	By checking Joint Val&Ver Report /4/, Stakeholder Consultation Questionnaires /17/ and opinion book /18/, and interviewing staff from local Environmental Protection Bureau during the site visit, it is confirmed there were no negative inputs received during both construction and operation phase.

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	By checking Xintian Coal Mine Methane Cooperative Development Agreement signed between Yongmei Group Co., Ltd. and the Project Proponent /12/, it is confirmed that PP has the legal right to use the collected CMM. By checking EIA Approval /9/ and Project Approval /7/, it is confirmed the project activity has been approved by local government. By checking Grievance Book /18/ and interviewing stakeholders during site visit, it is confirmed no negative comments has been received during this monitoring period. Therefore, it was verified the project activity does not violate any legal rights held by stakeholders, indigenous people (IPs), local communities (LCs), and customary rights holders.
Outcome of FPIC discussion	As mentioned above, the project has been approved by Chinese government. Xintian Coal Mine Methane Cooperative Development Agreement has been signed between Yongmei Group Co., Ltd. and the Project Proponent /12/ for legally collect and use CMM by the project activity. As verified through checking Grievance Book /18/ and interview stakeholders during site visit, it was verified Indigenous people (IPs), local communities (LCs), and customary rights holders have no negative comments for the construction and operation of the project up to the end of this monitoring period. Therefore, it was verified the project has not encroached on land, relocated people without consent, and forced physical or economic displacement during this monitoring period.

4.2.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Grievance received and steps taken to resolve the grievance including the outcomes of the resolution	Not applicable as no inputs/grievances have been received for the project during both construction and operation phase of the project. As justified in 4.2.2 section of this report, a opinion book /18/ has been put in the office of the project to collect stakeholders' views about the project, which can be easily accessible to stakeholders for ongoing consultation.
Grievance redress procedure	During site visit, it was verified a Grievance Book has been located at the office of the project. Grievance redress procedure described in Monitoring Manual /40/, has been checked and confirmed via onsite interview: Stakeholders can register any comments or grievances at any time by telephone, email or via the Opinion Book, and get an immediate response from the project proponent. The project proponent will review the Opinion Book once a week. After receiving comments or grievances, the project proponent will contact the stakeholder within

3 days and propose a solution and mediation plan within one week with the relevant government agency; if necessary, the project proponent will address the issue through legal means such as arbitration and courts. The entire process shall be dealt with within 30 days.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No comments received from public channel.	Not applicable as no comments received from public channel.	Not applicable as no comments received from public channel.

4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

As confirmed with the project proponent during site visit, no new entity is involved in project design or implementation. By checking Business License /11/, it was verified the PP was established on 17-01-2011 and the project has been running since operation start (i.e. 26-09-2020) without any problems. By checking Operation and Maintenance Records /57/ and interviewing operation staff during site visit, the assessment team confirmed the project has operated without any accidents since its commissioning. Therefore, the assessment team deemed PP has expertise or experience in implementing similar project activities and engaging communities.

On-site training for the related procedures including monitoring, recording and reporting was verified to be in place and their implementation was confirmed by interview with the key operators and observing the operation. Competence and training records /15/ of on-site personnel engaged in measurement of parameters were presented during verification and found to be in order.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	By checking EIA Approval /9/ and Project Approval /7/ issued by government, it is confirmed the project has been approved by Chinese government, in this sense, the project meets all the requirement of regulation and laws set up by Chinese government in aspect of environment, health and safety. The project aims to utilize low-concentration coal mine methane (CMM) that would otherwise be vented into the atmosphere, thereby reducing greenhouse gas emissions and air pollution in the surrounding area, minimizing odour nuisance, and lowering health risks for local residents. By checking Staff Roster /16/, it was verified the project offers job

	opportunities for local residents. Therefore, it was verified no natural or human induced risks to stakeholders' well being have been identified.
Risks to stakeholder participation	As mentioned above, the project has been approved by Chinese government. In this sense, the project meets all the requirement of regulation and laws set up by Chinese government in aspect of environment, health and safety. The assessment team confirmed that as per Measures for Public Participation in Environmental Impact Assessment /53/, the government gives the legal right to the project proponent to access the stakeholders and consider their advice. Local stakeholders have no negative comments for the construction and operation of the project. The same has been confirmed when interviewing stakeholders during site visit. Therefore, it is confirmed no risks has been identified to stakeholder participation.
Working conditions	As mentioned above, the project has been approved by Chinese government. In this sense, the project meets all the requirement of regulation and laws set up by Chinese government in aspect of environment, health and safety. the project aims to utilize low-concentration coal mine methane (CMM) that would otherwise be vented into the atmosphere, thereby reducing greenhouse gas emissions and air pollution in the surrounding area, minimizing odour nuisance, and lowering health risks for local residents. By checking EIA Report /8/, it was confirmed the project proponent has established and improved the safety production responsibility system; formulated safety production rules and regulations and operating procedures; formulated and implemented the safety production education and training plan. These measures ensure the effective implementation of safety production investment, eliminate safety hazards in time, and carry out the standardization construction of safety production. The same has been confirmed during site visit. Therefore, the assessment team deemed the staff from the project are working in safety working environment. And no risks identified for working conditions.
Safety of women and girls	As mentioned above, the project has been approved by Chinese government. In this sense, the project meets all the requirement of regulation and laws set up by Chinese government in aspect of environment, health and safety. In order to protect the physical and mental health of minors, China issued "Prohibition of Child Labor Regulations" /47/, prohibiting employers from recruiting minors under the age of 16. Also, China published "Law of the People's Republic of China on the Protection of Women's Rights and Interests" /52/ and "Law of the People's Republic of China on the Protection of Minors" /43/. Therefore, the Project will not expose women and girls to further risks or hazards.

	By checking Staff Roster /16/, it was verified no girls have been recruited, also equal payment has been made to women and men. Therefore, it is confirmed no risks has been exposed to safety of women and girls.
Safety of minority and marginalized groups, including children	China has strict prohibition for child labour. Thus, the project does not involve child labour neither in construction nor at operation of project activity. In the HR policy is also mentioned that no child labour will be entertained. The same was confirmed by the assessment team through checking Staff Roster /16/ and on site interview. Besides, in order to protect the physical and mental health of minors, the State Council promulgated the "Prohibition of Child Labor Regulations" /47/, prohibiting employers from recruiting minors under the age of 16. By checking Staff Roster /16/ and on site interview, the assessment team was able to confirmed that no minors under the age of 16 were employed.
Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers)	During construction phase, the air pollution, noise, wastewater and solid wastes caused by project construction have been treated according to the measures in EIA Report. The EIA Report has been approved by local government /8//9/. The assessment has been provided in the Joint Val&Ver Report /4/. The assessment team also checked the National Pollutant Discharge Permit Management Information Platform – Public Portal², administered by Ministry of Ecology and Environment of P.R.China, and confirmed that PP of the project activity has obtained Pollutant Discharge Permit. As provided in Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges³ issued by State Council of the People's Republic of China (Order of the State Council of the People's Republic of China, No. 736, issued 24-01-2021), a pollutant discharge permit shall be issued to a pollutant discharge entity which meets the following conditions: (1) Obtaining an approval document for the environmental impact report (form) of the construction project in accordance with the law, or having completed filing procedures for the environmental impact registration form. (2) The discharge of pollutants shall comply with the requirements of the pollutant discharge standards, and the discharge of key pollutants shall comply with the requirements of the technical standards for applying for and issuing pollutant discharge permits, the approval document for the environmental impact report (form), and the requirement for the control of the total volume of key pollutants discharged; and if the production and operation venue of the pollutant discharge entity is located in a key area or river basin which fails to meet the national environmental quality standards, the pollutant discharge entity shall also comply with the special

² <https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=25b870c1426448f3a31059f291c08b2b>

³ https://www.gov.cn/gongbao/content/2021/content_5587653.htm

requirements of the relevant local people's government for improving ecological and environmental quality.

(3) The use of a pollution prevention and control facility can achieve the compliance with the requirements for permitted concentration of discharge or conformity with the feasible technology for pollution prevention and control.

(4) The monitoring loci, indicators, and frequency, among others, of the self-monitoring plan comply with the national self-monitoring standards.

The above English translation about Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges is reproduced from the Lawinfochina website⁴, which is jointly operated by the Peking University Legal Translation Research Center and Peking University Yinghua (Beijing) Technology Co., Ltd., and is recognized as an authoritative source.

Considering the project proponent has obtained a pollutant discharge permit, the assessment team deems the project's pollution performance during this monitoring period satisfies the four conditions set out in Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges.

During the operation period, all the mitigation measures proposed by EIA Report /8/ has been implemented and the project activity has acquired Expert Review Opinion on Environmental Protection Acceptance for the Project /21/ after completing construction. Via site investigation, interviewing stakeholders, as well as checking EIA Report /8/, EIA Approval /9/ and Expert Review Opinion on Environmental Protection Acceptance for the Project /21/, and Environmental Protection Completion Acceptance Monitoring Report Form /10/, it was verified the following key aspects have been addressed:

Air quality

During the operation period, the main atmospheric pollutants produced by CMM utilization and power generation are CO₂, SO₂, NO_x, total suspended particulate (TSP) etc. The emission concentrations of SO₂, NO_x and TSP meet the standard requirements of Period V of the national standard Limits and Measurement Methods for Exhaust Pollutants from Compression Ignition and Gas Fueled Positive Ignition Engines of Vehicles (GB 17691-2005).

Water quality

During operation period, the waste water discharged from the water circulating pump in the project is collected through the circulating pool and recycled for use without discharge; the waste water produced by the generator cooling system is discharged into the circulating pool after cooling by the cooling tower, and is recycled without discharge. Wastewater collected by the sedimentation tank is used for dust-controlling road spray or vegetation watering without discharge. The sewage has been collected by the septic tank and reused.

Noise

⁴ <https://www.lawinfochina.com/display.aspx?id=34777&lib=law&sharetype>

During operation period, the noise is generated by generators, circulating cooling tower and water pump. The noise emission of the project meets the requirements of the second class standard of Industrial Enterprise Boundary Noise Emission Standard (GB12348-2008), and the environmental noise of residential areas meets the requirements of the second class standard of Acoustic Environment Quality Standard (GB3096-2008).

Solid Waste

During operation period, the solid waste of the project is mainly dust residue, oily solid waste, waste oil and domestic waste. Domestic solid waste is collected in bins and transported to the landfill site. Dust and sludge collected from the gas filters and the sedimentation tanks are collected and then removed by staff members from the sanitation department. Harmful or dangerous solid waste, such as waste oil, are stashed temporarily in a storage room before being transported and treated by a qualified company.

