



LOWER ZAMBEZI REDD+ PROJECT VCS VERIFICATION REPORT



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Summary:

AENOR CONFIA S.A.U (AENOR) has carried out the twelfth VCS verification of the Lower Zambezi REDD+ Project (LZRP). The LZRP is a reducing emission from deforestation and degradation (REDD+) project on 40,126 ha of privately owned land in Rufunsa District, Zambia with an accounting area of 33,338 ha. The project was developed to conform to the Verified Carbon Standard (VCS, Version 4.7). Furthermore, the Project is aligned with the Government of the Republic of Zambia's (GRZ) National REDD+ Program, implemented through the Forestry Department.

The core project climate activities undertaken include forest carbon inventorying, modelling cumulative deforestation patterns and soil carbon assessments. Core community project activities include up to eighteen different types of community-based deforestation mitigation initiatives designed to create sustainable, scalable alternatives to deforestation, and strategic, meaningful incentives that comprise part of pay-for-performance programs that support forest conservation. Core biodiversity project activities include forest conservation systems, biodiversity monitoring and management, and fire management.

The project start date and implementation date is 1st October 2009 and will be operational until 30th September 2039. The estimated emissions reductions for the 30-year project span are 5,607,851 tCO₂e at an average of 186,928 tCO₂e/yr. The emissions reductions for the current monitoring period (1st January 2024 to 31st December 2024) are 243,495 tCO₂e.

The purpose of the verification was to determine the conformance of the project concerning the VCS Standard v4.7. Furthermore, the assessment of the ex-post monitored anthropogenic GHG emissions reductions that has occurred because of the project's activities. The scope of the verification was to assess the conformance of the validated project, once implemented, with the VCS requirements and requirements in the validated Project document.

The verification consisted of the following three phases to confirm that the monitoring report meets the stated requirements and identified criteria:

- A desk review of the project monitoring report (MR) /1/ and monitoring plan implementation
- Follow-up interviews with project stakeholders with an on-site visit as well as a review of project activities
- The resolution of outstanding issues and internal technical review, followed by the issuance of the final verification report and opinion.

This is the twelfth verification event, corresponding to the monitoring period from 1st January 2024 to 31st December 2024. During the verification event, 4 Corrective Action requests (CAR) and 7 Clarification requests (CL). All these issues raised during the verification process were appropriately closed by means of corrections, clearer explanations, and provision of additional supporting documents.

The purpose of the site visit and assessment (see Sections 2.3 and 2.4 of this verification report for more information) was to determine the conformance of the project with respect to the VCS Version 4.7 Standard; The field visit took place from the 24th of February 2025 to the 1st of March 2025, in

which the auditor visited the project area, interviewed key stakeholders, staff and other related experts, and reviewed the VCS-MR /1/ and the supporting documents. The scope of the verification was to assess the conformance of information in the project design document with the VCS standards.

Hence, once all issues detected were appropriately solved, AENOR carried out a final verification report and deemed with a reasonable level of assurance that the project complies with all the verification criteria for VCS. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria. Hence, the audit team concludes that the net GHG emission reductions for the lands included in the project boundary at the verification stage have been quantified under VCS rules. The GHG emission reductions were calculated based on the approved methodology VM0009 Methodology for Avoided Ecosystem Conversion, v3.0 of 6th June 2014, and the monitoring plan included in the MR /1/.

The AENOR verification team assessed the calculations and can confirm that the GHG emission reductions during the monitoring period amount to 243,495 tCO₂e (without discounting buffer emissions) for this monitoring period. AENOR's verification team can confirm that the project is well managed and that results are well supported. Monitoring plans are effective, and the project proponent has developed enough procedures and tools to collect data. A buffer discount rate of 21% (-51,134 tCO₂e) was applied, resulting to 192,361 tCO₂e VCU's eligible for issuance.

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1 INTRODUCTION

1.1 Objective

The objective of the verification audit was to conduct an independent assessment of the project to determine the following:

- The extent to which methods and procedures, including monitoring procedures, have been implemented per the monitoring report /1/, including the monitoring plan.
- The extent to which the GHG emissions reductions reported in the monitoring report is materially accurate.

1.2 Scope and Criteria

Verification Scope: The scope of the verification audit is to verify the emission reductions of the project against the Verified Carbon Standard version 4.7, the identified methodology and the validated project document throughout the monitoring period from 1st January 2024 to 31st December 2024 /1/.

These audit's objectives included verifying the project's calculated reductions with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the Monitoring report /1/.

The scope of the verification included the review of the GHG project and implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHG's; and periods covered.

Criteria: The criteria from the following documents were used to assess this project:

- VCS Standard v4.7.
- VCS Program Guide v4.4.
- VCS Program Definitions v.4.5 (in the April 2024 VCS Program Updates it was requested to apply updates from version v4.4 to v4.5 immediately).
- Registration and Issuance Process, v4.4.
- VCS AFOLU Non-Permanence Risk Tool v 4.2.
- VCS Validation Report Template, VCS Version 4.3 (The April 2024 VCS Program Updates indicates that "VCS Program project templates v4.4 is effective from 1st January 2025 for all project requests").
- VM0009 Methodology for Avoided Ecosystem Conversion, v3.0 (and all the applicable tools).

Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document.

1.3 Level of Assurance

The evaluation was carried out to ensure a satisfactory level of confidence regarding compliance with the specified audit standards and significance thresholds within the audit's scope. Following the audit results, a favourable assessment indicates reasonable assurance that the project's greenhouse gas (GHG) assertion is substantially accurate and provides a fair depiction of the GHG data and details. The materiality threshold concerning the combined impact of errors, omissions, and misrepresentations compared to the total reported GHG emission reductions was set at five per cent (5%), as outlined in the VCS Standard version 4.7 for projects.

All the revisions of the verification report before being submitted to the client were subjected to an independent internal technical review to confirm that all verification activities had been completed according to the pertinent AENOR instructions required. The technical review was performed by technical reviewers qualified in accordance with AENOR's qualification scheme for VCS validation and verification.

1.4 Summary Description of the Project

The Lower Zambezi REDD+ Project is a forest conservation initiative aimed at reducing emissions from deforestation and forest degradation (REDD+). It covers 40,126 hectares of privately owned land in Zambia's Rufunsa District, with a designated accounting area of 33,338 hectares. The area, known as the Rufunsa Conservancy, is owned by the Zambian company Sable Transport Limited. Biocarbon Partners (BCP) serves as the Project Proponent, overseeing certification and initial project financing.

Key climate related activities within the project include conducting forest carbon inventories, modelling deforestation trends, and assessing soil carbon. Community focused activities comprise up to eighteen different deforestation mitigation initiatives, which offer sustainable and scalable alternatives to forest loss and incorporate results-based incentives to support conservation. Biodiversity efforts focus on forest protection systems, biodiversity monitoring and management, and fire control.

The project commenced on 1 October 2009 and is scheduled to run until 30 September 2039. Over its 30-year duration, it is expected to reduce emissions by approximately 5,607,851 tonnes of CO₂ equivalent (tCO₂e), averaging 186,928 tCO₂e annually. For the current monitoring period (1 January to 31 December 2024), the project anticipates emissions reductions of 243,495 tCO₂e. After applying a 21% buffer discount, 192,361 tCO₂e are eligible for VCU issuance.

BCP engaged AENOR to verify this monitoring period. Following a review of the Monitoring Report, supporting documents, and interviews, AENOR has found sufficient evidence to confirm the project's conformance with the VCS Standards with reasonable assurance.

2 VERIFICATION PROCESS

2.1 Method and Criteria

The project was evaluated to ensure compliance with the criteria outlined in Section 1.2 of this report. The verification process involved a comprehensive review of documentation, interviews, communication with relevant personnel, and an on-site inspection conducted from 24th February to 1st March 2025. As described in the report, findings were issued confirming the project's full compliance with all VCS requirements. AENOR carried out the verification and concludes, with reasonable assurance, that the project meets all applicable verification standards.

To support the verification process, a project-specific Verification and Sampling Plan was developed. This plan aimed to ensure the audit was both efficient and effective, by providing a risk-based framework for determining the appropriate scope and depth of verification activities. The plan was informed by the verification elements listed above and aligned with VCS guidance and ISO 14064-3 standards. Adjustments to the Verification and Sampling Plan were made based on site-specific conditions, focusing on areas with the highest potential for material discrepancies.

Verification activities included an in-depth desk review, a field visit to the project site, and interviews with local stakeholders and monitoring personnel, conducted between February and 24th February to 1st March 2025. The risk assessment during verification focused on evaluating the monitoring system, including data flow and control procedures, with particular attention to the quality of raw data, data sources, and the accuracy of spreadsheet calculations.

Regarding the verification schedule and key milestones, the following are highlighted:

- Public Comment Period: No public comment period was provided.
- KOM date: 31st January 2025.
- NOVS delivery: 31st January 2025.
- Final Audit Plan: 24th February 2025.
- Site visit: 24th February to 1st March 2025.
- Issuance of the 1st round of findings: 12th March 2025.
- Closure of findings: 19th May 2025.

AENOR reproduced and verified 100% of sheets in the spreadsheet of emission reduction calculations /3-15/, and the data calculations carried out in those sheets for the project area for the monitoring period (1st January 2024 to 31st December 2024). The project area was 100% checked using the GIS database and shape files /16-38/. The carbon calculations were also 100% verified and cross-checked with validated values.

AENOR opted to conduct a thorough and meticulous examination of the documents to ensure the accurate application of the VM0009 methodology version 3.0, including its formulas and equations,

and to verify the provision of necessary data for calculating GHG emission reductions. Following this assessment, AENOR asserts with a reasonable level of confidence that the stated emission reductions are devoid of significant errors, omissions, or inaccuracies.

Furthermore, AENOR confirms the adequacy of evidence supporting the reported net anthropogenic GHG emission reductions, noting a clear audit trail containing the necessary evidence and records to substantiate the figures stated in this verification report since:

- Sufficient evidence available: The project participant has provided 100% of the data used in the calculations to achieve the final amount of GHG emission reductions reported.
- Nature of evidence: The raw data was collected from reliable sources. They are detailed in the project documents and have been provided to the verification team, and the most relevant ones are appropriately detailed in Appendix 2.

AENOR audit team conducted an on-site inspection of the project area to verify the information collected and to replicate the calculations outlined in Sections 2.3 and 2.4 of the verification report. As a result of this inspection, AENOR confirms the accuracy of the data presented in the monitoring report. Based on the evidence provided, which is both verifiable and reliable, AENOR can certify the net anthropogenic greenhouse gas (GHG) emission reductions associated with the project.

2.2 Document Review

A thorough review of all project documentation was carried out to verify consistency with, and identify any deviations from, the requirements of the VCS program, the applied methodology (VCS VM0009 V3.0), and the Monitoring Report (MR) /1/. The initial assessment focused on the MR and included a detailed examination of project specifics, implementation progress, monitored data and parameters, and the calculation of GHG emission reductions. Reviewed materials included monitoring data, carbon rights agreements, forest management contracts /39/, maps and aerial imagery /16-38/, standard operating procedures (SOPs) for monitoring and grievance handling, biomass and carbon calculation spreadsheets /3-15/, and responses to four Corrective Action Requests (CARs) and Clarification Requests (CLs) (Appendix 3). Adjustments to the Verification and Sampling Plan were made based on monitoring conditions, with a focus on identifying processes at highest risk of material discrepancies.

The Project Proponent used the VCS AFOLU Non-Permanence Risk Tool to evaluate overall project risk. AENOR reviewed the Non-Permanence Risk Report /2/, which was downloaded from the Verra Project Hub and supported by accompanying risk documentation, to confirm the project's compliance with the VCS AFOLU Non-Permanence Risk Tool version 4.2. Each risk factor was carefully evaluated for compliance, and the final calculated risk score was 21%. Appendix 2 of this report includes a comprehensive list of documents submitted by the Project Proponent and reviewed by AENOR during the verification process.

2.3 Interviews

The AENOR verification team conducted on-site interviews to confirm selected information and resolve issues identified in the document review. The interview and the identifying process are explained as follows. AENOR carried out a completed and accurate interview process on several dates.

Several weeks before the start of the on-site audit visit in the Lower Zambezi (Zambia) project area, AENOR's audit team reached the Project Proponent team to let them know the audit team's preferences regarding the stakeholder groups to be interviewed to guarantee confidence, representativeness, and impartiality, based on the information collected from the Stakeholder Consultation Process and a requested list of community stakeholders. Considering that Lower Zambezi is not a grouped project, and the initially collected information from the PD, MR and supporting evidence, it could be concluded that, in the time before the audit visit, the following stakeholders from the Bunda Bunda Chiefdom were the most relevant to be interviewed:

- Rufunsa Forest District Officer
- Mweshan'gombe Community, village banking and savings group and Cooperative members (Mwenshan'gombe zone)
- Chilimba community and Cooperative (Chilimba zone)
- Water projects beneficiaries
- Beekeepers and beehives promoters
- Beneficiaries of Climate Smart Technologies.
- Livelihood project beneficiaries.
- Namanongo Community and Cooperative (Namanongo zone)
- Chongwe community and Cooperatives (Chongwe Zone)
- BCP local employees in Chinyunyu and Scouts and Biodiversity monitoring team.

AENOR's audit team defined a preliminary questionnaire to complement and support the desk review process as a starting point to interview each one of the stakeholders on-site. This questionnaire considered Verified Carbon Standards (VCS) topics and Free, Prior and Informed Consent (FPIC) values based on the information compiled by AENOR's audit team about the project before the on-site visit, during the desk-review. A small sample of these questions has been included on the following page for clarification and transparency purposes. Moreover, and as stated below, AENOR's audit team used these questions for gathering purposes. Several new questions were sporadically and systematically included during on-site interviews, considering the direction in which discussions were directed and the topics that stakeholders wanted to discuss freely during the different moments of the interviews.

Some of the questions to the stakeholders, project employees and regional authorities were related to matters such as:

- How has the project area changed since the project start date (2009)?
- What activities were carried out in the project area before the project started?
- What activities are carried out in the project area now?

- Have there been any fires or pest outbreaks in the project area in the last years, during the monitoring period?
- Are you aware of illegal logging in the project area during the monitoring period?
- Have you participated in a participatory rural appraisal during the monitoring period? If so, could you describe it?
- Is there any reluctance or concern about the project implementation during the monitoring period?
- In your opinion, what are the main risks and benefits of the project during the monitoring period? Have the PP informed you of risks and benefits of the project during the monitoring period?
- Have you had any conflict, complaint or grievance related to the project during the monitoring period? Has it been solved? How? Are you aware of any grievance, conflict, or complaint from others due to the project?
- What are your channels of communication with the project staff?
- Do you have any suggestions for the project developer on how to improve the project?
- What do you know about the verification process and the audit team visit?
- How often do project personnel meet with the communities to discuss the project?
- Have you received any benefits from the project during the monitoring period? Have you been negatively affected by the project? Have you received any training?
- Do you feel the PP has respected land ownership during the monitoring period? Does your community have any disputes over land ownership? Do you believe the community has been fairly rewarded for its participation during the monitoring period?
- Have you noticed climate changes in the project area during the monitoring period? Does the project support you in adapting to climate change? Have you seen any native wild animals in the project area?
- What are your responsibilities as a project employee? Have you been provided with an employment contract? Were your employee rights and benefits explained? Do you think the hiring process treated and considered all people fairly, including women?
- Have you received any training as a project employee during the monitoring period?
- Do you think local communities have given equal opportunity employment to fill up the positions?
- Does the project comply with local, regional and national laws and regulations? Do you know about any disputes over the boundaries of the project lands? Do you know if local communities freely consent to participate in the project?

However, during the process, some questions were updated based on the feedback acquired from local people to obtain as much information of the highest materiality and quality as possible. Some of these new related questions were strictly connected to the conversation the audit team had with each one of the interviewees.

Some of the questions directed to the Lower Zambezi (BCP) management employees were related to the following:

- Contracts,
- Ownership, project starting date,
- Activities carried out before the project started and the ones allowed nowadays inside the project area,
- Community involvement and their interconnections,
- Illegal logging activities,
- Patrolling,
- Remote sensing activities, including community and biodiversity monitoring,
- Fires, outbreaks, and forest diseases,
- Local stakeholder communication and meetings,
- Risks and benefits of the project,
- Climate benefits,
- Biodiversity benefits,
- Others.

The stakeholders, employees and local authorities were interviewed by AENOR's audit team. The on-site interviews took place from 24th February 2025 to 1st March 2025. All the information was audited with a reasonable level of assurance, and accuracy was acquired.

AENOR's audit team has attached the attendance sheets for all the on-site meetings in Appendix 4 of this report. For each meeting, the location, dates, names and surnames, the role, profession, stakeholder group, community and signatures have been included.

Apart from these meetings, AENOR's audit team prepared the audit on-site visit to sample as many biomass and leakage plots as possible, considering the difficult conditions of the roads and the terrain to access most of them. To arrive at the first sampling plot, the audit team was required to drive for more than 5 hours until the closest point to the road, and from there walk a few kilometres back and forth. Repeating this process as many times as necessary to guarantee confidence about the information obtained, the audit team visited four (4) biomass sampling plots, two (2) proxy plots and one (1) leakage plot and had interviews with the Field Monitoring Team that were measuring the trees to understand if the BCP internal procedures were being applied properly.

The audit team chose specific plots to guarantee that the greatest amount of data available is obtained. Afterwards, the audit team compared the data obtained in those measurements with the one reported in the spreadsheets /3-15/, Confirming that the reported values are accurate, with reasonable minimum differences, and ensuring that the data is realistic, objective, and beyond doubt. For more information, see Section 2.4 of this report, below.

2.4 Site Visits

The objectives of the on-site inspections performed were mainly to cross-check the description provided in the monitoring report /1/, related to the VCS requirement implemented by the Project proponent, including:

- Ensure that the geographic area of the project, as reported in the VCS-MR and the accompanying KML file /16-38/, is in conformance with Section 3.11.2 of the VCS Standard.
- Perform a risk-based review of the project area to ensure that the project conforms to all other requirements of the VCS rules and the methodology.
- Observe the Project Proponent's evidence and collect and record data to assess whether data collection techniques conform to the monitoring plan and related documentation and to evaluate data quality control systems.
- Select samples of data and information for verification to meet a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 4.1.10 of the VCS Standard.
- Perform a risk-based review of the project area to ensure that the project is in conformance with the eligibility requirements of the VCS rules and the applicability conditions of the methodology; and
- Interview local authorities to confirm that the project operates in accordance with current permits and authorizations and its relationship with local actors and communities.
- Interview the key personnel involved in each of the Lower Zambezi project benefits, including local stakeholders and observe monitoring practices.
- Verify activities such as patrolling, community support, and biodiversity monitoring, in the project zone, among others.

In addition to the site inspection, meetings via teleconferences were carried out with project representatives and personnel in charge of carrying out the calculations /3-15/, image processing /16-38/, and project benefits, among others.

The complete list of activities verified on-site, and the itinerary can be seen below.

