

VALIDATION REPORT for the Project Activity

Unyte Biochar

In United Kingdom

Report No: CCIPL2313/RIVERSE/VAL/UNBR/20240604

Revision number: 1.0 Report Date: 03-09-2024

Carbon Check (India) Private Limited.

1701, Logix Office Tower, Plot No.: BW - 58, Sector - 32, NOIDA (Uttar Pradesh) - 201301, India.



I. OFFSET PROJECT DATA

Project title:	Unyte Biochar
Applicable GHG scheme:	Riverse Standard
Agreed level of assurance and scope of validation:	Reasonable level of assurance
Host party/country:	United Kingdom
Project location:	Theddingworth
Methodology (Applicable GHG scheme):	BECCS and Biochar RIV-ENGY-02-PYGAS-V1.0, September 2023
Sectoral Scope/Technical Area	3. Biomass carbon removal and storage
Stakeholder Consultation commenting period:	From 10-06-2024 until the project is certified.
Validated Detailed Project Description DPD:	Unyte Biochar - DPD - Validation2024, Updated 02-09-2024
Average Riverse Carbon Credits:	Estimated: 6976 tCO ₂ e/year
GHG reducing measure/technology:	Conversion of biomass to biochar and utilization in construction material/asphalt for storage.

Party/Country	Project Developers/Client	Role	Contract party
United Kingdom	Jamie Bartley (Jamie@unyte.co.uk) - Unyte Hemp Ltd	Project Developer	\boxtimes
	Christophe Nourissier (christophe.nourissier@augur.associates) - Augur Associates	Registration Partner	

II. VALIDATION TEAM (compliance of § 148e of VVS)

Va	lidation 1	Team		-			F	Role		-		
Full name	Affiliation	Appointed for Sectoral Scopes (Technical Areas)	Team leader	Acting/trainee Team Leader	Local Expert	Team Member	Technical Expert	Acting/Trainee Tech. Exnert	Trainee Auditor	Technical Reviewer	Expert to TR	Trainee TR
Anubhav Dimri	CCIPL	3. Biomass carbon removal and storage	Х				Х					
Sawan Rawat	CCIPL	3. Biomass carbon							Х			



		removal and storage						
Sanjay Kumar Agarwalla	CCIPL	3. Biomass carbon removal and storage					Х	
Amit Anand	CCIPL	3. Biomass carbon removal and storage				Х		

III. VALIDATION REPORT Validation Phases and Status:

Desk Review

v Sollow up interviews, On Site Assessment

 \boxtimes Resolution of outstanding issues \boxtimes Corrective Actions / Clarifications Requested

Full Approval and Submission for registration or submission to client
 Rejected or negative validation opinion

Final Approval Date	Approval	Distribution
	By: Priya Suman, Compliance Officer	No distribution without permission from the Client or responsible organizational unit
Date: 03-09-2024	Båya Syman	Unrestricted distribution



Abbreviations

BAU	Business As Usual
СА	Corrective Action / Clarification Action
CAR	Corrective Action Request
CCIPL	Carbon Check (India) Private Ltd.
CL	Clarification Request
CO ₂	Carbon Dioxide
CO₂eq	Carbon Dioxide Equivalent
COI	Conflict of Interest
DPD	Detailed Project Description
DVR	Draft Validation Report
EF	Emission Factor
FA	Final Approval
FAR	Forward Action Request
FVR	Final validation Report
GSC	Global Stakeholder Consultation
GHG	Greenhouse gas(es)
ICVCM	Integrity Council for Voluntary Carbon Market
IPCC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
KII	Key Impact Indicator
LCA	Life Cycle Assessment
MRR	Monthly Reading Records
OSV	On Site Visit
PD	Project Developer
QC/QA RCC	Quality control/Quality assurance Riverse Carbon Credit
SAB	Standard Advisory Board
TA	Technical Area
TAC	Technical Advisory Committee
TR	Technical Review
TRL	Technology Readiness Level
	United Nations Sustainable Development Goals
VVB	Validation & Verification Body



Validation Opinion — summary

The Validation and Verification Body (VVB), Carbon Check (India) Private Ltd hereinafter referred to as CCIPL, has been appointed by Unyte Hemp Ltdto perform the validation of their offset project "Unyte Biochar ". The validation was performed based on the Riverse Standard. The scope of the validation is defined as an independent and objective review of the Detailed Project Description (DPD), the project's baseline establishment and monitoring plan and other relevant documents. The information in these documents is reviewed against Riverse Standard.

The report is based on the assessment of the Detailed Project Description undertaken through stakeholder consultations, application of standard auditing techniques including but not limited to document reviews, site visit, and stakeholder interviews, review of the applicable/applied methodology and its underlying formulae and calculations.

The Validation team confirms the contractual relationship signed on the 24/06/2024 between the VVB, Carbon Check (India) Private Ltd and the Client, Unyte Hemp Ltd. The team assigned for the validation meets CCIPL's internal procedures including the requirements of ISO 14065 for VVB's team composition and competence. The validation team has conducted a thorough contract review as per ISO 14064^{/B05/} and CCIPL's procedures and requirements. The contract with client and CCIPL's contract review process confirms the objectives, scope, criteria for validation and also confirms the level of assurance of the validation. The level of assurance for this validation is reasonable. The objective, scope and criteria are detailed below.

Validation methodology and process

The validation has been performed as described in or ISO 14064^{/B05/} and constitutes the following steps:

- Conflict of interest review;
- Selection of validation team;
- Initial interaction/ Kick off call with the Client;
- Development of the validation plan;
- Publication of the Detailed Project Description on the Riverse Registry (10-06-2024) for 30-day Stakeholder consultation.
- Document review of data and information (Detailed Project Description and the relevant documents including the reference to information relating to projects or technologies similar to the proposed project activity and review based on the approved methodology being applied and of the appropriateness of formulae and accuracy of calculations).
- Cross checks between information provided in the Detailed Project Description and information from other sources.
- Follow up actions for cross checking data.
- Follow-up interaction with the client and other project personnel for supplemental information and corrective action as necessary; and
- Issuance of Validation Report after internal technical review.

Validation criteria

The following steps based on the requirements of the Procedures Manual, version $02^{/B03/}$ were followed during the validation audit:

- Understanding project activities and Project Developer's organization
- Familiarity with production's physical flows
- Understanding the GHG quantification methods and sector-specific approaches
- Assessing Project Developer's compliance with Riverse's 14 eligibility criteria
- Ensuring use of a conservative LCA model for GHG reduction calculations
- Evaluating accuracy of input data in the calculation model
- Confirming annual carbon credit estimates for removal/avoidance.



The host party for the project activity is Unyte Biochar in the United Kingdom.

The project correctly applies the baseline and monitoring methodology (related to applicable GHG Scheme) RIV-ENGY-02-PYGAS-version 1.0, "BECCS and Biochar: Pyrolysis of biomass for bioenergy with carbon capture and storage"/^{B02/}.

The project is expected to lead to removals of 6,976 tCO₂eq emissions per year that are real, measurable and give long-term benefits to the mitigation of climate change. It is demonstrated that the project is not a likely baseline scenario. Carbon removals attributable to the project are hence additional to any that would occur in the absence of the project activity.

The DPD contains a monitoring plan for the monitoring of the carbon removals from the project. The monitoring arrangements described in the monitoring plan are feasible within the project design and it is CCIPL's opinion that the Project Developers are able to implement the monitoring plan.

The project activity by recycling its hemp product production waste and turning it into biochar and thus durably storing the biogenic carbon captured by the crop during its growth^{/02/}, will result in reductions of greenhouse gas (GHG) emissions that are real, measurable and provide long-term benefits to the mitigation of climate change. Overall, the project complies with the 12 general eligibility criteria described in section 4 of the Riverse Standard Rules, version 6.0^{/B01/}.

The total Riverse Carbon Credits from the project are estimated to be 34,880 t of CO_2 eq over a 5-year crediting period, averaging 6,976 t of CO_2 eq annually. The Riverse Carbon Credit forecast has been checked and it is deemed likely that the stated amount shall be achieved given the underlying assumptions do not alter.

The validation protocol describes a total of 21 findings which include:

- 0 Corrective Action Requests (CARs);
- 20 Clarification Requests (CLs);
- 1 Forward Action Requests (FARs);

All findings of the main report and the project have been closed satisfactorily: FAR(s) shall be checked during the 1st periodic verification of the project.

Carbon Check (India) Private Ltd. concludes the validation with a positive opinion that the offset Project Activity "Biochar production at Unyte Biochar" in the United Kingdom, as described in the Detailed Project Description^{/02/}, meets all applicable requirements, including those specified in the Riverse Standard Rules, version 6.0^{/B01/}, Riverse Procedures Manual, version 2^{/B03/}, relevant methodologies, tools and guidelines provided by the Riverse Standard.

The selected baseline and monitoring methodologies, BECCS and Biochar, Version 1.0^{/B02/} of the Riverse standard are applicable to the project and correctly applied. Carbon Check (India) Private Ltd therefore requests the registration of the project with requirements of the Riverse Standard.



TABLE OF CONTENTS

1.	INTRODUCTION	8
1.1	Objective	8
1.2	Scope	8
2.	METHODOLOGY	9
2.1	Desk review	10
2.2	Background documents:	10
2.3	On site visit exclusion justification	11
2.4	Resolution of outstanding issues	11
2.5	Internal quality control	12
2.6	Validation Team	12
3.	VALIDATION FINDINGS	12
4.	DETAILED PROJECT DESCRIPTION/ PROJECT DESIGN:	12
5.	PROJECT DESCRIPTION:	14
6.	BASELINE AND MONITORING METHODOLOGY	15
6.1	Applicability of the selected methodology to the project activity 6.1.1 Life Cycle Assessment LCA 6.1.2 System Boundary 6.1.3 Baseline Scenario Identification 6.1.4 Project Scenario 6.1.5 Algorithms and/or formulae used to determine carbon removal 6.1.6 Carbon Removals 6.1.7 Additionality 6.1.8 Permanence and Risk of Reversal 6.1.9 No double counting 6.1.10 Substitution 6.1.11 Leakage 6.1.12 Technology Readiness Level (TRL) 6.1.13 Targets alignment 6.1.14 Minimum Impact	15 16 17 18 20 20 21 22 23 24 24 24 24 25 25
6.2	Monitoring6.2.1Parameters determined ex-ante6.2.2Parameters monitored ex-post6.2.3Sampling Protocol	25 25 27 27
7.	MANAGEMENT SYSTEM AND QUALITY ASSURANCE	27
8.	SUSTAINABLE DEVELOPMENT GOALS (CO-BENEFITS)	28
9.	ENVIRONMENTAL AND SOCIAL DO NO HARM SAFEGUARDS	28
10.	STAKEHOLDER CONSULTATION	
		33
APP	PENDIX B	61



1. INTRODUCTION

The Project Developer Unyte Hemp Ltd has appointed the Carbon Check (India) Private Ltd. to perform an independent validation of the offset Project Activity "Biochar Production at Unyte Biochar" in the United Kingdom (hereafter referred to as "project activity"). This report summarises the findings of the validation of the project, performed on the basis of Riverse Standard Rules, version 6.0^{/B01/} and the Riverse Procedures Manual, version 2.0^{/B03/} of the Riverse Standard, as well as criteria given to provide for consistent project operations, monitoring and reporting. This report contains the findings and resolutions from the validation and a validation opinion.

1.1 Objective

The objective of validation is to provide an external evaluation to ensure that:

- the LCA methods employed are robust and accurate,
- that there is consistency in the primary data collected,
- and that the project adequately answers to all 14 criteria outlined by the Riverse Standard.

Validation seeks to guarantee the realness and authenticity of the project, ensuring that it genuinely contributes to the set objectives and is not merely a theoretical construct. This external validation provides an additional layer of credibility and trustworthiness to the entire process, ensuring stakeholders of the project's integrity and alignment with established requirements.

Validation provides a thorough and independent assessment of the proposed project activity against the requirements of the Riverse Standard, in particular, the project's monitoring plan and the project's compliance with the Riverse Standard. These are validated in order to confirm that the project design, as documented, is sound and reasonable and meets the identified criteria. Validation is a requirement for all offset projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of offset credits.

1.2 Scope

The validation scope is defined as an independent and objective review of the project design. The DPD is reviewed against the relevant criteria (see above) and decisions by the Standard Advisory Board of the Riverse Standard, including the approved baseline and monitoring methodology. The validation team has, based on the recommendations in the criteria Riverse Standard Rules, version $6.0^{/B01/}$ and the Riverse Procedures Manual, version $2.0^{/B03/}$ employed a risk-based approach, focusing on the identification of significant risks for project implementation and the generation of the Riverse Carbon Credits.