4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	China has published "Labor Law" /44/ and "Law of the People's Republic of China on the Protection of Women's Rights and Interests" /52/ and "the Special Provisions on Labor Protection for Women Workers" /48/, which could prohibit such phenomena. It has been confirmed during onsite inspection and interviews that project proponent strictly obeys the anti-discrimination rules set out in the law. No discrimination has occurred or will occur.
Sexual harassment	It has been confirmed during onsite inspection and interviews that project proponent strictly obeys the anti-discrimination rules set out in the law. No sexual harassment has occurred or will occur.
Gender equity in labor and work	It has been confirmed during onsite inspect and interviews that project proponent strictly obeys the law, i.e. "Law of the People's Republic of China on the Protection of Women's Rights and Interests" /52/, "Labor Contract Law of the People's Republic of China" /45/ and "the Special Provisions on Labor Protection for Women Workers" /48/. Besides, China also ratified relevant ILO core conventions on equality, namely Equal Remuneration Convention (Convention No 100) /51/. By checking Staff Roster /16/ and interviewing staff from the project proponent during site visit, it was confirmed male and female employees enjoy equal pay for equal work.
Forced labor	It has been confirmed during onsite inspect and interviews that project proponent strictly obeys the law, i.e. "Law of the People's

	Republic of China on the Protection of Women's Rights and Interests" /52/, "Labor Contract Law of the People's Republic of China" /45/ and "the Special Provisions on Labor Protection for Women Workers" /48/. Besides, China also ratified relevant ILO core conventions on equality, namely Equal Remuneration Convention (Convention No 100) /51/. By interviewing staff from the project proponent during site visit, it was validated male and female employees enjoy equity in labor and work.
Child labor	It has been confirmed during onsite inspect and interviews that project proponent strictly obeys the law, i.e. Labor Law of the People's Republic of China /44/, and there is no forced labor.
Human trafficking	It has been confirmed during onsite inspect and interviews that project proponent strictly obeys the law, i.e. Labor Law of the People's Republic of China /44/, "Law of the People's Republic of China on the Protection of Minors" /43/ and "Prohibition of Child Labor Regulations" /47/. Besides, no child labor was identified from the Staff Roster /16/.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
N.A.	China has published relevant regulations and practice in line with the treaties, such as the "Constitution of the People's Republic of China" /49/, the "Labor Law of the People's Republic of China" /44/, the "Anti-Discrimination Law of the People's Republic of China" /50/, the "Law of the People's Republic of China on the Protection of Minors" /43/, to make sure that no action can be taken against human rights. Especially with regard to gender equality, China has published the "Law of the People's Republic of China on the Protection of Women's Rights and Interests" /52/ and the "Special Provisions on Labor Protection for Women Workers" /48/, which stipulates detailed enforcement rules to provide support and benefits to women. It has been confirmed during onsite inspect and interviews that project proponent strictly obeys the law and the legal rights and interests of all employees are protected. No indigenous peoples or tribal peoples are treated differently from the majority of local people. Therefore, it was verified the project does not involve any conflict with livelihood of local people and respect all human rights. Stakeholder consultation had been carried out to take their opinion. The host country prohibits discrimination on the basis of a person's race, sex, religion, place of birth, or social status.

4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Preservation and protection of cultural heritage	As per the EIA Report /8/ of the project activity, it is clear that the project site is not a cultural heritage site and the construction of the project activity does not require or cause any form of physical or economic relocation of peoples. The project has received the necessary approvals (EIA Approval /9/ and Project Approval /7/) from the local authorities. Therefore, cultural heritage is not involved in the project.

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Disputes over rights to territories and resources	By checking Xintian Coal Mine Methane Cooperative Development Agreement signed between Yongmei Group Co., Ltd. and the Project Proponent /12/, it is confirmed that PP has the legal right to use the collected CMM. By checking EIA Approval /9/ and Project Approval /7/, it is confirmed the project activity has been approved by local government. Therefore, the assessment team confirmed no territories accessed by the project was owned or customarily accessed by the stakeholders and no disputes has been occurred during this monitoring period and this section is not applicable.
Respect for property rights	By checking Xintian Coal Mine Methane Cooperative Development Agreement signed between Yongmei Group Co., Ltd. and the Project Proponent /12/, it is confirmed that PP has the legal right to use the collected CMM. By checking EIA Approval /9/ and Project Approval /7/, it is confirmed the project activity has been approved by local government. Based on the above justifications, the assessment team confirmed no territories accessed by the project during its lifetime was owned or customarily accessed by the stakeholders and the project does not involve in the property rights of stakeholders, IPs, LCs, and customary rights holders during its lifetime.

4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	Not applicable as the project does not involve the property rights of stakeholders, IPs, LCs, and customary rights holders during its lifetime and thus no benefit sharing plan is involved between PP and

	the stakeholders.
Benefit sharing during the monitoring period	Not applicable as the project does not involve the property rights of stakeholders, IPs ⁵ , LCs ⁶ , and customary rights holders during its lifetime and thus no benefit sharing plan is involved between PP and the stakeholders.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	By checking EIA Report /8/ approved by government and via on site investigation, it is confirmed the project does not alter biodiversity and is not located in high conservation value areas, and there are no rare and valuable plant and animal species. Therefore, it is confirmed the project activity does not adversely impacted habitats for rare, threatened, or endangered species during the monitoring period.
Soil degradation and soil erosion	The project utilizes the extracted low concentration coal mine methane (CMM) to produce electricity. The waste heat from the generators will be recovered by waste heat boilers to provide free hot water to the coal mine. Therefore, it is confirmed the project does not adversely impacted soil during the monitoring period.
Water consumption and stress	The project utilizes the extracted low concentration coal mine methane (CMM) to produce electricity. The waste heat from the generators will be recovered by waste heat boilers to provide free hot water to the coal mine. By checking EIA Report /8/ approved by government and via site investigation, it is confirmed small amount of water will be used in cooling system, which will be recycled. Therefore, it is confirmed the project activity will not cause water consumption stress.

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed that the project does not involve habitats for rare, threatened, or endangered species.
Areas needed for habitat connectivity	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed the project does not involve habitats for rare, threatened, or endangered

⁵ IPs means Indigenous Peoples

⁶ LCs means local communities

	species and will not impact areas needed for habitat connectivity.
--	--

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Habitats for rare, threatened, and endangered species	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed the project does not involve habitats for rare, threatened, or endangered species.
Areas for habitat connectivity	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed the project does not involve habitats for rare, threatened, or endangered species and will not impact areas for habitat connectivity.

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed that the project does not involve introduction of any species.

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed that the project does not involve any existing invasive species.

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Invasive species	Not applicable. By checking EIA Report approved by government /8//9/ and via interviewing with stakeholders, it is confirmed the project does not involve existing invasive species.

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	Not applicable as the project is not a ARR, ALM, WRC or ACoGS project.

4.3 Accuracy of Reduction and Removal Calculations

The monitoring has been carried out in accordance with the monitoring plan contained in the Joint PD&MR (version 02.1 dated 29-08-2022). CTI confirms that all parameters stated in the monitoring plan are monitored and reported appropriately. All parameters required to be monitored by the monitoring plan as per the monitoring methodology ACM0008 (Version 08.0) and the management system were assessed during the site visit. The monitoring report lists each parameter required by the monitoring plan and the information flow (i.e. from data generation, aggregation, recording, calculation and reporting) for these parameters is provided. The information flow for the each parameter in further verified in the following sections.

◆ Parameters monitored

Parameter monitored ex ante

The data in table below has been verified against the data sources and the registered PD /3/.

Parameter title	Description	Data	Unit	Source
$MT_{BL,s,i,y}$	Methane from source s that would have been captured and destroyed by use i in the baseline scenario in the year y	0	/	By checking EIA Report /8/ and interview with stakeholders during site visit, it was validated all CMM would be vented to the atmosphere in the baseline scenario, that is to say, no CMM with low concentration methane was captured and destroyed in the baseline scenario. Therefore, value of this parameter is 0.
$EF_{EL,k,y}, EF_{EL,j,y}$ ($EF_{grid,CM,y}$)	Combined margin emission factor for the grid in year y	0.50885	tCO ₂ /MWh	2019 Baseline Emission Factors for Regional Power Grids in China dated 29-12-2020 published by China DNA /13/
$TDL_{j,y}$	Average technical transmission and distribution losses for providing electricity to source j in year y	3%	/	As justified in "Project emissions from the energy use to capture and to use methane" section of this report, for the project activity, project and leakage electricity consumption sources to which scenario A applies (0 MWh) is smaller than the electricity consumption of all baseline electricity consumption sources to which scenario A applies (39,360 MWh). 3% is applied for this parameter which is in compliance with Tool 05.
CEF_{CH_4}	Carbon emission factor for combusted	2.75	tCO ₂ e/tCH ₄	Consistent with ACM0008 version 08.0

	methane			
D_{CH_4}	Density of methane under normal conditions of temperature and pressure	0.67	kg/m ³ under normal condition	Consistent with ACM0008 version 08.0

Parameter monitored ex post

- ✓ **MT_{PJ,s,i,y}: Methane from sources captured and destroyed by use i in the project activity in year y**
- ✓ **MM_{ELEC,y}: Methane measured sent to use of power generation in year y**

MT_{PJ,s,i,y} and MT_{ELEC,y} is calculated by "methane volume * Density of methane under normal conditions of temperature and pressure (D_{CH_4})".

During onsite investigation and interviewing staff from the project owner, it was verified methane amount is continuously monitored by multi-parameter measuring instruments for gas volume, temperature and pressure; while gas analyzer for CH₄ concentration.

Pure CH₄ volume was then automatically converted temperature and pressure to normal condition, and was daily recorded by DCS system, monthly aggregated by staff from the project owner /23/. Density of methane under normal conditions of temperature and pressure (D_{CH_4}) was determined ex-ante as per Chapter 10 (Page 10.64), Volume 4, 2019 Refinement to the 2006 IPCC, i.e. 0.67 kg/m³, under normal condition.

Data was recorded in the CMM Monthly Report /23/. To evaluate its rationality, the assessment checked public literature "Analysis of Electricity Generation Performance per Unit Volume of Gas of Domestic Gas Generator Sets and Its Influencing Factors" /56/; thus it was verified that the electricity generation per unit volume of methane is in the range of 2.26–3.29 kWh/m³. By checking the CMM Power Generation Statistics Table /26/, it was verified that the electricity supply was 168,667,488 kWh during this monitoring period. Therefore, considering the internal-use rate of 6%, the electricity generation per unit volume of methane of the project activity was calculated as 2.83 kWh/m³ (= 168,667,488 kWh × 1.06 / 63,087,857 m³), which falls within the literature-verified range.