DATE	Activity	Location
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19/02/2025	KOM Meeting (NERs Calculations)	Online
20/02/2025	KOM Meeting (GIS assesment and NPR tool)	Online
24/02/2025	The arrival of the Auditor and picked up from the Airport	Lusaka
	Opening Meeting	Lusaka
24/02/2025	Travel to Chinyunyu	Chinyunyu BCP office
24/02/2025	Lunch Break	
	Visit to Rufunsa FD office	DFOs Office
	Travel to Chongwe Lodge	Chongwe
25/02/2025	Travel to RC plots	RC
25/02/2025	Field Visit Accounting Area (1 leakage plot (RUL 59) and 1 proxy plot (RUPN 158) Monitored in 2024 / Interviews with Forest Monitoring Team.	RC
25/02/2025	Travel to Chongwe Lodge	Chongwe
26/02/2025	Travel to RC plots	RC
26/02/2025	Field Visit Accounting Area (4 Biomass plots and 1 proxy Plot) Monitored in 2024 RUN 292 RUN 247 RU 34 RU 20 Proxy: Rupn090	RC
26/02/2025	Travel to Chongwe Lodge	Chongwe
27/02/2025	Travel to Chilimba	
	Meeting with the Chilimba Cooperative / Interview 2 Teachers from the Teacher Salary Support Project (Education) 2024	Chilimba Zone
	Visit 2 conservation lead farmers' fields	
	Visit Beekeepers, visit the beehives site and interview beneficiaries	
	Interview Members of Village Banking/ Savings Group (Social)	
	Lunch Break	
	Visit community projects (water - boreholes) / Interview with beneficiaries	
27/02/2025	Travel to Chongwe Lodge	Chongwe
28/02/2025	Travel to Mwenshan'gombe	
	Meeting with the Mwenshan'gombe Cooperative / Interview 2 Teachers from the Teacher Salary Support Project (Education)	Mwenshan'gombe Zone

	Visit 2 conservation lead farmers' fields	
	Visit Beekeepers, visit the beehives site and interview beneficiaries	
	Lunch Break	
	Visit community projects (water/boreholes) / Interview with beneficiaries	
28/02/2025	Travel to Chongwe Lodge	Chongwe
1/03/2025	Travel to Namanongo	
01/03/2025	Meeting with the Namanongo Cooperative	Namanongo Zone
	Interview Members of Village Banking/ Savings Group (Social)	
	Interview with scouts/ rotation de brief	
	Visit 2 conservation lead farmers' fields	
	Final / Closing meeting	
01/03/2025	Travel back to Lusaka	Lusaka
01/03/2025	Auditors facilitated to the airport	Lusaka

As part of the field assessment, the audit team visited several plot areas. Specifically, on 25th and 26th February 2025, they examined the following biomass, proxy plots and a leakage plot (ID):

- RU34 (biomass)
- RUN292 (biomass)
- RU20 (biomass)
- RUN247 (biomass)
- RUPN158 (proxy)
- RUSP090(proxy)
- RUL59 (Leakage)

During these visits, the audit team conducted measurements to crosscheck the data against the inventory raw data provided by the Project Proponent, ensuring high accuracy in quantifying net GHG emission reductions. Additionally, the VVB reviewed the standard operating procedures (SOPs) of the forest team staff and examined other aspects such as the materials used. Hence, the verification team has confirmed that the project activity has been operating in accordance with the specifications outlined in the validated project design document and from previous verifications.

2.5 Resolution of Findings

Findings identified during the verification process may indicate either non-compliance with verification criteria or potential risks to achieving the project's objectives. These findings are categorized as Corrective Action Requests (CARs), Forward Action Requests (FARs), or Clarification Requests (CLs).

A **Corrective Action Request (CAR)** is issued under the following circumstances:

- Non-conformance with program requirements or the applied methodology is identified in the project documentation or lacks sufficient supporting evidence.
- Errors are detected in assumptions, data, or emissions reduction calculations that could affect the quantified emission reductions.

A **Clarification Request (CL)** is raised when the information provided is insufficient or unclear, making it difficult to determine compliance with applicable VCS requirements.

A **Forward Action Request (FAR)** is issued when aspects of project implementation, monitoring, or reporting require attention or improvement for future verification periods such as the listed in section 2.5.1 below.

This assessment resulted in a total of 11 findings: four (4) CARs and seven (7) CLs and one further FAR. Each was resolved through satisfactory responses from the project proponent, demonstrating compliance with the relevant requirements. All findings were re-evaluated prior to formal acceptance and closure. Details of the issues raised, responses provided, and conclusions drawn are documented in Appendix 3. The required updates are reflected in the latest version of the Monitoring Report (MR) /1/ and its associated annexes.

Upon closure of all findings, the AENOR auditor concluded that the MR /1/ is both accurate and complete. It effectively represents the nature of the project and its climate benefits, while clearly demonstrating how emission reductions are achieved, monitored, and reported.

2.5.1 Forward Action Requests

A Forward Action Request (FAR) is issued because there is a time-gap between the available satellite (Sentinel-2) imagery (April) and the end of the monitoring period (December). Although this gap has been consistent since the beginning of the project and has been deemed correct during the last verification events, there is a risk that significant disturbances may not be detected.

This FAR must ensure that, by the end of the baseline validity period, the PP provides evidence of continuous monitoring without any gaps, and that all deforestation events have been accounted for avoiding any time-gap between the available satellite imagery.

2.6 Eligibility for Validation Activities

AENOR has conducted the verification considering the paragraph 4.1.20 VCS standard. AENOR holds accreditation for validation and verification for the sectoral scope 14. Agriculture, Forestry, Land Use.

3 VALIDATION FINDINGS

During the current monitoring period, no new deviations were identified. Instead, the methodology deviations remained consistent with those verified in the previous monitoring report, as outlined below:

3.1 Methodology Deviations

The monitoring approach in M8 saw minor deviation of the visual approach for leakage monitoring as cited in Appendix F of the VM0009. Instead of estimating degradation, the Forest Inventory Team geo-referenced every felled tree, comparing their density against project area averages, enhancing accuracy. Disturbances, rarely captured by plots, were measured directly, with satellite imagery used for encroachment checks. Accuracy assessments for deforestation emissions were included in the report and will be integrated into future evaluations. These adjustments improve accuracy without affecting emission reductions. Additionally, the project employs two allometric equations for biomass estimation, ensuring conservative estimates. These deviations focus solely on monitoring methods, enhancing accuracy and conservativeness without impacting other aspects of the methodology.

Related to the visual approach for leakage monitoring, the procedure in the PD was changed like in the preceding monitoring period (M8). Instead of forest inventory team members estimating the degradation, they were required to geo-reference any felled tree in the permanent plots this figure can be then compared against the average tree density in the project accounting area. This deviation was applied during the previous monitoring period.

Regarding the monitoring of disturbances, the methodology VM0009 requires that disturbances in the project area be monitored in plots. During this monitoring period, cloud-free Sentinel-2 imagery from April-May-2023 in comparison to April-May-2024 was used to check for potential encroachment. The imagery was obtained from Google Earth Engine, exported to Google Cloud as map tiles, and then opened in QGIS where imagery from different years was compared to identify changes. No encroachment was detected for the current monitoring period. This methodology deviation does not affect the conservativeness of emissions reductions, on the contrary, it provides a better understanding of the disturbances than by using fixed plots.

The allometric equation used to estimate above-ground biomass in the present monitoring period and all previous ones was not tested on trees larger than 55 cm. The project inventory data includes a few trees larger than this. The biomass measurement of the largest tree in the representative sample was found greater than the predicted biomass by the equation. However, the equation does not behave similarly beyond the range of measurements taken for the representative sample (the difference of the first-order derivative of the equation values was found greater than 10%). Thus, for all trees in the inventory greater than 55 cm DBH, the calculated biomass was set equal to a 55 cm DBH tree. In this way, there is no possibility of the equation overpredicting the biomass of trees outside the size classes tested.

Hence, AENOR deems that these deviations which impact the applicability of the methodology do not negatively affect the Net GHG calculations but provide for their conservativeness. The Project remains in compliance with the VCS rules, it is completely implemented, and discrepancies have been commented on in the MR and suitability assessed by AENOR.

3.2 Project Description Deviations

There were project description deviations during this monitoring period (1st January 2024 to 31st December 2024) as stated by the Project proponent. During the current monitoring period, the audit team has acknowledged that there were project description deviations:

1. The Name Change: The name of one of the other entities involved in the project changed from BCP Trust to Legacy Forests. While this is a name change, the entity itself remains unchanged. This change occurred in 2021.
2. New Entity Inclusion: A new entity, Nature Nectar, was included to support project implementation, despite not being initially outlined in the project design. Nature Nectar's involvement primarily focuses on scaling up beekeeping activities and connecting beekeepers to markets. This partnership was established in 2021.
3. Risk Inclusion: The project did not explicitly include project risks related to working conditions in the validated Project Description (PD). However, this risk has been explicitly included in the monitoring report and will be incorporated into the PD during the next baseline re-evaluation.
4. Adverse Effects of Introduced Species: While the validated PD did not identify any adverse effects from introduced species, the project introduced species under climate smart agriculture in the project zone, thus deviating from the PD. The monitoring report contains a table outlining introduced species in the project zone and their adverse effects.

The audit team's assessment of the evidence documents and interviews with the project staff concluded that the project deviations regarding Other Entities Involved in the Project are valid and do not affect the Net GHG emissions nor affect the conservativeness of these emissions reductions.

3.3 New Project Activity Instances in Grouped Projects

This project is not categorized as a grouped project, and the Project Proponent has not incorporated any new project activity instances.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:
Audit history	Validation 04-April-2014 VCS Verification 01-October-2009-01-October-2013 VCS Verification 02-October-2013-30-September-2014 VCS Verification 01-October-2014-31-December-2015 VCS Verification 01-January-2016-31-December-2016 VCS Verification 01-January-2017-31-December-2017 VCS Verification 01-January-2018-31-December-2018 VCS Verification 01-January-2019-31-December-2019 VCS Verification 01-January-2020-31-December-2020 VCS Verification 01-January-2021-31-December-2021 VCS Verification 01-January-2022-31-December-2022 VCS Verification 01-January-2023-31-December-2023 VCS Verification 01-January-2024-31-December-2024 VCS The audit team examined the Verra registry and determined that the audit history indicated consistency with the respective Validation/Verification Bodies, with AENOR CONFIA S.A.U participating in the last four verifications under the VCS program.
Double counting and participation under other GHG programs	Not applicable because the project proponent does not undertake any other GHG program within the project area.
No double claiming with emissions trading programs or binding emission limits	The Verification team conducted a review beyond the VCS GHG platform, including assessments of programs such as CDM and GS, to ensure that the project is not claiming GHG emission reductions by multiple entities toward separate mitigation targets or emissions inventories. Additionally, the Verification team opines that the project activities are not affiliated with other emissions Trading Programs.

No double claiming with other forms of environmental credit	The Audit team confirmed by reviewing GHG trading platforms that no other forms of environmental credits are requested by the project activities under LZRP.
Supply chain (scope 3) emissions double claiming	The Project Proponent states that they are not preventing other companies within the supply chain from reporting their Scope 3 emission statements. AENOR Audit team assessed the MR/1/ and through its previous verifications it concludes that there has not been any double claiming in the past and present verifications.
Sustainable development contributions	The Verification team confirmed the sustainable contribution by confirming the achievement of the reported indicator detailed in MR, section 1.12. They include. • SDG 1. No Poverty - Disbursement of conservation fees, livelihood investments, local employment /120/121/. • SDG 2. Zero Hunger - Improvement of honey /66-81/, climate-smart agriculture /109-114/. • SDG 4. Quality Education -Teacher's' salary Support /120/121/. • SDG 5. Gender Equality - Recruitment of local women for livelihood and resource protection activities /125/. • SDG 6. Clean Water and Sanitation - Drilling of 4 Boreholes and Mechanization of Boreholes /93-101/. • SDG 7. Affordable and Clean Energy - Eco Charcoal site management /104-109/. • SDG 8. Decent Work and Economic Growth - Small business development and diversification /125/. • SDG 9. Industry, Innovation and Infrastructure - Forest carbon science innovation supports technology thereby supporting rural communities gaining access to global markets through various livelihood initiatives such as bee keeping /104-108/. • SDG 10. Reduced Inequalities - Conservation fees and livelihood investments benefiting rural households /66-126/. • SDG 11. Sustainable Cities and Communities - Development of sustainable and resilient community governance structures and livelihood initiatives /66-126/.

	• SDG 12. Responsible Consumption and Production- Conservation Farming contributes to this goal /109-114/. • SDG 13. Climate Action - Implementation of REDD+ activities, achieving 243,495 tCO2e emissions reductions (before discount) /115-116/. • SDG 15. Life on Land - Protection of forests and important wildlife habitats, and sustainable use of community lands. The activities around conservation farming and protection of the ecosystems /109-119/ assessed by the VVB point to this SDG provision. • SDG 16. Peace, Justice and Strong Institutions - Support for good governance of local institutions /117/ where the Audit team also assessed and observed that the project coordinates with communities through a structured peace deal and institutionalization through the community needs assessment sessions. • SDG 17. Partnerships for the Goals - Partnership with government and Local natural resources management institutions /133-170/. BCP has consistently created partnership and collaboration with Government and local institutions including communities to ensure common benefits and developments are shared. AENOR audit team concludes that the sustainable contributions listed above are linked towards the total GHG emissions reduction during this monitoring period which amounts to 243,495 tCO2e.
Additional information relevant to the project	No commercially sensitive information has been excluded from the public versions of project documents. AENOR audit team concludes that it has reviewed the Appendix 2 listed evidence and found that all conform with the VCS program requirements hence nothing is excluded.

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
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Stakeholder identification	Not Applicable since stakeholders who could potentially be affected by or influence the project have remained unchanged since validation. The audit team review of documents and through interviews with some stakeholders concludes that no new stakeholders have been identified during the current monitoring period.
Legal or customary tenure/access rights	Not Applicable
Stakeholder diversity and changes over time	Not Applicable
Expected changes in well-being	Not Applicable
Location of stakeholders	Not Applicable
Location of resources	Not Applicable

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	During the interview sessions at the Community meetings, members highlighted the objectives of raising awareness about the BCP-REDD+ Model, emphasizing the community's role in ensuring the project's success, explaining the VCS process, and underlining the community's involvement in this process. Additionally, some community meetings /63/ provided updates on the project's implementation status. These gatherings also served as platforms for community members to voice their grievances /62/, which were addressed and resolved. A total of 109 community consultative meetings were held in the current monitoring period with a total of 3,881 people attending. individuals in attendance /63/.The outcome of the consultative meetings have been sharing of the best practices in grievances and conflicts resolution, benefit sharing plans and reports to keep the community updated. There has been so far no negative feedback received from any interviewed with the community regarding the consultations. The audit team thoroughly

	reviewed the details of the meetings, which are documented in the Community Engagement tracker /63/ in addition to interviews with the leaders of the community and provides the conclusion that the ongoing consultations are and will be conducted after the verification.
Date(s) of stakeholder consultation	The community engagement tracker /63/ has included the most relevant dates of stakeholders' consultations, all meeting minutes, reports and dates held during Monitoring Period 12 (MR12). Following a review of the tracker and confirmation from the community regarding these meetings, AENOR concludes that the stakeholder meeting dates provided are accurate.
Communication of monitored results	From the feedback obtained through interviews with the community, the audit team assessed the Communication of Monitoring Results done during Community Meetings was consistently conducted. This was also affirmed by the engagement tracker /63/ detailing the meeting reports and minutes on how meetings sensitization was conducted and minutes drawn from each session. The audit team indicates a positive perception and adherence to the established process within the community, reflecting effective communication and transparency in monitoring efforts.
Consultation records	Based on the reviewed records, the audit team concludes that the community meetings were well documented and supported by comprehensive reports. These reports contained detailed information about meeting content, outcomes, and local community participation. Furthermore, the accessibility of these reports through the Community Engagement tracker /63/ indicates a transparent and accountable approach to communication with stakeholders. This demonstrates a commitment to keeping the community informed and involved in decision making processes. Community Engagement Tracker/63/ is provided in Appendix 2.
Stakeholder input	Based on interviews conducted with the community and a review of supporting documents including meeting minutes /63/ and the grievance register /62/ as referenced in Appendix 2, AENOR audit team concludes that a well-structured and effective process exists for capturing input, feedback, and grievances from both local communities and other stakeholders. Immediate concerns are addressed during meetings, while more complex issues are followed up through additional meetings or written correspondence. Notably, during the current monitoring period, no negative feedback from local stakeholders was received that required changes to the project design. The comprehensive evaluation of the engagement Tracker /63/ and Grievance Register /62/, which document stakeholder perspectives, shows that there were no inputs from the local stakeholder, the project received that would necessitate updating the project design.

This demonstrates a strong commitment to transparency, accountability, and responsiveness to community concerns.

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	The audit team reviewed the Lands and Deeds Act, Cap 185 of the Laws of Zambia, which provides for the registration of easements over land. According to Section 50 of the Act, when an easement is created over land covered by a provisional certificate or certificate of title for the purpose of being attached to or used with another piece of land, the Registrar is required to enter a memorial. Once this memorial is recorded, the easement takes legal effect from the date of entry. The Lower Zambezi REDD+ Project is located on private land within the Rufunsa Conservancy and operates with the full consent of the landowner. A legally binding Conservation Easement agreement is in place between the landowners and Biocarbon Partners (BCP), granting BCP the carbon and conservation rights for the project area for a 30-year term as per the application for the certificate of registration in Zambia in 2012. Prior to finalizing this agreement, BCP engaged with communities as per /133–170/ within the project zones, where community meetings, permission letters, purchase agreements and partnership meetings were conducted as per the BCP organization to ensure that FPIC principles are properly disseminated. They sought their consent to implement a REDD+ project in the Rufunsa Conservancy. All activities conducted within the project zone continue with the full consent of residents, in accordance with the principles of Free, Prior, and Informed Consent (FPIC). The audit team concludes that the Lower Zambezi REDD+ Project operates in compliance with the legal provisions of the Lands and Deeds Act. Situated on private land, the project is governed by a valid Conservation Easement between the landowners and BCP. Community consent was obtained prior to project implementation, reflecting adherence to FPIC principles and demonstrating effective stakeholder engagement throughout the project lifecycle.
Outcome of FPIC discussion	Community feedback gathered during audit interviews reflected broad consent for the implementation of the REDD+ project within the Rufunsa Conservancy. Community members confirmed that no relocations have

occurred since the project's inception. However, there were minor encroachment cases in remote parts of the conservancy, where the affected households voluntarily agreed to relocate after being allocated alternative land within the project zone.

A portion of the Rufunsa Conservancy had previously been encroached upon by illegal charcoal producers, both before and shortly after the project began an issue reported in the previous monitoring period and corresponding verification report. Due to heavy rainfall between February and March, the audit team was unable to physically access the affected area. However, analysis of satellite imagery revealed minor land clearing in the northern part of the project area, adjacent to the previously encroached zone (as shown in Figure 12 of the MR /1/), where 2.96 hectares were cleared for illegal agricultural expansion.