The validation is not meant to provide any consulting towards the Project Developers. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the project design.

While carrying out the validation, CCIPL determines if the project activity complies with the relevant requirement of the Riverse Standard Rules, version 6.0^{/B01/}, the applicability conditions of the selected methodology, guidance issued by the Riverse Standard and also assesses the claims and assumptions made in the DPD without limitation on the information provided by the Project Developers.



2. METHODOLOGY

The following validation process is used based on the requirements of the Procedures Manual, version $02^{/B03/}$ was followed during the validation audit:

- ✓ Understanding project activities and Project Developer's organization
- ✓ Familiarity with production's physical flows
- \checkmark Understanding the GHG quantification methods and sector-specific approaches
- ✓ Assessing Project Developer's compliance with Riverse's 14 eligibility criteria
- ✓ Ensuring use of a conservative LCA model for GHG reduction calculations
- ✓ Evaluating accuracy of input data in the calculation model
- ✓ Confirming annual carbon credit estimates for removal/avoidance.

The validation process is utilized to evaluate whether the Project's approach, as outlined in the project design, is consistent with the Riverse Standard requirements and the BECCS and Biochar methodology^{/B02/}. A validation checklist is developed for the Project which summarizes the criteria used to evaluate the Project's compliance with the riverse standard, the Project's conformance with each criterion, and the validation team's findings.

Conflict of Interest Review

Prior to beginning any validation project, CCIPL conducts an evaluation to identify any potential conflicts of interest associated with the project. If no potential conflicts are identified for the offset project, then CCIPL moves with the validation of offset project. This process is followed before issuing LoE to the client and the contract for validation is signed between CCIPL and the client.

Validation Team composition

CCIPL's Audit Team consisted of the following individuals who were selected based on their validation experience, as well as familiarity with applied technology: Anubhav Dimri – Team Leader, Sawan Rawat – Trainee Assessor. Validation team composition (along with background details/CV of team members) was communicated in LoE and also before start of validation. In case of any team change during validation, the same shall be communicated to the client and COI shall be re-assessed.

Audit Kick-off

The validation process was initiated with a kick-off conference call/meeting between VVB and the client. The meeting focused on confirming the validation scope, objectives, criteria, schedule, and the information required for the validation.

Desk Review

The validation team performed a desk review of the Detailed Project Description and supporting documentation.

- ✓ A review of data and information;
- ✓ Cross checks between information provided in project design and information from sources with all necessary means without limitations to the information provided by the project developer;

Clarification requests

✓ The validation team has requested CLs (supplemental information) during the validation process. The clarification requests and the responses provided by have been summarised in the validation protocol of this report.



Validation Reporting

✓ The resolution of outstanding issues and the issuance of the draft validation report and opinion and thereafter internal technical review before final decision on the validation.

The following sections outline each step in more detail.

2.1 Desk review

The following table outlines the documentation reviewed during the validation:

Ref no.	Reference Document
/01/	Webhosted DPD, 10-06-2024
/02/	Final DPD, 02-09-2024
/03/	LCA Results, 05-07-2024
/04/	Signed Site Registration Document, 05-02-2024
/05/	Application to the West Northamptonshire Council, 03-05-2024
/06/	GreenPower Pyrolyser offer, 05-04-2024
/07/	Unyte Biochar Project Timeline, 30-04-2024
/08/	Unyte Biochar Site information, 21-06-2024
/09/	Biomass policy statement, 21-06-2024
/10/	Fertilizing products documentation, 21-06-2024
/11/	Unyte Biochar Revenue Model, 09-08-2024
/12/	Unyte Biochar Revenue Estimates, 09-08-2024
/13/	Biochar Permanence Risk Evaluation, 21-06-2024
/14/	Unyte Hemp sales agreement, 13-06-2024
/15/	Additionality Evaluation, 12-08-2024
/16/	Clinker Avoidance, 21-06-2024
/17/	Confirmation letter for Biochar Use in Road Construction, 21-06-2024
/18/	Pyrolysis installation plan and characteristics, 17-06-2024
/19/	Brief description of the 6-chamber furnace for briquettes, 21-06-2024
/20/	Signed agreement with Welland Waste Management Ltd, 24-07-2024
/21/	Pre-Application 'Advice in Principle' from the West Northamptonshire Council, 14-08-2024
/22/	Countersigned contract between CCIPL and Unyte Hemp Ltd, 24-06-2024

2.2 Background documents:

Ref no.

Reference Document



/B01/	Riverse - Standard rules V6 – May 2024 - Final
/B02/	Riverse - Methodology - BECCS and Biochar V1.0, September 2023
/B03/	Riverse - Procedures Manual V2 – May 2024
/B04/	 Woolf et al (2021) Marrot, L., Candelier, K., Valette, J. et al. Valorization of Hemp Stalk Waste Through Thermochemical Conversion for Energy and Electrical Applications. Waste Biomass Valor 13, 2267–2285 (2022). <u>https://doi.org/10.1007/s12649-021-01640-6</u> Green Power Kiln Output (reference for carbon content of biochar) Answers from the Riverse certification platform. All other background documents, which has been used by the validation team to cross check the technical specification of the project activity, input parameters for
	the financial model, barriers.
/B05/	ISO 14064

2.3 On site visit exclusion justification

According to the Riverse Procedures manual V2^{/B03/} physical on-site visits are only mandated for projects that issue more than 10,000 Riverse Carbon Credits annually. The project activity sequesters 6,976 tCO2e/year, so it does not require a physical on-site visit.

The VVB has also received confirmation in an email correspondence with the Riverse team that a remote audit is also not required, since the project is still in design phase and (a) not yet operational and therefore (b) not yet issuing carbon credits. This will be conducted later, once the project site is established and once the project starts issuing credits/starts operations.

A FAR has also been raised, requesting a site visit to be performed during the first verification period.

2.4 Resolution of outstanding issues

The objective of this phase of the validation is to resolve any outstanding issues (issues that require further elaboration, research or expansion), which need be clarified prior to Carbon Check (India) Private Limited' conclusion opinion on the project design. In order to ensure transparency a validation protocol is customized for the project. The protocol shows the criteria/requirements, means of validation and the results from validating the identified criteria in a transparent manner.

The validation protocol serves the following purposes:

- It organizes, details and clarifies the requirements an offset project is expected to meet applicable to the GHG scheme;
- It ensures a transparent validation process where the validator will document how a particular requirement has been validated and the result of the validation.
- It ensures that the issues are accurately identified, formulated, discussed and concluded in the validation report.
- It ensures the determination of achieving credible carbon removals from the project activity.

The validation protocol consists of two tables. The completed validation protocol for this project is enclosed in Appendix A to this report.

Findings established during the validation can either be seen as a non-fulfillment of Riverse Standard criteria or where a risk to the fulfillment of project objectives is identified. Corrective action requests (CAR) are issued, where:



- ✓ The Project Developer/Project Developers have made mistakes that will influence the ability of the project activity to achieve real, measurable, verifiable and additional carbon removals;
- ✓ The applicable GHG scheme requirements have not been met;
- ✓ There is a risk that carbon removals cannot be monitored or calculated.

A request for clarification (CL) may be issued if information is insufficient or not clear enough to determine whether the applicable GHG scheme requirements have been met.

A forward action request (FAR) is raised during validation to highlight issues related to project implementation that require review during the first verification of the project activity. The FAR does not relate to the applicable GHG scheme requirements for registration.

The validation protocol consists of two tables. Table 1 reflects the eligibility requirements and reference to the description used to validate the project activity against those requirements, as well as means of validation, reference to Table 2 (i.e. table of findings) and preliminary and final opinion of the VVB on every particular requirement listed in table 1.

2.5 Internal quality control

The final validation report has passed a technical review and quality review before being submitted to the Project Developer and the Riverse registry. The technical review has been performed by a technical reviewer qualified in accordance with CCIPL's qualification scheme for offset project validation and verification.

2.6 Validation Team

Carbon Check has appointed a competent team as per the ISO 14065, the Riverse standard sectoral classification and Carbon Check internal procedures, the team is outlined below:

Validation Team	ı				Type of In	volveme	nt	
Full name	Location	Appointed for Sectoral Scopes (Technical Areas)	Supervising the work	Desk review	Report and protocol Writing	Technical Expert Input	Reporting Support	Technical Reviewer
Anubhav Dimri	India	 Biomass carbon removal and storage 	х	х	Х	Х	Х	
Sawan Rawat	India	3. Biomass carbon removal and storage		х	Х		Х	
Sanjay Kumar Agarwalla	India	3. Biomass carbon removal and storage				X(TE to TR)		
Amit Anand	India	3. Biomass carbon removal and storage						х

3. VALIDATION FINDINGS

The findings of the validation are stated in the following sections. The validation criteria (requirements), the means of validation and the results from validating the identified criteria are documented in more detail in the validation protocol in Appendix A.

4. DETAILED PROJECT DESCRIPTION/ PROJECT DESIGN:



The Detailed Project Description/project design is based on the currently valid DPD/project design template and is completed in accordance with the relevant forms and guidance.

Subject	Webhosted (initial) DPD/project design ^{/01/}	Validated DPD /project design ^{/02/}	Assessment
Offset Project title	Biochar production at Unyte Biochar	Biochar production at Unyte Biochar	Based on the review of the initial DPD ^{/01/} and the
Project location	United Kingdom	United Kingdom	final validated DPD ^{/02/} ,
Offset Project technology including the capacity	The project activity aims to recycle its hemp product production waste by turning it into biochar, thus durably storing the biogenic carbon captured by the crop during its growth. According to the LCA Results the project will offset 7191.93 tCO2e annually.	The project activity aims to recycle its hemp product production waste by turning it into biochar, thus durably storing the biogenic carbon captured by the crop during its growth. According to the LCA Results the project will offset 6,976 tCO2e annually.	VVB has determined that necessary changes have been made to the final DPD based on the clarifications raised by the VVB in the Validation Protocol Table 2, Appendix A. The DPD now satisfactorily fulfils the criteria laid down by the
Methodologies and tools applied (scope and version numbers) applicable GHG scheme	BECCS and Biochar Methodology V1.0 ^{/B02/}	BECCS and Biochar Methodology V1.0 ^{/B02/}	Riverse - Standard rules V6 ^{/B01/} , Riverse - Methodology - BECCS and Biochar V1.0 ^{/B02/} , Riverse - Procedures
Carbon removals calculations (formula applied/ amount of Riverse Carbon Credit s)	6,976 RCCs	6,976 RCCs	Manual V2 ^{/B03/} .
Additionality: (Benchmark / input values/analysis type/project start date/IRR or NPV values etc. or barriers)	Regulatory analysis and a barrier analysis was provided by the PD. Insufficient IRR was found to be the main financial barrier.	The barrier analysis was replaced with an investment analysis. The benchmark was a cross referencing the PD's talks with several investors (Removall, Vertree, Replant, WhyOffset, Capturiant, Invert) and feedback from their Financial advisory board. For a 1.5 million investment, the revenue goal is 15,000,000 \in in project revenue to attract investments. In the Unyte Biochar (no CCs) revenue estimate, the sole biochar revenue falls short of this threshold (7,786,000 \in net) With about 6,300,000 \in missing, the carbon credit sales revenue (5,045,833 \in with credits sold at 100 \in /t) allows the project to	



	 Type and amount of feedstock inputs Amount of biochar sold in fresh matter Natural gas consumption Electricity consumption 	 reach a profitability level that can attract early investors. Type and amount of feedstock inputs Amount of biochar sold in fresh matter Natural gas consumption Electricity 	
GHG Monitoring (parameters / frequency)	 amount and type Biochar organic carbon and moisture content Updated barrier analysis showing that initial projections were reasonable Amount of clinker replaced by biochar 	 consumption amount and type Biochar organic carbon and moisture content Updated barrier analysis showing that initial projections were reasonable Amount of clinker replaced by biochar 	
Crediting period (type / start date)	01-01-2025 to 31-12- 2029	01-01-2025 to 31-12- 2029	
Project Start date	01-01-2025	01-01-2025	
Party involved	Christophe Nourissier (christophe.nourissier @augur.associates) - Augur Associates	Christophe Nourissier (christophe.nourissier @augur.associates) - Augur Associates	
Project	Jamia Bartlay	Jamaia Dantilay	1
110,000	Jamie Bartley	Jamie Bartley	
Developer/offset	(Jamie@unyte.co.uk) - Unyte Group	Jamie Bartiey (Jamie@unyte.co.uk) - Unyte Group	

Please refer to Appendix A of this report for details of each change between webhosted (initial) DPD/project design and the final DPD/project design for submission. The Validation Team has carried out the validation process based on the Webhosted (initial) DPD/project design and raised CARs/CLs against the project by issuing the validation protocol.

