

Credit Documentation Flow

It is critical to have rigorous project documentation to ensure the consistent implementation of program requirements (defined by Pilot Trading Plan 1.0). This documentation flow will provide the legal structure needed for real, verified, and defensible credits.

Each participating agency has a responsibility in this process, as detailed below:

Form	Signatory	Purpose	Method
1. SWCD Installation Report	SWCD	Initial records for BMP installation; provides records & photos; initiates documentation flow process.	Site Visit at project installation.
2. Credit Verification Report	Agriculture Agency	Primary report for on-the-ground "verification" of BMP and confirmation of credit generation. Considered "third-party verified".	Site Visit at project initiation, annually, after significant weather event, or notification from SWCD that practice is not maintained.
3. Credit Certification Report	Permitting Authority	"Certify" that credits are applicable for permit compliance or "stewardship" sales.	Desk Review at project initiation and annually.
4. Credit Release Letter	EPRI	Audit that all project records are complete. Release credits for "retirement" and "reserve".	Desk Review at project initiation and annually.
5. Notice of Credit Suspension, Reinstatement, Cancellation	Agriculture Agency/Permitting Authority	Suspension of credits in the event of verification/certification deficiencies. Cancel credits, if suspension is not resolved. The program reserve pool will restore cancelled credits.	As needed.

SWCD Installation Report

Project Name: _____

Prepared By: _____

SWCD District, State _____

Name: _____ **e-mail:** _____

Date: _____

Project Type (cover crops, HUAP, etc): _____

Project Documentation:

Confirm whether the following documents have been completed and attached hereto as part of this SWCD Installation Certification:

- On-site Photos, date stamped (pre and post-Installation)
- Revised Credit Calculation Report (if applicable).

BMP Installation:

Date of Installation: _____

Date of confirmation by SWCD: _____

Name of SWCD Person doing confirmation: _____

On-site Inspection (attach additional pages as necessary):

Describe any deviations between the BMP practices installed and their Project Application and/or contract commitments.

If any deviations were reported above, describe how they nevertheless conform to the requirements of the ORB Trading Plan (Note: a Revised Credit Calculation Report must be completed and attached to this Form if any deviations occurred. EPRI can provide support for new Credit Calculation Report, as needed).

Confirm whether the BMP Practices specified in the Project Application for this Project were installed in accordance with the relevant NRCS Practice Standards.

Please include any other comments here.

Attestation:

I certify that the BMP Practices specified in the Project Application were installed and that there were no deviations between the installed and contracted BMP Practices, other than those noted herein. I further confirm that, to the best of my knowledge, the landowner meets baseline requirements for this program and I have reviewed necessary records to make such a determination (aerial photos, farm practice history records, etc).

Signed: _____

Date: _____

Print Name: _____

Credit Verification Report

The report must be completed during or immediately after on-site inspection.

Project Name: _____

Verifier Information

Organization Name: _____

Contact Person: _____

Email: _____ Phone: _____

Site Inspection Date: _____ Previous Inspection Date: _____

HUC 10 Project Location: _____
 (10-digit HUC watershed number)

Project Type: _____
 (Cover Crops, HUAP, Milkhouse Waste Management, etc)

Project Start Date (Month, Year): _____

Anticipated Project End Date (Month, Year): _____

Project Documents Reviewed by Verifier:

- Project Application
- Credit Calculation Report
- Signed Producer Contract
- SWCD Installation Report
- Other (specify) _____

Additional Required Records to be provided by Verifier:

- On-site Photos with date time stamp taken during Verification Inspection
- New Credit Calculation Report, if it was re-run based on inspection

Verification Summary (attach additional pages if necessary).