In response, and with the agreement of the local community, this specific area was excluded from the project's official boundary. The encroachment was largely the result of uncertainty regarding the exact location of the conservancy's northern boundary. Approximately 19 households had settled on private land within the Project Area, while an additional 24 households were living on communal land either within or adjacent to the boundary. These figures were confirmed in the previous monitoring period and verified by the AENOR audit team. Given the sensitivity of land tenure issues in Zambia and to avoid conflict, a decision was made not to pursue evictions. Instead, the affected land was removed from the carbon accounting boundary to prevent disputes and avoid any need for resettlement.

The audit team concludes that the Lower Zambezi REDD+ Project remains compliant with the legal framework established by Zambia's Lands and Deeds Act. Operating within the privately owned Rufunsa Conservancy, the project is governed by a Conservation Easement agreement between the landowners and Biocarbon Partners (BCP), which grants carbon and conservation rights for a 30-year term starting in 2012 as per the application of certification with the Government. Importantly, prior to finalizing the agreement, BCP secured community consent in line with the principles of Free, Prior, and Informed Consent (FPIC). All project activities continue to be implemented with the explicit approval of local residents, reinforcing the project's adherence to FPIC principles and its commitment to community engagement.

4.2.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Grievance received and steps taken to resolve the grievance including the outcomes of the resolution	During interviews with community stakeholders in Chilimba, Chongwe, and Namanongo, participants stated that they had neither raised any concerns nor received any negative feedback related to the project. They expressed confidence that the project is progressing in the right direction. Based on these interviews, the audit team concluded that the project demonstrates a responsive and accountable approach to community engagement, promoting trust and effective grievance resolution within its stakeholder engagement framework.
Grievance redress procedure	The project has established a comprehensive Grievance Redress Mechanism (GRM) aligned with the Verified Carbon Standard (VCS) and Climate, Community & Biodiversity (CCB) requirements. This GRM includes clear procedures for lodging and tracking grievances, ensuring transparency and accountability throughout the process. A designated grievance register /62/ is maintained to document all reported cases, actions taken, and outcomes for proper follow-up. As part of its community interface, the project provides contact information of key BCP personnel to stakeholders, enabling community members to directly engage with project staff regarding concerns. This mechanism is designed to ensure that grievances are addressed in a timely and respectful manner, allowing for equitable participation and resolution. During AENOR's audit visit, the team reviewed documentation including the grievance register /62/ and interviewed stakeholders to verify the GRM's effectiveness. They found that BCP's communication strategy, which includes physical signage, a dedicated hotline, and clearly outlined reporting channels, demonstrates a proactive and accessible approach. This reflects compliance with VCS standards, which require stakeholder engagement, effective communication, and transparent handling of grievances. The audit concluded that these systems have been effectively implemented, building trust and facilitating collaboration with local communities while ensuring that any adverse impacts are appropriately reported, addressed, and resolved.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No comment was received because the project did not undergo any public comment in the current monitoring period.	Not applicable during the current MR even though there is continuous monitoring of grievances.	The audit team reviewed the VCS Verra Registry platform and confirmed that the project did not undergo any public comment in the current monitoring period and no comment was received for this monitoring period (M12).

4.2.6 Risks to Local Stakeholders and the Environment

The risk of elite capture of project benefits remains a significant challenge, potentially discouraging broader community participation if local stakeholders perceive that only a select few are gaining from the initiative. For example, some households may believe that the REDD+ project does not offer sufficient benefits to warrant halting deforestation. To mitigate this risk, a comprehensive stakeholder engagement and sensitization strategy has been implemented. This includes ensuring a consistent presence of BCP staff within communities to build trust, foster understanding, and promote support for the project. The verification team is satisfied that the project proponent has maintained clear, consistent communication, which is critical in sustaining stakeholder interest and participation.

A lack of awareness among stakeholders regarding the objectives, processes, and benefits of REDD+ initiatives could hinder their engagement and support. In some cases, households may continue engaging in deforestation while seeking to benefit from the project. To address this, BCP has supported the formation and strengthening of local governance structures, such as Zone Development Committees (ZDCs), which receive training and are empowered to manage projects and community natural resources autonomously. The audit team finds this approach instrumental in enhancing community ownership and encouraging sustainable practices that align with project goals.

The project proponent emphasizes the need for effective communication to prevent misunderstandings, mistrust, and disengagement. Miscommunication may lead to a disconnect between project performance such as forest conservation outcomes and the benefits received by communities, potentially reducing participation. To resolve this, Annual Work Plans and Needs Assessments /117/ conducted in collaboration with government partners and ZDCs were assessed by the audit team and through interviews to ensure inclusive governance. Regular field visits are undertaken by BCP across all zones within the chiefdom to share progress updates, gather community feedback, and collaboratively plan future initiatives. These participatory planning efforts foster transparency and minimize the risk of elite capture by ensuring community-wide involvement in project implementation /62-64/.

The audit team concludes that the project has made substantial efforts to maintain open and effective communication channels with local stakeholders. The development of participatory Annual Work Plans, active involvement of government partners, and continuous field engagement collectively enhance transparency, community trust, and ownership.

Additionally, addressing stakeholders' concerns around economic implications such as potential loss of livelihoods or reduced access to resources is crucial for maintaining support. Poorly communicated economic benefits may lead some households to continue deforestation while collecting project benefits. To manage this, the project has implemented stringent safeguards to prevent misuse and ensure tangible community outcomes. For example, community funds are retained and administered by the project to reduce incentives for corrupt practices. Furthermore, the selection of community projects and benefit distribution is carried out through participatory processes involving representatives from all villages within each zone. This accountability was confirmed by local stakeholders during interviews. Transparent monitoring and reporting mechanisms are in place to promptly detect and address any misconduct or corruption. The audit team also reviewed additional strategies, such as the Conservation Community Covenant, and found them robust and effective in managing risk and promoting equitable benefit sharing.

Working conditions are a critical concern, particularly for field activities like fire management and forest monitoring, which expose staff to hazards due to rough terrain and equipment use. The project proponent ensures adherence to national and international safety standards, including the provision of Personal Protective Equipment (PPE) to all field staff interviewed by the audit team. Comprehensive training is conducted prior to deployment in high-risk tasks, ensuring safe equipment handling and minimizing the risk of injury. Training records and materials reviewed by the audit team confirmed this proactive approach to worker safety.

The project also acknowledges the importance of addressing land tenure and rights-related risks, which, if unresolved, could lead to disputes between local communities and project developers. Such tensions can adversely affect both project implementation and local working conditions. To prevent this, BCP has established and continues to strengthen inclusive community engagement systems that ensure the participation of all stakeholders, including indigenous peoples. The audit team evaluated the grievance resolution mechanism, which encourages stakeholders to submit grievances and guarantees resolution within 30 days. The absence of reported grievances during this monitoring period supports the effectiveness of these mitigation efforts.

Gender equity is another priority area for the project. The audit team acknowledges the project's recognition of potential gender-based risks, such as discrimination, unequal access to opportunities, or harassment in the workplace. During the audit, the RC camp manager confirmed BCP's zero-tolerance policy toward gender discrimination and harassment, as codified in their official policies. The organization identifies as an equal opportunity employer and actively promotes female participation in employment opportunities. All scouts involved in patrols receive comprehensive training that includes firearm safety, wildlife interaction protocols, and handling of sensitive issues, including prevention and response to sexual harassment. Training records reviewed by the audit team confirmed that measures are in place to ensure the safety and well-being of female employees and community members.

Due to the project's location near a National Park and a Game Management Area, security risks from wildlife, illegal loggers, miners, and armed poachers are considerable, particularly for scouts and forest monitoring teams. To address this, the audit team observed that safety briefings and debriefings are standard protocol, and that field personnel are prohibited from conducting operations without trained, armed scouts or wildlife police officers from the Department of National Parks and Wildlife. These precautions are vital in safeguarding the physical safety of all field workers and ensuring the continued success of biodiversity monitoring and protection efforts.

4.2.6.1 Management Experience

To assess the expertise and experience of the LZRP management team, several evidence-gathering activities were undertaken. These included the management team CV document reviews /179-188/, stakeholder interviews, and consultations with implementing partners. Project documentation was analyzed to trace the history of the management team's involvement in REDD+ initiatives, while interviews with project staff and external stakeholders provided insights into the leadership's operational effectiveness, technical competencies, and strategic direction. Additional discussions with partner organizations and relevant government institutions helped assess the collaborative aspects of project implementation and support structures in place.

The evidence checked included records of the project's verifications and validations under the Verified Carbon Standard (VCS) and Climate, Community, and Biodiversity (CCB) standards. Specifically, 18 successful validations and verifications for the LZRP and LCFP projects since 2013 were confirmed, illustrating consistency and adherence to international standards. Team résumés, organizational charts, and training documentation also demonstrated the breadth of technical skills within the core team, which includes professionals in conservation, carbon accounting, GIS/remote sensing, ecology, business administration, and community engagement. Additionally, partnerships with government institutions were reviewed to validate the external support and expertise available to the project.

In conclusion, AENOR audit team confirms that the LZRP management team, led by BCP, possesses extensive and specialized expertise in managing large-scale carbon and conservation projects in Africa. The team's consistent track record of third-party verifications, its pioneering achievements in REDD+ implementation, and the depth of its technical capacity strongly support this conclusion. Moreover, the involvement of skilled partners and government collaborators, along with an apparent strategy to maintain and supplement expertise as needed, reflects a robust and adaptive approach to project execution.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	To assess the identification and management of natural and human-induced risks, the audit team employed a range of evidence-gathering activities. These included interviews with community members, project staff, and local leaders; field visits to verify implementation of mitigation measures; and a review of

	relevant project documentation such as risk assessments /2/, training records, staff safety protocols like the use of PPES, and reports on grievance mechanisms and register /62/. Observations from site inspections were cross-referenced with feedback from stakeholders to evaluate the consistency and effectiveness of the mitigation strategies. Additionally, the team reviewed records of community sensitization campaigns and partnerships with local government to understand the integration of climate resilience and governance strategies into project activities. The evidence confirmed the implementation of multiple risk mitigation measures, including the promotion of climate smart agriculture, physical barriers to manage wildlife conflict, and the establishment of clinics and water infrastructure to reduce health risks. Documents and interviews verified the use of training programs on human rights and safety, the presence of transparent grievance systems, and mechanisms for inclusive community engagement and conflict resolution. Field staff were found to be well equipped and trained, and there were clear linkages between the project and government structures to address political or governance related risks. Based on this evidence, the assessment concludes that the project has a comprehensive, multi layered approach to risk management, effectively addressing both environmental and socio-political challenges through proactive, inclusive, and adaptive strategies.
Risks to stakeholder participation	To assess the risk of elite capture, low stakeholder participation, and misinformation around REDD+ benefits, the audit team conducted a variety of evidence-gathering activities. These included interviews with community members, Zone Development Committee representatives, project staff, and government partners. Field observations were made during community meetings and participatory planning sessions. The team also reviewed Annual Work Plans, Needs Assessments, training records, meeting minutes, and documentation on grievance mechanisms /62/. Particular attention was paid to how project decisions were made, how benefits were distributed, and whether there was inclusive representation in governance structures. The audit also evaluated how sensitization and awareness efforts were conducted on the ground. The evidence confirmed that BCP has implemented a multi-faceted and structured approach to stakeholder engagement and risk mitigation. The presence of dedicated staff within communities, the empowerment of local institutions like Zone Development Committees, and the use of participatory planning mechanisms were all verified through documentation and stakeholder testimony. These structures help minimize the risk of elite capture and promote equitable benefit sharing. Furthermore, the audit validated the

	existence of secure systems for community fund management, transparent decision-making processes, and consistent communication strategies. Based on this evidence, the assessment concludes that BCP has developed and implemented robust systems to ensure inclusive participation, transparency, and fairness effectively addressing concerns around misinformation, resistance, and elite capture in REDD+ benefit distribution.
Working conditions	To evaluate the management of health and safety, land tenure, gender equity, and security risks within the LZRP, the audit team carried out multiple evidence gathering activities. These included direct interviews with project staff, scouts, community members, and local leaders, as well as consultations with representatives from the Department of National Parks and Wildlife. Field observations during activities such as fire management training and patrols were conducted to assess practical implementation of safety measures. Additionally, the audit team reviewed the training manuals /63/, land tenure documentation /171-175/, grievance register /62/, and gender policy documents. Particular attention was given to how risks are mitigated through training, equipment, and procedural safeguards, as well as the mechanisms in place for community engagement and conflict resolution. The evidence verified that BCP has established and implemented comprehensive protocols to mitigate risks in all key areas assessed. All project workers are provided with PPE and receive mandatory training before engaging in high-risk activities like fire management. Field staff involved in biodiversity monitoring are always accompanied by armed scouts or wildlife officers, ensuring protection in high-risk zones. Community engagement systems and grievance mechanisms were found to be active and inclusive, with grievances addressed within a set 30-day period. The audit also confirmed BCP's equal opportunity employment policy /188/, proactive inclusion of women, and a zero-tolerance stance on harassment. Based on these findings, the assessment concludes that BCP effectively manages occupational, social, and environmental risks in compliance with national and international standards, ensuring both worker safety and community participation are upheld throughout project implementation.
Safety of women and girls	No issues were gathered concerning this component during the audit visit as everyone interviewed considered them safe from any form of harm as per employment records /188/ assessed.
Safety of minority and marginalized groups, including children	No issues were gathered concerning this component during the audit visit as everyone interviewed considered them safe from any form of harm as per employment records /188/ assessed.

Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers)	From the assessment of the project's approach to chemical use, particularly in response to Fall Armyworm (FAW) infestations, the audit team conducted interviews with project staff, farmers, and Ministry of Agriculture representatives. Field visits were carried out to observe training sessions and verify whether chemical use was being promoted or discouraged. Documentation reviewed included training materials provided to farmers, the Ministry of Agriculture's FAW Manual on Integrated Pest Management (Appendix J of the MR /1/), and procurement records for any chemicals distributed. The evidence confirmed that the project itself does not use or promote harmful chemicals and that farmers are explicitly discouraged from using chemicals during training sessions. In rare cases of severe FAW outbreaks, any chemical interventions are coordinated through government programs using low-risk pesticides, as outlined in the official FAW Manual. Based on this evidence, the assessment concludes that the project maintains a precautionary approach to chemical use, ensuring alignment with environmental safety standards and reinforcing sustainable pest management practices.
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4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	BCP has established a comprehensive Human Resources (HR) Policy, approved by the Ministry of Labour /188/, which aligns with Zambian labour laws and international standards. This policy strictly prohibits any form of discrimination by employees or project participants during project implementation. In addition, BCP has developed a dedicated "Workplace Harassment, Discrimination, and Bullying Policy" that also applies to contractors. All new staff are introduced to these policies during onboarding and are required to acknowledge their understanding and agreement. The organization promotes inclusivity by supporting the employment of female Community Scouts /102/ under codes of conduct set by the Department of National Parks and Wildlife (DNPW) and Community Resource Boards (CRB). Government partners such as the DNPW and the Forestry Department also follow formal policies aimed at preventing discrimination. Community agreements further reinforce non-discrimination by classifying acts like threats or obstruction as non-performance. These provisions have been reviewed by the AENOR audit team, who conclude that

	the project proponent has put in place robust and enforceable measures to uphold equity and prevent discriminatory practices.
Sexual harassment	BCP's policies also explicitly prohibit sexual harassment and include preventive measures that apply to both employees and contractors. The "Workplace Harassment, Discrimination, and Bullying Policy" covers harassment in all forms, including sexual harassment, and is reinforced during staff onboarding. The project proponent has created a safe reporting environment through a formal grievance mechanism and a dedicated Whistleblower service that allows confidential reporting of unethical behaviour. The Whistleblower Policy ensures protection against retaliation, encouraging individuals to report incidents without fear of victimization. All complaints are expected to be escalated to designated officials for appropriate action. Based on its review of these systems, the AENOR audit team concludes that the project proponent demonstrates a strong commitment to maintaining a safe, respectful, and harassment-free working environment.
Gender equity in labor and work	BCP places a strong emphasis on gender equity within its operations, particularly in the context of promoting sustainable use and management of natural resources under REDD+ projects. The organization is committed to mainstreaming gender considerations to ensure equal access, participation, and benefits for men and women in natural resource management initiatives. BCP actively works to reduce or eliminate gender inequalities. To achieve these goals, BCP implements various activities aimed at challenging gender stereotypes and empowering women to take on leadership roles in natural resource management. Economic opportunities for women are actively encouraged through livelihood empowerment support /82-102/ and linkages to stable markets. AENOR's audit team could therefore verify that BCP demonstrates its commitment to gender equity through concrete actions, such as supporting the employment of female Community Scouts and enrolling women in programs like Conservation Farming/Climate Smart Agriculture. BCP-supported Community Scouts /102/ and Lead Farmers are women, reflecting the organization's efforts to promote gender diversity and inclusion within its projects /66-102/.
Forced labor	The project proponent has demonstrated a clear commitment to preventing forced labour by upholding both local labour laws and relevant international standards. Internal policies are in place to prohibit any form of coercion or involuntary work, serving as a foundational framework for ethical conduct

	within the organization. These policies apply to all employees and stakeholders involved in the project. During the audit, documentation provided by the project proponent and interviews with project staff confirmed that no instances of forced labour were observed or reported. Based on the evidence reviewed and stakeholder interviews, the audit team concludes that the project proponent effectively implements and enforces measures that prevent forced labour within its operations.
Child labor	The project proponent's internal labour policies /188/ also explicitly prohibits the employment of individuals below the legal working age /179-187/. This aligns with both Zambian labour laws and international conventions on child labour. Training and onboarding processes emphasize the importance of compliance with these standards. Audit interviews with employees and community stakeholders, as well as a review of personnel records, revealed no involvement of minors in project-related activities. The audit team concludes that there is no evidence of child labour within the project, and the systems in place are effective in ensuring continued compliance with child protection regulations.
Human trafficking	To address the risk of human trafficking, the project proponent has established policies embedded under the staff profile information /188/ that prohibit any form of trafficking related activities. The organization promotes transparency in hiring practices, conducts background checks, and monitors its supply chains and partnerships to prevent exploitation. The audit team reviewed relevant policies and conducted interviews with key staff and community members. The patrol teams in RC area confirmed that there were no traces of human trafficking during the assessment period. The audit team confirms that there is no evidence of human trafficking associated with the project and that the preventative systems implemented by the project proponent are robust and compliant with applicable legal and ethical standards.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Potential Inadequate respect for the rights of IPs and LCs in the projects can lead to human rights violations, including forced	The project proponent outlines several key risks as outlined in section 2.3.2 of the monitoring report /1/ relating to human rights in the context of a project aimed at recognizing, respecting, and promoting the protection of the rights of Indigenous Peoples (IPs), Local Communities (LCs), and customary rights holders. Possible mitigation include:

evictions, harassment, and violence.	Capacity building Initiatives: The project supports capacity-building initiatives within IPs and LCs, empowering them economically, socially, and environmentally through education, training, and skills development as per the assessment of the LZRP engagement tracker /63/ shared. Conflict Resolution Mechanisms: A robust conflict resolution mechanism through the grievance register /62/ is in place, allowing communities to raise grievances transparently and seek resolution within a defined timeframe, ensuring accessibility and fairness. Equitable Benefit Sharing: Community Forest management agreements have been signed, highlighting benefit-sharing mechanisms to ensure economic, social, and environmental benefits generated by the project are fairly distributed among the communities. Partnership with Indigenous Representatives: Collaboration occurs with traditional leadership and cooperatives /133-170/ within the project zone, ensuring Indigenous representation and involvement in decision-making processes. The audit team assessment through interviewing the stakeholders and communities hence concludes that the project proponent demonstrates a comprehensive commitment to upholding human rights, particularly those of Indigenous Peoples, Local Communities, and customary rights holders.
Potential infringement on the land and resource rights of IPs, LCs, and customary rights holders	Community Consultation and Free, Prior, and Informed Consent (FPIC): Comprehensive FPIC processes are undertaken before initiating any project activities, ensuring that IPs and LCs are consulted, and their consent obtained /133-170/, thus upholding their right to self-determination and participation in development initiatives. Conflict Resolution Mechanisms: A robust conflict resolution mechanism through the grievance register /62/ is in place, allowing communities to raise grievances transparently and seek resolution within a defined timeframe, ensuring accessibility and fairness. Equitable Benefit Sharing: Community Forest management agreements have been signed, highlighting benefit-sharing mechanisms to ensure economic, social, and environmental benefits generated by the project are fairly distributed among the communities. The audit team assessment through interviews with stakeholders and communities concludes that the project proponent demonstrates a comprehensive commitment to minimize land infringements and resource

	rights, particularly those of Indigenous Peoples, Local Communities, and customary rights holders.
Potential to overlook or undervalue the traditional knowledge, cultural heritage, and customary practices of IPs and LCs, risking their loss, appropriation, or misappropriation	Respect for Traditional Knowledge: The project acknowledges and respects the local/traditional knowledge/82-92/ held by IPs and LCs, ensuring that project activities do not exploit or appropriate this knowledge without proper consent. The audit team assessment through interviews with communities concludes that the project proponent does not undervalue the traditional heritage of Indigenous Peoples, Local Communities, and customary rights holders.
Potential Failure to obtain FPIC from IPs and affected communities before implementing REDD+ activities	Community Consultation and Free, Prior, and Informed Consent (FPIC): Comprehensive FPIC processes are undertaken before initiating any project activities, ensuring that IPs and LCs are consulted, and their consent obtained /133-170/, thus upholding their right to self-determination and participation in development initiatives. Before any project is implemented, IPs and LCs are consulted by conducting a need assessment /117/ to obtain FPIC before initiating any project activities that may affect their lands, resources, or livelihoods. The audit team assessment through interviews with communities concludes that the project proponent has obtained full consent from Indigenous Peoples, Local Communities, and customary rights holders before implementing the project.
Potential excluding or marginalizing IPs and LCs from meaningful participation in the design, planning, implementation, and monitoring of the projects	Participatory needs assessment: Before any project is implemented, IPs and LCs are consulted by conducting participatory needs assessment /117/ to obtain FPIC before initiating any project activities that may affect their lands, resources, or livelihoods. This is done to ensure that no one is excluded as far as project implementation is concerned (See appendix B for supporting documentation related to participatory needs assessment and approvals from traditional leadership, conducted) Partnership with Indigenous Representatives: The project collaborates with local natural resource governance institutions (Cooperatives) as the project has signed agreements with them. Been patrons to the CFMGs, the project also collaborates with Traditional leadership i.e. the chief. The project Involves them in decision-making processes and seek their input on matters that affect their rights and interests through community meetings.

	Community Meetings Trackers for the current monitoring period (M12) /63/. Capacity Building Initiatives: The project conducts capacity building initiatives within IPs and LCs to empower them economically, socially, and environmentally /63/. This includes initiatives in the education, training, and skills development sectors. In the current monitoring period-M12, supported teachers /120-121/ and tertiary school community members with school fees and Tuition fees. Equitable Benefit Sharing: The project signed agreements /146-148/ with the respective communities where benefit sharing mechanisms are highlighted. By working with the Cooperatives, the project ensures that economic, social, and environmental benefits generated by the project are shared fairly and contribute to the well-being of these communities. The audit team assessment through interviews with communities concludes that the project proponent has included the Indigenous Peoples, Local Communities, and customary rights holders in meaningful participation in the design, planning, implementation, and monitoring of the projects in the monitoring period M12.
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4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Potential to overlook or undervalue the cultural heritage, traditional knowledge, and customary practices of IPs.	The project proponent demonstrates a strong commitment to human rights through multiple integrated initiatives. Respect for traditional leadership and customary practices is central to the project's approach, ensuring that indigenous governance structures are acknowledged and involved in decision-making processes. Community consultation is actively prioritized through collective gatherings announced via traditional channels, reinforcing the principles of participation and inclusive engagement. Additionally, by promoting sustainable agricultural practices introducing improved farming techniques and conservation farming /109-114/, the project supports local livelihoods and helps reduce reliance on environmentally harmful activities such as deforestation. This effort directly contributes to upholding the right to work and an adequate standard of living for the communities involved.

	Further, the project promotes sustainable economic alternatives, such as honey production and beekeeping /66-80/ which align with environmental sustainability and the human rights principle of intergenerational equity. The project also actively protects cultural heritage through the development and implementation of a High Conservation Values (HCV) Protocol /118-119/, which includes safeguarding burial sites, graveyards, and shrines crucial elements of community identity and spirituality. Based on interviews and evidence reviewed, the AENOR audit team concludes that the project proponent adopts a holistic approach that effectively integrates key human rights principles into the design and execution of its activities, ensuring that development efforts are inclusive, respectful, and sustainable.
Potential Failure to recognize and protect cultural sites, sacred places, and traditional ecological knowledge can lead to the erosion and loss of cultural identity and heritage for IP communities.	To support the preservation and protection of cultural heritage, the project in M4 successfully developed a Biodiversity and Conservation Protocol for High Conservation Values /119/ and carried out an HCV assessment in alignment with the HCV Resource Network methodology, covering all zones under the LZRP /1/. The assessment provides initial evidence of the presence and significance of cultural and social HCVs, including sacred sites such as burial grounds and shrines. This marks a foundational step toward establishing a structured monitoring framework. AENOR audit team's conclusion of the assessment indicates that further action is warranted, particularly through planned community consultations and awareness initiatives in M13 (2025), which aim to validate and document social HCVs and establish a strategy for their ongoing protection and monitoring.

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks over Property	The audit assessment confirmed that the project area remains under leasehold tenure /171-175/ with Rufunsa Conservancy, and thus local communities do not hold statutory or customary land rights within it. The assessment verified that no involuntary relocations have occurred throughout the project period. Evidence from the engagement tracker /63/ indicate that past encroachments were primarily due to boundary misinterpretation, and affected individuals were given the choice to remain or were voluntarily relocated to alternative land within the project zone. Subsequent minor encroachment incidents were similarly

	addressed through voluntary relocation after fair consultation and allocation of land. These findings were corroborated through stakeholder interviews and document review, indicating alignment with VCS requirements regarding community rights and displacement. During the current monitoring period (M12), the audit team observed new instances of encroachment and assessed the project's response measures. Evidence collected includes minutes of meetings held with His Royal Highness Chief Bunda-Bunda /63/, a grievance resolution follow-up with the Chifita community, and site visits through the PP scouts along the project boundaries and candid interviews with stakeholders, community and the BCP employees. The project proponent also enhanced local engagement by supporting CSA lead farmers through provision of agricultural inputs and training /63/, encouraging sustainable land use and discouraging further encroachment /111/. The audit team concluded that the project has demonstrated a proactive and participatory approach to managing encroachment, with plans for further preventive action through community engagement and economic incentives. These efforts were found to be credible and aligned with best practices for land use conflict resolution and community-based conservation.
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4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	To assess the fairness, transparency, and effectiveness of revenue-sharing mechanisms under the Lower Zambezi REDD+ Project (LZRP), the audit team conducted a series of evidence-gathering activities. These included in-depth interviews with BCP management, Zone Development Committee (ZDC) members, community stakeholders, and local leaders such as chiefs and headmen. The team also reviewed key documents, including the REDD+ Conservation Fee Sharing Agreement (RCFSA), associated addendums, sustainable harvesting plans, and land use plans. Financial records such as quarterly bank statements, reconciliation reports, and community project approvals were examined to verify the disbursement of conservation fees. Field visits were conducted to confirm the implementation of community projects funded through these conservation fees and to observe the participatory budgeting process in action. The evidence confirmed that LZRP operates exclusively on privately owned land and does not generate REDD+ revenue from community lands, thereby

	avoiding any transfer or relinquishment of land rights from local communities. The project incentivizes community participation through performance-based conservation fee distributions outlined in the RCFSA. These fees are transparently managed, with clearly defined allocations to traditional leaders, administrative bodies, and communities. The 82% community share is distributed in-kind through a participatory planning and budgeting process, promoting inclusivity and local ownership. AENOR audit team concludes that the revenue-sharing framework under the LZRP is well-structured, participatory, and performance-based, effectively aligning financial incentives with conservation outcomes while respecting community rights and enhancing local development.
Benefit sharing during the monitoring period	To verify the implementation of benefit sharing under the 2024 revised REDD+ Conservation Fee Sharing Agreement (RCFSA), the audit team conducted interviews with BCP staff, zone cooperative leaders, headmen, and representatives from the office of His Royal Highness Chief Bunda Bunda. These interviews were complemented by the review of official payment records, bank statements, signed receipts, and minutes from Zone Development Committee (ZDC) meetings /120/121/162-164/. The audit team also cross-referenced these financial documents with the allocations outlined in the RCFSA to confirm consistency. Additionally, evidence of completed needs assessments for upcoming project cycles was reviewed, including signed forms and community meeting records. The evidence confirmed that K270,000.00 was distributed in line with the 6% allocation to leadership structures: K90,000.00 each to the four cooperatives, four headmen, and Chief Bunda Bunda. All payments were well-documented, traceable, and executed in accordance with the 2024 revised RCFSA. The remaining 25% for community project implementation has not yet been disbursed but is scheduled for the next monitoring period, with needs assessments already completed and documented. The audit concludes that benefit sharing is being carried out transparently, in alignment with the terms of the RCFSA, and that preparations for project implementation reflect a structured and participatory planning process.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	The project proponent outlines potential risks and impacts on biodiversity and ecosystems:

	• Positive Impact on Biodiversity: The project aims to enhance landscape connectivity and create a corridor between the Chiawa GMA and Lower Zambezi National Park, which is designed to have a positive impact on biodiversity. This could lead to improved habitat conditions and conservation management, benefiting wildlife populations. • Enhanced Conservation Management: Improved conservation management on Rufunsa Conservancy is expected to enhance habitat conditions for wildlife, potentially leading to increased biodiversity in the area. • Rehabilitation of Animal Populations: The ongoing and future rehabilitation of animal populations on Rufunsa Conservancy could positively impact other depleted areas by serving as a source for individuals to migrate and repopulate those areas. • Displacement of Poaching Activities: The statement suggests that displacement of poaching activities is unlikely due to the depletion of wildlife in the project zone and neighbouring areas. Additionally, the presence of the Conservancy and increased patrols could disrupt poaching routes and deter poachers from accessing the Lower Zambezi National Park. • Community Involvement in Conservation: Community-based deforestation mitigation projects within the project zone are designed to improve community well-being and may indirectly contribute to biodiversity conservation efforts. After assessing the HCV protocols /119/ and the HCV report /118/ and interviews with the stakeholders and community during the audit visit, the statements highlight potential positive impacts on biodiversity and ecosystems like reduction of logging, reduced poaching and illegal charcoal burning, it's essential to monitor and mitigate any unintended negative consequences, such as habitat fragmentation in the future scenarios.
Soil degradation and soil erosion	The project proponent refrains from engaging in any activities that would disturb the soil composition of the area, such as extensive agricultural input usage. Additionally, it safeguards the forest at the top of the Lower Zambezi escarpment, thereby mitigating soil erosion through soil stabilization measures. The Climate Smart farmers /109-114/ have strengthened this.
Water consumption and stress	The project proponent has not conducted any activity disrupting the hydrology of the area such as dam construction or irrigation in the community area /93-101/.

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The project proponent highlights the presence of several Rare, Threatened, and Endangered (RTE) species within the Lower Zambezi National Park (LZNP) and its adjacent area, the Lower Zambezi REDD+ Project (LZRP). 1. Elephants: African Forest elephants are listed as decreasing on the IUCN Red List. They face threats such as habitat loss, fragmentation, and poaching for their ivory. 2. Lions: African lions are listed as vulnerable on the IUCN Red List. They face threats such as habitat loss, prey depletion, human-wildlife conflict, and poaching. 3. Leopards: African leopards are listed as Least Concern on the IUCN Red List. They face threats such as habitat loss, human-wildlife conflict, and poaching for their skins and body parts. 4. Wild Dogs: African wild dogs are listed as endangered and, in some places, as critically endangered on the IUCN Red List. They face threats such as habitat loss, human-wildlife conflict, and infectious diseases transmitted from domestic dogs. 5. Vultures: Various species of vultures are listed as critically endangered, endangered, or vulnerable on the IUCN Red List. They face threats such as habitat loss, poisoning from consuming poisoned carcasses, and collisions with man-made structures. 6. Southern Ground-Hornbill: Southern ground-hornbills are listed as vulnerable on the IUCN Red List. They face threats such as habitat loss, hunting, and collisions with power lines.
Areas needed for habitat connectivity	The audit team's assessment of the project proponent, its staff, and community engagement confirms that the project activities are intentionally structured to reduce environmental pressures, thereby helping to mitigate threats to Rare, Threatened, and Endangered (RTE) species /122-124/ and their habitats /104-108/. The project plays a key role in securing a critical buffer zone by addressing drivers of habitat degradation and poaching. Furthermore, it includes preventive measures such as surveillance and regular law enforcement patrols by trained scouts to reduce the risk of these threats being displaced to other parts of the landscape.

	Based on the desk review of the HCV report /118/, the interviews with community and physical observations of the sites visited, the audit team is satisfied that the project proponent recognizes the presence of RTE species in the Lower Zambezi National Park (LZNP) and the Lower Zambezi REDD+ Project (LZRP) areas and is actively implementing conservation measures to safeguard their survival.
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Evidence gathering activities, evidence checked, and assessment conclusion	
Habitats for rare, threatened, and endangered species	During the monitoring period, the audit team conducted interviews with project staff, community members, and local scouts to assess the risks to habitats supporting Rare, Threatened, and Endangered (RTE) species. Field visits were conducted in accessible zones of the project area to verify the presence of patrols, signage, and conservation activities. Additionally, the team reviewed documented patrol logs, biodiversity monitoring records, incident reports, and training materials related to wildlife protection. These engagements aimed to verify the implementation of planned mitigation actions and assess the community's role in supporting habitat protection and surveillance efforts. The audit team reviewed the HCV report for both LCFP and the LZRP /118/ including biodiversity and habitat monitoring reports /122–124/, records of law enforcement patrols /104–108/, and incident tracking systems for poaching or encroachment and found that the rare or threatened species have been fully protected within the ecosystem. Surveillance data and spatial analysis were also examined to evaluate trends in land-use changes and human activity near critical wildlife habitats. Information on community education programs and local development initiatives aimed at reducing reliance on forest resources was also analyzed. These documents provided insight into the effectiveness of mitigation measures and confirmed the identification of habitat risks for key RTE species such as elephants, lions, wild dogs, and vultures.
Areas for habitat connectivity	The audit team concludes that the project proponent has appropriately identified risks to the habitats of RTE species and areas critical for habitat connectivity. The implementation of active mitigation strategies including regular scout patrols, community sensitization, and habitat monitoring demonstrates a structured and responsive approach to conserving biodiversity within the project zone. No unmanaged risks were identified during the assessment period, and the existing measures are deemed adequate to prevent or mitigate threats such as habitat loss, poaching, and

human-wildlife conflict. Consequently, the audit team is satisfied that the project effectively safeguards the ecological integrity of the area and contributes meaningfully to the protection of RTE species.

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
<i>Zea mays</i> (Maize)	The most common staple food grown in the global South. Sorghum spp. presents a viable alternative and has supplanted maize due to its higher yield and resistance to bird predation. The stakeholders and communities interviewed by the audit team during the field visit mentioned that there is no documented negative evidence, and it is widely utilized in Zambia.
<i>Cajanus cajan</i> (Pigeon pea)	There is no local alternative among native species. This legume is highly nutritious. The stakeholders and communities interviewed by the audit team during the field visit mentioned that no adverse evidence has been recorded, and it is extensively utilized in Zambia.
<i>Mangifera indica</i> (Mango)	The introduction of another species <i>Parinari curatellifolia</i> is widely adopted by the PP and serves as a potential alternative to mangoes and is locally employed; however. The stakeholders and communities interviewed by the audit team during the field visit mentioned that it doesn't match the production and fruit size of the primary species has a slower growth rate and that no adverse evidence has been documented and is widely utilized in Zambia.
<i>Carica papaya</i> (Papaya/Pawpaw)	There are no known local alternatives among native species that match the size of its fruit. The stakeholders and communities interviewed by the audit team during the field visit mentioned that there is no adverse evidence has been documented, and it is extensively utilized in Zambia.
<i>Moringa oleifera</i> (Moringa)	Possibly, there are alternative local species with similar nutritional values, but <i>Moringa oleifera</i> stands out for its rapid growth. The stakeholders and communities interviewed by the audit team during the field visit mentioned that there is no adverse evidence has been documented, and it is widely utilized in Zambia for medicinal purposes.
<i>Faidherbia albida</i> (Formerly <i>Acacia albida</i>)	This species is native to Zambia, though it may not naturally exist in all project areas. It holds value for its nitrogen-fixing and soil-stabilizing capabilities, thereby enhancing soil fertility. <i>Faidherbia albida</i> is also suitable for fodder. The stakeholders and communities interviewed by the audit team during the field visit mentioned that there is no adverse evidence has been documented, and its extensive use is observed in Zambia.
<i>Gliricidia sepium</i>	The species, <i>Gliricidia sepium</i> , serves as a versatile nitrogen-fixing tree, providing valuable support to agroforestry and conservation agriculture endeavours while aiding in soil stabilization and offering fodder for livestock. Its rapid growth rate and high biomass production contribute significantly to soil organic matter, thereby enhancing soil fertility. Additionally, it can withstand repeated cutting or harvesting. The stems of <i>Gliricidia sepium</i> are

	suitable for firewood, alleviating pressure on fuel wood extraction from forests. While considered a weed in Jamaica, this classification doesn't apply to other regions, including Zambia, and it's not listed as invasive on the Global Invasive Species Database. Furthermore, the trees typically exhibit limited seed production outside their native range due to a lack of pollinators and unfavourable conditions for seed germination, minimizing the risk of spread.
<i>Tephrosia candida</i> and <i>Tephrosia vogelii</i>	These species are especially valuable for their drought tolerance and nitrogen-fixing properties, as their nitrogen release rate closely aligns with crop uptake, minimizing nitrogen loss. Tephrosia is abundant in bioactive phytochemicals with potent insecticidal properties against a broad spectrum of pests. The leaves of Tephrosia are commonly employed for pest control and no adverse effects have been recorded. Overall, the stakeholders and communities interviewed by the audit team during the field visit mentioned that there are no adverse effects of non-native species inclusion on the community and the forests. The audit team finds the project's approach to species introduction and management to be satisfactory, with evidence of diligent monitoring and mitigation efforts.