With the updated information and corrections done on final project design, the PP/client has addressed all the CARs /CLs that were raised by the Validation Team.

5. **PROJECT DESCRIPTION:**

Starting date of project	Expected project operational lifetime	Crediting period
01-01-2025	Conservative estimate taken as 5 years.	01-01-2025 to 31-12-2029

Unyte aims to recycle its hemp product production waste by turning it into biochar^{/02/}. This operation of Unyte Hemp Ltd, i.e. Unyte Biochar, is settled in Theddingworth, United Kingdom. Unyte plans to utilize the Multi-Eco pyrolysing furnaces from Green Power Ltd for the production of high-quality biochar. The process of pyrolysis will be enhanced by compacting the biomass with a press line from Agrobio Bichet, which will create high-density briquettes and yield high-grade biochar^{/19/}. Initially, Unyte will depend on the green waste from a local wood processing



facility and its existing hemp reserves. Eventually, it will also handle the hemp waste from its neighboring hempcrete plant.

The main advantage of biochar lies in its ability to retain the carbon that the plant has extracted from the atmospheric pool. This is in contrast to other methods such as outright combustion, natural decomposition, and various waste management alternatives, which result in the emission of CO_2 and other GHGs into the atmosphere. This process will not result in the export of any syngas or bio-oil. All the syngas/bio-oil produced shall be used to power the pyrolysis plant itself.

Unyte Biochar is in the process of finalizing an uptake agreement to sell the biochar and the associated carbon credits to a low-carbon construction material manufacturer to be used as a replacement for clinker and aggregate in cement and asphalt. No avoidance credits are currently being considered for this activity.

Carbon Check (India) Private Ltd validation team considers the project description of the project contained in the offset project design to be complete and accurate. Adherence to the eligibility criteria is established in validation protocol table 1, Appendix A. The LCA results provide accurate, transparent data and conservative estimates. The monitoring plan also includes all necessary Key Impact Indicators (KIIs) to be monitored. The offset project design complies with the relevant methodology, tools, forms and guidance at the time of offset project design submission for registration.

6. BASELINE AND MONITORING METHODOLOGY

6.1 Applicability of the selected methodology to the project activity

Approved baseline and monitoring methodology "BECCS and Biochar" (version 1.0)^{/B02/} has been correctly quoted and applied for the proposed offset project activity, the validation team compared it with actual text of the applicable version of the methodology. At the time of GSP of the DPD methodology "BECCS and Biochar version 1.0"^{/B02/} applied was the latest one.

The validation team determined the applicability of methodology BECCS and Biochar (version 1.0)^{/B02/} as follows:

Applicability condition of the methodology (BECCS and Biochar), Version 1.0 ^{/B02/}		Assessment by the validation team
This methodology, tailored to processes including pyrolysis and gasification, focuses on projects creating energy while simultaneously sequestering carbon in biochar (or bio- oil). Projects are usually optimized for producing one or the other, and either setup is eligible. (Current version: v1.0)	Yes	Based on the assessment of the project activity details provided in the DPD ^{/02/} , VVB confirms that the project involves pyrolysis of biomass for biochar production and meets the applicability condition for the methodology.

The assessment of the project's compliance with the applicability criteria of the methodology BECCS and Biochar (version 1.0)^{/B02/} as documented in the offset project design, which are evaluated in detail under the validation protocol in Appendix A to this report based on the webhosted DPD/initial project design^{/01/}. The validation teams have verified that the documentation content is correctly quoted and interpreted in the offset project design. Thus, the validation team confirms the applicability of the selected methodology to the proposed offset project activity.



6.1.1 Life Cycle Assessment LCA

Due to the absence of a comparable baseline scenario and the exclusive production of biochar, a comparative approach was not applied to this project. Consequently, the GHG reduction assessment solely addressed the project scenario, with carbon credit issuance reflecting the net negative emissions resulting from carbon removals attributed to biochar. A cradle-to-grave approach was used for the LCA, meaning that it considers all life cycle stages, from production to the end of life.

6.1.1.1 Functional Unit

A functional unit is the reference value to which all impacts are normalized. The project's main function is producing biochar. Therefore, the functional unit for the LCA is the production of 1 tonne of biochar and its application in producing low-carbon construction material. Thus the functional unit as determined for the project is in accordance with requirements of section 5.2.1 of Riverse Standard Rules (V6.0).

6.1.1.2 Assumptions

Key Assumptions:

- Waste feedstock inputs come with no impacts/B02/.
- Buildings and main infrastructure have a lifetime of 20 years, and the distribution network connection has a lifetime of 50 years/^{B02/}.

Project Specific Assumptions:

• In the absence of primary data from the project developer on the composition of the pyrolysis machinery, conservative estimates were made. It was assumed to have a 5-year service lifetime and be composed of 50 tonnes of steel, which was 50% unalloyed and 50% low-alloyed^{/02/}. These assumptions were deemed appropriate due to the low contribution of impacts from machinery, even though the most impactful reasonable scenario was assumed.

6.1.2 System Boundary

The system boundary as well as the sources and gases identified in the DPD are deemed to be appropriate by the VVB.

The system boundary defines which processes are included in the project scenario. An overview of the system is shown in the figure below, and details are provided in the following sections for the project scenario.

The scope of the LCA is cradle-to-grave, meaning that it considers all life cycle stages, from production to the end of life. The upstream limit of the system was the acquisition of feedstock inputs, and the downstream limit was the end of life of biochar through its application in producing low-carbon construction materials.

A more detailed description of each process has been provided in the project scenario section below.



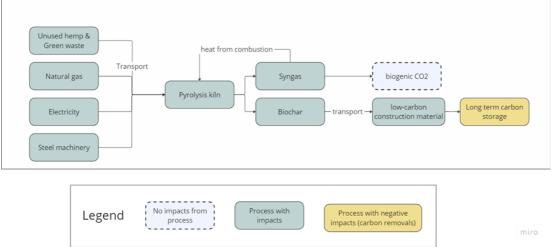


Figure 1: Detailed depiction of the system boundary

In summary, the project boundary was correctly identified in accordance with the methodology BECCS and Biochar (version 1.0)^{/B02/}. All greenhouse gas emissions occurring within the proposed project activity boundary as a result of the implementation of the proposed offset project activity have been appropriately addressed in the offset project activity. The validation team confirms that all main GHG emission sources, the physical delineation of the project activity and other relevant project and baseline emission sources covered in the methodology are included in the system boundary.

According to the assessment of the VVB, the identified system boundary and selected sources of emissions are justified for the project activity.

6.1.3 Baseline Scenario Identification

As per the applied methodology BECCS and Biochar (version 1.0)^{/B02/}, the validation team confirms that a typical baseline scenario cannot be defined for BECCS and biochar projects due to the diverse nature of their final products. No baseline scenario is considered for the biochar component, because it is assumed that biochar does not replace any product. Biochar has many uses and effects in the soil and can be related to mineral fertilizer or compost use but does not typically fully replace any product. Due to the uncertainty in choosing a baseline, the conservative approach is taken, and no avoided products are accounted for.

Information and proof needed from projects	Information and proof provided
Amount and type of final products	Biochar. Proof provided: • DPD ^{/02/} • Description of carbonization complex ^{/18/,} /19/
Description of the use of the product	 Biochar is used to replace clinker in concrete production and aggregate in asphalt production. Proof provided: Clinker Avoidence^{/16/} Confirmation letter for Biochar Use in Road Construction^{/17/}
Transport distance and mode to place of use (if applicable)	0.47 km Proof provided: • LCA ^{/03/} • Unyte Biochar Site information ^{/08/}
Relevant characteristics of the product	 Feedstock type: Wood waste and agricultural hemp waste. feedstock amount: 7000 tonnes



 biochar fresh: 2352 tonnes moisture content: 1.65% organic carbon content: 90.2% Proof provided: DPD^{/02/} LCA^{/03/} Marrot, L., Candelier, K., Valette, J. <i>et al.</i> Valorization of Hemp Stalk Waste Through Thermochemical Conversion for Energy and Electrical Applications. <i>Waste</i> <i>Biomass Valor</i> 13, 2267–2285 (2022). ^{/B04/}
 Green Power Kiln Output ^{/B04/}

All the assumption and data used by the Project Developers are listed in the offset project design and/or supporting documents. The absence of a comparable baseline scenario has been justified appropriately, supported by evidence and can be deemed reasonable.

6.1.4 Project Scenario

The project scenario includes 4 life cycle stages:

- 1. Feedstock provisioning and transport
- 2. Pyrolysis
- 3. Biochar use in the production of low-carbon materials
- 4. Infrastructure and machinery

6.1.4.1 Feedstock provisioning and transport

The feedstock for the first year of production includes unused hemp from Unyte's hemp storage facility and green waste from neighbouring wood processing plants in the ratio of 1:6. For the second year, the feedstock would consist of wood waste. In the third year of production specifically, additional hemp waste will be sourced from Unyte's hemp-based construction facility to match the increased share of wood waste in a ratio of 1:1. The project plan is to further scale up the feedstock provisioning of hemp waste and green waste in a ratio of 1:3 in the fifth year of production^{/02/}.

These feedstock inputs are waste materials that would have been stored to decay, composted, disposed of or used for animal bedding, eventually releasing carbon in the atmosphere. Since they are waste products, they enter the project system boundary with no environmental impacts.

The transport distance averages 6 km and is almost 0.5 km for the first year. Emissions from truck transport of feedstock inputs to the pyrolysis site are included^{/02/}.

Information and proof needed from projects	Information and proof provided
Amount and type of each feedstock input	 1st year: Hemp and green waste from wood processing plant in ratio 1:6 2nd year: Wood waste 3rd year: Additional hemp waste to wood waste ratio 1:1 5th year: Hemp waste to green waste in ratio 1:3 Proof provided: DPD^{/02/} Answers from the Riverse certification platform^{/B04/}
Average transport distance of each input	1 st year: 0.47km 5-year average: 6km



	Proof provided: • LCA ^{/03/} • Unyte Biochar Site information ^{/08/}
Energy used for preparing inputs	Diesel in feedstock provisioning. Proof provided: • LCA ^{/03/} • Answers from the Riverse certification platform ^{/B04/}

6.1.4.2 Pyrolysis

This stage consists of electricity consumed by 6 pyrolysis chambers and natural gas to launch the pyrolysis kiln. The feedstock is shredded using electricity and added to the pyrolysis machine, which is pyrolysed at 530 degrees Celsius for 10 minutes. Another by-product of this process is syngas which will be burnt to provide heat for the pyrolysis process^{/02/}.

Information and proof needed from projects	Information and proof provided
Amount and type of electricity used	Grid electricity: 1400676 kWh
	Proof provided:
	 LCA^{/03/}
	Answers from the Riverse
	certification platform/B04/
type and amount of energy used for starting the	Natural gas: 300 litres.
pyrolysis/gasification process	Proof provided:
	 LCA^{/03/}
	Answers from the Riverse
	certification platform/ ^{B04/}

6.1.4.3 Biochar use in the production of low-carbon materials

This stage calculates the carbon sequestered over 100 years from adding biochar to the cement mix. It is assumed that the biochar addition to cement here will not decay or decompose, so no fraction of the stored carbon will be released. Therefore, the permanence factor of carbon removal from biochar is 100. This is because once biochar is immobilized in the inert concrete material, it is not exposed to the same biogeochemical processes as it is in soil, so no degradation is expected.

Packaging was excluded since the project does not expect to use any packaging and will sell directly to the uptaker.

Biochar is widely accepted to be a viable component of cement: "Biochar, as an additive in concrete and other applications, achieves long term carbon storage and significant emissions reduction compared to conventional materials.

From enhancing construction materials (Zhang et al., 2022) to reducing the carbon footprint of cement-based products (Suarez-Riera, Restuccia, Ferro, 2020), biochar potentially serves as a carbon-sequestering additive in cement mortar, contributing to both strength and sustainability (Gupta, Kua & Low, 2017). This capability enables buildings to function as carbon sinks (Zhang et al., 2022)."^{/02/}

Information and proof needed from projects	Information and proof provided
amount and type of electricity and chemicals used	To be verified during first verification.
amount and type of other inputs and outputs (if applicable)	-
distance and mode of transport for delivery of final products	To be verified during first verification.