However, by checking the calibration reports /34//33/, the assessment team found the multi-parameter measuring instruments and gas analyzers have not been calibrated annually, not in line with the monitoring plan of the joint PD&MR which stated that the monitoring frequency is annually. However, the delayed calibration for all multi-parameter measuring instruments was completed in April or May 2025, and its results confirm that no measurement errors were present in the equipment; while the delayed calibration for all gas analyzers was completed in May 2025, and its results confirm that no measurement errors were present in the equipment.

As per para 366 and 367 of CDM Validation and Verification Standard for project activities version 03.0, it is stated that the DOE may conclude its verification, provided the conservative approach is adopted in the calculation of GHG emission reductions or net anthropogenic GHG removals: applying the maximum permissible error of the instrument to the measured values taken during the period between the

scheduled date of calibration and the actual date of calibration, if the results of the delayed calibration do not show any errors in the measuring equipment, or if the error is smaller than the maximum permissible error. The DOE shall confirm that the error has been applied: In a conservative manner, such that the adjusted measured values of the delayed calibration shall result in fewer claimed GHG emission reductions or net anthropogenic GHG removals.

According to CDM VVS, PP applied conservative method to calculate the value of these two parameters for the entire monitoring period from (01-03-2022 to 31-03-2025 by applying the accuracy (1.5% and 7%) as the maximum permissible error of the multi-parameter measuring instruments and gas analyzers to the measured values, i.e. the adjusted value = measured value*(1-1.5%)*(1-7%). The detailed calculation has been included in the ER calculation sheet and verified by the assessment team to be correct. The assessment team confirmed value of this parameter in this monitoring period were:

Monitoring period	Measured Value (m ³ CH ₄)	Adjusted Value (m ³ CH ₄)	Adjusted Value (tCH ₄)
01-03-2022 to 31-12-2022	15,650,414	14,336,561	9,605.48
01-01-2023 to 31-12-2023	21,147,188	19,371,882	12,979.16
01-01-2024 to 31-12-2024	20,367,468	18,657,619	12,500.59
01-01-2025 to 31-03-2025	5,922,787	5,425,569	3,635.13
Total (01-03-2022 to 31-03-2025)	63,087,857	57,791,631	38,720.36

✓ **Global warming potential of methane (GWP_{CH4})**

This value (28 tCO_{2e}/tCH₄) was taken from the IPCC Fifth Assessment Report (AR5) default value as required by VCS Standard v4.7, section 3.15.4.

✓ **EG_{use,k,y} (EG_{PJ,grid,y}): Energy of type k displaced by the project activity in year y**

During onsite investigation and interviewing staff from the project owner, it was verified the parameter was continuously measured by bidirectional electricity meters installed at the power supply line out of the power plant. The meter readings were recorded monthly.

At 24:00 of last day of each month, staff from the project owner would record the meter readings /28/ and aggregate CMM Power Generation Statistics Table /26/. For the excess electricity that supplied to CSPG, local power grid company would read the meters at the same cut-off time and issue ETNs /27/ afterwards.

Data of this parameter was sourced from CMM Power Generation Statistics Table /26/, which has been crosschecked with that in Raw Meter Reading Records /28/, Internal Electricity Transaction Notes between the project activity and coal mine /22/ and ETNs issued by local power grid company /27/. However, by checking the calibration reports, the assessment team found the newly installed electricity meters have not been calibrated annually, not in line with the monitoring plan of the joint PD&MR which stated that the monitoring frequency is annually. However, the delayed calibration for all meters was completed in November 2025, and its results confirm that no measurement errors were present in the equipment.

As per para 366 and 367 of CDM Validation and Verification Standard for project activities version 03.0, it is stated that the DOE may conclude its verification, provided the conservative approach is adopted in the calculation of GHG emission reductions or net anthropogenic GHG removals: applying the maximum permissible error of the instrument to the measured values taken during the period between the scheduled date of calibration and the actual date of calibration, if the results of the delayed calibration do not show any errors in the measuring equipment, or if the error is smaller than the maximum permissible error. The DOE shall confirm that the error has been applied: In a conservative manner, such that the adjusted measured values of the delayed calibration shall result in fewer claimed GHG emission reductions or net anthropogenic GHG removals.

According to CDM VVS, PP applied conservative method to calculate the value of this parameter for the entire monitoring period from (01-03-2023 to 31-03-2025 by applying the accuracy (1%) as the maximum permissible error of the electricity meters to the measured values, i.e. the adjusted value = measured value $\times$ (1-0.5%). The detailed calculation has been included in the ER calculation sheet and verified by the assessment team to be correct. The assessment team confirmed value of this parameter in this monitoring period were:

Monitoring period	Measured Value (MWh)	Adjusted Value (MWh)
01-03-2022 to 31-12-2022	41,803.531	41,594.513
01-01-2023 to 31-12-2023	56,690.376	56,406.924
01-01-2024 to 31-12-2024	54,290.462	54,019.010
01-01-2025 to 31-03-2025	15,883.119	15,803.703
Total (01-03-2022 to 31-03-2025)	168,667.488	167,824.151

✓ **EC_{PJ,j,y}: Quantity of electricity consumed by the project electricity consumption source j in year y**

During onsite investigation and interviewing staff from the project owner, it was verified the parameter was continuously measured by bidirectional electricity meters installed at the power supply line out of the power plant. The meter readings were recorded monthly.

At 24:00 of last day of each month, staff from the project owner would record the meter readings /28/ and aggregate CMM Power Generation Statistics Table /26/.

Data of this parameter was sourced from CMM Power Generation Statistics Table /26/, which has been crosschecked with that in Raw Meter Reading Records /28/ and Internal Electricity Transaction Notes between the project activity and coal mine /22/. However, by checking the calibration reports, the assessment team found the newly installed electricity meters have not been calibrated annually, not in line with the monitoring plan of the joint PD&MR which stated that the monitoring frequency is annually. However, the delayed calibration for all meters was completed in November 2025, and its results confirm that no measurement errors were present in the equipment.

As per para 366 and 367 of CDM Validation and Verification Standard for project activities version 03.0, it is stated that the DOE may conclude its verification, provided the conservative approach is adopted in the calculation of GHG emission reductions or net anthropogenic GHG removals: applying the maximum

permissible error of the instrument to the measured values taken during the period between the scheduled date of calibration and the actual date of calibration, if the results of the delayed calibration do not show any errors in the measuring equipment, or if the error is smaller than the maximum permissible error. The DOE shall confirm that the error has been applied: In a conservative manner, such that the adjusted measured values of the delayed calibration shall result in fewer claimed GHG emission reductions or net anthropogenic GHG removals.

According to CDM VVS, PP applied conservative method to calculate the value of this parameter for the entire monitoring period from (01-03-2023 to 31-03-2025 by applying the accuracy (0.5%) as the maximum permissible error of the electricity meters to the measured values, i.e. the adjusted value = measured value $\times (1+0.5\%)$. The detailed calculation has been included in the ER calculation sheet and verified by the assessment team to be correct. The assessment team confirmed value of this parameter in this monitoring period were:

Monitoring period	Measured Value (MWh)	Adjusted Value (MWh)
01-03-2022 to 31-12-2022	1.832	1.841
01-01-2023 to 31-12-2023	0.745	0.749
01-01-2024 to 31-12-2024	0.765	0.769
01-01-2025 to 31-03-2025	0.178	0.179
Total (01-03-2022 to 31-03-2025)	3.342	3.538

- ✓ **Eff_{i,y} (Eff_{ELEC,y}): Efficiency of methane destruction in use i (for the Project, i represents power generation)**

Default value (99.5%) from latest version IPCC, i.e. Chapter 4 (page 4.45), Volume 2 Energy, 2006 IPCC Guidelines for National Greenhouse Gas Inventories, was applied (no update in the 2019 refinement to IPCC 2006).

Monitoring equipment and calibration

The monitoring equipments /19/ have been calibrated periodically as per the relevant industrial standard by the qualified third party to ensure the monitoring equipments' accuracy and in good conditions. By examining the meter replacement records /25/, the assessment team confirmed that the measuring instruments were replaced during this monitoring period. The relevant information of monitoring equipments' calibration is listed as below.

Monitoring parameter	Monitoring equipment	Pipeline/ meter	Serial Number	Model	Accuracy Class	Usage period during this MP	Calibration Date	Validity	Calibration Entity
MT _{PJ,S,i,y} MM _{ELEC,y}	Gas analyzer	1#	L0105190984	GJG100J	For methane concentration between 0 and 1%: 0.07%; For methane concentration between 1% and 100%: 7%	01-04-2022 to 31-03-2025	02-06-2021	01-06-2022	Zunyi Institute of Products Quality Inspection and Testing
							01-05-2025	30-04-2026	Fangyuan Testing and Certification Group Co., Ltd
		2#	L0107191579	GJG100J		01-03-2022 to 31-03-2025	02-06-2021	01-06-2022	Zunyi Institute of Products Quality Inspection and Testing
							01-05-2025	30-04-2026	Fangyuan Testing and Certification Group Co., Ltd
		3#	200001224	GJG100H(C)		01-03-2022 to 24-12-2024*	19-09-2021	18-09-2022	National Station of Mining Safety Metrology
			L0112242049	GJG100J(A)			01-05-2025	30-04-2026	Fangyuan Testing and Certification Group Co., Ltd
	Multi-parameter measuring instruments	1#	G0005190516	GD3	Flow meter: ±1.5%	01-03-2022 to 31-08-2022**	02-09-2021	01-09-2022	Zunyi Institute of Products Quality Inspection and Testing
			G0005220250	GD3		01-09-2022 to 31-03-2025	17-05-2025	16-05-2026	Zunyi Institute of Products Quality Inspection and Testing
		2#	G0004210246	GD3	Pressure transmitter: ±1.5% for 10.0~100.0 kPa, ±0.75% for 100.0~200.0 kPa	01-04-2022 to 24-08-2024	09-09-2021	08-09-2022	Zunyi Institute of Products Quality Inspection and Testing
			G0005220230	GD3	Temperature transmitter: ±1.0°C		23-04-2025	22-04-2026	Zunyi Institute of Products Quality Inspection and Testing
		3#	2020020737	GD3(B)	25-08-2024 to 31-03-2025	06-05-2025	05-05-2026	Zunyi Institute of Products Quality Inspection and Testing	
			G0010210403	GD3	01-03-2022 to 31-08-2022	19-09-2021	18-09-2022	Zunyi Institute of Products Quality Inspection and Testing	
						01-Sep-2022 to 31-03-2025	23-04-2025	22-04-2026	Zunyi Institute of Products Quality

									Inspection and Testing
$EG_{use,k,y}$ $(EG_{PJ,grid,y})$ $EC_{PJ,j,y}$	Electricity meter	Previous	200124504142	DSZ535	$\pm 0.5\%$	01-03-2022 to 31-03-2022	20-09-2021	19-09-2022	Liuzhi Mining (Group) Metrology and Testing Institute
		E1	2311583654000026	DSZ331	$\pm 0.5\%$	01-04-2022 to 31-03-2025	20-11-2025	19-11-2026	Shanxi Huacekerui Metrology Testing Co., Ltd.
		E2	2311583654000028	DSZ331	$\pm 0.5\%$	01-04-2022 to 31-03-2025	20-11-2025	19-11-2026	Shanxi Huacekerui Metrology Testing Co., Ltd.