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	Not applicable since the audit team did not identify or were told of any invasive species that affected the community wellbeing.

	Evidence gathering activities, evidence checked, and assessment conclusion
Invasive species	After the Monitoring Report /1/ review, site visits and interviews were conducted, where observations and feedback from the community was clear that there were no invasive species during the current Monitoring period and in the visit The audit team also assessed the previous monitoring report M11 which confirmed that there were no invasive species.

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	There were no risks identified since the Lower Zambezi REDD+ Project (LZRP) operates as a REDD+ initiative, with its core objective focused on reducing emissions from deforestation and forest degradation, while also promoting forest conservation and sustainable management practice. So, the project is not an ARR, ALM, WRC or ACoGS project.

4.3 Accuracy of Reduction and Removal Calculations

Procedures for quantifying emission reductions were conducted following the VM0009 v.3.0 June 2014: Methodology for Avoided Ecosystem Conversion for Sectorial Scope 14 methodology and its related tools. The verification team performed an intensive review of all input data, parameters, formulas, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS documentation, VCS methodology and associated tools, and the PD.

Furthermore, the verification team reproduced calculations for selected samples to ensure the accuracy of the results. Conversion factors, formulas, and calculations were provided by PP in spreadsheet /3-15/ format to ensure all formulas were accessible for review. The verification team recalculated subsets of the analysis to confirm correctness. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice.

Baseline Emissions

Section 5.1 of the MR and the calculation spreadsheet /3-15/ submitted to AENOR provide information related to the baseline emissions calculations.

Baseline emissions ($E^{[m]}$) for the current monitoring period (01-January-2024 to 31-December2024) were calculated using Equation F.15. from VM0009 v3.0

$$E_{B\Delta}^{[m]} = E_B^{[m]} - E_B^{[m-1]} \quad [F.15]$$

Cumulative baseline emissions were calculated using a logistic deforestation model, based upon a point interpretation of forest state in the reference area applying equation F.16 from VM0009, v3.0

$$E_B^{[m]} = E_{B\text{BM}}^{[m]} + E_{B\text{SOC}}^{[m]} - C_{B\text{SOC}}^{[m]} - C_{B\text{BGB}}^{[m]} - C_{B\text{DW}}^{[m]} - C_{B\text{WP}}^{[m]} \quad [F.16]$$

Baseline emissions from biomass for the current monitoring period are based on the average per hectare carbon stocks in selected carbon pools from AGOT, BGOT given by equation F.17 for the accounting area and F.18 for the proxy area.

$$c_{P\text{BM}}^{[m]} = \sum_{b \in B} c_{P\text{b}}^{[m]} \quad [F.17]$$

$$c_{B\text{BM}}^{[m]} = \sum_{b \in B} c_{B\text{b}}^{[m]} \quad [F.18]$$

Cumulative baseline emissions were calculated using a logistic biomass emission model (BEM), validated in the PD, based upon a point interpretation of the forest state in the reference area applying

$$\begin{aligned}
E_{B\ BM}^{[m]} &= BEM_{SP}(c_{P\ 1\ BM}^{[m=0]}, c_{B\ BM}^{[m]}, t^{[m]}, x^{[m]}) = BEM_{U2,3/P1}(c_{P\ 1\ BM}^{[m=0]}, c_{B\ BM}^{[m]}, t^{[m]}, x^{[m]}) \quad [F.24] \\
\text{when } E_{B\ BM}^{[m]} &\geq A_{P\ 1}^{[m=0]}(c_{P\ 1\ BM}^{[m=0]} - c_{B\ BM}^{[m]}) \\
\text{then } E_{B\ BM}^{[m]} &= BEM_{U2,3}(wc_{P\ 1,2\ BM}^{[m=0]}, c_{B\ BM}^{[m]}, t^{[m]}, x^{[m]}) \\
\text{when } E_{B\ BM}^{[m]} &\geq A_{P\ 1}^{[m=0]}c_{P\ 1\ BM}^{[m=0]} + A_{P\ 2}^{[m=0]}c_{P\ 2\ BM}^{[m=0]} - c_{B\ BM}^{[m]}(A_{P\ 1}^{[m=0]} + A_{P\ 2}^{[m=0]}) \\
\text{then } E_{B\ BM}^{[m]} &= BEM_{U2,3/P1}(wc_{P\ 1,2,3\ BM}^{[m=0]}, c_{B\ BM}^{[m]}, t^{[m]}, x^{[m]}) \\
&\dots \\
E_{B\ BM}^{[m]} &= A_{P\ 1}^{[m=0]}c_{P\ 1\ BM}^{[m=0]} + A_{P\ 2}^{[m=0]}wc_{P\ 1,2\ BM}^{[m=0]} + \dots + A_{P\ n}^{[m=0]}wc_{P\ i,n\ BM}^{[m=0]} \\
&\quad - c_{B\ BM}^{[m]}(A_{P\ 1}^{[m=0]} + A_{P\ 2}^{[m=0]} + \dots + A_{P\ n}^{[m=0]})
\end{aligned}$$

equation F.24.

Cumulative baseline emission from SOC were estimated using a soil emission model (SEM), applying equation F.29.

$$\begin{aligned}
E_{B\ SOC}^{[m]} &= SEM_{sp}(c_{P\ 1\ SOC}^{[m=0]}, c_{B\ SOC}^{[m]}, t^{[m]}, x^{[m]}) = SEM_{U2,3/P1}(c_{P\ 1\ SOC}^{[m=0]}, c_{B\ SOC}^{[m]}, t^{[m]}, x^{[m]}) \quad [F.29] \\
\text{when } E_{B\ SOC}^{[m]} &\geq A_{P\ 1}^{[m=0]}(c_{P\ 1\ SOC}^{[m=0]} - c_{B\ SOC}^{[m]}) \\
\text{then } E_{B\ SOC}^{[m]} &= SEM_{U2,3/P1}(wc_{P\ 1,2\ SOC}^{[m=0]}, c_{B\ SOC}^{[m]}, t^{[m]}, x^{[m]}) \\
\text{when } E_{B\ SOC}^{[m]} &\geq A_{P\ 1}^{[m=0]}c_{P\ 1\ SOC}^{[m=0]} + A_{P\ 2}^{[m=0]}c_{P\ 2\ SOC}^{[m=0]} - c_{B\ SOC}^{[m]}(A_{P\ 1}^{[m=0]} + A_{P\ 2}^{[m=0]}) \\
\text{then } E_{B\ SOC}^{[m]} &= SEM_{U2,3/P1}(wc_{P\ 1,2,3\ SOC}^{[m=0]}, c_{B\ SOC}^{[m]}, t^{[m]}, x^{[m]}) \\
&\dots \\
E_{B\ SOC}^{[m]} &= A_{P\ 1}^{[m=0]}c_{P\ 1\ SOC}^{[m=0]} + A_{P\ 2}^{[m=0]}wc_{P\ 1,2\ SOC}^{[m=0]} + \dots + A_{P\ n}^{[m=0]}wc_{P\ i,n\ SOC}^{[m=0]} \\
&\quad - c_{B\ SOC}^{[m]}(A_{P\ 1}^{[m=0]} + A_{P\ 2}^{[m=0]} + \dots + A_{P\ n}^{[m=0]})
\end{aligned}$$

Cumulative carbon not decayed in SOC used a decay emission model (DEMSOC) as per equation F.33

$$C_{B\ SOC}^{[m]} = \sum_{i \in \mathcal{M}} DEM_{SOC}(E_{B\ \Delta\ SOC}^{[i]}, t^{[m]}, t^{[i-1]}) \quad [F.33]$$

Carbon not decayed in below-ground biomass used a decay emission model (BEM), as per F.32 of VM0009 v3.0.

$$C_{B\ BGB}^{[m]} = \sum_{i \in \mathcal{M}} DEM_{DW,BGB}(E_{B\ \Delta\ BGB}^{[i]}, t^{[m]}, t^{[i-1]}) \quad [F.32]$$

Both cumulative baseline emissions from below-ground biomass at the end of the previous [m-1] and current monitoring period [m] were calculated according to equation F.30.

$$E_{B\ BGB}^{[m]} = \frac{r_{RS} E_{B\ BM}^{[m]}}{1 + r_{RS}} \quad [F.30]$$

The following table summarizes the calculated values of the baseline parameters:

Parameter	Equation used (VM0009 v3.0)	Value (tCO2e)
$E_{B\ \Delta}^{[m]}$ Baseline emissions for the current monitoring period	F.15	244,175
$E_{B\ \Delta}^{[m-1]}$ Cumulative baseline emissions from the previous monitoring period	F.16	2,416,974
$E_{B\ BM}^{[m]}$ Cumulative baseline emissions from biomass at the end of the current monitoring period	F.24	2,306,169
$E_{B\ SOC}^{[m]}$ Cumulative baseline emissions from SOC for the current monitoring period	F.28	845,215
$C_{B\ SOC}^{[m]}$ Carbon not decayed SOC at the end of the current monitoring period	F.32	-490,235
$C_{B\ BGB}^{[m]}$ Carbon not decayed in BGB at the end of the current monitoring period.	F.29	1
$E_{B\ BGB}^{[m]}$ Cumulative baseline emissions from below-ground biomass at the end of the current monitoring period	F.29	808,656
$E_{B\ BGB}^{[m-1]}$ Cumulative baseline emissions from below-ground biomass at the beginning of the current monitoring period	F.29	738,074

AENOR has checked the calculations provided and confirmed that this amount of baseline emissions is in conformance and has followed the methodology in the new version of the PD.

Project emissions

The MR stated that there were no project emissions in the current monitoring period.

Within Section 5.2 of the MR, there are two Sentinel 2 satellite images, one of them from April-May 2023 and the other one from April-May 2024, shared with the audit team. In there, it is clear through visual interpretation that 2.96 hectares have been deforested for the current monitoring period. Additional information on the carbon stock and emissions from disturbance (project emissions) calculation has been

provided within Appendix C, concluding that both maps and calculations are accurate and stating with a reasonable level of assurance that there is no project emissions within the current monitoring period.

The visual image analysis shows minor clearing in the Northern part of the project area near the encroached area. The clearing was for illegal agricultural expansion. The total area disturbed was 2.3 ha. It is conservatively assumed that the entire area disturbed was forested before the clearing. It is also conservatively assumed that all the cleared land is in the dense tree class. Therefore, the emissions were estimated to be $2.96 * 229.9$ (a combined disturbance-emissions factor for ABG+BGB+soil for the LZRP) = 680 tCO₂e. Thus, the Project proponent justified this by the remote sensing and GIS analysis in the MR.

The assessment of project emissions has been done with the full review of spreadsheet calculations /3-15/ and the proper comparison with the methodology. Furthermore, GIS material /16-38/ has been checked to be contrasted with the boundaries of the project and the spreadsheet calculation.

The calculations have been reproduced according to the methodology used, and the verification team obtained the same results. Thus, AENOR considers that the calculations were done correctly by the PP.

AENOR has checked the assumptions provided and confirmed that this amount of project emissions is in conformance and has followed the methodology in the validated Project Description /1/.

Leakage

As reported in Section 5.4 of the MR, leakage emission for the current period ($E_L^{[m]}$) was calculated using equations F.44 and F.45 of VM0009.

$$E_{L\Delta}^{[m]} = E_L^{[m]} - E_L^{[m-1]} \quad [F.44]$$

$$E_L^{[m]} = E_{LASF}^{[m]} + E_{LASG}^{[m]} + E_{LME}^{[m]} \quad [F.45]$$

Activity-shifting leakage in forested area is calculated through the validated leakage emissions model (LEM) validated in the PD /1/, as per equation F.46. Market leakage is not accounted for by the project.

$$E_{LASF}^{[m]} = LEM(c_P^{[m]}, c_B^{[m]}, p_{LDEG}^{[m]}, t^{[m]}, x^{[m]}) \quad [F.46]$$

The portion of leakage due to degradation in forest at the end of the current monitoring period was calculated as per equation B.9

$$z = \frac{1}{\sum_{k \in \mathcal{S}} A_k} \sum_{k \in \mathcal{S}} \frac{A_k}{n_k} \sum_{j \in \mathcal{P}_k} y_{j,k} \quad [B.9]$$

The following table summarizes the calculated values of the leakage parameters:

Parameter	Equation used. (VM0009 v3.0)	Value
$E_L^{[m]}$ Cumulative emissions from leakage at the end of the current monitoring period	F.44 /F.45	0
$E_L^{[m-1]}$ Cumulative emissions from leakage at the beginning of the current monitoring period	F.44 /F.45	0
$E_{L\Delta}^{[m]}$ Change in emissions due to leakage	F.44 /F.45	0
$E_{(LASF)}^{[m]}$ Cumulative emissions from activity-shifting leakage in forested areas at the end of the current monitoring period	F.44/45	0
$P_{LDEG}^{[m=0]}$ Portion of leakage due to degradation prior to first verification event	B.9	0.087

The assessment of the leakage has been done with the full review of spreadsheet calculations /315/. Complementary, GIS material /16-38/ has been checked to be contrasted with the boundaries of the project and the spreadsheet calculation.

As stated above, leakage has been calculated using equation F.43 of VM0009, and an explanation on a minor deviation from the protocol has been explained in section 3.2.1 of the MR.

Leakage was found to be zero because the degradation factor calculated was 0.080 which is less than the minimum 20% threshold according to the VM0009 methodology, meaning that the leakage observed/monitored in the current monitoring period is insignificant and, therefore equal to 0.

Appendix 2 contains details regarding the computation of the degradation factor, along with the inclusion of raw data. Additionally, the Monitoring Report/1/ has included a visual depiction of the leakage area and the corresponding monitored plots during the current monitoring period. The raw field data about the leakage monitoring exercise has been reviewed in the spreadsheet utilized for calculating the degradation factor.

The calculations have been reproduced according to the methodology used, and AENOR's verification team obtained the same results. Thus, AENOR considers that the PP did the leakage calculations correctly.

AENOR has checked the calculations provided and confirmed that this amount of leakage emissions is in conformance and has followed the methodology in the validated PD.

Net GHG emission reductions

As indicated in Section 5.4 of the MR, net GHG emission reductions were calculated using equation F.53 of VM0009 v3.0.

$$E_{\Delta GER}^{[m]} = E_{B\Delta}^{[m]} - E_{P\Delta}^{[m]} - E_{L\Delta}^{[m]} - E_U^{[m]} \quad [F.53]$$

The confidence deduction based on uncertainty in emissions models, carbon stock estimates in the project accounting area and carbon stock estimates in the proxy area ($E_U^{[m]}$) was calculated per equation F.57.

$$E_U^{[m]} = E_{B\Delta}^{[m]} \left[\frac{1.64}{E_{B\Delta}^{[m]} + A_{PAA}c_P^{[m]} + A_{PX}c_B^{[m]}} \sqrt{(U_{EM}^{[M]})^2 + (U_P^{[m]})^2 + (U_B^{[m]})^2} - 0.15 \right] \quad [F.57]$$

The following table summarizes the uncertainty parameters calculated:

Parameter	Equation used (VM0009 v3.0)	Value (tCO ₂ e)
$E_U^{[m]}$ Confidence deduction based on uncertainty in emissions models, carbon stock estimates in the project accounting area and carbon stock estimates	F.57	0
$U_{EM}^{[M]}$ Total uncertainty in Baseline Emissions Models	F.14	5,542
$U_P^{[m]}$ Total uncertainty in project accounting area carbon stock estimate	B.10	877,833
$U_B^{[m]}$ Total uncertainty in proxy area carbon stock estimate	B.10	60,520

VCUs were estimated using equation F.55, in which emissions allocated to the buffer account are calculated using a non-permanence risk rating of 21% (see Section 4.5 of this report).

$$E_{\Delta NER}^{[m]} = E_{\Delta GER}^{[m]} - E_{BA}^{[m]} \quad [F.55]$$

The following table summarizes the GHG emissions of the project calculated for the current monitoring period.

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Buffer pool allocation (tCO ₂ e)	Emission Reductions (tCO ₂ e)	Emission reductions VCUs (tCO ₂ e)	Total VCU issuance (tCO ₂ e)
01-01-2024 to 31-Dec-2024	244,175	-680	0	-51,134	243,495	0	192,361
Total	244,175	-680	0	-51,134	243,495	0	192,361

The net anthropogenic GHG reductions due to the project activity for the monitoring period (01-January-2024 to 31-December-2024) were 243,495 tCO₂e. The total number of buffer credits that need to be deposited into the AFOLU pooled buffer account is 51,134 and the VCUs eligible for issuance are 192,361 VCUs.

AENOR reproduced the calculations to achieve the same results and deemed they are depicted clearly and correctly in the provided sheets. The AENOR verification team was able to trace calculations directly from the data sources of inventory's field measurements. Formulae used comply with MR, validated PD and methodology, like the default values used to determine the parameters, are appropriate. Thus, the net amount of VCUs to be issued is accurate and realistic.

AENOR verified the parameters available at validation, the values reported or the references to the documents where they are used or explained by reviewing, reproducing, and crosschecking the evidence provided by the PP. AENOR checked the values of these parameters to be appropriate and correctly used in equations.

Regarding the accuracy of spreadsheet /3-15/, formulae, conversions and aggregations and consistent use of data and parameters, the PP elaborated a complete procedure to assure the accuracy and appropriateness of data. During the verification process, AENOR not only verified the spreadsheet calculation, data and parameters but also the AENOR team could verify that the PP conducted a rigorous QC/QA procedure of its field measurements and an assessment of uncertainty. Thus, AENOR deems the PP performed good practices in this assessment and concludes that GHG reductions were quantified correctly by the project description and applied methodology.

AENOR verified the consistency and accuracy of each parameter detailed in Section 4 of the MR by crosschecking the information in the MR with the information in PD as well as checking values and reproducing the calculations in the spreadsheet calculation package and did not find inconsistencies. Therefore, AENOR deems that values reported for the parameters are accurate and consistent.

The following tables summarize the data and parameters used by the PP to calculate the GHG emission reductions, their verified values and the assessment procedures implemented by AENOR and their results.

Data/Parameter available at validation	Value	Assessment procedure and result
α Combined effects of β and θ at the start of the historic reference period	1.484	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
β Effect of time on the cumulative proportion of conversion over time	0.000371	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
γ Time shift from the beginning of the historic reference period to the project start date	10,957	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.