Site Inspection: *Note any observations or comments based on the on-site inspection.*

Document Review: *Describe how supporting documents were reviewed and compared with the implemented project.*

Interviews: *Describe any interviews conducted during the site visit, and /or describe information additional to that provided in the supporting documents.*

Discrepancies: *Describe any discrepancies between the project contract commitments, original project implementation or engineering plans, and/or any other observed discrepancies between the on-the-ground implementation and project commitments.*

Resolution of Discrepancy: *Describe how any identified discrepancies can be or have been resolved. This could be re-running EPA Region V Spreadsheet to update credit estimations and providing a revised Credit Calculation Report.*

Accuracy of Nutrient Credit Calculation: *Identify, discuss and justify conclusions regarding the accuracy of the credit estimations for the project.*

Baseline Confirmation (Year 1 Only): *Describe the documentation, photos and/or records provided confirming that this project meets the baseline requirements, as determined by the program Trading Plan. Baseline confirmation is only required in year 1.*

Other: *Identify any other remaining issues or concerns.*

NOTICE:

- Attach on-site photos, including date-time stamp, taken during on-site inspection.
- If nutrient credit estimates were updated, complete a new Credit Calculation Report (including screenshots of the model run). EPRI can assist with this as necessary.

Verification Opinion

Based on confirmation of Edge-of-Field nutrient load reductions calculations as specified in the ORB Trading Plan and detailed in the Credit Calculation Report, the [INSERT STATE AGENCY] has confirmed that the installation of the specified BMP Practice(s) will result in the following Point of Generation Credits.

Year	Calculated Annual Nitrogen and Phosphorous Load Reduction in Pounds/Year		Annual Credits Contracted	Annual Credits Verified
2013	TN:	TP:		
2014	TN:	TP:		
2015	TN:	TP:		
2016	TN:	TP:		
2017	TN:	TP:		

Additional comments related to the verification opinion and site inspection:

Attestation:

I certify, based on review of the above records and site investigations conducted in accordance with the Trading Plan, that:

- The above named Project meets all ORB Program eligibility requirements;
- The specified BMPs have been implemented and maintained in accordance with the applicable NRCS Practice Standards or approved modifications;
- The specified Credits have been quantified using appropriate metrics and methodologies, as defined in the ORB Trading Plan;
- The specified BMPs are being maintained and are performing as designed; and
- Appropriate arrangements are in place to ensure the specified BMPs are maintained for the period of the contract.

Signed: _____

Date: _____

Print Name: _____

Agency: _____

EPRI Templates

Credit Certification Report

Completion of this report can only occur after a thorough review of all project records.

Project Name: _____

HUC 10 Project Location: _____
 (10-digit HUC watershed number)

Project Type: _____
 (Cover Crops, HUAP, Milk house waste management, etc)

Documentation reviewed prior to this Certification:

- | | |
|--|---|
| <input type="checkbox"/> Project Application | <input type="checkbox"/> SWCD Installation Report |
| <input type="checkbox"/> Credit Calculation Report | <input type="checkbox"/> Credit Verification Report |
| <input type="checkbox"/> Signed Producer Contract | |

Year	Credits Certified in Pounds/Year	
2013	TN:	TP:
2014	TN:	TP:
2015	TN:	TP:
2016	TN:	TP:
2017	TN:	TP:

The [STATE AGENCY] certifies that [PROJECT ID] conforms in all respects to the requirements of the Trading Plan, as amended, and all other applicable state requirements, that the specific Credits noted above are hereby authorized for registration and sale on the ORB Program Online Registry, and that these credits can be applied towards regulatory compliance requirements or stewardship commitments, as detailed in the Trading Plan, as amended. The foregoing certification shall be conditioned on the maintenance of the specified BMP Practices, as described in the Project Application, over the life of the Project. Any deviations from the described practices must be reported to the [STATE AGENCY] within 30 days of discovery. Where not cured in accordance with the Trading Plan, Appendix E, Section 11, such deviations shall result in the automatic revocation of this certification and suspension or cancellation of the associated Credits.