6.1.4.4 Infrastructure and machinery

The pyrolysis machine was assumed to weigh 50 tonnes, composed of half unalloyed steel and half low-alloyed steel. The assumed lifetime was 5 years. This was the largest and shortest-lived machine that could be reasonably estimated to obtain conservative estimates of reduced emissions. Still, this estimate accounted for small life-cycle impacts (about 1%), so it was unnecessary to refine this estimate further^{/02/}.

Information and proof needed from projects	Information and proof provided
Amount of steel, concrete, PVC HPDE, and other main	Riverse assumption: 50 tonnes of steel
materials used to construct the site and machinery	The exact quantity of metals, concrete and plastics to be determined in a machine report that shall be verified during the first verification. Proof provided: • DPD ^{/02/}
	 Answers from the Riverse certification platform^{/B04/}
Service lifetime of machinery	5 years Proof provided: • DPD ^{/02/} • Answers from the Riverse certification platform ^{/B04/}

6.1.5 Algorithms and/or formulae used to determine carbon removal

The Validation team confirms that the steps taken, and the equations and parameters applied in the DPD/offset project design to calculate project emissions, baseline emissions and leakage and carbon removal comply with the requirements of the selected methodology including applicable tools.

The validation team confirm that all assumptions and data used by the Project Developer are listed in the offset project design (including their references and sources). All documentation used as a basis for assumptions and sources of data are confirmed as correctly quoted and interpreted in the offset project design. The values stated in the offset project design are considered reasonable and the baseline methodology and applicable tools have been correctly applied to calculate the Riverse Carbon Credits from the offset project activity.

6.1.6 Carbon Removals

In summary, the calculation of Riverse Carbon Credits was correctly demonstrated by the PD according to the methodology BECCS and Biochar (RIV-ENGY-02-PYGAS-V1.0)^{/B02/}. The table below summaries validation team's determination of Riverse Carbon Credits:

All assumptions made for estimating GHG are listed in the DPD	Yes	VVB has determined that all assumptions made for estimating GHG removals are listed in the DPD ^{/2/} along with their
All data used by Project Developers is listed in the DPD	Yes	references and sources.
Their references and sources are also listed in the DPD	Yes	Data, formulas and parameters used are complete, accurate, transparent and conservative.
Formulas, parameters, values are complete, accurate, transparent and conservative	Yes	The BECCS and Biochar methodology ^{/B02/} has been applied correctly to calculate



All the references and documents used are correctly quoted and conservatively interpreted in the DPD	Yes	project emissions, leakage emissions and carbon removals.
Methodology has been applied correctly to calculate project emissions, baseline emissions, leakage emissions and carbon removals	Yes	Baseline emissions have not been considered as the biochar does not replace any product. A cradle to grave Life cycle assessment approach has been applied by the PD.

Based on the calculations and results presented in the sections above the implementation of the project activity will result in an average ex-ante estimation of carbon removals conservatively calculated to be 6,976 tCO₂e per year for the selected crediting period.

All assumptions and data used by the Project Developers are listed in the offset project design and/or supporting documents, including their references and sources. All documentation used by the Project Developers as the basis for assumptions and source of data is correctly quoted and interpreted in the offset project design. All values used in the offset project design are considered reasonable and conservative in the context of the proposed project activity. The methodology has been applied correctly to calculate project emissions, leakage and carbon removals. All estimates of the project and leakage emissions can be replicated using the data and parameter values provided in the offset project design.

6.1.7 Additionality

The project refers to section C3 of the BECCS and Biochar methodology $^{\!/\text{B02/}}$ to demonstrate additionality.

The Riverse Additionality Template^{/15/} has been filled out and provided to the VVB by the Project Developer. It contains:

- a regulatory surplus analysis, proving that the project's mitigation activities go beyond what is required by regulations, and
- investment analysis with a business plan proving that revenue from carbon finance is necessary to make the project investment a financially viable and interesting option, and carbon finance is crucial to ensuring the project can overcome financial hurdles and become a feasible investment option.

PD has also provided evidence in the form of Biomass policy statement^{/09/}, Fertilizing products documentation^{/10/}, Unyte Biochar Revenue Model^{/11/} and Unyte Biochar Revenue Estimates^{/12/} to support the claims made in the additionality evaluation document^{/15/}.

All issues and clarifications related to additionality have been resolved and Regulatory additionality and financial additionality has been established.

The validation team confirms the project activity is additional as claimed in the DPD $^{/02/}$ and the Additionality evaluation document $^{/15/}$.

6.1.7.1 Regulatory Surplus Analysis:

The UK's Waste Directive limits biochar use by classifying biomass residues and biochar byproducts as waste, except for certain natural agricultural and forestry materials. The Fertilising Products Regulation governs biochar by restricting feedstock types, contamination, and hazardous substances—still, no regulations mandating the use of leftover biomass for biochar production and its further usage. The project seeks carbon credits to fund necessary equipment and operations but struggles with insufficient IRR to attract investors in a crowded biochar market. The biochar market saw a sharp decline in demand and prices, with 2023 being particularly challenging. Revenue from carbon credits is essential to bridge the gap between biochar sales revenue and the investment needed to make the project viable and attractive to



investors. Without carbon credits, the project cannot meet investor demands, relying solely on insufficient biochar sales revenue^{/02/}.

VVB has reviewed the following documents for the assessment of regulatory surplus analysis:

- 1. Detailed Project Description^{/2/}
- 2. Riverse Additionality Template/15/
- 3. Description of the regulatory environment concerning the project's mitigation activity.
- 4. Description of current and confirmed upcoming regulations or incentives that promote the project's solution.

Based on an overall review, the project has met the requirements of the regulatory surplus analysis in accordance with the §4.3.1 of the Riverse Standard Rules, version $06^{/B01/}$.

6.1.7.2 Investment Analysis

An investment analysis has been provided including a business plan proving that revenue from carbon finance is necessary to make the project investment a financially viable and interesting option, and carbon finance is crucial to ensuring the project can overcome financial hurdles and become a feasible investment option^{/02/}.

VVB has reviewed the following documents for the assessment of investment analysis:

- 1. Detailed Project Description^{/02/}
- 2. Riverse Additionality Template^{/15/}
- 3. Unyte Biochar Revenue Model/11/ and Unyte Biochar Revenue Estimates/12/
- 4. Description of the IRR requirements concerning the project activity.
- 5. Description of current and confirmed upcoming incentives that promote the project's solution.

Based on an overall review, the project has met the requirements of the investment analysis in accordance with the §4.3.2 and 4.3.3 of the Riverse Standard Rules, version $06^{/B01/}$.

6.1.7.3 Barrier analysis

According to section 4.3 of the Riverse Standard V6.0^{/B01/}, either investment or barrier analysis is required to be done by the PD.

PD has opted to perform an investment analysis thus a barrier analysis is not required.

6.1.7.4 Conclusion of assessment of Additionality

The evidence were transparently reviewed by the validation team and considered to be appropriate. Regulatory analysis and investment analysis clearly demonstrate that the proposed project activity is financially unattractive. Therefore, the proposed project activity is not business-as-usual, i.e. the proposed project activity is additional.

6.1.8 Permanence and Risk of Reversal

The combination of hemp & wood waste will be pyrolysed to create biochar, which will be used in low-carbon construction materials. The project's commitment period for carbon removals is 100 years. The reversal risk assessment template^{/13/} has been completed by the Project Developer and shows that the project has no reversal risks with a high or very high-risk score (>10, considering the likelihood and severity of the risk).



No additional action is required from the Project Developer, and the default contribution of 3% of the project's verified removal credits shall be transferred to the buffer pool upon issuance^{/02/}.

VVB has assessed the reversal risk assessment^{/13/} provided the PD and finds the evidence and justification for a permanence of 100 years satisfactory.

6.1.9 No double counting

Double use of RCCs is prevented by the Riverse Registry, where RCCs are traced with a unique identification number from issuance to retirement, and an immutable certificate is generated upon retirement. **Double issuance of credits on multiple registries** is not allowed, as stated in the Riverse Standard Rules. By signing the Riverse MRV & Registry Terms & Conditions, Project Developers agree to not seek credit issuance for the same activity under a different standard for the same year.

The Project Developer has no previous issuance of carbon credits to disclose for the same mitigation activity under a different time period and a different crediting program. Moreover, double issuance of credits along the value chain will be prevented by the sales agreement terms that Unyte Hemp will share with the uptakers mentioning that carbon credits have already been issued for the mitigation activity and cannot be reissued, as required by the Riverse BECCS and Biochar methodology.

Several types of double claiming are outlined in the Riverse Double Counting Policy, and are described for the project below:

Double claiming with an NDC: There is no project requirements here because the project's RCCs will not be used towards a nationally determined contribution (NDC) or for a domestic climate mitigation target of a jurisdiction or nation other than the host country because the EU NDC scope does not cover engineered carbon removals such as carbon sequestration through biochar. Furthermore, the project's RCCs will not be used towards CORSIA.

Double claiming with national climate policies and emissions trading schemes: This is not applicable to the project activity because engineered carbon removals, such as carbon sequestration through biochar, are not covered by the EU ETS system.

Double claiming with other GHG-related environmental credits: This is not allowed, as stated in the Riverse Standard Rules. By signing the Riverse MRV & Registry Terms & Conditions, Project Developers agree to not seek credit issuance at the same time as another GHG-related environmental credit for the same project activity and time period.

Double Claiming of Emissions for Reporting Towards Voluntary Climate Pledges: Not applicable for this project^{/02/}.

Section C5-Unicity of the BECCS and Biochar methodology states:

"For carbon removal credits from biochar, projects must ensure that the user of biochar will not claim carbon credits. This can be done through a signed agreement between the biochar producer and farmers."

In this case an agreement between Unyte and the purchaser has been drafted which states: "Sales of biochar produced by Unyte Hemp Ltd/Unyte Biochar do not give the Purchaser any rights to the carbon credits that are generated by its biochar production."

PD has also provided a signed agreement with Welland Waste Management Ltd stating that they will not be applying for carbon credits associated with the supplied feedstock.



Based on the assessment of the evidence mentioned above, VVB has determined that unicity has been satisfactorily established.

6.1.10 Substitution

As biochar production is not eligible for avoidance Riverse Carbon Credits (RCCs), this eligibility criterion is not assessed.

6.1.11 Leakage

The leakage risk from upstream and downstream emissions is estimated to be low because these emissions are included in the life-cycle-based GHG reduction quantification.

There is a risk of activity shifting leakage when biomass is used for feedstock inputs. This risk is estimated to be negligible for this project because the biomass used is a waste product and had no use before the project.

For year one, Unyte has a stock of hemp that is degrading. It cannot be processed as Unyte's building material plant has not been constructed yet. Plus, local and/or affordable alternatives for processing are scarce as the UK still implements a restrictive licensing system for hemp.

Hemp processing generates three direct hemp products: fibre, shiv and dust. While Unyte's construction material plant will use fibre to produce insulation mats and shiv to produce hempcrete, there is no use for hemp dust in construction (in the UK, it can be burnt for energy or used for animal bedding – in both cases re-emitting CO2)

Unyte will be recuperating green waste from a wood processing plant next door from the biochar operation. The wood would have otherwise been burnt or sent to a landfill to rot as it is composed of bits and branches that are unfit for use. Therefore, the diversion of this biomass to the project does not affect the supply for other uses, and there is no risk of activity shifting^{/02/}.

PD claims there is negligible activity shifting leakage as the feedstock being used are waste products with no other use and the leakage risk from upstream and downstream emissions is managed by including these emissions in the LCA results^{/3/}.

VVB has determined these claims to be true by thorough assessment of the DPD^{/02/}, the LCA results^{/3/} and the answers in the Riverse certification platform^{/B04/}.

6.1.12 Technology Readiness Level (TRL)

The project has a TRL of 7- System model or prototype demonstration in an operational environment, as all units in the biochar production chain have been proven to be operational but have not been assembled on site yet. This meets the Riverse Standard Rules requirement of a TRL of at least 6. This TRL is justified by the detailed brochure provided by Green Power of their existing equipment and its operational characteristics.

Once commissioning is over, project TRL will be 9, as actual production will start to measure its carbon capture^{/02/}.

Based on the assessment of the detailed description of Green Power's Carbonization Complex^{/18/} and its operational characteristics^{/19/}, VVB has determined that this TRL is justified.