λ_{soc} Exponential soil carbon decay parameter	0.2	Conservative default based on IPCC value. Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
σ_{EM} Estimated standard deviation of the state observations used to fit the logistic function	0.4978	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
$\mathcal{B}$ The set of all selected carbon pools in biomass.	2	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
$\mathcal{C}$ The set of all selected carbon pools	3	The project accounts for AGOT, BGOT and SOC. All other pools are optional, were found to be insignificant and have been conservatively excluded. Value is consistent with validated PD.
$\mathcal{J}$ The set of all observations of conversion	28,582	VM0009, v3.0 section 6.6 onwards. The number of observations of forest state in the reference area was originally quantified as 3120 but some points were removed due to complications with forest state interpretation or non-forest at the start of the historic reference period. Value is consistent with validated PD.
$\mathcal{M}$ The set of all monitoring periods	27	There will be 27 monitoring events over the project crediting period of 30 years.
nd Number of spatial points in the reference area	2,582	Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets /3-15/.
o_i Binary. State observation for the sample point in the reference area	0 or 1	Data was collected as per the methodology. Value is consistent with validated PD.
$PL ME$ A portion of leakage related to the market	0	Value is consistent with validated PD.

q Lag between start of degradation and conversion	620	Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets /3-15/.
rRS Expansion factor for above-ground biomass to below-ground biomass (root/shoot ratio)	0.54	Value is consistent with validated PD and original source (Chidumayo, E. N. 2013)/9-10/. Correctly inputted in the calculation spreadsheets /3-15/.
rU Onset proportion of conversion immediately adjacent to the project area	0.126	Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets /3-15/.
t Time since the project start date	5,205	Calculation reproduced /3-15/. Value correctly estimated.
t_i The point in time of the observation made at point	1-12,698	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
tPL Length of project crediting period	10,957	Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets /3-15/.
w_i Weight applied to the i th sample point in the reference area	0.000034 965	Calculation reproduced /3-15/. Values correctly estimated.

Data/Parameter monitored	Value	Assessment procedure and result
$A[m=0]$ P_1 Area of project accounting area stratum 1 prior to first verification event	27,322	Value is consistent with validated PD /1/ and GIS data. Calculation reproduced /3-15/. Value correctly estimated.
$A_P^{[m=0]}$ P_2 Area of project accounting area stratum 2 prior to first verification event	6,016	Value is consistent with validated PD /1/ and GIS data. Calculation reproduced /3-15/. Value correctly estimated.

$cB[m]$ Baseline carbon stocks at the end of the current monitoring period	10.6	Calculation reproduced /3-15/. Value correctly estimated.
$cB[m BGB]$ Carbon not decayed in BGB at the end of the current monitoring period	1	Calculation reproduced /3-15/. Value correctly estimated.
$cB[m SOC]$ Carbon not decayed in SOC at the end of the current monitoring period	-490,235	Calculation reproduced /3-15/. Value correctly estimated.
$cB[m b]$ Baseline scenario average carbon stock in selected carbon pools	10.6	Calculation reproduced /3-15/. Value correctly estimated.
$c_{BBM}^{[m]}$ Baseline carbon stocks in biomass at the end of the current monitoring period	10.6	Calculation reproduced /3-15/. Value correctly estimated.
$cB[m SOC]$ Baseline soil carbon stocks at the end of the current monitoring period	131.7	Calculation reproduced /3-15/. Value correctly estimated.
$cP[m]$ Project carbon stocks at the end of the current monitoring period	179.5 Dense Tree Stratum, 168.4 Light Tree Stratum	Calculation reproduced /3-15/. Value correctly estimated.

<i>cP[m -1]</i> Project carbon stocks at the beginning of the current monitoring period	179.5 Dense Tree Stratum, 168.4 Light Tree Stratum	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m =0]</i> Project carbon stocks prior to the first verification event	233.8 Dense Tree Stratum, 225 Light Tree Stratum	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m 1=0] BM</i> Project carbon stocks in stratum 1 prior to first verification event	225	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m 2=0] BM</i> Project carbon stocks in stratum 2 prior to first verification event	233.8	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m BM=0]</i> Project carbon stocks in biomass prior to first verification event	7,554,258	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m b]</i> Average carbon in biomass in the project accounting area	168.4 in Stratum 1 and 179.5 in Stratum 2	Calculation reproduced /3-15/. Value correctly estimated.
<i>cP[m SOC=0]</i> Project soil carbon stocks prior to first verification event	192.6	Calculation reproduced /3-15/. Value correctly estimated.

$E\Delta GER[m]$ GERs for the current monitoring period	243,495	Calculation reproduced /3-15/. Value correctly estimated.
$E\Delta GER[i]$ GERs for monitoring period i	2,641,747	Calculation reproduced /3-15/. Value correctly estimated.
$E\Delta NER[i]$ NERs for monitoring period i	2,297,696	Calculation reproduced /3-15/. Value correctly estimated.
$E[Bm]$ Cumulative baseline emissions at the end of the current monitoring period	2,661,149	Calculation reproduced /3-15/. Value correctly estimated.
$EB[m-1]$ Cumulative baseline emissions at the beginning of the current monitoring period	2,416,974	Calculation reproduced /3-15/. Value correctly estimated.
$EB[m\Delta]$ Change in baseline emissions	244,175	Calculation reproduced /3-15/. Value correctly estimated.
$E_{B[i]\Delta BGB}$ Change in baseline emissions from belowground biomass during monitoring period i	808,656	Calculation reproduced /3-15/. Value correctly estimated.
$EB[m\Delta SOC]$ Baseline change in emissions from soil carbon	78,407	Calculation reproduced /3-15/. Value correctly estimated.
$E_{B[i]\Delta SOC}$ Baseline emissions from soil carbon in monitoring period i	845,215	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}BBGB$ Cumulative baseline emissions from belowground biomass at the end of the current monitoring period	808,656	Calculation reproduced /3-15/. Value correctly estimated.

$E^{[m-1]}_{BBGB}$ Cumulative baseline emissions from belowground biomass at the beginning of the current monitoring period.	738,074	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_{BBM}$ Cumulative baseline emissions from biomass at the end of the current monitoring period	2,306,169	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_{BSOC}$ Cumulative baseline emissions from soil carbon at the end of the current monitoring period	845,215	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_{BA}$ Cumulative emissions allocated to the buffer account at the end of the current monitoring period	-344,046	Consistent with non-permanence risk report. Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_L$ Cumulative emissions from leakage at the end of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m-1]}_L$ Cumulative emissions from leakage at the beginning of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_L \Delta$ Change in emissions due to leakage	0	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_L ASF$ Cumulative emissions from activity- shifting leakage in forested strata at the end of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.
$E^{[m]}_{LME}$ Cumulative emissions from market effects leakage at the end of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.

$E^{[m]} P\Delta$ Change in project emissions	-680	Calculation reproduced /3-15/. Value correctly estimated.
$E_{P\Delta BRN}^{[m]}$ Cumulative project emissions due to burning at the end of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.
$E[um]$ Cumulative confidence deduction at the end of the current monitoring period	0	Calculation reproduced /3-15/. Value correctly estimated.
$PL[m\ DEG]$ Portion of leakage due to degradation at the end of the current monitoring period	0.04	Calculation reproduced /3-15/. Value correctly estimated.
$PL[m\ DEG=0]$ Portion of leakage due to degradation prior to first verification event	0.087	Consistent with previous MR. Calculation reproduced /3-15/. Value correctly estimated.
$t^{[i-1]}$ time from the project start date to beginning of monitoring period i	0	Consistent with previous MR. Calculation reproduced /3-15/. Value correctly estimated.
$t[m]$ Time from project start date to end of current monitoring period	5,571	Calculation reproduced /3-15/. Value correctly estimated.
$t[m-1]$ Time from project start date to beginning of current monitoring period	5,205	Calculation reproduced /3-15/. Value correctly estimated.
$UB[m]$ Total uncertainty in proxy area carbon stock estimate	60,520	Calculation reproduced /3-15/. Value correctly estimated.

$UEM[M]$ Total Uncertainty in Baseline Emissions Models	5,542	Calculation reproduced /3-15/. Value correctly estimated.
$U_P [m]$ Total uncertainty in proxy area carbon stock estimate	877,833	Calculation reproduced /3-15/. Value correctly estimated.

In conclusion, AENOR has thoroughly assessed the calculations and parameters, comparing them with the methodology and previous Monitoring Report/1/. As a result, AENOR affirms that the established parameters are correct and appropriate. The parameters monitored and validated are deemed correct, reliable, and consistent by AENOR. The parameters and data presented in the monitoring report aligns with the previous monitoring reports, as observed by the audit team during the desk reviews and explanations provided by the data inventory team, the provided calculations, and the applicable methodology. Therefore, the results presented in the monitoring report are considered reliable, consistent, and accurate by AENOR.

4.4 Quality of Evidence to Determine Reductions and Removals

The information and parameters applied to calculate greenhouse gas (GHG) emission reductions are detailed in Section 4 of the Monitoring Report (MR). Throughout AENOR's verification process, the Project Proponent (PP) provided sufficient evidence both in terms of quantity and quality to substantiate the reported GHG emission reductions. Robust quality assurance and quality control (QA/QC) measures are integral to the organization's processes, ensuring precision in inventory data, modelling outcomes, and carbon accounting practices. These QA procedures are designed to identify and correct potential errors in data entry, calculations, or formatting that could lead to inaccurate results.

Field data is predominantly collected using digital tools, either uploaded directly to the central database or temporarily stored on Google Drive for verification before transfer. All submitted data undergoes quality checks by designated staff. The PP has implemented Standard Operating Procedures (SOPs) and field manuals that comprehensively govern carbon inventory activities. To maintain data integrity, internal audits and random spot checks are routinely performed. In line with Verified Carbon Standard (VCS) requirements, the PP ensures secure and accessible storage of all project data for a minimum of two years following the end of the crediting period. To support ongoing project oversight, essential data outputs, including the spatial database, are preserved for use in annual verifications.

Roles and responsibilities are clearly defined in the MR /1/, and the PP has established QA/QC systems to uphold the consistency and reliability of field inventory data. Interviews with the PP and a review of the submitted data and results confirmed the PP's capacity to accurately report GHG reductions. The audit team found the data to be well-organized, transparent, and traceable to specific methodological and monitoring components. The project has established comprehensive Standard Operating Procedures and Field Manuals to guide all aspects of carbon inventory, supported by a robust quality assurance system within the Carbon Accounting department. Quality control measures include continuous field feedback, senior staff oversight, spot checks, internal audits, and the use of a digital data capture system that enables real-time error detection and correction.

During the current monitoring period, senior personnel directly supervised plot re-sampling to ensure accuracy. GIS and Remote Sensing components follow similarly stringent procedures, with oversight from senior management. Notably, the CDM was independently developed by external experts and underwent rigorous internal third-party auditing, reinforcing the integrity of spatial data and analysis. These QA/QC procedures are further detailed in Section 4.3 of the MR. AENOR assessed and confirms the PP for its adherence to best practices and concludes that the GHG reductions have been quantified in full accordance with the validated Project Design Document and applicable methodology. The supporting evidence is judged to be both adequate and reliable for confirming the project's reported emission reductions.

Based on this, AENOR concludes that the project proponent has applied best practices and accurately quantified GHG emission reductions in accordance with the Project Design and approved methodology.

4.5 Non-Permanence Risk Analysis

The project utilized the non-permanence risk analysis tool, AFOLU Non-Permanence Risk Tool 4.2, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing them. The audit team reviewed the Non-Permanence Risk Report submitted through Verra Project Hub and additional documentation /127-175/, following VCS Standard v4.7 Section 3.2.10 and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. At all levels, the audit team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the PP. Each risk factor was thoroughly assessed for conformance.

It is important to note that AENOR's audit team requested the PP that for all NPR risk factors, they make sure the report provides explanations, justifications and/or documental evidence in accordance with Project Hub instructions. Instructions are included in the table below for each type of sub-group risk.

This way, the PP explained to the VVB that for some questions in the NPR tool that are non-applicable, the online tool does not allow a way to indicate the question is "N/A", therefore the responses to such questions were automatically left empty. For each case where the PP did not include a response to a non-applicable question in the Project Hub, the PP has outlined its justification in a supporting document shared with the audit team /127-175/.

AENOR has checked that the information provided in the NPRR is consistent with the supporting documents provided. The assumptions and justifications provided to determine the risk rating of each risk factor are elaborated and they are based on provided documents using conservative assessments. AENOR deems that the information provided is reliable and appropriate from reliable sources. Thus, the overall risk rating of 21% is credible and realistic.

Internal Risk (1)	Risk Factor and/or Mitigation Description	Risk Rating	VVB Assessment
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Project Management	Project Hub instructions state that: “Each project management risk factor set out below (referring to the Project Hub) shall be assessed. Select the checkbox(es) for the risk factors and/or mitigation options that apply to the project and leave those that do not apply empty. Please upload any required documentary evidence using the link provided to justify your selection. Then click on the 'Save' button at the bottom of the page before moving to the next section.” Q1 (as identified in the Project Hub) states: Does the project have an adaptive management plan in place that includes a monitoring plan? If No, the project fails the risk assessment. If Yes, proceed to Q2 (as identified in the Project Hub). The PP answered YES (see the assessment on the right column, VVB assessment). Thus, Q2 (as identified in the Project Hub) states: Do any of the following project management risks apply to the project? The PP indicated that none of them apply (a-g) to them. However, as expressed in the previous page, the PP shared an additional support document in which they demonstrated that (a-g) risk factors do not apply to them (see the demonstration below).	YES	According to the NPRT, the PP provides different opportunities for continuous communication and consultation: 1- Meetings convened by BCP and stakeholders. 2- Meetings convened for the sessions of the REDD+ Committee. 3- Operational meetings held with communities to consult and agree on how to implement actions related to the operation of the REDD+ project, and the well-being of communities. 4- Project development meetings, in which the progress of the project is reviewed and evaluated by the Project proponent and partners. Complementarily, the Monitoring Plan is integrated into the implementation of the PP activities (allowing the information collection on direct effects and impacts that the project generates) and has also been formulated to respond to the diverse needs and expectations of stakeholders. Therefore, AENOR's audit team assessed this information throughout onsite interviews, in which the interviewees recognized that during several meetings these communication methods were stipulated to be the ones carried out during the project process.
	a) Species planted (where applicable) associated with more than 25 per cent of the stocks on which GHG credits	0	Not applicable. in this forest enrichment strategy, planting or reforestation actions do not apply to the project area.

	have previously been issued are not native nor proven to be adapted to the same or similar agroecological zone(s) as the project area.		There are no invasive species used in the Project Accounting Area. The VVB assessed with onsite testimonies and direct observations shows that the LZRP project area is intact with native forest.
	b) Ongoing enforcement to prevent encroachment by outside actors is required to protect more than 50 percent of stocks on which GHG credits have previously been issued	0	The project proponent has conducted various stakeholders and community meetings to sensitize the community and train them on the protection of forest resources where they draw benefits from. AN assessment by the audit on the engagement tracker/63/, confides that there are ongoing collaborative efforts to combat encroachment that may risk the reduction of GHG credits.
	c) Management team does not include individuals with significant experience in all skills necessary to successfully undertake the project activities (i.e., any area of required experience is not covered by an individual with at least five years' experience in that area).	0	The project proponent has a multidisciplinary team with experience in the development and implementation of REDD projects. VVB reviewed the Curriculum vitae of key personnel /179-188/ to confirm the management experience. In accordance with provided evidence, BCP is an organization that has been working by implementing programs for the community's economy and simultaneously protecting existing forests.
	d) The management team does not maintain a presence in the country or is located more than one day of travel from the project site, considering all parcels or polygons in the project area.	0	BCP has its head office based in Lusaka, less than three hours' drive from the project area and there are well-trained, experienced staff based at the conservancy, responsible for day-to-day management plus a Community Engagement Team living within the neighbouring communities, as the audit team could assess during the 24 th of February to 1 st March 2025 on-site visit. Carbon Accountants have a proven track record in REDD+ verification, having been involved in one of the biggest VCS

			REDD+ projects in Africa, Luangwa, also under verification by a similar audit team from AENOR. BCP's Carbon Team is responsible for verifying the LZRP in the past years, including the baseline reevaluation in 2020. The audit team has reviewed the CVs of relevant staff /179-188/.
	e) The management team has previously failed to submit a loss report within two years of detecting a loss event.	0	Not applicable. It must be evaluated in other coming monitoring periods. Further, BCP has never failed to submit an event that affects GHG emissions, even though no other BCP project has experienced a loss event.
	f) ALM projects: Some or all the farmers participating in the project have not received training on the improved ALM practices implemented as part of the project or the monitoring and reporting procedures implemented during the crediting period.	0	Not applicable. LZRP is not an ALM project, but a REDD+ project (VCS MR/1/). Confirmed by the whole auditing process and eligibility criteria and applicability conditions of the methodology.
	g) ALM projects: Some or all the farmers participating in the project are unaware of the potential for yields to decrease temporarily due to the transition to improved agricultural practices	0	Not applicable. LZRP is not an ALM project, but a REDD+ project (VCS MR/1/). Confirmed by the whole auditing process and eligibility criteria and applicability conditions of the methodology.
	As indicated in the Project Hub to refer to mitigation factors, Q3 states: Do any of the following mitigations apply to the project?	YES	The answers are expressed below, considering risk mitigation factors h-i.
	h) Mitigation: Management team includes individuals with significant (i.e., more than five years) experience in AFOLU project design and implementation, carbon accounting, and reporting	-2	The PP has a multidisciplinary team with experience in the development and implementation of REDD projects. The verification team reviewed the Curriculum vitae of key personnel /179-188/ to confirm the management experience. Several information about

	(e.g., individuals who have successfully managed projects through validation, verification, and issuance of GHG credits) under the VCS Program or other approved GHG programs.		BCP and their experience is included in the NPRT /132/. The BCP Management team has employees with significant experience in AFOLU project design and implementation, carbon accounting, and reporting (e.g., individuals who have successfully managed projects through validation, verification, and issuance of GHG credits) under the VCS program.
	i) Mitigation (ALM projects): A comprehensive training plan for all farmers participating in the project is in place, covering implementation of planned ALM practices, monitoring and reporting obligations and their potential costs.	0	This is not an ALM project. Thus, the mitigation factor is not applicable to the LZRP project.
Total Project Management (PM): (a + b + c + d + e + f+h+i): 0 Total shall not be less than zero.			