Signature: _____

Print Name: _____

Title: _____

State Agency: _____

Date: _____

EPRI Templates

Credit Release Letter

Project Name: _____

This notice attests that the following Released Credits associated with the above named Project have been verified in accordance with the Trading Plan, Appendix E, Section 8 and have received all necessary agency certifications in accordance with the Trading Plan, Appendix E, Section 9 and are, accordingly, released for immediate registration and sale on the [ORB Program Online Registry]. The Reserved Credits will be allocated to the credit reserve in accordance with the Trading Plan, Section 13.

Credit Release Checklist:

- | | |
|--|--|
| <input type="checkbox"/> Project Application | <input type="checkbox"/> Signed Producer Contract |
| <input type="checkbox"/> Credit Calculation Report | <input type="checkbox"/> Credit Verification Report |
| <input type="checkbox"/> SWCD Installation Report | <input type="checkbox"/> Credit Certification Report |

Credit Release Summary:

Year	Total Annual Credits		EPRI Retired Credits	Reserved Credits	Released Credits
	TN:	TP:	Total:	Total:	Total:
			Serial No:	Serial No:	Serial No:

ORB Program Administrator: EPRI

Signature: _____

Print Name: _____

Title/Position: _____

Date: _____

Notice Regarding BMP Issues, Credit Suspension, Credit Reinstatement and/or Credit Cancellation

Project Name: _____

Notice of potential issue(s) with BMP practices

SWCD hereby provides notice to EPRI and the State Agricultural Agency of the following potential issue(s) with the BMP practices described in the Project Application for the above-referenced Project ID.

Name and Title

Date of Notice

Notice of credit suspension

Based on due evaluation of the issue(s) reported by the SWCD, EPRI or the State Agricultural Agency hereby provides notice that the credits specified below have been suspended due to a deficiency, deviation or failure with respect to the BMP practices described in the Project Application for the above-referenced Project ID.

Suspended Credits	Associated BMP Practices and Source or Cause of Deficiency, Deviation or failure
TN/TP: Amount: Serial No:	

Name and Title

Date of Notice

Notice that suspension has been lifted and credits have been reinstated

EPRI or the State Agricultural Agency hereby provides notice that the suspension described above has been lifted, in whole or in part, through the following actions.

If fewer than all of the BMP Practices have been restored or rehabilitated, then specify the remaining shortfall below.

Suspended Credits	Associated BMP Practices and Source or Cause of Deficiency, Deviation or failure
TN/TP: Amount: Serial No:	

Name and Title

Date of Notice

Notice that credit(s) have been cancelled

EPRI or the State Agricultural Agency hereby provides notice that the credits specified below have been cancelled.

Cancelled Credits	Reason for Cancellation
TN/TP: Amount: Serial No:	

Name and Title

Date of Notice

EPRI Templates

Credit Calculation Report

Project Name: _____

Date: _____

Name: _____

Title: _____

Organization: _____

Method(s) for estimating nutrient reductions must be one of the approved methods as defined by the signed Trading Plan. Nutrient load reduction estimates must take into account farm specific variables such as soil types, slopes, cropping history, prior tillage practices, and number and type of livestock to calculate reliable and consistent load reduction estimates for each project.

Specify which method was used for estimating nutrient reductions.

- EPA Region 5 Spreadsheet
- Ohio DNR Load Reduction Spreadsheet Milk House Waste Calculator
- Other. Specify _____

Briefly Describe the BMP to be installed from which this estimate is based:

Year	Calculated Annual Nitrogen and Phosphorous Load Reduction		Total Annual Credits (1 pound = 1 credit)
	TN:	TP:	
	TN:	TP:	
	TN:	TP:	
	TN:	TP:	
	TN:	TP:	

I certify that I am trained in the use of the credit estimation calculators; I have executed the calculator(s) according to the criteria specified in the Trading Plan; and that to the best of my knowledge the credit estimates are true, accurate, and correct based on the proposed BMP.

Attach a screenshot of credit calculator outputs.

Signed: _____ Date: _____

Print Name: _____

Organization Name: _____