6.1.13 Targets alignment

According to the BECCS and Biochar methodology^{/B02/}, targets alignment is proven using a comparative life cycle assessment with the baseline scenario. As the project does not identify a baseline scenario or perform a comparative LCA, VVB has determined that this section does not apply to the project.

6.1.14 Minimum Impact

The project is expected to remove 6,796 tCO2eq annually over the 5-year crediting period, according to the results of the GHG removal quantification. Since this surpasses the requirement in the Riverse Standard Rules of 1000 tCO2eq, the project meets this eligibility criterion. VVB confirms this through a thorough assessment of the Life Cycle Assessment results^{/03/}.

6.2 Monitoring

The project GHG monitoring plan is in compliance with the Riverse BECCS and Biochar methodology (version 1.0)^{B02/}. It is the VVB's opinion that the Project Developer is able to implement the monitoring plan.

6.2.1 Parameters determined ex-ante

The ex-ante parameters listed below have been provided in the "Fixed Parameters" sheet of the LCA results $^{\prime 03\prime}$

SI. No.	GHG monitoring Parameters	Description
1	Calculated_biochar_amount_dry	2313.192 tonnes, Dry biochar amount calculated using the formula: inputs_biochar_amount_fresh * (1 - inputs_moisture_content / 100)
2	Calculated_carbon_to_CO2	(44/12) = 3.6666666667 Ratio based on the atomic weights of CO2 and Carbon.
3	Fixed_coir_density	Bulk density of coir 200 kg/m3
4	Fixed_diesel_density	Density of diesel used in feedstock preparation 0.84 kg/m3.
5	Fixed_kg_diesel_per_hour	Diesel consumption per hour 24.78 kg/hour.
6	Fixed_machine_lifetime	5 years is taken as the conservative estimated lifetime of the equipment.
7	Fixed_peat_density	Bulk density of peat 150 kg/m3
8	 Emission factors transport, freight, lorry 3.5-7.5 metric ton, EURO5 wood chipping, terrain chipper, diesel market for electricity, low voltage market for natural gas, low pressure metal working, average for steel product manufacturing market for steel, low- alloyed 	Emission factors from the <i>ecoinvent-3.9.1-</i> <i>cutoff</i> database.



•	market for steel,	
	unalloyed	

The validation team confirms that all relevant parameters have been sufficiently considered and the values of the parameters are real, measurable and conservative.

6.2.2 Parameters monitored ex-post

List of Key Impact Indicators (KIIs) to audit:

Criteria	Indicator	Sources	Frequency
C1 - Measurability	Type and amount of feedstock inputs	Bill, receipt or contract with biomass provider of the quantity of biomass actually used	Annually, at the beginning of the year
C1 - Measurability	Amount of biochar sold in fresh matter	Bills, receipts production records, or sales records of biochar	Annually, at the beginning of the year
C1 - Measurability	Natural gas consumption	Receipts of annual propane purchases	Annually, at the beginning of the year
C1 - Measurability	Electricity consumption amount and type	Electricity bills from the pyrolysis site	Annually, at the beginning of the year
C1 - Measurability	Biochar organic carbon and moisture content	Laboratory chemical analyses of biochar	Annually, at the beginning of the year
C3 - Additionality	Updated barrier analysis showing that initial projections were reasonable	Biochar selling projections & current data	Annually, at the beginning of the year
C6 - Co benefits	Amount of clinker replaced by biochar	Production records, and process records followed to create clinker	Once, during verification

In summary, the validation team is convinced of compliance of the monitoring plan with the requirements of the BECCS and Biochar methodology (version 1.0)^{/B02/}.

6.2.3 Sampling Protocol

No sampling protocol was applied as part of the validation activities.

7. MANAGEMENT SYSTEM AND QUALITY ASSURANCE

Based on the evaluation of the Key Impact Indicators (KIIs) to be monitored, VVB has determined that all parameters of importance for controlling and reporting of project performance are incorporated in the monitoring plan



A clarification was raised (CL8) regarding the frequency of the monitoring activities which was satisfactorily justified by the PD.

8. SUSTAINABLE DEVELOPMENT GOALS (CO-BENEFITS)

The project contributes to the following United Nations Sustainable Development Goals (UN SDGs).



Goal 12.2: Achieve the sustainable management and efficient use of natural resources

By placing value on resources that might otherwise be discarded as waste, Unyte Biochar facilitates the reintegration of these residues into production. The project contributes to this SDG by using waste materials such as hemp waste and green waste for effective waste management and reductions in emissions and overall waste^{/02/}.

The performance indicator of this SDG is the amount of waste taken up by the project, and for 2024 its value is estimated at 1 ton/carbon credit^{/02/}.

VVB finds that the project sufficiently contributes to the SDG Goal 12.2: "Achieve the sustainable management and efficient use of natural resources" and finds PD's justification for choosing the goal appropriate.



SDG 13.2: Integrate climate change measures into national policies, strategies and planning

Cement production is energy-intensive and emits the most due to its clinker production process. In Europe, the emissions of clinker production are around 880 kg $\rm CO_2$ per ton¹. However, the project plans to substitute clinker with biochar to reduce these emissions. This emission avoidance is considered a co-benefit because it is not being issued Avoidance Riverse

Carbon Credits and is not included in the GHG reduction quantification below^{/02/}.

Hence, the performance indicator of this SDG is the amount of avoided CO_2 emissions; for 2024, its value is estimated at 880 kg CO_2 /ton of biochar produced^{/02/}.

VVB finds that the project sufficiently contributes to the SDG Goal 13.2: "Integrate climate change measures into national policies, strategies and planning" and finds PD's justification for choosing the goal appropriate.

According to the Riverse Standard Rules V6.0^{/B01/}, projects must provide at least 2 co-benefits from SDG goals framework. Based on the review of section 3.6 "Co-benefits" of the provided DPD, VVB has determined that the project meets this criterion.

9. ENVIRONMENTAL AND SOCIAL DO NO HARM SAFEGUARDS

¹ https://www.vie-publique.fr/en-bref/289347-production-de-ciment-le-cout-de-la-decarbonation



Stakeholder consultation:

According to the Riverse standard rules V6 section 3.3.6, the stakeholder consultation is to be conducted in parallel to the validation.

This is conducted online through the Riverse Registry for 30 days during the validation phase. However, the project is open for public consultation on the Riverse platform.

Risk assessment:

The Risk Assessment Template^{/13/} has been completed by the project developer for the project activity based on the details listed in section C8 of the methodology BECCS and biochar-V1.0^{/B02/}. A complete assessment of each of the problem items is provided below:

Problem	Impact	Severity	VVB Assessment
Heavy metal or other pollutants in biochar applied to agricultural soils	ants in biochar human health		The biochar is not being used in soil amendment but instead used to replace clinker in concrete and asphalt production, so this risk does not apply to the project activity. This has been assessed by the VVB by reviewing the DPD ^{/02/} , Unyte biochar sales agreement ^{/14/} , Clinker Avoidance ^{/16/} , Confirmation letter for Biochar Use in Road Construction ^{/17/}
Use of dedicated crops, competition for food and agricultural land.	tion for land use		The project activity uses degrading hemp waste and wood waste as feedstock for biochar production. This has been assessed by the VVB by reviewing the DPD ^{/02/} and the sales agreement with Welland Waste Management Ltd. ^{/20/}
Deforestation from use of forestry products as feedstock Local and far-off land use change		Major	Direct forest products are not used as feedstock. Only hemp and wood waste is used as feedstock for biochar production. This has been assessed by the VVB by reviewing the DPD ^{/02/} and the sales agreement with Welland Waste Management Ltd. ^{/20/}
Distant transport of feedstock inputs GHG emissions and climate change impact		Moderate	Average distance for the first year will be 0.47km. The furthest Hemp plant from which feedstock will be sourced is 15km away from site. This will be monitored annually and accounted for in the LCA ^{/03/} . CL6 was raised regarding the average distance of feedstock input and was satisfactorily justified by the PD.
Pollutants emitted to the air during gasification/pyrolysis (particulate matter,	Human health impacts	Minor	Risk has been accounted for in the risk assessment template ^{/13/} . Biochar production with the bio- furnace does not release chemicals and the same has been



nitrogen oxides, sulfur compounds)			assessed by the VVB by reviewing the description of pyrolysis complex ^{/18/} .
Contaminated gasification/pyrolysis residue and ash, improper waste management	Human health and ecotoxicity impacts	Minor	Risk has been accounted for in the risk assessment template/13/. Biochar production with the bio-furnace does not release chemicals and the same has been assessed by the VVB by reviewing the description of pyrolysis complex ^{/18/} .
Collection and export of organic matter from agricultural fields for gasification/ pyrolysis disrupts soil organic matter	Damage to soil health	Major	Hemp has proven positive effects on soil health & carbon capture. This is due to the fact that about 50% of hemp's root biomass is located within 40 inches of the topsoil. Roots represent about 20% of total hemp biomass. In hemp cultivation, roots are not collected and stay in the ground. They therefore add soil organic carbon to the soil after the harvest as they decompose. As hemp doesn't require tilling, this carbon stays in the ground/ ^{13/} . Additionally, the feedstock used is the co-product of a hempcrete and hemp fibre production plant. Waste does not drive the harvest - the main products do, so there isn't any excessive harvest link to the reuse of hemp waste/ ^{13/} . The same has been assessed by the VVB by reviewing the risk assessment template/ ^{13/} and the source provided for the hemp root biomass claim by the PD.

The validation team concludes that in accordance with section 4.8 of the Riverse standard rules V6^{/B01/}, the environmental impact by the project activity has been evaluated in the ESDNH evaluation sheet of the Biochar risk evaluation document^{/13/} by the Project Developer and the same is stated in the DPD^{/2/} and the Biochar risk evaluation document^{/13/}. It is the validation team's opinion that all risks have been sufficiently identified and appropriate likelihoods and severities have been assigned to the risks and the project activity does not cause the adverse environmental impacts and there are no regulations or requirement by the host country to conduct the EIA for the project activity.

When the project starts operations, it must provide laboratory chemical analyses proving that their biochar is below the pollutant thresholds presented in Table 4 of the BECCS & Biochar methodology/^{B02/}. This shall be assessed during the first verification phase.

10. STAKEHOLDER CONSULTATION



Requirements		VVB assessment
Whether Stakeholder Consultation conducted?	⊠Yes ⊡No	The Stakeholder consultation is done online through the Riverse Registry in parallel with the validation phase. Though it was to be open for a 30-day period, VVB has confirmed through e-mail correspondence with the Riverse team that the consultation will stay open until the project is certified.
Does the project have a legal permit?	⊠Yes ⊡No	VVB confirms that the PD has received an acknowledgement ^{/05/} and pre-application advice ^{/21/} from the West Northamptonshire Council regarding the installation of the pyrolysis machinery.
Whether template letter sent to relevant local communities and stakeholders during the validation phase?	⊠Yes ⊡No	VVB confirms that the PD has sent an application to the West Northamptonshire Council and received an acknowledgement ^{/05/} from the council regarding the same.
Template letter translated to local language?	∐Yes ⊠No	VVB confirms that a translation to local language was not required as the local language is English.
Local stakeholders made aware of the project's intentions, potential impacts, and the avenues through which they can express their opinions?	⊠Yes ⊡No	Based on a thorough review of the application, acknowledgement ^{/05/} and pre- application advice ^{/21/} from the West Northamptonshire Council, VVB confirms that all relevant details regarding the project have been shared with the stakeholders.
Does the stakeholder consultation gather feedback on the environmental and social impacts of the project, among other feedback.	⊠Yes ⊡No	Based on a thorough review of the pre- application advice ^{/21/} from the West Northamptonshire Council, VVB confirms that the environmental and social impacts of the project have been acknowledged by the stakeholders.
Dates of Stakeholder Consultation:	From 10-06-2024 till the project is certified.	VVB has confirmed through e-mail correspondence with the Riverse team that the consultation started with the validation audit and will stay open until it is complete.
Location of Stakeholder Consultation:	Open consultation on the Riverse Registry	The Stakeholder consultation is done online through the Riverse Registry in parallel with the validation phase. According to It was to be open for a 30-day period, VVB has received confirmation that the consultation will stay open till the end of the validation audit.
Number of Comments:	0	VVB has confirmed through e-mail correspondence with the PD and the Riverse team that no public comments were received during the stakeholder consultation period.