In AENOR´s opinion, total project management risk rating (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool: VCS V4.2

Internal Risk (2)	Risk Factor and/or Mitigation Description	Risk Rating	VVB Assessment
Financial Viability	Project Hub instructions state that: “The financial viability of a project is based on 1) the number of years until breakeven is reached (i.e., the payback period) and 2) the funding secured relative to what is needed to implement and operate the project until reaching breakeven. Select the radio button that corresponds to the correct response for each question. Also, please select the mitigation checkbox if it applies to the project. Please upload any	e	See answers below (a-e):

	required documentary evidence using the link provided to justify your selection.” Thus, Q1 (as identified in the Project Hub) states that: How long is the project's payback period (i.e., how many years will it take to breakeven)?		
	a) The payback period is greater than 20 years from the current risk assessment.	0	The project has already reached the breakeven point in 2018, and cashflow in the future is predicted to remain positive.
	b) The payback period is greater than 10 years from the current risk assessment, but less than or equal to 20 years.	0	The project has already reached the breakeven point in 2018, and cashflow in the future is predicted to remain positive.
	c) The payback period is greater than seven and up to and including 10 years from the current risk assessment.	0	The project has already reached the breakeven point in 2018, and cashflow in the future is predicted to remain positive.
	d) The payback period is greater than four and up to and including 7 years from the current risk assessment.	0	The project has already reached the breakeven point in 2018, and cashflow in the future is predicted to remain positive.
	e) The payback period is four years or less from the current risk assessment.	0	The project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. AENOR has reviewed the financial plan and the cashflow and confirms that such information is considered correct. Also, this information was assessed during the 24th of February to 1st March 2025 site visit, together with the management team to understand the cashflow and NPV analysis.
	As stated within the Project Hub, Q2 questions:	i	See answers below (f-i):

	What percentage of funding has the project secured to cover the total cash out required before the project reaches breakeven?		
	f) Project has secured less than 15 percent of funding needed to cover the total cash out required before the project reaches breakeven.	0	Not applicable. Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. See i) below.
	g) Project has secured 15 percent to less than 40 percent of the funding needed to cover the total cash out required before the project reaches breakeven.	0	Not applicable. Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. See i) below.
	h) Project has secured from 40 percent to less than 80 percent of the funding needed to cover the total cash out required before the project reaches breakeven.	0	The PP has established a not-for-profit organization (BCP Trust) to help counter the risk of low carbon prices affecting community benefits from the project. The Trust has leveraged donor funds specifically to support and build upon community benefits. To date, the Trust has benefited from the support of local donors such as USAID, Mills Foundation, CSEF and Musika. The project is also diversifying revenues into other enterprises like savings groups /82-92/ to mitigate the risk of low carbon prices. In addition, the project invests in marketing the project and its strategic conservation and poverty reduction benefits to seek higher credit prices
	i) Project has secured 80 percent or more of the funding needed to cover the total cash out before the project reaches breakeven.	0	Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. A Financial Model has been provided to demonstrate the financial health of BCP as the implementing organization. AENOR has reviewed the financial plan and the cashflow and confirms that such information is considered correct.

			Also, this information was assessed during the 24th of February to 1st March 2025 site visit, together with the management team to understand the cashflow and NPV analysis.
	According to the Project Hub, the mitigation factor to be applied requires answering Q3, which states that: Does the following mitigation apply to the project?	YES	See answer below:
	j) Mitigation: Project has available, as callable and secured financial resources, at least 80 percent of total cash out before the project reaches breakeven.	-2	The Biocarbon Partners Trust, established in 2018, is a not-for-profit organization aiming to mitigate the risk of low carbon prices impacting community benefits. It leverages donor funds and has received support from local donors like USAID, Mills Foundation, CSEF, and Musika. The project is diversifying revenues into Eco-Charcoal and investing in marketing to seek higher credit prices for its strategic conservation and poverty reduction benefits. The audit team assessed the ZDA investment certificate and letter.
Total Financial Viability (FV) = [as applicable, ((b, c, d or e) + (f, g, h or i + j))] = 0 Total shall not be less than zero and the sub-total for question two with the mitigation j shall not be less than zero (note: the mitigation only applies to Q2)			

Then, in AENOR's opinion, total financial viability risk rating (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool: VCS v4.2.

Internal Risk (3)	Risk Factor and/or Mitigation Description	Risk Rating	VVB Assessment
Opportunity Cost	Project Hub instructions for Opportunity Cost indicates that:	YES	The most likely of the land use scenarios is subsistence-based and was acknowledged by the audit team during the onsite visit in 24th February to 1st March 2025. The MR covering this

	“Opportunity cost analysis shall be based on the net present value (NPV) of the alternative land uses identified in the project’s additionality assessment except where most baseline activities are subsistence driven. If you answer 'Yes' to Q1, please provide the reason, save and proceed to Q3. If you answer 'No' to Q1, proceed to Q2. Q3 is required only if you answer 'Yes' to Q1. Select mitigation action(s) that apply to the project and leave those that do not apply empty. Please upload any required documentary evidence using the link provided to justify your selection.” Thus, Q1 states: Are the baseline activities subsistence-driven? If No, proceed to Q2. If Yes, proceed to Q3.		monitoring period lists all activities that are having positive community impacts and BCP has consulted extensively with all community stakeholders to understand the drivers of deforestation within the project zone and to formulate the most efficient mitigation strategy and beneficial projects, as the audit team could acknowledged during the 24th February to 1st March 2025 on-site visit, as per the different interviews that happened in the project area. The project certainly has positive socio-economic benefits and has been previously certified under the CCBA Standard and received gold validation for community benefits. BCP has a highly qualified and experienced team that have worked on conservation and natural resource management projects in Zambia and across Africa. This team has already started implementing several pilot projects within a very short space of time. Because the answer to Q1 is “yes” the tool instructs the user to proceed to Q3. The answer to Q3 is “yes”. Thus, Q2 a-f are not applicable. AENOR has reviewed the response of the PP in the NPRT as well as the information on the MR. This is crosschecked with the general auditing process and other supporting evidence. Complementary, the audit team, assessed through direct observations and onsite testimonies that the information about the activities of the project is deemed correct and accurate according to the information provided.
	a) Net present value (NPV) of the most profitable alternative land use activity is expected to be at least 100 percent more than that of the project activities.	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the question answered above (baseline activities subsistence-driven).
	b) NPV of the most profitable alternative land use activity is expected to be greater than	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the

	50 percent and up to 100 percent more than that of project activities		question answered above (baseline activities subsistence-driven).
	c) NPV of the most profitable alternative land use activity is expected to be greater than 20 percent and up to and including 50 percent more than that of project activities.	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the question answered above (baseline activities subsistence-driven).
	d) NPV of the most profitable alternative land use activity is expected to be 20 percent or less than that of project activities.	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the question answered above (baseline activities subsistence-driven).
	e) NPV of project activities is expected to be greater than 20 percent and up to 50 percent more profitable than that of the most profitable alternative land use activity.	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the question answered above (baseline activities subsistence-driven).
	f) NPV of project activities is expected to be over 50 percent more profitable than that of the most profitable alternative land use activity.	0	N/A since the project needs to apply to Q3 (instead of Q2) because of the question answered above (baseline activities subsistence-driven).
	Q3 (as indicated in the Project Hub) states: Does the project have net positive community impacts? A response is only required if the answer to Q1 is Yes.	YES	Because the answer to Q1 is "yes" the tool instructs the user to proceed to Q3. The answer to Q3 is "yes"
	g) Net positive community impacts of project activities are not demonstrated.	0	Not applicable. See the answer (h) below.
	h) Net positive community impacts of project activities are demonstrated.	0	The project proponent had demonstrated the net positive impact for the community impacts due to project activities (see CCB validation and verification). The audit team interviewed people and crosschecked the information to demonstrate the positive community impacts throughout the project area.

	Q4 (as indicated in the Project Hub) states that: Do any of the following mitigations apply to the project?	YES	See mitigation factor j below:
	i) Mitigation: Project is protected by a legally binding agreement to continue management practices that protect the credited carbon stocks over the duration of the project crediting period.	-2	The project is protected by a legally binding agreement to continue management practices that protect the credited carbon stocks over the duration of the project crediting period. The audit team interviewed forestry Department stakeholders and assessed the contract agreements of the stakeholders and found this consistent. The audit team interviewed forestry Department stakeholders and assessed the contract agreements of the stakeholders and found this consistent. The audit team also reviewed the covenants /82-92/ with the statements in the NPRT to confirm that the information is correct and therefore the mitigation action is valid.
	j) Mitigation: Project is protected by legally binding agreement to continue management practices that protect the credited carbon stocks for at least 100 years.	0	Not applicable, as the PP has conservatively decided to not apply for this mitigation factor.
	k) Mitigation: Where there is a potential for revenue loss compared to the most profitable alternative land use activity, project is a not for profit or has additional financial support (e.g., via grants, government funding, ecosystem services payments or SD VSta assets) to overcome expected revenue loss.	0	Not applicable, as the PP has conservatively decided to not apply for this mitigation factor.
Total Opportunity Cost (OC) = [as applicable, (a, b, c, d, e, f, g or h) + (i or j) + k]: 0 Total shall not be less than zero.			

Communities and the project proponent signed covenants and agreements to realize the project activities during the crediting period.

Then, in AENOR's opinion, total opportunity cost risk rating (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

Internal Risk (4)	Risk Factor and/or Mitigation Description	Risk Rating	VVB Assessment
Project Longevity	Project Hub instructions for project longevity indicate that: “Project longevity is the number of years, beginning from the project start date, that project activities will be maintained. Project longevity must be a minimum of 40 years to pass the assessment. Please select the correct response to Q1. If you respond “No” to Q1, complete Q2 and Q3. In Q2, enter the project duration in years. Finally, answer Q4. Please upload any required documentary evidence using the link provided to justify your selection.” As such, Q1 (as identified in the Project Hub) states: Did the project request registration on or after 1 January 2024?	NO	
	Q2 (as identified in the Project Hub) states: Does the project have a legally binding agreement that covers at least 100 years from the project's start date? If Yes, the project is given a zero score for this risk category. If No, proceed to Q3.	NO	As stated in the Project Hub, if the answer is NO, the PP had to automatically go to Q3.
	Q3 (as identified in the Project Hub) states: What is the project longevity in years? If you answered Yes to Q1	YES	Project Longevity is 30 years. AENOR has reviewed the response provided in the NPRT and confirmed such information with local authorities

	and the project longevity is less than 40 years, the project fails the risk assessment. If you answered No to Q1 and the project longevity is less than 30 years, the project fails the risk assessment. Please note that projects with project longevity of less than 40 years will be ineligible for the Core Carbon Principles label.		interviews as well as direct testimonies from people from these communities. AENOR also reviewed the Mentioned Law and confirmed that the information in the PD and NPRT does match with the testimonies and the regulations of the Law. For further information, please see the information in the PD or the NPRT.
	Q4 (as identified in the Project Hub) states: Does the project have a management, financial and monitoring plan for the entire project longevity? If No, the project fails the risk assessment. If Yes, proceed to Q5.	YES	The audit team assessed LZRP verification breakeven model, acknowledging the response provided by BCP. Go to Q5 to continue with the assessment.
	Q5 (as identified in the Project Hub) states: Is the project an ARR or IFM project with harvesting? If No, proceed to Q7. If Yes, proceed to Q6.	No	The project is a REDD+ project. Go to Q7 to continue with the assessment (as required by the Project Hub).
	Q6 (as identified in the Project Hub) states: Can the project demonstrate a commitment to continue the management practice, replant or allow re-growth? If No, the project falls the risk assessment.	N/A	As required by the Project Hub, as Q5 does not apply, the PP shall go to Q7 directly.
	Q7 (as identified in the Project Hub) states: Does the project have a legal Agreement or requirement to continue the management practice(s)? If No, proceed to a. If Yes, proceed to b.	Yes	Go to b below to continue with the assessment.

	a) Without legal agreement or requirement to continue the management practice.	0	N/A
	b) With legal agreement or requirement to continue the management practice.	18	The project is being implemented on private land with a 99-year lease, signed in 2011 /171-175/ (as reviewed by the audit team on several occasions) and the PP has a long-term carbon rights agreement in place with the title deed holder. The contractual agreement is for a 30-year project. Activities will be carried out initially for 30 years. A long-term active adaptive management plan covering the project period is in place for LZRP and has been submitted to the Zambian Forestry Department and the Climate, Community and Biodiversity Alliance (CCBA) /40/. The long-term financial plan has been submitted to a financial institution in Zambia, AMOCPA Certified Public Accountants in agreement with requirements of the VCS (relevant evidence has been shared with the audit team)

Total Project Longevity (PL): 18

Total shall not be less than zero. Any project with a legally binding agreement that covers at least 100 years from the project start date will be assigned a score of zero. Any project that requests registration on or after 1 January 2024 with a project longevity of less than 40 years fails the risk assessment. Any project that requests registration before 1 January 2024 with a project longevity of less than 30 years fails the risk assessment. The selected project longevity shall be supported by a management, financial and monitoring plan.

Then, in AENOR´s opinion, Total Project Longevity (18) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

Therefore, **total internal risk** is calculated as the sum of (PM + FV + OC + PL), totalling 18 (according to the NPR tool the total may not be less than zero).

External Risk (1)	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
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Land and Resource tenure	Q1 (as indicated in the Project Hub) states: Has due process been undertaken to discover any disputes over ownership and land, resource access, or use rights? If No, the project fails the risk assessment. If Yes, proceed to Q2.	Yes	The Rufunsa Conservancy, where the project area is located, has a free and clear title deed /174-178/. The boundaries have been demarcated with full consultation with local leaders, as acknowledge during the audit team 24th February to 1st March 2025 on-site visit. Zambia has strong investment protection laws, and the project proponent has been awarded an Investment Licence from the GRZ. This reduces the risk of expropriation. Yes, and hence, Go to Q2 to continue the assessment.
	Q2 (as indicated in the Project Hub) states: Has the project executed a binding legal agreement(s) (such as a contract) securing the legal right to control and operate project activities over the entire project area with all entities that have verified ownership claims or verified land, resource access or use rights (such as customary rights holders)? If No, the project fails the risk assessment. If Yes, proceed to Q3.	Yes	AENOR has interviewed local authorities and local communities and crosschecked the information on Rufunsa Conservancy that has already been through a legal suit and the highest institutions of the Country upheld the integrity of this title. Through BCP, the property is also covered by BCP's Investment Protection Certificate which further reduces the risk of appropriation. It is highly unlikely that this land risks expropriation again. In addition, the project invests in publicizing the project locally and internationally to ensure that the GRZ remains aware of the values that this project is providing the Nation as the country's first REDD+ project. The Project is building a positive, lasting relationship with neighbouring communities and the Government of Zambia to ensure that the land is productive and beneficial to the Nation. Go to Q3 to continue with the assessment.
	Q3 (as identified in the Project Hub) states: Do the same or different entities hold land ownership and resource access or use rights?	-	See answer b) below
	a) Ownership and resource access or use rights are held by the same entity(ies).	0	See answer b) below

	b) Ownership and resource access or use rights are held by different entity(ies) (e.g., the government own the land, and the project proponent holds a lease or concession).	2	The communities' leadership through the chiefdom are involved in the project and have been granted rights by the Zambian Government to utilize land in their chiefdom hence the user rights of the land. Otherwise, there is a lease agreement between BCP as the project proponent and Rufunsa Conservancy who are is the landowner.
	Q4 (as identified in the Project Hub) states: Is the project in a country/jurisdiction with a history of national, sub-national, or local government ("Government") intervention in land or resource use?	-	See answer e) below
	c) Government has previously expropriated significant areas of land (i.e., 10% or more) in the project area in the past 20 years.	0	Not applicable. Refer to answer e)
	d) Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles) in the past 20 years.	0	Not applicable. Refer to answer e)
	e) No instances of Government intervention in the past 20 years or specific instances of expropriation and government intervention in land rights in the project area have been conclusively resolved	0	There are no disputes or conflicts over the ownership of land rights in the territory. AENOR has interviewed local authorities and local communities and crosschecked the information with the legal agreements and the information in the MR /1/ and NPRT /2/ to confirm that BCP's LZRP holds the status of a lease based on the

	against the government in a court of competent jurisdiction.		constitutional, legal and regulatory provisions cited
	Q5 (as identified in the Project Hub) states: What percent of the project area is affected by disputes over land tenure or ownership?	-	See answer h) below
	f) Disputes exist in more than 5 percent of the project area.	0	Not applicable. See answer h) below
	g) Disputes exist in up to and including 5 percent of the project area.	0	Not applicable. See answer h) below
	h) No disputes exist.	0	There are no disputes. This information has been crosschecked with the interviews between AENOR and different stakeholders such as local authorities or community members. See Appendix 2 of this report for more information on the activities and interviews performed by AENOR's audit team. The interviewees recognized not to be aware of any type of disputes in the project area. AENOR considers that the explanations in the NPRT are correct according to the information gathered during the 24th of February to 1st March 2025 onsite visit.
	Q6 (as identified in the Project Hub) states: What percent of the project area has disputes over access or use rights?	-	See answer k) below
	i) Disputes exist in more than 5 percent of the project area.	0	Not applicable. Please see answer k) below
	j) Disputes exist in up to and including 5 percent of the project area.	0	Not applicable. Please see answer k) below

	k) No disputes exist.	0	There are no disputes. This information has been crosschecked with the interviews between AENOR and different stakeholders such as local authorities or community members. See Appendix 2 of this report for more information on the activities and interviews performed by AENOR's audit team. The interviewees recognized not to be aware of any type of disputes in the project area. AENOR considers that the explanations in the NPRT are correct according to the information gathered during the 24th of February to 1st March 2025 onsite visit.
	Q7 (as identified in the Project Hub) states: Have the risks of upstream and sea impacts undermining the carbon stocks of a WRC project been demonstrated as insignificant or effectively mitigated for the ten years that follow the risk assessment?	-	N/A, the LZRP project is not a WRC project.
	l) Potential upstream and sea impacts are not demonstrated to be insignificant or effectively mitigated.	0	Not applicable. See answer to question Q7 above.
	m) Potential upstream and sea impacts are demonstrated to be insignificant or effectively mitigated.	0	Not applicable. See answer to question Q7 above.
	Q8 (as identified in the Project Hub) states: Do any of the following mitigations apply to the project?	Yes	See answer below
	n) Mitigation: Project area is protected by a legally	-2	The audit team interviewed forestry Department stakeholders and assessed

	binding commitment (e.g., a license, conservation easement, conservation servitude, or protected area) to continue management practices that protect carbon stocks for the duration of the project crediting period.		the contract agreements of the stakeholders and found this consistent. AENOR has reviewed the agreements /9-14/ and confirmed the legality of such statements with the local authorities.
	o) Mitigation: Where disputes over land tenure, ownership or access or use rights exist, documented evidence is provided that demonstrates the project is taking action to try to resolve the disputes or clarify overlapping claims.	0	Not applicable, the PP decided to conservatively not apply for this mitigation factor.
Total Land Tenure (LT) = [as applicable, ((a or b) + (c, d, or e) + (f, g or h) + (i, j or k) + (l or m) + n + o)] = 0 Total shall not be less than zero.			