* By checking meter change records /25/, it was verified the gas analyzer with serial number 200001224 has been used for previous pipeline before equipment upgrading.

** By checking meter change records /25/, it was verified the Multi-parameter measuring instruments with serial number 2020020737 has been used for previous pipeline before equipment upgrading.

The electricity meters have been calibrated by the qualified third party listed in table above, in accordance with the Electrical Meters for Measuring Alternating-current Electrical Energy (JJG 596-2012) /41/, and the corresponding calibration records and accreditation certificates /29//32//37//39/ have been verified by the assessment team. The accuracy class of the meters meets the requirements of the Joint PD&MR. The Joint PD&MR requires annual calibration. Review of the calibration reports shows that the newly installed meters have not been calibrated every year. The delayed calibration for all meters was completed in November 2025, and its results confirm that no measurement errors were present in the equipment. In accordance with paragraphs 366 and 367 of the CDM Validation and Verification Standard for project activities (version 03.0), the PP has conservatively applied an adjustment to the monitored electricity values for the entire monitoring period, ensuring that the reported data remain reliable and do not lead to an over-estimation of emission reductions.

The gas analyzers have been calibrated by the qualified third party listed in the table above, in accordance with the Verification Regulation of High-Low Concentration Methane Transmitters for Coal Mine (JJG 1133-2017) /42/, and the corresponding calibration records and accreditation certificates /34//30//31//38//35//36/ have been verified by the assessment team. The accuracy class meets the Joint PD&MR requirements. The Joint PD&MR requires annual calibration; however, the reports show the gas analyzers were not calibrated every year. The delayed calibration for all gas analyzers was completed in May 2025, and its results confirm that no measurement errors were present in the equipment. In accordance with paragraphs 366 and 367 of the CDM Validation and Verification Standard for project activities (version 03.0), the PP has conservatively applied an adjustment to the monitored electricity values for the entire monitoring period, ensuring that the reported data remain reliable and do not lead to an over-estimation of emission reductions.

The Multi-parameter measuring instruments have been calibrated by the qualified third party listed in the table above, in accordance with the Verification Regulation of Vortex-shedding Flowmeter (JJG 1029-2007) /40/, and the corresponding calibration records and accreditation certificates /33//35/ have been verified by the assessment team. The accuracy class meets the Joint PD&MR requirements. The Joint PD&MR requires annual calibration; however, the reports show the multi-parameter measuring instruments were not calibrated every year. The delayed calibration for all multi-parameter measuring instruments was completed in April or May 2025, and its results confirm that no measurement errors were present in the equipment. In accordance with paragraphs 366 and 367 of the CDM Validation and Verification Standard for project activities (version 03.0), the PP has conservatively applied an adjustment to the monitored electricity values for the entire monitoring period, ensuring that the reported data remain reliable and do not lead to an over-estimation of emission reductions.

Data management and control

The project proponent is responsible for operation and routine maintenance of power plant under the project activity. The quality assurance and quality control procedures have been addressed in the VER project management and Monitoring Manual /40/, including the organization structure with the responsibilities, personnel competencies, monitoring procedures and monitoring management. By

interview with the staff and check records /42//40//15/ during on-site visit, it can be confirmed that the monitoring management system is implemented following the project management and Monitoring Manual /40/.

By checking Monitoring Manual /40/, it was verified monitoring personnel were required to strictly adhere to the conservative principle in data recording, utilizing conservative values for all missing or damaged data during the monitoring process. For instance, in cases of missing CMM flow data due to sensor failures or power outages, the lowest possible values for methane fraction and CMM flow rate, namely "0," were employed to fill the data gaps. This approach ensures that any uncertainties are addressed in a manner that does not overestimate the project's performance, thereby maintaining the integrity of the monitoring results.

All monitoring devices have been calibrated and maintained periodically to ensure the accuracy of measurement. Calibration records of instruments used in measurements were made available during the verification visit and found to be valid for the entire period of the verification. Competence and training records of in-plant personnel engaged in measurement of plant parameters were presented during verification and found to be in order.

CTI confirms that appropriate methods and formulae for calculating baseline emissions, project emissions and leakage have been followed, and the assumptions, emission factors and default values that are applied in the calculation have been justified.

Baseline emissions

As per registered Joint PD&MR, baseline emissions would have occurred due to methane destruction, methane venting and use of other fossil fuels that are displaced by methane under the project activity. Baseline emissions due to venting should be discounted in case host country has regulations in place that are restricting the release of methane into the atmosphere.

$$BE_y = BE_{MD,y} + BE_{MR,y} + BE_{Use,y} \quad \text{Equation (1)}$$

Where:

BE_y	=	Baseline emissions in year y (t CO ₂ e)
$BE_{MD,y}$	=	Baseline emissions from destruction of methane in the baseline scenario in year y (t CO ₂ e)
$BE_{MR,y}$	=	Baseline emissions from release of methane into the atmosphere in year y that is avoided by the project activity (t CO ₂ e)
$BE_{Use,y}$	=	Baseline emissions from the production of power, heat or other forms of useful energy replaced by the project activity in year y (t CO ₂ e)

Methane destruction in the baseline scenario

As mentioned above, all CMM would be vented to the atmosphere in the baseline scenario, that is to say, the baseline scenario does not involve any flaring or usage of CMM. Therefore, $BE_{MD,y} = 0$.

Methane venting in the baseline scenario

As per para 64 of ACM0008 version 08.0 and registered Joint PD&MR, the amount of methane that would have been emitted to the atmosphere in the baseline scenario shall be determined as follows:

$$BE_{MRy} = \sum_i \sum_s (MT_{PJ,s,i,y} - MT_{BL,s,i,y}) \times GWP_{CH_4} \quad \text{Equation (2)}$$

Where:

BE_{MRy} = Baseline emissions from release of methane into the atmosphere in year y that is avoided by the project activity (t CO₂e)

$MT_{PJ,s,i,y}$ = Methane from source s captured and destroyed by use i in the project activity in year y (t CH₄)

$MT_{BL,s,i,y}$ = Methane from source s that would have been captured and destroyed by use i in the baseline scenario in the year y (t CH₄)

i = Use of methane (flaring, power generation, etc.)

s = Source of methane that would have been captured, sent to and destroyed by use i in the baseline scenario in the year y. This may include eligible CBM, CMM, VAM, eligible AMM and eligible OCM

GWP_{CH_4} = Global warming potential of methane (t CO₂e/t CH₄)

By checking EIA Report /8/, Statement from Xintian coal mine /58/ and interview with stakeholders during site visit, it was verified all CMM would be vented to the atmosphere in the baseline scenario, that is to say, no CMM with low concentration methane was captured and destroyed in the baseline scenario. There, the audit team confirmed for the project activity,

$$BE_{MRy} = \sum_i \sum_s MT_{PJ,s,i,y} \times GWP_{CH_4} \quad \text{Equation (3)}$$

As verified during site visit, methane from the mine captured and destroyed by the project ($MT_{PJ,s,i,y}$) equals to methane measured sent to use ($MM_{ELEC,y}$, described in "project emissions from destruction of captured methane" section of this report).

The detailed calculation process of $BE_{MR,y}$ has been included in the ER calculation spreadsheet and confirmed by the assessment team to be correct. The parameters determining $BE_{MR,y}$ during this monitoring period are verified as follows:

Monitoring period	$MT_{PJ,s,i,y}$ tCH ₄	GWP_{CH_4} tCO ₂ e/tCH ₄	$BE_{MR,y}$ tCO ₂ e
01-03-2022 to 31-12-2022	9,605.48	28	268,953
01-01-2023 to 31-12-2023	12,979.16	28	363,416
01-01-2024 to 31-12-2024	12,500.59	28	350,016

01-01-2025 to 31-03-2025	3,635.13	28	101,783
Total (01-03-2022 to 31-03-2025)	38,720.36	28	1,084,168

Baseline emissions from the production of power, heat or vehicle fuels

As mentioned above, the waste heat from the generators will be recovered by waste heat boilers to provide free hot water to the coal mine, replacing same amount of heat energy which was provided by waste coal fired boilers before the implementation of the Project. PP decided not to claim emission reductions for waste heat recovery, which is verified to be in compliance with the methodology and is conservative. Besides, via checking Joint PD&MR /03/ and onsite investigation, it was verified the project activity does not involve in the production of vehicle fuels. Therefore, only baseline emissions from the production of power were claimed, which is verified to be reasonable.

As per para 67 of ACM0008 version 08.0 and registered Joint PD&MR, the baseline emissions from displacement of power or heat generation, or supply of vehicle fuels are given by the following equation:

$$BE_{Use,y} = \sum_k (EG_{use,k,y} \times EF_{ELEC}) \quad \text{Equation (4)}$$

Where:

- $BE_{Use,y}$ = Baseline emissions from energy displaced by the project activity in year y (t CO₂)
- $EG_{use,k,y}$ = Energy of type k displaced by the project activity in year y (energy unit)
- EF_{ELEC} = Baseline emissions factor for energy type k production in year y (t CO₂/energy unit)
- k = Energy type displaced by the project activity

Baseline emissions factor for power generation

As per para 68 of ACM0008 version 08.0, if the baseline scenario includes power generation that would be replaced by the project activity, the emission factor for displaced electricity is calculated as per the latest version of Tool05 "Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation".

Determination of the emission factor for electricity generation ($EF_{PJ,grid,y}$, i.e. EF_{ELEC})

As mentioned above, before the implementation of the project activity, the electricity utilized by Xintian coal mine was supplied by CSPG in the baseline scenario. Therefore, Scenario A (Electricity consumption from the grid) from Tool05 was applied. $EF_{PJ,grid,y}$ (EF_{ELEC}) shall therefore be determined in accordance with Option A1 of Tool05, i.e. the applied emission factor shall be the combined margin emission factor of the CSPG, calculated in accordance with Tool07 "Tool to calculate the emission factor of an electricity system" version 07.0 ($EF_{PJ,grid,y} = EF_{ELEC} = EF_{grid,CM,y}$).