Carbon Check considers the local stakeholder consultation carried out adequately. The Project Developers have taken due account of all comments received by the stakeholders and its summary is described in the DPD adequately.



APPENDIX A

Carbon Check offset project Validation Protocol

Biochar production at Unyte Biochar in United Kingdom

Report No. CCIPL2313/RIVERSE/VAL/UNBR/20240604



Validation Proto	Validation Protocol Table 1: Project Eligibility Criteria checklist				
Eligibility Criteria	Description and requirements of meeting the eligibility criteria.	Reference	VVB Assessment		
C1 - Measurability	The project developer shall prove that the project removes GHG emissions through a comparative Life Cycle Assessment (LCA) ^{/3/} . If the project makes biochar and is eligible for carbon removal credits, the carbon sequestered over 100 years must be calculated and included in the LCA ^{/3/} . The LCA ^{/3/} should follow the method described in the Life Cycle Assessment section of BECCS and Biochar methodology ^{/B02/} .	Life Cycle Assessment (LCA) ^{/03/} DPD ^{/02/}	Through a thorough assessment of the LCA report and the monitoring plan, VVB has determined that the LCA meets all the requirements and the list of proposed Key Impact Indicators (KIIs) is appropriate. Any questions regarding LCA have been satisfactorily answered by the PD.		
C2 - Real	 Projects must prove that they exist and operate as claimed, or are being developed and will begin operations within 2 years of certification. This may be proven by receipts from sales of products, such as biochar or the final products from syngas and bio-oil. For pre-financing of projects, proof may include contracts or receipts from the purchase of key machinery. 	Unyte Biochar-Sites registration ^{/04/}	As the project is still in design phase, Unyte Biochar's Site registration document and GreenPower's offer regarding sale of pyrolysis equipment has been assessed by the VVB to validate this eligibility criterion. A site visit shall be performed during the 1st verification phase as well. A FAR has also been raised regarding the site visit. Implementation of monitoring plan and KIIs shall also be verified during the 1st verification phase.		



C3 - Additionality	 All projects must demonstrate their Regulatory Additionality, plus either financial or prevalence additionality. <u>Regulatory additionality:</u> Projects must prove that their activities are not already mandated by regulation, even if there are relevant regulations that cover the project type. This is to ensure that the project would not have been implemented regardless of issuance of carbon credits. <u>Financial additionality</u>: Projects must prove that they are in financial need, and that revenue from carbon credits would not go towards enriching project developers. Projects may prove that they: are operating at a financial loss and need additional funding. are operating and seeking funding to implement improvements in their technology. are raising funds to develop a new site and need additional funding. 	Regulatory additionality: • Biomass policy statement ^{/09/} • EU fertilizing products regulation ^{/10/} Financial additionality: • Investment Analysis ^{/15/}	Based on the review of the evidence provided by the PD and the updated Additionality_evaluation ^{/15/} and BiocharUnyteMulti-EcoofftakeSHARED ^{/11/} documents, VVB has determined that the PD has provided satisfactory Regulatory and Investment analyses. All issues and clarifications raised on this criterion have been resolved and Regulatory additionality and Financial additionality have been established.
--------------------	---	--	--



C4 - Permanence	The project must demonstrate permanence by proving that the carbon shall remain sequestered for over 100 years to qualify as long-term carbon storage and be eligible for carbon removal credits. Permanence is ensured by measuring characteristics of biochar that are known indicators of carbon stability: organic carbon and hydrogen content. These must be measured in laboratory chemical analyses. To ensure a sufficient level of carbon storage, biochar must have a ratio of molar hydrogen to organic carbon of less than 0.7.	Biochar_risk_evaluation-Unyte Biochar ^{/13/}	The reversal risks have been evaluated in the permanence evaluation sheet of the Biochar risk evaluation file ^{/13/} provided by the PD. VVB has determined that all risks have been sufficiently identified and appropriate likelihoods and severities have been assigned to the risks thus demonstrating permanence.
	Models proposed by Woolf et al (2021) ^{/B04/} are used to calculate the amount of long-term6 carbon storage from biochar. Hydrogen and organic carbon content, along with soil temperature, are used to calculate the amount of carbon stored in the soil after 100 years. This criterion is proven using results from laboratory chemical analyses of a project's biochar, and a description of the biochar sampling procedure.		



C5 - Unicity	Carbon credits must only be counted once. They must not be 1) double counted by being issued in multiple registries, or 2) claimed by both the credit seller and buyer. Additionally, for carbon removal credits from biochar, projects must ensure that the user of biochar will not claim carbon credits. This can be done through a signed agreement between the biochar producer and farmers.	UnyteHemp- BiocharSalesAgreement/ ^{14/} Supply of Green Waste Oversize for Bio Char Feedstock – signed ^{/18/}	Section C5-Unicity of the BECCS and Biochar methodology ^{/B02/} states: <i>"For carbon removal credits from biochar,</i> <i>projects must ensure that the user of biochar will</i> <i>not claim carbon credits. This can be done</i> <i>through a signed agreement between the biochar</i> <i>producer and farmers."</i> In this case an agreement ^{/14/} between Unyte and the purchaser has been drafted which states: <i>"Sales of biochar produced by Unyte Hemp</i> <i>Ltd/Unyte Biochar do not give the Purchaser any</i> <i>rights to the carbon credits that are generated by</i> <i>its biochar production."</i> PD has also provided a signed agreement with Welland Waste Management Ltd ^{/20/} stating that they will not be applying for carbon credits associated with the supplied feedstock. Based on the assessment of the evidence mentioned above, VVB has determined that unicity has been established and the criterion is satisfactorily met.
C6 - Co-benefits	Projects must provide at least 2 co-benefits from the UN Sustainable Development Goals (SDG) framework.	DPD ^{/2}	Based on a thorough review of the DPD ^{/2/} project has satisfactorily provided 2 co-benefits that align with the project.
C7 - Substitution	Projects must prove that the final products from syngas and bio-oil are appropriate substitutes for the materials they claim to avoid. This can include heat, electricity, steam, chemicals, and many others.	N/A	Since the project is claiming removal credits and not avoidance credits, this eligibility criterion does not apply.



C8 - Environmental & social do no harm	 Projects must not contribute to environmental or social damage. Evaluate the risk type, likelihood, and severity the project poses for each UN SDG, or other relevant sustainability indicator. Action plan to prevent/manage any substantial risks. 		According to the Riverse standard rules V6 ^{/B01/} section 3.3.6, the stakeholder consultation is to be conducted in parallel to the validation. This is conducted online through the Riverse Registry for one month during the validation phase. It is under public consultation on the Riverse platform.
			In accordance with section 4.8 of the Riverse standard rules V6 ^{/B01/} , Environmental and social risks have been evaluated in the ESDNH evaluation sheet of the Biochar risk evaluation file provided by the PD. VVB has determined that all risks have been sufficiently identified and appropriate likelihoods and severities have been assigned to the risks.
C9 - Leakage	The project's avoided GHG emissions should not be indirectly transferred elsewhere. There is a risk that if the fossil-based energy displaced by bioenergy is sold and consumed elsewhere, the net emissions reduction thanks to bioenergy may be offset by increased emissions in those other locations. This risk is valid and is outside the scope of Riverse's and projects' intervention.	N/A	Since the project is claiming removal credits and not avoidance credits, this eligibility criterion does not apply.
	There is a risk that feedstock inputs may be cultivated in distant areas and imported to the bioenergy site. In this sense, impacts from cultivating feedstocks are shifted to other locations. This risk is managed because transport of feedstock inputs to the biogas site is included in the LCA to calculate carbon credits.		



C10 - Rebound	The risk here is	N/A	Rebound effects apply to projects that produce
effects	that energy efficiency and sustainability improvements from		bio-energy. The project only produces biochar
	bioenergy (compared to		and no excess bio-energy and the VVB has
	fossil-based energy) leads to an increase in overall energy		determined the same through the assessment of the DPD ^{/2/} and supporting documents.
	consumption, thereby offsetting		the Dr D and supporting documents.
	some of the initial energy savings. This may occur due to, for example:		
	 lower energy prices lead to higher total consumption of energy 		
	• reduced environmental impacts and improved		
	perception of bioenergy lead to increased consumption, as consumers no longer avoid high-emitting fossil fuel- based energy		
	 lower energy prices allow for cost-saving on energy consumption, which may then be reinvested into other carbon-emitting goods and services 		
C11 - Technology	Projects must prove that they have a Technology Readiness	Detailed description of Green	PD has claimed a TRL of 7 so the project meets
Readiness Level	Level (TRL) of 6 or higher,	Power's Carbonization Complex	the requirement.
	meaning that the technology has been demonstrated in a relevant environment.	/18/, /19/	
		Green Power offer for	Based on the assessment of the detailed
	For BECCS and biochar projects that are already operating, this may be proved using	development of the Carbonization complex dated April 5, 2024 ^{/6/}	description of Green Power's Carbonization Complex ^{/18/} and its operational characteristics ^{/19/} ,
	receipts from sales of products, such as biochar or the final		VVB has determined that this TRL is justified.
	products from syngas and		j
	bio-oil, to show that they have a TRL 9 (actual system proven in operational environment).		
	For projects under development, this may be proved as		
	above during the verification phase.		
	For innovative projects under development, this can be		
	proven using results or files		
	from earlier research stages or prototypes, or proof of purchase of machinery that is		
	proven to work in similar applications.		



C12 - Targets alignment	As energy sector projects, BECCS and biochar projects must prove that they lead to at least a 40% reduction in GHG emissions compared to the baseline scenario, as defined in the Riverse Standard Rules.	N/A	Since the project is claiming removal credits and not avoidance credits, this eligibility criterion does not apply.
C13 - Minimum impact	Projects must justify at least 1000 tCO2eq avoided over the 5-year crediting period.	Life Cycle Assessment (LCA) ^{/3/} DPD	The project removes 34880 tCO2e over the duration of the crediting period. This value surpasses the standard's requirement of 1000 tCO2e by a significant margin. This has been assessed by the VVB by reviewing the Life Cycle Assessment results ^{/3/} .
C14 - Independently validated	Project's LCA, Detailed Project Description (DPD) and Monitoring Plan must be audited by a third-party auditor.	Life Cycle Assessment (LCA) ^{/3/} Detailed Project Description (DPD) ^{/1/} Monitoring Plan	This project was audited and validated by Anubhav Dimri and Sawan Rawat in August, 2024.



Validation Protocol Table-2: List of findings

CL	01	Section	Measurability	Date: 03/07/2024
Descriptio	on of CL			
PD is requ	ested to clarify	the use of diesel in	LCA calculations for feedsto	ck provisioning.
Project de	veloper respo	nse		Date: 08/07/2024
For this, w hour (PMS	re consider the b) - referring to t	ecoinvent process he operational time	"wood chipping, terrain chip of the machine.	processing (shredding, drying). per, diesel", which accounts for 1 productive machine
Documen	lation provided	d by project devel	oper	
Life Cycle	Assessment			
VVB asse	essment			Date: 08/07/2024
PD has pro		ctory clarification fo	or the use of diesel in the LCA	A calculations.