As per para 85 of Tool07, the combined margin emissions factor is calculated as follows:

$$EF_{grid,CM,y} = EF_{grid,OM,y} \times w_{OM} + EF_{grid,BM,y} \times w_{BM} \quad \text{Equation (5)}$$

Where:

- $EF_{grid,BM,y}$ = Build margin CO₂ emission factor in year y (t CO₂/MWh)
- $EF_{grid,OM,y}$ = Operating margin CO₂ emission factor in year y (t CO₂/MWh)
- w_{OM} = Weighting of operating margin emissions factor (per cent)
- w_{BM} = Weighting of build margin emissions factor (per cent)

As per para 86 of Tool 07, for CMM utilization and abatement project, $w_{OM} = 0.5$ and $w_{BM} = 0.5$

The value of $EF_{grid,BM,y}$ and $EF_{grid,OM,y}$ is directly sourced from 2019 Baseline Emission Factors for Regional Power Grids in China dated 29-12-2020 published by China DNA /13/

$$EF_{PJ,grid,y} (EF_{ELEC}) = EF_{grid,CM,y} = 0.8042 \times 0.5 + 0.2135 \times 0.5 = 0.50885 \text{ tCO}_2/\text{MWh}$$

The detailed calculation process of $BE_{Use,y}$ has been included in the ER calculation spreadsheet and confirmed by the assessment team to be correct. The parameters determining $BE_{Use,y}$ during this monitoring period are verified as follows:

Monitoring period	$EF_{ELEC,y}$	$EG_{PJ,grid,y}$	$BE_{Use,y}$
	MWh	tCO ₂ e/MWh	tCO ₂ e
01-03-2022 to 31-12-2022	41,594.513	0.50885	21,165
01-01-2023 to 31-12-2023	56,406.924	0.50885	28,702
01-01-2024 to 31-12-2024	54019.010	0.50885	27,487
01-01-2025 to 31-03-2025	15,803.703	0.50885	8,041
Total (01-03-2022 to 31-03-2025)	167,824.151	0.50885	85,395

Project emissions

As per para 74 and 75 of ACM0008 version 08.0, project emissions comprise the following sources:

- (a) Emissions from the energy use to capture and use methane;
- (b) Emissions from destruction of captured methane through production of various energy types and/or flaring and/or flameless oxidation;
- (c) Emissions from the un-combusted methane.

Project emissions are defined by the following equation:

$$PE_y = PE_{ME,y} + PE_{MD,y} + PE_{UM,y} \quad \text{Equation (6)}$$

Where:

- PE_y = Project emissions in year y (t CO₂e)
- $PE_{ME,y}$ = Project emissions from energy use to capture and use methane (t CO₂e)
- $PE_{MD,y}$ = Project emissions from destruction of captured methane (t CO₂e)
- $PE_{UM,y}$ = Project emissions from un-combusted methane in year y (t CO₂e)

Project emissions from the energy use to capture and to use methane

As per para 76 of ACM0008 version 08.0 and registered joint PD&MR, additional energy may be used due to the project activity (e.g. for the capture, transport, compression and use or destruction of methane). Emissions from this energy use should be accounted as project emissions:

- (a) Emissions due to electricity consumption should be determined using the latest version of the "Tool to calculate baseline, project and/or leakage emissions from electricity consumption" should be used;
- (b) Emissions due to additional fossil fuel consumption, including heat consumption should be determined the latest version of the "Tool to calculate project or leakage CO₂ emissions from fossil fuel combustion" shall be used.

During onsite investigation, it was verified only when the project is not in operation, electricity would be consumed from Xintian coal mine, which was supplied by China Southern Power Grid (CSPG). And no fossil fuel would be used for the project activity.

As per para 16 of Tool05 "Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation", emissions due to electricity consumption was determined via equation below:

$$PE_{ME,y} = PE_{EC,y} = \sum_j ECP_{j,y} \times EF_{EF,j,y} \times (1 + TDL_{j,y}) \quad \text{Equation (7)}$$

$EF_{EF,j,y}$ is equivalent to $EF_{grid,CM,y}$, which has been justified and assessed above in "Determination of the emission factor for electricity generation ($EF_{EL,k,y}$, i.e. $EF_{k,y}$)" section of this report.

As per "Data / Parameter table 3" of Tool05, For $TDL_{j,y}$, use default values of 3% for project and leakage electricity consumption sources:

- (a) baseline electricity consumption sources;
- (b) project and leakage electricity consumption sources if the electricity consumption by all project and leakage electricity consumption sources to which scenario A or scenario C (cases C.I or C.III) applies is

smaller than the electricity consumption of all baseline electricity consumption sources to which scenario A or scenario C (cases C.I or C.III) applies.

During onsite investigation, it was verified only when the project is not in operation, electricity would be consumed from Xintian coal mine, which was supplied by China Southern Power Grid (CSPG), which belongs to Scenario A.

By checking CMM Power Generation Statistics Table /26/, it was verified electricity displaced by the project activity was 167,824.151 MWh during this monitoring period. Since only when the project is not in operation, electricity would be consumed from Xintian coal mine, which was supplied by China Southern Power Grid (CSPG). as per CMM Power Generation Statistics Table /26/, the electricity consumption of all project and leakage electricity consumption sources would be very small and was 4.02 MWh. Therefore, it was verified for the project activity, project and leakage electricity consumption sources to which scenario A applies (4.02 MWh) is smaller than the electricity consumption of all baseline electricity consumption sources to which scenario A applies (167,824.151 MWh). Therefore, 3% is applied as $TDL_{j,y}$, which is deemed to be reasonable.

The detailed calculation process of $PE_{ME,y}$ has been included in the ER calculation spreadsheet and confirmed by the assessment team to be correct. The parameters determining $PE_{ME,y}$ during this monitoring period are verified as follows:

Monitoring period	$EC_{PJ,j,y}$ MWh	$EF_{grid,CM,y}$ tCO ₂ e/MWh	$TDL_{j,y}$ -	$PE_{EC,y}$ tCO ₂ e
01-03-2022 to 31-12-2022	1.841	0.50885	3%	1
01-01-2023 to 31-12-2023	0.749	0.50885	3%	0.4
01-01-2024 to 31-12-2024	0.769	0.50885	3%	0.4
01-01-2025 to 31-03-2025	0.179	0.50885	3%	0.1
Total (01-03-2022 to 31-03-2025)	3.538	0.50885	3%	2

Project emissions from destruction of captured methane

As per para 77 of ACM0008 version 08.0, when the captured methane is burned in a flare, power plant, or oxidized in a flameless oxidation unit, combustion emissions are released.

$$PE_{MD,y} = \sum_i MD_{i,y} \times CEF_{CH_4} \quad \text{Equation (8)}$$

Where:

PE_{MD} = Project emissions from methane destroyed (t CO₂e)

$MD_{i,y}$ = Methane destroyed through use i (t CH₄)

i = Use of methane (power generation, heat generation, supply to gas grid to various combustion end uses)

CEF_{CH_4} = Carbon emission factor for combusted methane. Set as 2.75 (t CO₂/t CH₄)

As per para 78 of ACM0008 version 08.0 and registered joint PD&MR, In each end-use, the amount of methane destroyed depends on the efficiency of combustion of each end use and should be determined as follows.

$$MD_{i,y} = MM_{i,y} \times Eff_{i,y} \quad \text{Equation (9)}$$

Where:

$MD_{i,y}$ = Methane destroyed through use i in year y (t CH₄)

$MM_{i,y}$ = Methane measured sent to use i in year y (t CH₄)

$Eff_{i,y}$ = Efficiency of methane destruction in use i in year y (%)

Considering the project activity destroys captured methane for electricity generation, $PE_{MD,y}$ was thereby calculated via equation below,

$$PE_{MD,y} = MM_{elec,y} \times Eff_{elec,y} \times CEF_{CH_4} \quad \text{Equation (10)}$$

The detailed calculation process of $PE_{MD,y}$ has been included in the ER calculation spreadsheet and confirmed by the assessment team to be correct. The parameters determining $PE_{MD,y}$ during this monitoring period are verified as follows:

Monitoring period	$MM_{ELEC,y}$ tCH ₄	$Eff_{ELEC,y}$ -	CEF_{CH_4} tCO ₂ e/tCH ₄	$PE_{MD,y}$ tCO ₂ e
01-03-2022 to 31-12-2022	9,605.48	99.5%	2.75	26,283
01-01-2023 to 31-12-2023	12,979.16	99.5%	2.75	35,515
01-01-2024 to 31-12-2024	12,500.59	99.5%	2.75	34,205
01-01-2025 to 31-03-2025	3,635.13	99.5%	2.75	9,947
Total (01-03-2022 to 31-03-2025)	38,720.36	99.5%	2.75	105,950

Project emissions from un-combusted methane

As per para 81 of ACM0008 version 08.0 and registered joint PD&MR, not all of the methane sent to the flare, to the flameless oxidizer or used to generate power and heat will be combusted, so a small amount will be released to the atmosphere. These emissions are calculated as follows:

$$PE_{UM,y} = GWP_{CH_4} \times \sum_i MM_{i,y} \times (1 - Eff_{i,y}) \quad \text{Equation (11)}$$

Where:

$PE_{UM,y}$	=	Project emissions from un-combusted methane (t CO ₂ e)
GWP_{CH_4}	=	Global warming potential of methane (t CO ₂ e/t CH ₄)
i	=	Use of methane (power generation, heat generation, supply to gas grid to various combustion end uses)
$MM_{i,y}$	=	Methane measured sent to use i in year y (t CH ₄)
$Eff_{i,y}$	=	Efficiency of methane destruction in use i in year y (%)

Considering the project activity destroys captured methane for electricity generation, $PE_{UM,y}$ was thereby calculated via equation below,

$$PE_{UM,y} = GWP_{CH_4} \times MM_{elec,y} \times (1 - Eff_{elec,y}) \quad \text{Equation (12)}$$

The detailed calculation process of $PE_{UM,y}$ has been included in the ER calculation spreadsheet and confirmed by the assessment team to be correct. The parameters determining $PE_{UM,y}$ during this monitoring period are verified as follows:

Monitoring period	$MM_{ELEC,y}$ tCH ₄	$Eff_{ELEC,y}$	GWP_{CH_4} tCO ₂ e/tCH ₄	$PE_{UM,y}$ tCO ₂ e
01-03-2022 to 31-12-2022	9,605.48	99.5%	28	1,345
01-01-2023 to 31-12-2023	12,979.16	99.5%	28	1,818
01-01-2024 to 31-12-2024	12,500.59	99.5%	28	1,751
01-01-2025 to 31-03-2025	3,635.13	99.5%	28	509
Total (01-03-2022 to 31-03-2025)	38,720.36	99.5%	28	5,423

Leakage

As per para 82 and 83 of ACM0008 version 08.0 and registered joint PD&MR, leakage may occur if the project activity prevents methane from being used to meet baseline thermal energy demand, whether as a result of physical constraints on delivery, or price changes. Where regulations require that local thermal demand is met before all other uses this leakage can be ignored.