CL	02	Section	Measurability	Date: 03/07/2024
escriptio	on of CL		· · · ·	
e "Ecoin • tra • wo • ma • ma • ma • ma	vent activities" ta ansport, freight, lo bod chipping, ter arket for electrici arket for natural	ab of the LCA results. orry 3.5-7.5 metric to rain chipper, diesel ty, low voltage gas, low pressure erage for steel produc w-alloyed	n, EURO5	ons and the values used for the references i
• 110		lalloyed		
Project de	eveloper respor	ISe		Date: 08/07/2024
The source trans wood mark mark meta mark	ce is Ecoinvent 9 port, freight, lorry chipping, terrair et for electricity, et for natural gas l working, averag et for steel, low-a	9.3.1. Emission factor y 3.5-7.5 metric ton, E n chipper, diesel: 1.26 low voltage: 2.7900e s, low pressure: 8.198	-1 kgCO2eq/kWh 33e-1 kgCO2eq/m3 nanufacturing: 1.6532e+0 kgCO2eq gCO2eq/kg	
'The source trans wood mark mark meta mark mark mark	ce is Ecoinvent 9 port, freight, lorry chipping, terrair et for electricity, et for natural gas l working, averag et for steel, low-a et for steel, unall	0.3.1. Emission factor y 3.5-7.5 metric ton, E n chipper, diesel: 1.26 low voltage: 2.7900e s, low pressure: 8.198 ge for steel product m alloyed: 2.1819e+0 k	EURO5: 5.5603e-1 kgCO2eq/t.km 612e+2 kgCO2eq/h -1 kgCO2eq/kWh 83e-1 kgCO2eq/m3 hanufacturing: 1.6532e+0 kgCO2eq kgCO2eq/kg CO2eq/kg"	
'The source trans wood mark mark meta mark mark mark	ce is Ecoinvent 9 port, freight, lorry l chipping, terrair et for electricity, et for natural gas l working, averag et for steel, low-a et for steel, unall tation provided	0.3.1. Emission factor y 3.5-7.5 metric ton, E n chipper, diesel: 1.26 low voltage: 2.7900e s, low pressure: 8.198 ge for steel product m alloyed: 2.1819e+0 kg0	EURO5: 5.5603e-1 kgCO2eq/t.km 612e+2 kgCO2eq/h -1 kgCO2eq/kWh 83e-1 kgCO2eq/m3 hanufacturing: 1.6532e+0 kgCO2eq kgCO2eq/kg CO2eq/kg"	



CL	03	Section	Measurability	Date: 03/07/2024
Descripti	ion of CL	÷		
			on of natural gas is calculate to start the pyrolysis process	d as 0 during the pyrolysis phase in the LCA results, s.
Project d	leveloper resp	onse		Date: 08/07/2024
		0		of 8.1983e-1, thus: 2.95kgCO2eq or 0.0025tCO2eq
		ed by project deve		
Life Cycle	Assessment			
VVB ass	essment			Date: 08/07/2024
•		factory clarification	for calculating the contributio	n of natural gas as zero in the LCA calculations.
Finding i	s closed.			

CL	04	Section	Measurability	Date: 03/07/2024		
Description of CL						
"It is uncle	ar if the energy req	uirement for shredd	ling and compaction of feed	dstock into briquettes has been added to LCA.		
	ested to clarify and	provide more detai	il about the feedstock pre t	reatment and preparation processes during the		
	provisioning life cyc		ii about the recustock pre-t	realment and preparation processes during the		
loodotooli	proviolorning ine eye	no otago.				
Project de	eveloper response)		Date: 08/07/2024		
				n P2 (Pyrolysis), for more working days that the plan		
will probab	bly have (check the	answer to question	().			

Life Cycle Assessment			Date: 08/07 /2024
Since the answers to que Pyrolysis/Gasification she		•	nputs_electricity_kWh and for P2.
PD is requested to updat	e the values in the LCA a	ccordingly.	
Project developer resp	onse		Date: 17/07/2024
we have taken a conserv	ative approach by overes		ations. As mentioned in our response to questio ricity consumption. We assumed the project we
we have taken a conserv operate continuously (30	ative approach by overes days a month).	stimating the project's elec	
we have taken a conserv operate continuously (30 This approach increases values.	ative approach by overes days a month).	stimating the project's elec	ricity consumption. We assumed the project we
we have taken a conserv operate continuously (30 This approach increases values. VVB assessment Based on the assessme	ative approach by overes days a month). the project's emissions an nt of the LCA calculatior	stimating the project's elec	ricity consumption. We assumed the project we e avoided emissions, resulting in more conserva Date: 17/07/2024 ons #4 and #6 on the Riverse platform, VVB

CL	05	Section	Measurability	Date: 03/07/2024		
Descripti	Description of CL					
		re content is selected e value selected as c		vides a range of 1.65–2.50%.		
Project d	leveloper respons	Se		Date: 08/07/2024		

Carbon

СК



This project will use two types of feedstock to produce biochar: hemp and wood. According to the provided reference, biochar produced from wood has ~1.58% moisture, while biochar produced from hemp has ~1.65% moisture. In a conservative approach, we considered the highest moisture content, even if wood represents the biggest feedstock shares.

Documentation provided by project developer

Life Cycle Assessment

VVB assessment

Date: 08/07/2024

PD has provided a satisfactory clarification for the selected moisture content value being conservative.

CL 06	Section	Measurability	Date: 03/07/2024			
Description of CL						
and wood waste are used transport distance would a impact of feedstock provisi	Feedstock transport distance is taken as 0.47 km. This value is calculated using the feedstock ratio of the first year where hemp and wood waste are used in a ratio of 1:6. However, in subsequent years, as the ratio of feedstock changes, the average transport distance would also increase. Yet the average transport distance of the first year (0.47km) is being used to calculate impact of feedstock provisioning through the entire crediting period. PD is requested to justify the value of average transport distance for the first year being used for the duration of the entire					
Project developer respon	ISE		Date: 08/07/2024			
As the project will be verified every year for the crediting period, the transport distances will change for each year (also mentioned in the monitoring plan). To make it accurate for year 1, 0.47 km is considered.						
Documentation provided	by project developer					
Life Cycle Assessment			-			
VVB assessment			Date: 08/07/2024			



PD has provided a satisfactory clarification for the selected average distance value.

CL	07	Section	Measurability	Date: 03/07/2024
Description	of CL			
· · · · ·	e pyrolyser is sto 155 880 kWh"	pped for 5 days	per month for maintenance,	the energy consumption would be $E = 21.65 x$
This calculat	on assumes each	month has 30	days.	
PD is reques	ted to justify the c	alculated value	of energy consumption.	
Eg. E = 21.6	5 x 24 x (365-12*	5) = 158 478 kW	/h"	
Project deve	eloper response			Date: 08/07/2024
run 24/7 and	stop 5 days per	month for maint	enance. This is accounted fo	on will be able to generate. The plant is expected to or in the biochar output (less biochar produced as we n considers more electricity than the plant will actually
			vative approach as all the im days that the plant will prob	pacts related to energy requirements are considered ably have.
·	<u> </u>		to adjust for other lesser day	/S. "
	ion provided by			
	on the Riverse Im	pact certification	n platform	
VVB assess	sment			Date: 08/07/2024



PD has updated the answer for #6 and provided a satisfactory clarification for the energy consumption value being conservative.

Finding is closed.

CL	08	Section	Measurability	Date: 11/07/2024
 Description	of CL			
			II the KIIs shall be monitored a ncy was chosen over a batch-w	nnually, at the beginning of the year. PD is /ise monitoring approach.
Project dev	eloper respo	onse		Date: 17/07/2024
project deliv uploaded to	ers the expe the Impact C	ected carbon remova ertification Platform a	l/avoidance. Additionally, acco t least once per year.	easurement of indicators to determine whether to ording to the Riverse Standard, the KIIs must a also aligns with yearly carbon credit sales cycle
Documenta	tion provide	d by project develo	ber	
Monitoring P	lan, DPD			
VVB assess				
				Date: 17/07/2024
PD has prov	ided a satisfa	actory justification for	the selected monitoring approa	
	ided a satisfa	actory justification for	the selected monitoring approa	
PD has prov	ided a satisfa	actory justification for	the selected monitoring approa	

Since over 6000 tons of green waste is being purchased from neighbouring wood processing plants for feedstock provisioning, PD is requested to provide a sales agreement for the purchase of the wood waste stating that the seller shall not claim carbon credits for waste sold for biochar production as well.



We don't have a signed contract yet. Nevertheless, we'll try to get a letter of Intent that should be sent in the coming days					
Update: 24/07/2024					
We have now received the proof for the waste supply, which you can find <u>here</u> .					
Date: 17/07/2024					

CL	10	Section	Additionality	Date: 11/07/2024		
Description of	Description of CL					
Regulatory surplus analysis section of the Additionality evaluation report missing PD's response for " <i>Confirmed upcoming national-level regulations related to the technology (within 5 years)</i> " as per the Additionality template. PD is requested to fill the missing section in the additionality evaluation report or provide a justification for its omission.						
Project develo	per response			Date: 17/07/2024		
There is no mention of any regulation in the making by the UK gov. The field is now complete						
Documentation provided by project developer						
Updated Additi	Updated Additionality evaluation report.					



VVB assessment	Date: 17/07/2024
The missing section in the additionality evaluation report has been added by the PD.	
Finding is closed.	
Finding is closed.	

CL	11	Section	Additionality	Date: 11/07/2024	
Description of	Description of CL				
	stify why a bar			er type has not been identified. PD is also lysis when the main issue is described	
Project develo	per response			Date: 17/07/2024	
	We agree the investment analysis is more aligned with this project's goals. The document was changed to gather investment analysis instead of barrier analysis.				
Documentatio	n provided by	project developer			
Updated Addition	onality evaluati	on report.			
VVB assessm	ent			Date: 17/07/2024	
PD has updated the Additionality evaluation report and have now added the investment analysis instead of a barrier analysis. Based on the review of the Investment analysis, VVB has raised multiple issues listed below individually. PD is also requested to update additionality section of the DPD as it still mentions a barrier analysis instead of an investment analysis.					
Project develo	per response			Date: 12/08/2024	
thank you for th	is remark. I ad	ded a comment in the cl	hanged section		
Documentation	n provided by	project developer			
Updated DPD					



VVB assessment	

Date: 12/08/2024

Based on the review of the updated DPD, VVB confirms that the necessary changes have been made to the additionality section of the DPD.

CL 11 is closed. Refer to CL15-20 for further clarifications regarding the Investment analysis.

CL	12	Section	Additionality	Date: 11/07/2024	
Description	n of CL				
In the Additionlity evaluation template, PD has claimed that "No government subsidy is available for this project." but the VVB has found government grants such as "Direct air capture and greenhouse gas removal programme" which includes grants for biochar projects. PD is requested to identify if any other grants/subsidies apply to this project and justify why this project does not qualify for those grants/subsidies.					
Project dev	veloper response	9		Date: 17/07/2024	
The PD missed the application window for subsidies (here)					
		y project developer			
	window for subsid	dies.png		B (17/07/000)	
VVB asses		1		Date: 17/07/2024	
PD has provided a satisfactory clarification for missing their application for relevant grants/subsidies in the additionality evaluation report.					
Finding is	closed.				

CL	13	Section	Co-benefits	Date: 11/07/2024	
Description of	Description of CL				

Carbon — снеск—	ISO_FM 4.9 Riverse Validation Report	Revision: June 2024
A so honofite are listed in the answe		
	er to Q#25, while only 2 co-benefits are listed in the DI he answer to question 25 and the information provided	
PD is also requested to provide a tir	meline and an update regarding the stakeholder consi	ultation proceedings
Project developer response		Date: 17/07/2024
eport at least 2 co-benefits. About the timeline and an update re Riverse platform for 30 days fror communication about the project wa		nyone can send questions through the
Documentation provided by proje	ct developer	
DPD		
Question #25 on the Impact certifica	ation platform.	
VVB assessment		Date: 17/07/2024
PD has provided a satisfactory clari consultation.	fication regarding the selected co-benefits and update	ed the VVB regarding the stakeholder
Finding is closed.		
many is closed.		

CL	14	Section	Minimum Impact	Date: 11/07/2024
Description of CL				



Section 3.12. Minimum impact section of DPD states "The project is expected to remove 6976.17 tCO2eq over the crediting period"				
This statement is incorrect as according to the LCA 6976.17 is only the value for the first the crediting period are 34880.86 tCO2eq.	t year of removals. Total removals over			
Project developer response	Date: 17/07/2024			
Thank you for this remark. The minimum impact section is corrected now.				
Documentation provided by project developer				
DPD	D-4 47/07/0004			
VVB assessment	Date: 17/07/2024			
Section 3.12 "Minimum impact" now states the correct value of 34,880 tCO2eq removals but Section 4.4 "Results" mentions 34,881 removal credits.				
PD is requested to use the conservative value and keep these values consistent in the I	DPD.			
Project developer response	Date: 09/08/2024			
Done				
VVB assessment	Date: 09/08/2024			
PD has changed the value in Section 4.4 "Results" and the values are now consistent through the DPD. Finding is closed.				

CL	15	Section	Investment analysis	Date: 31/07/2024
Description of CL				



The date of investment decision, type of benchmark used, financial indicator used is not provided in accordance with the paragraphs 6 and 7 of the CDM Methodological Tool27: Investment Analysis, v14.0.

Project developer response

Date: 09/08/2024

The purpose of the validation is to give sufficient guarantees to investors to get them to support the project. The date is therefore undetermined; however, we expect the money to be raised around September – November 2024 if we want to fall in line with our project timeline (attached to the DPD)

Talks with investors suggested it would take the form of equity, but this is yet undetermined as we are still finalising the offtake agreements our current investor was demanding before they invest. Money talks are going to follow the "feasibility" talks.