By checking Joint PD&MR /03/ and interview with stakeholders during site visit, it was verified all CMM would be vented to the atmosphere in the baseline scenario. Via site interview and checking Joint PD&MR /03/, it was verified under baseline scenario electricity demand of Xintian coal mine was met by CSPG, which is dominated by fossil fuel power plants. Under project scenario, electricity generated by the project activity was utilized by Xintian coal mine, and the excess electricity will be supplied to

CSPG. Therefore, the audit team verified the project activity does not prevent methane from being used to meet baseline thermal energy demand.

Emission reductions

The emission reductions for this monitoring period was calculated as:

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
01-03-2022 to 31-12-2022	290,118	27,629	0	262,489
01-01-2023 to 31-12-2023	392,118	37,334	0	354,784
01-01-2024 to 31-12-2024	377,503	35,957	0	341,546
01-01-2025 to 31-03-2025	109,824	10,457	0	99,367
Total	1,169,563	111,377	0	1,058,186

4.4 Quality of Evidence to Determine Reductions and Removals

All necessary documentations are collected, referenced and aggregated, which is easily accessible in hard-copy or electronic format. Measurements are performed by calibrated equipment, and the key data can also be cross-checked via other sources, such as records, receipts and inventory data. No assumptions are used that have any material influence on reported emission reductions.

4.5 Non-Permanence Risk Analysis

The project is not AFOLU project, and thus non-permanence risk analysis is not applicable for the project.

5 VERIFICATION OPINION

5.1 Verification Summary

CTI Certification Co., Ltd. (CTI) has performed the verification of the emission reductions that have been reported for the project activity "Guizhou Xintian CMM Power Generation Project" in China (VCS Project ID: 2762) for the period 01-03-2022 to 31-03-2025.

The verification is based on the baseline and monitoring methodology ACM0008 (Version 08.0), Joint PD&MR (version 02.1 dated 29-08-2022) and the monitoring report (version 3.0 dated 09-03-2026). The verification consisted of the following three phases:

- i) desk review of the project design and the baseline and monitoring plan;
- ii) follow-up interviews with project stakeholders;
- iii) resolution of outstanding issues and the issuance of the final verification and certification report.

The project proponents are responsible for the collection, calculation and determination of the GHG data in accordance with the monitoring plan and the reporting of GHG emission reductions on the basis set out within the project monitoring report.

Our verification approach was based on the requirements as defined under the applicable VCS standards, relevant UNFCCC requirements and ISO 14064-3: 2019. Our approach is risk-based, drawing on an understanding of the risks associated with reporting GHG emissions data and the controls in place to mitigate these. The verification can confirm that:

- the project is implemented and operated as per the Joint PD&MR;
- the monitoring plan in Joint PD&MR is as per the applied methodology;
- the monitoring complies with the monitoring plan in the Joint PD&MR;
- the monitoring report and other supporting documents provided are complete and verifiable and in accordance with the applicable VCS Standard version 4.7 and CDM requirements;
- the installed equipment being essential for generating emission reduction runs reliably and is calibrated appropriately;
- the monitoring system is in place and generates GHG emission reductions data;
- the GHG emission reductions are calculated without material misstatements.

It is CTI's responsibility to provide an independent verification statement on the reported GHG emission reductions for the project. Based on an understanding of the risks associated with reporting of GHG emission data and the controls in place to mitigate these, CTI planned and performed our work to obtain the information and explanations that we considered necessary to provide reasonable assurance that reported GHG emission reductions are fairly stated.

CTI does not assume any responsibility towards the issuance and utilization of the VCUs hereby verified and certified. Request for issuance of VCUs shall be made by the project proponent to an approved VCS Program Registry based on the requirements set out under the most recent version of the VCS Program Guidelines clause on VCS Registration.

The verification of reported emission reductions is based on the information made available to CTI and the engagement conditions detailed in this report. CTI cannot be held liable by any party for decisions made or not made based on this report.

In CTI's opinion the GHG emissions reductions of the "Guizhou Xintian CMM Power Generation Project" for the period 01-03-2022 to 31-03-2025 are fairly stated in the monitoring report (version 3.0 dated 09-03-2026). The GHG emission reductions were calculated correctly on the basis of the approved methodology ACM0008 (Version 08.0) and the monitoring plan contained in the Joint PD&MR (version 02.1 dated 29-08-2022).

5.2 Verification Conclusion

CTI can confirm that the GHG emission reductions are calculated without material misstatements. Based on the evidence and information that are considered necessary to guarantee that GHG emission reductions are appropriately calculated, CTI confirms the following statement:

Verification period: From 01-03-2022 to 31-03-2025

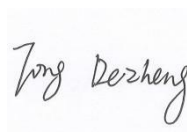
Verified GHG emission reductions and carbon dioxide removals in the above verification period:

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCUs (tCO ₂ e)	Removal VCUs (tCO ₂ e)	Total VCUs (tCO ₂ e)
01-03-2022 to 31-12-2022	290,118	27,629	0	262,489	/	262,489
01-01-2023 to 31-12-2023	392,118	37,334	0	354,784	/	354,784
01-01-2024 to 31-12-2024	377,503	35,957	0	341,546	/	341,546
01-01-2025 to 31-03-2025	109,824	10,457	0	99,367	/	99,367
Total	1,169,563	111,377	0	1,058,186	/	1,058,186

5.3 Ex-ante vs Ex-post ERR Comparison

Year	Ex-ante emissions reductions/removals	Achieved emissions reductions/removals	Percent difference	Justification for the difference
------	---------------------------------------	--	--------------------	----------------------------------

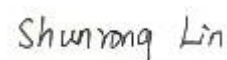
01-03-2022 to 31-12-2022	403,606	262,489	-34.96%	Via interviewing with staff from the project owner, it was verified the main reason was less CMM supply, which is deemed as reasonable.
01-01-2023 to 31-12-2023	504,803	354,784	-29.72%	
01-01-2024 to 31-12-2024	504,803	341,546	-32.34%	
01-01-2025 to 31-03-2025	124,472	99,367	-20.17%	
Total	1,537,685	1,058,186	-31.18%	



Mr. Dezheng TONG

Team Leader

09-03-2026



Ms. Shunrong LIN

Technical Reviewer

09-03-2026

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

Section	Information	Justification	Assessment method and conclusion
Not applicable	Not applicable	Not applicable	Not applicable

APPENDIX 2: <ABBREVIATIONS>

CAR	Corrective Action Request
CER	Certified Emission Reduction(s)
CL	Clarification request
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
CTI	CTI Certification Co., Ltd
VVB	Validation and Verification Body
EF	Emission Factor
ER	Emission Reduction
FAR	Forward Action Request
GHG	Greenhouse Gas(es)
MP	Monitoring Period
MR	Monitoring Report
MRRs	Meter Reading Records
CSPG	China Southern Power Grid
PD	Project Description
PP	Project Proponent
VCS	Verified Carbon Standard
VCU	Verified Carbon Unit

APPENDIX 3: <COMPETENCE OF TEAM MEMBERS AND TECHNICAL REVIEWERS>

Mr. Dezheng TONG

Satisfies the requirements of competence management system of CTI Certification, and is hereby appointed as:

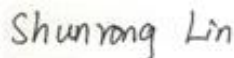
Qualification						
Status	GHG Auditor	Validator	Verifier	Team Leader	Technical Reviewer	Technical Expert
Date	√	√	√	√	-	√

Scope	Technical Area
SS 1: Energy industries (renewable/non-renewable sources)	TA 1.2: Energy generation from renewable energy sources
SS 8: Mining/mineral production	TA 8.1: Mining/mineral production
SS 10:Fugitive emissions fom fuels(solid,oil and gas)	TA 10.1: Fugitive emissions from oil and gas

This appointment is valid for 3 years from its date of approval below and is bound by internal requirements of management system of the Certification Body of CTI.

Approved by:

Shunrong LIN



Technical Competent Manager

Shenzhen, 01-01-2024

Ms. Shunrong LIN

Satisfies the requirements of competence management system of CTI Certification, and is hereby appointed as:

Qualification						
Status	GHG Auditor	Validator	Verifier	Team Leader	Technical Reviewer	Technical Expert
Date	√	√	√	√	√	√

Scope	Technical Area
SS 1: Energy industries (renewable/non-renewable sources)	TA 1.2: Energy generation from renewable energy sources
SS 3: Energy demand	TA 3.1: Energy demand
SS 13: Waste handling and disposal	TA 13.1: Solid waste and wastewater
	TA 13.2: Manure
SS 14: Afforestation and reforestation	TA 14.1: Afforestation and reforestation
SS 15: Agriculture	TA 15.1: Agriculture

This appointment is valid for 3 years from its date of approval below and is bound by internal requirements of management system of the Certification Body of CTI.

Approved by:

Wu Lin

Wu LIN

Technical Competent Manager

Shenzhen, 25-Oct-2022

Ms. JIANG Shu'e

Satisfies the requirements of competence management system of CTI Certification, and is hereby appointed as:

Qualification						
Status	GHG Auditor	Validator	Verifier	Team Leader	Technical Reviewer	Technical Expert
Date	-	-	-	-	-	√

Scope	Technical Area
SS 6: Construction	TA 6.1: Construction
SS 8: Mining/mineral production	TA 8.1: Mining/mineral production
SS 10: Fugitive emissions from fuels (solid, oil and gas)	TA 10.1: Fugitive emissions from oil and gas

This appointment is valid for 3 years from its date of approval below and is bound by internal requirements of management system of the Certification Body of CTI.

Approved by: *Shunrong Lin*

Shunrong LIN

Technical Competent Manager

Shenzhen, 01/01/2024

Ms. Qixin ZHANG

Satisfies the requirements of competence management system of CTI Certification, and is hereby appointed as:

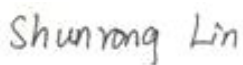
Qualification					
GHG Auditor	Validator	Verifier	Team Leader	Technical Reviewer	Technical Expert
√	√	-	-	-	-

Scope	Technical Area
SS 1: Energy industries (renewable/non-renewable sources)	TA 1.2: Energy generation from renewable energy sources
SS 13: Waste handling and disposal	TA 13.2: Manure

This appointment is valid for 3 years from its date of approval below and is bound by internal requirements of management system of the Certification Body of CTI.

Approved by:

Shunrong LIN



Technical Competent Manager

Shenzhen, 01-May-2024

APPENDIX 4: <REFERENCES>

Documentation used to verify the information provided by the project proponents

- /1/ Climate Bridge (Shanghai) Ltd.: VCS monitoring report for Guizhou Xintian CMM Power Generation Project, version 01 dated 30-Jun-2025, version 2.0 dated 25-11-2025, version 3.0 dated 09-03-2026
- /2/ Climate Bridge (Shanghai) Ltd.: Emission Reduction Calculation Spreadsheet for Guizhou Xintian CMM Power Generation Project
- /3/ Registered Joint PD&MR version 02.1 dated 29-08-2022
- /4/ TÜV NORD CERT GmbH: Joint Validation & Verification Report version 2.0 dated 30-08-2022
- /5/ VERRA Website: Joint PD&MR, version 02.1 dated 29-08-2022
- /6/ VERRA Website: Joint Val&Ver Report, version 2.0 dated 30-08-2022
- /7/ Project Approval of the project activity issued by Development and Reform Commission of Qianxi County, dated 13-03-2019
- /8/ Environmental Impact Assessment Report completed in May 2019
- /9/ Environmental Impact Assessment (EIA) Approval issued by Qianxi Branch of Bijie Ecological Environment Bureau on 28-06-2019
- /10/ Environmental Protection Completion Acceptance Monitoring Report Form completed by Xintian Coal Mine on April 2025
- /11/ Business License of Yonggui Energy Development Co., Ltd. Xintian Branch (established on 17-01-2011) issued by Guizhou Provincial Market Supervision Administration
- /12/ Xintian Coal Mine Methane Cooperative Development Agreement signed between the project proponent and Yongmei Group Co., Ltd. on 01-08-2020
- /13/ 2019 Baseline Emission Factors for Regional Power Grids in China dated 29-12-2020 published by China DNA
- /14/ Economic Assessment Method and Parameters for Construction Projects (2006 Edition) (NDRC & Ministry of Construction, Fa Gai Tou Zi [2006] No. 1325)
- /15/ Yonggui Energy Development Co., Ltd. Xintian Branch: Records of training for on-site staff.
- /16/ Staff Roster provided by the project proponent
- /17/ Stakeholder Consultation Questionnaires of Stakeholder Consultation Survey on 10-04-2022, 01-05-2023 and 01-06-2024
- /18/ Stakeholder Opinion Book
- /19/ Yonggui Energy Development Co., Ltd. Xintian Branch: nameplates of the equipment

-
- /20/ Statement from PP for equipment upgrading
 - /21/ Expert Review Opinion on Environmental Protection Acceptance for the Project issued on 17-04-2025
 - /22/ Internal Electricity Transaction Notes between the project activity and coal mine
 - /23/ CMM Monthly Report covering this monitoring period
 - /24/ Yonggui Energy Development Co., Ltd. Xintian Branch: Raw Coal Production Statistics Table covering this monitoring period
 - /25/ Meter change records covering this monitoring period
 - /26/ CMM Power Generation Statistics Table covering this monitoring period
 - /27/ Electricity Transaction Notes (ETNs) issued by local power grid company covering this monitoring period
 - /28/ Raw Meter Reading Records covering this monitoring period
 - /29/ Liuzhi Mining (Group) Metrology and Testing Institute: Calibration certificates for electricity meters (previous)
 - /30/ Fangyuan Testing and Certification Group Co., Ltd.: Calibration certificates of gas analyzer
 - /31/ Zunyi Institute of Products Quality Inspection and Testing: Calibration certificates of gas analyzer
 - /32/ Shanxi Huacekerui Metrology Testing Co., Ltd.: Calibration certificates for electricity meters (new)
 - /33/ Zunyi Institute of Products Quality Inspection and Testing: Calibration certificates of Multi-parameter measuring instruments
 - /34/ National Station of Mining Safety Metrology: Calibration certificates of gas analyzer
 - /35/ Zunyi Market Supervision Administration: Accreditation of Zunyi Institute of Products Quality Inspection and Testing issued on 06-06-2017 valid till 05-06-2023, issued on 29-03-2023, valid till 28-03-2029
 - /36/ China National Accreditation Service for Conformity Assessment: Accreditation of Fangyuan Testing and Certification Group Co., Ltd. issued on 28-08-2024, valid till 27-08-2030
 - /37/ China National Accreditation Service for Conformity Assessment: Accreditation of Shanxi Huacekerui Metrology Testing Co., Ltd., issued on 09-05-2025 valid till 08-05-2031
 - /38/ General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China: Accreditation of National Station of Mining Safety Metrology, valid from 31-08-2017 to 30-08-2022
 - /39/ Liupanshui Market Supervision Administration: Accreditation of Liuzhi Mining (Group) Metrology and Testing Institute, issued on 21-01-2020 valid till 20-01-2024

-
- /40/ Verification Regulation of Vortex-shedding Flowmeter (JJG 1029-2007)
<https://www.doc88.com/p-66519767067867.html>
- /41/ Electrical Meters for Measuring Alternating-current Electrical Energy (JJG 596-2012)
<https://www.doc88.com/p-5197628495862.html>
- /42/ Verification Regulation of High-Low Concentration Methane Transmitters for Coal Mine (JJG 1133-2017)
<https://www.doc88.com/p-11368414092805.html>
- /43/ "Law of the People's Republic of China on the Protection of Minors"
https://www.gov.cn/xinwen/2020-10/18/content_5552113.htm
- /44/ "Labor Law of the People's Republic of China"
https://www.gov.cn/banshi/2005-05/25/content_905.htm
- /45/ "Labor Contract Law of the People's Republic of China"
http://www.mohrss.gov.cn/xxgk2020/fdzdgknr/zcfg/fl/202011/t20201102_394622.html
- /46/ "Criminal Law of the People's Republic of China"
<http://gongbao.court.gov.cn/details/f8e30d0689b23f57bfc782d21035c3.html>
- /47/ "Prohibition of Child Labor Regulations"
<https://fgw.sh.gov.cn/ys-laogong-1.3.2.1/20240124/9174629f4b0c4453ad48edd741b50ae7.html>
- /48/ "Special Provisions on Labor Protection for Women Workers"
https://www.gov.cn/zwgk/2012-05-Jul-content_2131567.htm
- /49/ "Constitution of the People's Republic of China"
https://www.gov.cn/xinwen/2018-03/22/content_5276319.htm
- /50/ "Anti-Discrimination Law of the People's Republic of China"
<http://www.xixianrencai.com/News/5709.html>
- /51/ Equal Remuneration Convention, 1951 (No. 100)
<https://www.ilo.org/publications/equal-remuneration-convention-1951-no-100>
- /52/ "Law of the People's Republic of China on the Protection of Women's Rights and Interests"
https://www.gov.cn/banshi/2005-05/26/content_980.htm
- /53/ Measures for Public Participation in Environmental Impact Assessment issued by Ministry of Ecology and Environment of P.R.China
https://www.mee.gov.cn/xxgk2018/xxgk/xxgk02/201808/t20180803_629536.html
- /54/ Notice on Strengthening the Management of Greenhouse Gas Emission Reports for Power

Generation Enterprises during 2023–2025 issued by Ministry of Ecology and Environment of the People's Republic of China on 14-Oct-2023

https://www.mee.gov.cn/xxgk2018/xxgk/xxgk06/202302/t20230207_1015569.html

/55/ Notice on the Issuance of the Work Plan for the Expansion of the National Carbon Emission Trading Market to Cover the Steel, Cement, and Aluminum Smelting Industries issued by Ministry of Ecology and Environment of the People's Republic of China on 20-03-2025

https://www.mee.gov.cn/xxgk2018/xxgk/xxgk03/202503/t20250326_1104736.html

/56/ Public literature “Analysis of Electricity Generation Performance per Unit Volume of Gas of Domestic Gas Generator Sets and Its Influencing Factors”

<http://dianda.cqvip.com/Qikan/Article/ReadIndex?id=39237992&info=i/8k3UeSzwEI32nBcDZ8+rxuosvpMtHX6sf5wKKrUnl=>

/57/ Yonggui Energy Development Co., Ltd. Xintian Branch: Operation and Maintenance Records covering this monitoring period

/58/ Statement from Xintian coal mine

/59/ Translation document of the screenshots of the publicly available pollution discharge information

/60/ Translated Content from Screenshot of the Public Report on People's Daily Online

/61/ Translation Qualification of Shanghai Linyue Translation Service Co., Ltd. issued by Orlis Certification Co., Ltd valid from 01-07-2025 till 30-06-2028

/62/ Business License of Shanghai Linyue Translation Service Co., Ltd. issued by Minhang District Market Supervision Administration on 10-06-2020

Methodologies, tools and other guidance

/63/ Verified Carbon Standard: VCS Standard, version 4.7

/64/ Verified Carbon Standard: VCS Program Guide, version 4.4

/65/ Verified Carbon Standard: Registration & Issuance Process, version 4.5

/66/ UNFCCC EB: Approved methodology, ACM0008, Version 08.0

APPENDIX 5: <CORRECTIVE ACTION REQUESTS, CLARIFICATION REQUESTS AND FORWARD ACTION REQUESTS>

Table 1: Clarification Requests

CL ID	Clarification Request	Response by Project Proponent	Assessment
-------	-----------------------	-------------------------------	------------