The benchmark was a cross referencing of our talks with several investors (Removall, Vertree, Replant, WhyOffset, Capturiant, Invert...) and feedback from our Financial advisory board (list below)

Financial Advisory Board:

- Quentin Sauzay Managing Director of the Sustainable Desk at SouthBridge Group
- Olivier ROBERT Former CEO of the restructuration fund Guyenne Capital, moving to la Caisse des deports et des consignations
- Anissa Kasmi- Consultant Capital Market at Accenture who managed the salles of HSBC French agencies to My Money Group
- **Arnaud Lefebvre** M&A Manager at La Française des Jeux (the operator of France's and the Republic of Ireland's national lottery games)

Documentation provided by project developer

VVB assessment

Date: 09/08/2024

Since the Riverse team has clarified that a strict adherence to CDM Methodological Tool 27 is not required by the PD (As mentioned in the responses to CL17 and CL19), the VVB finds the justification provided to be satisfactory.



CL	16	Section	Investment analysis	Date: 31/07/2024
Description	of CL	•		
	•		alue of the project activity assets estment Analysis, v14.0.	at the end of the assessment period in accordance
Project dev	eloper respo	onse		Date: 09/08/2024
constructor. need replace It is hard for	This is why, v ement from 5 us to know t	ve took that referen years-on he rate of replacem	ce for our analysis. When asked for our analysis when asked for each of the second s	" (source – last entry in the table) according to the or more information they told us some pieces might is not operational yet , as it will be tailor-made for ck we will be using (hemp) is new to the constructor
Documenta	tion provide	d by project devel	oper	
-				
VVB asses	sment			Date: 09/08/2024
mentioned in	the respons		19) and the PD has justified a cor	odological Tool 27 is not required by the PD (As nservative life expectancy of the equipment to be 5
Finding is c	losed.			

CL	17	Section	Investment analysis	Date: 31/07/2024		
Description of	Description of CL					

Carbon	ISO_FM 4.9 Riverse Validation Report	Revision: June 2024
the "Biochar Unyte Multi-Eco OFFTA Analysis, v14.0 states that the investr	has been considered only for 5 years in the row 23 of KE SHARED" sheet. The requirement in the paragraphient analysis shall be conducted for atleast 10 years then with an investment analysis conducted for at least 10 years.	ph 6 of the CDM Tool27: Investment
	bon, Credit sales revenue, Biochar Sales revenue an	
Project developer response	[Date: 09/08/2024
As for Unyte, the first investment cyc Additionally, the lifespan of the equip	are conducted over at least 5 years, which aligns wi cle also spans 5 years, but market reactions to their oment is unclear (see item 22), so we're unsure how and, Unyte might decide to scale up production, whic	biochar production remain uncertain. much will need replacement between
	to project beyond the initial 5-year period. I can either ugh this may not accurately reflect the project's future	
Documentation provided by project	t developer	
- VVB assessment		
]	Date: 09/08/2024
	that a strict adherence to CDM Methodological Tool 2	Date: 09/08/2024 27 is not required by the PD, the VVB

CL	18	Section	Investment analysis	Date: 31/07/2024	
Description of CL					



The analysis provided in the Riverse additionality evaluation document refers to the expected return of 5x to 10x by venture capital. The reasoning for the same shall be evaluated in context of the paragraph 9 of the CDM Tool27: Investment Analysis, v14.0.

Project developer response

Date: 09/08/2024

Venture Capital: Seeks a 5x to 10x or more Multiple on Invested Capital (MOIC), investing in early-stage projects with high growth potential.

Given current risk and tensions on the biochar market, investors have made it clear they would be looking at the higher end of the MOIC spectrum.

For a 1,5million investment, our revenue goal is 15,000,000€ in project revenue to attract investments.

In the UK, VAT is 20% on the sales and corporation tax on gross profit is 25%

• Global business EBITDA = 26,047,500 Minus VAT is (20% on the sales) 26 047 500 - (26 047 500 x 20%) = 20 838 000

Minus corporate taxes (25%) 20 838 000 – (20 838 000 x 25%) = 15 628 500 of net revenue with carbon credits Which is just above the target of 15 000 000€

• EBITDA on biochar sales only = 20 247 500 Minus VAT is (20% on the sales) 20 247 500 - (20 247 500x 20%) = 16 198 000

Minus corporate taxes (25%) 16198000 – (16198000 x 25%) = 12 148 500 of net revenue without carbon credits Which is 2 851 500 short of the target of 15 000 000€, and the project does not meet investor expectations without carbon credit revenue

Documentation provided by project developer

VB assessment ased on the review of PD's response and the updated BiocharUnyteMulti-Ecoofftake aims to be justified. nding is closed. 19 Section Investment analysis escription of CL accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, sessment has not been provided in the Investment Analysis sheet. oject developer response	Date: 31/07/2024
aims to be justified. Inding is closed. Investment analysis Secription of CL accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, sessment has not been provided in the Investment Analysis sheet.	Date: 31/07/2024 sensitivity analysis for the additionality
nding is closed. 19 Section Investment analysis escription of CL accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, s sessment has not been provided in the Investment Analysis sheet.	sensitivity analysis for the additionality
19 Section Investment analysis escription of CL accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, sessment has not been provided in the Investment Analysis sheet.	sensitivity analysis for the additionality
19 Section Investment analysis escription of CL accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, sessment has not been provided in the Investment Analysis sheet.	sensitivity analysis for the additionality
accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, s sessment has not been provided in the Investment Analysis sheet.	sensitivity analysis for the additionality
accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, s sessment has not been provided in the Investment Analysis sheet.	sensitivity analysis for the additionality
accordance with the paragraph 28 of the CDM Tool27: Investment Analysis, v14.0, s sessment has not been provided in the Investment Analysis sheet.	· · ·
sessment has not been provided in the Investment Analysis sheet.	· · ·
sessment has not been provided in the Investment Analysis sheet.	· · ·
	Date: 09/08/2024
oject developer response	Date: 09/08/2024
oject developer response	Date: 09/08/2024
verse is not requiring them to follow CDM Tool 27 specifically. The tool was sir	mply used as inspiration for the outline
quirements.	
evertheless, we aknowledge the importance og the sensitivity analysis - which is ma	pped for next methodology updates.
sensitivity analysis was conducted by comparing the different scenarios for the re	emoval credit sales and was added in th
Iditionality template	
ocumentation provided by project developer	
VB assessment	Date: 09/08/2024
ased on the review of the updated Additionality_evaluation document and the update	
cument provided by the PD, VVB has determined that a satisfactory sensitivity analy	ysis has been conducted and added to
th documents using very conservative values.	
nding is closed.	



CL	20	20 Section Investment analysis Date: 31/07/2024							
Descripti	Description of CL								
The source biochar sa		r the values provided	l in the Investment Analysis have i	not been provided such as the EBITDA on					
PD is req	PD is requested to provide the sources for the values used for the investment analysis.								
Project d	Project developer response Date: 09/08/2024								



All cost and revenue items detailed in the BiocharUnyteMulti-EcoofftakeSHARED document linked to the DPD (Item #926 on the Riverse Slacker) While final value will be determined by our offtake agreement (probably with Holcim cement). According to our latest projections, here is our EBITDA calculation: - biochar sales price 400€/t - carbon credit sales price 100€/t - 3 credits per ton of biochar > 300€ in CC revenue for each ton of biochar EBITDA = Sales before tax - purchases and external charges - staff costs - other charges CAPEX Y1 : 800 000 CAPEX Y3 : 635 000

OPEX : 303 500€

EBITDA (cumulated on 5 years) EBITDA = 29,000,000 - 800,000 - 635,000 - (5x 303,500) EBITDA = 29,000,000 - 800,000 - 635,000 - 1,517,500 EBITDA = 26,047,500

EBITDA on biochar sales = 23,200,000 - 800,000 - 635,000 - (5x 303,500) EBITDA on biochar sales = 20,247,500

Documentation provided by project developer

VVB assessment

Date: 09/08/2024

Based on the review of the updated *BiocharUnyteMulti-EcoofftakeSHARED* document, VVB has determined that conservative values have been taken by the PD and the sources for the required values such as biochar sales price and EBITDA have been satisfactorily provided in the sensitivity analysis sheet of the document.



FAR	01	Section	Site-Visit	Date: 09/08/2024
Descriptio	on of CL			
Section 6.3	3.1. of the River	rse Procedures Ma	anual V2 states:	
	ual site audit is			od start date and/or before the second verification audit. ts, which are checked during verification via documents
				ith the Riverse team that a site visit is not required as the first verification phase of the project activity.
Project de	eveloper respo	onse		Date: XX/XX/XXXX
Documen	tation provide	d by project deve	loper	
Documen VVB asse	•	d by project deve	loper	Date: XX/XX/XXXX



APPENDIX B

Certificates of Competence

Ca	rbon Chec	k (India)) Priva	te Limited	
	Certifica	te of Com	petency		
	Mr. A	nubhav D	imri		
	IPL's internal qualification 14065:2020, ISO/IEC 1			he requirements of CDM AS (V7.0 HG programs:	
	for the follow	ing functions and re	quirements:		
⊠ Validator	⊠ Verifier	🛛 Team L	eader	🛛 Technical Expert	
🛛 Technical Reviewer	Health Expert	🗌 Gende	Expert	🛛 Plastic Waste Expert	
🛛 CCB Expert	🗆 Legal Expert	🛛 Financi		Environmental, Health and	
⊠ SDG+ ⊠ Social no-h		no-harm(E+)			
		ollowing Technical A	reas:		
🖂 TA 1.1	🛛 TA 1.2	🗆 TA 2.1	🛛 TA 3.1	🗆 TA 4.1	
🗌 TA 4. n	🗆 TA 5.1	🗆 TA 5.2	🗆 TA 7.1	🖾 TA 8.1	
🗆 TA 9.1	🗆 TA 9.2	🗆 TA 10.1 🛛 🖾 TA 13		L 🛛 🖾 TA 13.2	
🖂 TA 14.1	🛛 TA 15.1	🖾 TA 16.1			
Issue	Date			Expiry Date	
5 th Decem	ber 2023		31 st	December 2024	
Biya S	uman		50	unjos Atennalla	
	Priya Suman		Mr.	Sanjay Kumar Agarwalla Technical Director	
Comp	liance Officer			rechnical Director	
Revision da		History of the docu Su	ment: mmary of change	es	
20221			Annual revision		
Jan 2023 Dec 2023		hange in the templ	Annual revision	n in TA and function	
Dec 2023		mange in the templa	ne que lo revisio		



		Carl	с к—			
Ca	rbon Chec	k (Indi	a) Priva	ıte L	imited	
	Certifica	te of Co	mpetency	ý		
	Mr.	Amit Ar	and			
has been qualified as per CCIF ISO/IEC1	PL's internal qualificati 4065:2020, ISO/IEC	and the second sec		a resource and the		
	for the follow	ving functions an	d requirements:			
🛛 Validator	🛛 Verifier	🛛 Tea	m Leader	🛛 Tecl	hnical Expert	
🛛 Technical Reviewer	🗆 Health Expert	🗆 Ger	ider Expert	🛛 Plas	tic Waste Expert	
CCB Expert Legal Expert		🛛 Fina	Financial Expert		Environmental, Health and Safety financial matters	
SDG+	🛛 Social no-harm	-				
🛛 Local Expert for India	and RSA	no na				
	in the j	following Technic	al Areas:			
🛛 TA 1.1	🖾 TA 1.2	🗆 TA 2.1	🖾 TA 3.	1	🗆 TA 4.1	
	□ TA 5.1	□ TA 5.2			TA 8.1	
🗆 TA 9.1	🗆 TA 9.2	🗆 TA 10.1	TA 10.1 🛛 TA 13.		🖾 TA 13.2	
⊠ TA 14.1	🖾 TA 15.1	🗆 TA 16.1				
Issue [Date			Expiry	Date	
5 th Decemb	per 2023		31		ber 2024	
biya S	uman			Souges At	weather	
	riya Suman ance Officer	Mr. Sanjay Kumar Agarwalla Technical Director				
	Revisio	n History of the c	locument:			
Revision dat			Summary of char	-		
20221			Annual revision			
Jan 2023		Change in the ter	Annual revision		and function	
Dec 2023		Change in the template due to revision in TA and function				







Revision history:

Revision Number	Revision Date	Summary of changes
00	Nov 2022	New document as per ISO 14065 requirements
01	Jan 2021	Revision in response to NABCB's round 2 desk review observation
02	Nov 2022	Revision due to th NC no.06 issued in ANAB Office Assessment