01	During this monitoring period the equipment was upgraded. The PP must clarify whether this upgrade triggers the need for a new project approval.	According to Article 37 of the regulation of "Measures for the Administration of the Approval and Filing of Enterprise Investment Projects" issued by National Development and Reform Commission dated 08-March-2017, For projects that have obtained the project approval document, if one of the following circumstances applies, the project entity shall promptly submit an application for modification in writing to the original project approval authority. (1)The construction location undergoes a change; (2) The investment scale, construction scale, or construction content undergoes significant changes ;(3) The project modification may have significant adverse impacts on economic, social, environmental and other aspects; (4) Other major circumstances that require adjustments to the content specified in the project approval document. The upgraded total installation capacity remains within the approved project capacity which is 17.6 MW and it does not fall under the above four circumstances. Thus, it is no need to apply for modification to the original project approval authority. Furthermore, according to the review comments on Environmental Protection Completion Acceptance of the project in April 2025, the upgrading does not constitute a major modification and therefore, there is no need for re-approval.	Pursuant to Article 37 of the Measures for the Administration of the Confirmation and Recordation of Investment Projects of Enterprises (2023 Revision)⁷, a modification application is required only if the project involves: (1) a change in construction site; (2) a significant change in investment, construction scale or content; (3) material adverse economic, social or environmental impacts; or (4) any other major adjustment to the approved content. As verified, the upgrade does not alter the construction site or plant boundary coordinates, and the installed capacity remains within the 17.6 MW limit specified in the original approval, subject to future CMM availability, an additional 3.6 MW capacity may be considered. No additional land use or permanent structures are introduced. The generation technology (CMM-fired internal combustion engines) and operational model remain unchanged. Emission levels post-upgrade remain within the limits set out in the currently valid Pollutant Discharge Permit, and no new emission sources or sensitive receptors have been added. Additionally, Expert Review Opinion on Environmental Protection Acceptance for the Project /21/ concluded that the project has passed the environmental protection acceptance. In conclusion, none of the conditions under Article 37 of the Measures is met. Therefore, the proposed equipment upgrade does not require re-approval or amendment of the original project approval. Therefore, CL01 was closed.
----	---	---	--

⁷ https://www.gov.cn/zhengce/2021-12/01/content_5752774.htm

02	Please clarify whether any of the project information associated with addressing environmental issues can be publicly available from local government website.	Any stakeholder can search for information related to this project on the official website of the Guizhou Provincial Department of Ecology and Environment. If the project fails to adequately address environmental issues, the website will issue public criticism or notifications accordingly. Additionally, the Bijie City Ecology and Environment Bureau website (https://www.bijie.gov.cn/bm/bjssthjj/hjzl/hjzlyb/) provides monthly environmental quality reports for Bijie City, including air quality and water quality data for the project location in Gantang Town. Furthermore, from the public information (https://permit.mee.gov.cn/perxxgkinf/o/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=25b870c1426448f3a31059f291c08b2b), the project has obtained the pollutant discharge permit. The project owner uploads the monthly pollutant discharge emission report to the National Pollutant Discharge Permit Management Information Platform every month. Based on the monthly emission reports, the pollutant emission indicators comply with the relevant emission standards.	The assessment team checked the Permit Management Information Platform – Public Portal⁸, administered by Ministry of Ecology and Environment of P.R.China, and confirmed that PP of the project activity has obtained Pollutant Discharge Permit. As provided in Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges⁹ issued by State Council of the People's Republic of China (Order of the State Council of the People's Republic of China, No. 736, issued 24-01-2021), a pollutant discharge permit shall be issued to a pollutant discharge entity which meets the following conditions: (5) Obtaining an approval document for the environmental impact report (form) of the construction project in accordance with the law, or having completed filing procedures for the environmental impact registration form. (6) The discharge of pollutants shall comply with the requirements of the pollutant discharge standards, and the discharge of key pollutants shall comply with the requirements of the technical standards for applying for and issuing pollutant discharge permits, the approval document for the environmental impact report (form), and the requirement for the control of the total volume of key pollutants discharged; and if the production and operation venue of the pollutant discharge entity is located in a key area or river basin which fails to meet the national environmental quality standards, the pollutant discharge entity shall also comply with the special requirements of the relevant local people's government for improving ecological and environmental quality. (7) The use of a pollution prevention and control facility can achieve the compliance with the requirements for permitted concentration of discharge or conformity with the feasible technology for pollution prevention and control. (8) The monitoring loci, indicators, and frequency, among others, of the self-monitoring plan comply with the national self-monitoring standards. The above English translation about
		⁸ https://permit.mee.gov.cn/perxxgkinf/o/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=25b870c1426448f3a31059f291c08b2b ⁹ https://www.gov.cn/gongbao/content/2021/content_5587653.htm ¹⁰ https://www.lawinfochina.com/display.aspx?id=34777&lib=law&sharetype	

Table 2: Corrective Action Requests

CAR ID	Corrective Action Request	Response by Project Proponent	Assessment
--------	---------------------------	-------------------------------	------------

01	PP is requested to provide evidences to demonstrate the additionality was not affected due to the equipment upgrading.	The methodological tool "Combined tool to identify the baseline scenario and demonstrate additionality (version 07.0)" is applied in the project. Based on the analysis, the proposed project is additional. The deviation does not change the applicability of the methodological tool "Combined tool to identify the baseline scenario and demonstrate additionality (version 07.0)". The investment analysis in the registered PD shows that without revenue from carbon credits, the project IRR(after tax) was 3.61% and considering the carbon credits revenue, the project IRR was 18.82%. In 2022, the project's generator capacity was upgraded to 14 MW. The IRR was recalculated accordingly. According to the review comments on Environmental Protection Completion Acceptance in April 2025, as far, the actual total static investment was 92,000,000 CNY, therefore, the static investment was changed from 92,950,900 CNY in the registered Joint PD-MR to 92,000,000CNY. Meanwhile, the annual average OM cost converted from 26,903,402 CNY to 19,310,093CNY based on the actual installed capacity (7.6MW in the first two operation years and 14MW from the third operation years) and the designed installed capacity (17.6MW). And the expected electricity supplied and tariff were remained the same as the registered Joint PD-MR for the recalculation Project IRR . Accordingly, without carbon credit revenue, the IRR was 5.95%, and including carbon credit revenue, it was 22.65%. If the remaining 3.6MW will be installed, the static investment and OM cost would be increased, and the IRR would be lower than 5.95%. This indicates that, given the deviation from the registered PD, the project remains financially unattractive. Thus, the project is still additional considering the project description deviation.	According to Joint PD&MR /3/, the pre-upgraded IRR (after tax) was 3.61%. Environmental Protection Completion Acceptance Monitoring Report Form /10/ shows the total static investment was changed from 92,950,900 CNY to 92,000,000CNY. PP recalculated the IRR to reflect this change and also updated the annual O&M cost to match the new installed capacity. The assessment team reviewed the IRR spreadsheet and confirmed that the post-upgrade IRR (after tax) is 5.95%, below the 8% after-tax benchmark specified in the Economic Assessment Method and Parameters for Construction Projects (2006 Edition) (NDRC & Ministry of Construction, Fa Gai Tou Zi [2006] No. 1325) /14/. Additionally, the current IRR of 5.95% is based on actual investment and O&M costs only during the two monitoring periods, with the remaining years still using the 17.6 MW design values for electricity generation and operating hours. If the remaining 3.6 MW were to be installed later, total investment would rise while all other assumptions - including generation and hours - would remain unchanged at the original design levels. This would further lower the IRR below the current 5.95%. Consequently, it is concluded that the equipment upgrade does not compromise the additionality of the project activity. Therefore, CAR 01 was closed.
----	---	---	---

Table 3: Forward Action Requests

FAR ID	Forward Action Request	Response by Project Proponent	Assessment
NA	NA	NA	NA

APPENDIX 6: <ENGAGEMENT WITH THE RELEVANT GOVERNMENT AUTHORITIES TO VERIFY THE AUTHENTICITY OF THE CARBON PROJECT>

CTI has verified engagement with relevant government authorities and has reviewed publicly available government records to confirm the authenticity of the carbon project, in accordance with VVB guidance, as documented in the Confirmation of Project Approval Status in China issued on 15-10-2025.

Power purchase agreement

The assessment team reviewed a report¹¹ published on People's Daily Online on 25-11-2022 /60/. According to the report, the gas power station at Xintian Coal Mine has installed 14 domestically advanced 1000kW generator sets, with a total installed capacity of 14MW. Furthermore, it stated that the mine has signed an electricity sales agreement with the Southern Power Grid, allowing surplus electricity generated from gas to be sold to the grid without any cap or quota after meeting the mine's own consumption needs, thereby turning waste into a valuable resource. Given that People's Daily Online¹² is the digital platform of the People's Daily, the official newspaper of the Central Committee of the Communist Party of China, and serves as a primary and authoritative source for domestic and international audiences seeking information on Chinese policies and developments, the assessment team considered the information from this source to be credible. Based on this, it was concluded that the project has indeed signed an electricity sales agreement with the Southern Power Grid.

Pollution clearances

The assessment team checked the Permit Management Information Platform - Public Portal¹³, administered by Ministry of Ecology and Environment of P.R.China, and confirmed that PP of the project activity has obtained Pollutant Discharge Permit.

As provided in Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges¹⁴ issued by State Council of the People's Republic of China (Order of the State Council of the People's Republic of China, No. 736, issued 24-01-2021), a pollutant discharge permit shall be issued to a pollutant discharge entity which meets the following conditions:

¹¹ <http://gz.people.com.cn/n2/2022/1125/c405223-40209686.html>

¹² <http://en.people.cn/english/199811/26/about.htm>

¹³ <https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=25b870c1426448f3a31059f291c08b2b>

¹⁴ https://www.gov.cn/gongbao/content/2021/content_5587653.htm

- (1) Obtaining an approval document for the environmental impact report (form) of the construction project in accordance with the law, or having completed filing procedures for the environmental impact registration form.
- (2) The discharge of pollutants shall comply with the requirements of the pollutant discharge standards, and the discharge of key pollutants shall comply with the requirements of the technical standards for applying for and issuing pollutant discharge permits, the approval document for the environmental impact report (form), and the requirement for the control of the total volume of key pollutants discharged; and if the production and operation venue of the pollutant discharge entity is located in a key area or river basin which fails to meet the national environmental quality standards, the pollutant discharge entity shall also comply with the special requirements of the relevant local people's government for improving ecological and environmental quality.
- (3) The use of a pollution prevention and control facility can achieve the compliance with the requirements for permitted concentration of discharge or conformity with the feasible technology for pollution prevention and control.
- (4) The monitoring loci, indicators, and frequency, among others, of the self-monitoring plan comply with the national self-monitoring standards.

The above English translation about Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges is reproduced from the Lawinfochina website¹⁵, which is jointly operated by the Peking University Legal Translation Research Center and Peking University Yinghua (Beijing) Technology Co., Ltd., and is recognized as an authoritative source.

Considering the project proponent has obtained a pollutant discharge permit, the assessment team deems the project's pollution performance during this monitoring period satisfies the four conditions set out in Article 11 of Regulation on the Administration of Permitting of Pollutant Discharges.

The publicly available pollution discharge information /59/ and the translated screenshot content from People's Daily Online's public report /60/ have been translated by Shanghai Linyue Translation Service Co., Ltd., an ISO 17100-certified translation provider /61//62/. The translated materials /59//60/ and translator credentials /61//62/ have been submitted for review.

¹⁵ <https://www.lawinfochina.com/display.aspx?id=34777&lib=law&sharetype>