Then, in AENOR's opinion, total land tenure (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

External Risk (2)	Risk Factor and/or Mitigation Description	Risk Rating	VWB Assessment
Stakeholder Engagement	Instructions provided for Stakeholder Engagement within the Project Hub states that: "Stakeholder engagement shall be assessed for projects where local populations, including those living within or surrounding the project area (within 20 km of the project boundary), are reliant on the project area, such as for essential food, fuel, fodder, medicines or	Yes	In an initial survey of people in the project zone in 2012, a very high proportion of households bordering the project area were consulted in an area extending 20 km north of the project boundary and 95% agreed to the implementation of the LZRP (the audit team accessed relevant evidence from the CCB MR). None of the households were dependent on the conservancy, but the few that illegally settled within the conservancy boundary before the project started and have been consulted about the project. The survey was redone in 2017 and 91% of the respondents were aware that the

	building materials. Please select the checkbox(es) for the risk factors and/or mitigation options that apply to the project and leave those that do not apply empty. Upload any required documentary evidence using the link provided to justify your selection. Where local populations are not reliant on the project area, the risk is not relevant to the project, and you may skip this section." Q1 (as identified in the Project Hub) states: Are local populations, including those living in the project area or within 20 km of the boundary of the project area, reliant on the project area? If No, the risk rating for stakeholder engagement is zero and you can proceed to political risk. If Yes, proceed to Q2.		project is protecting the conservancy and 96% said they supported the project. Direct dependency on the project accounting area is too low to show up in survey data. It mostly consists of illegal poaching and illegal timber felling. Community scouts patrol the conservancy to prevent such activities. While patrol records show that the number of man days used for conservation activities in the conservancy has greatly increased, the poaching of wild animals and illegal logging has not increased. For instance, the LZRP dashboard data shows that there were 11 animals detected as poached in 2014, but only 4 in 2018 even though the number of conservations manpower days used in 2014 was only 298 compared to 4048 in 2018. This suggests that the number of people depending on the project area is not increasing and that there is increased awareness among those that used to depend on the area for these illegal activities. This shows that certainly more than 20 % of people reliant on the project area have been consulted and are aware of the project. Proceed to Q2
	Q2 (as identified in the Project Hub) states that: Have more or less than 50 percent of stakeholders living within and reliant on the project area been consulted?	-	See question b) below
	a) Less than 50 percent of stakeholders living within the project area and who are reliant on the project area have been consulted.	0	Not applicable, see answer to b) below.
	b) More than 50 percent of stakeholders living within the project area and who are reliant on	0	At least 50% of the Project proponent communities directly participated in the project's FPIC activities. The engagement tracker/63/ confirming participation

	the project have been consulted.		involved at least 50% of families in the communities. AENOR has reviewed the list of stakeholders, the people engaged with the project and confirmed such information by asking during the onsite interviews about their participation in the process. Then, the VVB considers that more than 50% of stakeholders were consulted.
	Q3 (as identified in the Project Hub) states that: Have more or less than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area been consulted?	YES	See answer d) below.
	c) Less than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area have been consulted.	0	Not applicable, see d) below. .
	d) More than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area have been consulted.	0	BCP has obtained consent from communities in the Rufunsa Conservancy to implement a REDD+ project, with a majority of them giving positive approval. All project activities are conducted with full local resident consent, following the principle of obtaining Free, Prior and Informed Consent (FPIC). A 2012 survey showed 95% of households in the area agreed to the LZRP implementation, with nondependent on the conservancy. A 2017 survey revealed 91% of respondents were aware of the project's protection and 96% supported it. The audit team reviewed the evidence provided by BCP and consulted direct

			interviews with hundreds of relevant stakeholders from Rufunsa Conservancy surroundings.
Total Stakeholder Engagement [as applicable, (a or b) + (c or d)]: 0 Total shall not be less than zero			

During the 24th of February to 1st March 2025 on-site visit, the VVB could confirm that local stakeholders participated in the different workshops carried out by project proponent; also, it was confirmed that consultations were carried out in site of the project area (as per stated in the MR). Then, in AENOR's opinion, total community engagement (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

External Risk (3)	Risk Factor and/or Mitigation Description	Risk Rating	VVB Assessment
Political Risk	Project Hub instructions for Political Risk states that: "The governance score of the country in which this project is located is already populated here. It is calculated from the mean of governance scores across the six indicators of the World Bank Institute's Worldwide Governance Indicators (WGI), averaged over the most recent five years of available data. Please select the mitigation checkbox if it applies to the project." Thus Q1 (as identified in the Project Hub) states: What is the governance score for the country?	4	See answer b) below
	a) Governance score of less than -0.79	0	Zambia presents a score of -0.47 according to the World Bank Institute's Worldwide Governance Indicators. AENOR verified the value and reliability of source.
	b) Governance score of -0.79 to less than -0.32	4	Zambia presents a score of -0.47 according to the World Bank

			Institute's Worldwide Governance Indicators. AENOR verified the value and reliability of source.
	c) Governance score of -0.32 to less than 0.19.	0	Zambia presents a score of -0.47 according to the World Bank Institute's Worldwide Governance Indicators. AENOR verified the value and reliability of source.
	d) Governance score of 0.19 to less than 0.82.	0	Zambia presents a score of -0.47 according to the World Bank Institute's Worldwide Governance Indicators.
	e) Governance score of 0.82 or higher.	0	Zambia presents a score of -0.47 according to the World Bank Institute's Worldwide Governance Indicators.
	Q2 (as identified in the Project Hub) states: Does the following mitigation apply to the project?	YES	See answers below
	f) Mitigation: The project is in a country that: 1) is party to the Paris Agreement and has submitted an NDC to the UNFCCC Secretariat in the last five years, 2) includes AFOLU commitments (conditional or unconditional) in its NDC, and 3) has a documented and active climate change plan that includes the project activity.	-2	Zambia was one of the first nine UN-REDD Pilot Countries in the World and there is a high level of interest within government for REDD+ pilot projects. This project is significant in that it is the first REDD+ project in Zambia. It is therefore strategic as a sub-national project which aims to support and feed into the design of a national REDD+ program. The project benefits from solid government support and interest for learning reasons. The project proponent is investing significantly in ensuring that the GRZ is kept well informed of this project, and the project's goals to contribute to

			national development goals and the national REDD+ strategy.
Total Political (PC) ((a, b, c, d or e) + f): 2 Total may not be less than zero.			

VVB confirms the governance score against the world bank platform: <http://info.worldbank.org/governance/wgi/Home/Reports>; the average indicator was calculated for the last 9 year. Then, in AENOR´s opinion, total political risk (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

Therefore, **total external risk** is calculated as the sum of (LT + CE + PC), totalling 2.

Natural Risk	Score (LS)	Mitigation	Affected by climate change	VVB Assessment
Fire	3	0.25	Yes	The likelihood of a natural fire is every 10 to less than 25 years, being insignificant to carbon stocks. The project is implementing significant fire mitigation activities, as can be seen in the NPRR /2/. AENOR traced this information within the project area and confirmed through onsite testimonies that the damage caused by fire is mainly related to cultural practices and the preparation of illegal charcoal. These actions are discouraged through the implementation of project activities such as providing technical training for sustainable agricultural activities and maintaining forest cover and reduce deforestation pressure on forests in the project area.
Pest and Disease Outbreaks	0	1	Yes	This risk is considered unlikely; there are no records of disease or pest outbreaks causing any significant impacts (>5%) to carbon stocks in Miombo woodlands. No known literature has documented forest disturbance from pests and diseases in the project area. The audit team visited the project area and asked relevant stakeholders if they know any kind of pest and diseases that are affecting the project area or nearby, and they stated the same information reported in the NPRR /2/.

Extreme weather	0	1	Yes	Zambia is not impacted by hurricanes. Droughts could possibly be considered an extreme weather phenomenon. However, this risk is considered unlikely and there are no records of drought causing any significant impacts (>5 %) to carbon stocks in Miombo woodlands. No known literature has documented forest disturbance from extreme weather conditions in the project area. The audit team visited the project area and asked relevant stakeholders if they know any kind of extreme weather that is affecting the project area or nearby, and they stated the same information reported in the NPRR /2/.
Geological Risk	0	1	No	Zambia is geologically stable and the risk of earthquakes and volcanoes occurring is unlikely. There is, therefore, no risk of significant (>5 %) impacts on carbon stocks in the project area due to geological phenomena. Thus LS= 0 is reasonable.
Total Natural Risk (as applicable, F + PD + W + G + ON): 0.75 Determined by $LS \times M$.				

Then, in AENOR's opinion, **total natural risk** (0.75) is properly justified and in accordance with AFOLU Non-Permanence Risk Tool, v4.2.

Future climate impact: Regarding the AFOLU Non-Permanence Risk Tool, the project area is within the following reference regions: E. Southern-Africa (100%)

Adaptative capacity: The project demonstrates at least 5 criteria of adaptative capacity. These criteria are:

- Variety
- Learning capacity
- Leadership
- Resources
- Fair governance
- Innovation.

Regarding AFOLU Non-Permanence Risk Tool v4.2, the SLR risk shall be assessed where the project is in a coastal zone using the AFOLU Non-Permanence Risk Assessment Calculation Tool. The project area is not allocated in a coastal zone, so this SLR risk is not applicable to this project.

Below is the assessment for the Future climate impact on natural risk:

Future Climate Impact on Natural Risk	Aggregated Subtotal Risk	Future Impact Factor	Total
Natural risk associated with climate change impact (NR-c)	0.75	1.18	0.89
Natural risk NOT associated with climate change impact (NR-nc)	0.00	1	0.00
Sea Level Rise (SLR)	N/A	N/A	0
Total Natural Risk	0.89		

Risk Category	Rating
a) Internal Risk	18
b) External Risk	2
c) Natural Risk	0.89
Overall Risk Rating (a + b + c)	21.0

AENOR has checked that information provided in the Non-Permanence Risk Report through the Project Hub, as well as supporting documents complementary to the NPR tool in the Verra Hub. The assumptions and justifications provided to determine the risk rating of each risk factor are developed and they are based on provided documents using conservative assessments. AENOR deems that information provided is reliable and appropriate from official sources, thus, the overall risk rating is credible and realistic.

The Total Number of credits to be deposited in the AFOLU Pooled Buffer Account is **51,134 tCO2e**.

5 VERIFICATION OPINION

5.1 Verification Summary

Following a comprehensive review of all project documentation, procedures, calculations, supporting evidence, and interviews, AENOR confirms that the monitoring carried out by the Project Proponent (PP) and the associated Monitoring Report are accurate and fully aligned with the requirements of VCS Version 4.7, the validated Project Description (PD), and the approved methodology (VM0009 Methodology for Avoided Ecosystem Conversion, Version 3.0, dated 6th June 2014). AENOR also affirms that the implementation of the Lower Zambezi REDD+ Project Monitoring Report adheres to the validated PD.

All verification activities covering objectives, scope, criteria, assurance level, and adherence to monitoring and project documentation under VCS Version 4.7 and its associated updates have been completed and are documented in this report. AENOR concludes, without any qualifications or limitations, that the Lower Zambezi REDD+ Project complies with all applicable VCS Version 4.7 requirements for the monitoring period from 1st January 2024 to 31st December 2024. The ex-post verification of GHG emissions was conducted in accordance with ISO 14064-3:2019. The verified GHG assertion confirms a total net reduction of 243,495 tCO₂e during the monitoring period. After applying a 21% buffer withholding (equivalent to 51,134 tCO₂e), based on the VCS Non-Permanence Risk Assessment Tool v4.2, the final number of Verified Carbon Units (VCUs) eligible for issuance is 192,361 tCO₂e.

5.2 Verification Conclusion

It is the opinion of AENOR, with a reasonable level of assurance, that the reasonableness of assumptions, the described limitations, the methods that supported each one of the claims about the outcome of future activities and the claimed ex-post emissions emission reductions are free from major errors, omissions, or inaccuracies.

Verification period: From 1st January 2024 to 31st December 2024.

The verified GHG emission reductions in the above verification period:

The non-permanence risk rating (%)	21
If applicable, the Long-term Average (LTA), whether it has been properly updated, and if it has been reached.	N/A (This is a REDD+ project)

Whether a loss has been appropriately accounted for, in accordance with the VCS Program rules, if applicable.

No loss has been accounted

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Buffer pool allocation (tCO ₂ e)	Reductions VCU (tCO ₂ e)	Emission reductions VCU (tCO ₂ e)	Total VCU issuance (tCO ₂ e)
01-01-2024 to 31-Dec-2024	244,175	-680	0	-51,134	243,495	0	192,361
Total	244,175	-680	0	-51,134	243,495	0	192,361

5.3 Ex-ante vs Ex-post ERR Comparison

Vintage period	Ex-ante estimated reductions	Achieved reductions	Percent difference	Explanation for the difference
01-01-2024 to 31-12-2024	244,175	243,495	0.28%	During the current monitoring period, the project lost 2.96 ha of forest because of illegal agricultural expansion. Consequently, the Ex-Ante Emissions Reductions are lower compared to the Ex-Post/Achieved Emissions Reductions.
TOTAL	244,175	243,495	0.28%	

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

The Project proponent asserts that no confidential information has been excluded from the monitoring report/1/. The audit team reviewed the evidence documents and concluded that all necessary confidential information had been shared for the VVB review, with no confidential information excluded.

APPENDIX 2: LIST OF EVIDENCE ASSESSED

N°	Documents reviewed or referenced
	MR and NPRR
1	20250120_VCS_MR_1202_01012024-31122024_v1.2_Track_changes.docx
2	VCS_NPR_REP_2025.pdf
	Carbon inventory, NER Calcs and Biomass and Leakage Plots
3	20201125_Master_carbon_stocks_calculations_v2_updated2025_BK.xlsx
4	20240212_LZRP_ER_Calc_M12_BK_updated2025.xlsm
5	20240212_LZRP_Leakage_M12_BK.xlsx
6	BCP_LZRP_CarbonData_MonitoringPeriod1_27Nov_2013_Resp1.xlsx
7	Baseline_reevaluation_alpha_and_beta_updates.docx
8	BCP_Biomass_SpotError_Protocol_Jan_2014.pdf
9	Chidumayo_2013_allometry_paper.pdf
10	Chidumayo_Estimating AG and BG biomass after clearing miombo_EnviroLet_2013.pdf
11	LZRP_Annex_M_BCP_Biomass_Sampling_LeakageMon_8June_2013.pdf
12	LZRP_Annex_M_BCP_Biomass_Sampling_LeakageMon_8June_Addendum2013.pdf
13	Mugasha_Miombo_Allometry.pdf
14	20201120_MRV_LZRP_M4-M8_5years_updated2025_ForestInv.xlsx
15	BCP_Biomass_Sampling_SOP_June_2019_V3.pdf
	GIS
16	Biomass_plots.zip
17	LZRP_Project_Roads_utm35s_02-03-2015.shp
18	LZRP_VCS_CDM_Points.shp
19	LZRP_VCS_Conservancy.shp
20	LZRP_VCS_Conservancy_Accounting_Area.shp
21	LZRP_VCS_Deforested_Perimeter.shp
22	LZRP_VCS_EcoCharcoal_Harvest_2015.shp
23	LZRP_VCS_EcoCharcoal_Sites_2015.shp
24	LZRP_VCS_Encroachment_Area.shp
25	LZRP_VCS_Encroachment_Clearings_2015.shp
26	LZRP_VCS_Forest-Non-Forest_1989.shp
27	LZRP_VCS_Forest-Non-Forest_2009.shp

28	LZRP_VCS_Land_Cover.shp
29	LZRP_VCS_Landsat_Burned_Area_2015.shp
	LZRP_VCS_Landsat_Cloud_Cover_2015.shp
30	LZRP_VCS_Leakage_Area.shp
31	LZRP_VCS_Leakage_Monitoring_Tracks_2015.shp
32	LZRP_VCS_MODIS_Burned_Area_2014.shp
33	LZRP_VCS_Monitoring_Plots.shp
34	LZRP_VCS_Proxy_Area.shp
35	LZRP_VCS_Reference_Area.shp
36	LZRP_VCS_Rivers.shp
37	LZRP_VCS_Threatened_Perimeter.shp
38	LZRP_VCS_Villages.shp
	Management Plan
39	20170505_LZRP_EnvironManPlan_Final_signed.pdf
	Community Engagement
40	2018_BCP Grievance SOP _ Mechanism.pdf
41	20210616_FPIC Manual_V8.pdf
42	Social Monitoring SOP V4_Community Engagement Strategy_2013.03.compressed.pdf
	Grievances
43	2018_BCP Grievance SOP & Mechanism.pdf
	Verification Notifications Letters
44	20250131_Acknowledgement of documents_Chakanda Cooperative_LZRP.pdf
45	20250131_Acknowledgement of documents_Liyoyelo Coopertaive_LZRP.pdf
46	20250131_Acknowledgement of documents_Mweshangombe Cooperative_LZRP.PDF
47	20250131_Acknowledgement of VCS Audit documents_Chilimba Coopertaive_LZRP.pdf
48	20250131_Letter of notice of VCS Audit_Chilimba Cooperative_LZRP.pdf
49	20250212_Documents delivered to FD-Rufunsa_VCS Audit_2025_LZRP_MC.pdf
50	Letter_of_notice_VCS_audit_FD.pdf
51	20250131_Letter of notice of VCS Audit_Chakanda cooperative_LZRP.pdf
52	20250131_Letter of notice of VCS Audit_Liyoyelo Cooperative_LZRP.pdf
53	20250131_Letter of notice of VCS Audit_Mweshangombe Cooperative_LZRP.pdf

54	Chongwe District Letter (1).pdf
55	Cover note_LZRP_Chakanda Cooperative.pdf
56	Cover note_LZRP_Chilimba Cooperative.pdf
57	Cover note_LZRP_Liyoyelo Cooperative.pdf
58	Cover note_LZRP_Mweshangombe Cooperative.pdf
59	20210616_FPIC Manual_V8
60	Distribution of documents Chilimba Zone.jpeg
61	LZRP COORDINATES.xlsx
	Implementation Status
62	2025_Chinyinyu_LZRP Grievance Register.xlsx
63	2024_LZRP_Engagement Tracker.xlsx
64	20250320_Kanyetu grievance resolution meeting_SM.docx
65	LZRP COORDINATES.xlsx
	Beekeeping
66	LZRP_Honey Purchasing 2024.xlsx
67	chalubilo purchase voucher IMG-20240215-WA0006jpg
68	Chasera zone honey purchase sheet junejuly.jpg
69	chilimba buying sheet junejuly 2024 IMG-20240725-WA0008.jpg
70	mweshangombe buying sheet PHOTO-2024-02-06-12-08-29.jpg
71	mweshangombe purchase voucher PHOTO-2024-02-06-12-08-27.jpg
72	Namanongo april purchase voucher WhatsApp Image 2024-04-19 at 09.23.06_4e28ab07.pdf
73	Mphata honey purchase voucher junejuly.pdf
74	Mukwela zone honey purchase sheet junejuly.pdf
75	Namanongo april purchase voucher WhatsApp Image 2024-04-19 at 09.23.06_4e28ab07.jpg
76	Namanongo buying sheet 1 WhatsApp Image 2024-03-15 at 15.55.35_2e999279.jpg
77	Ncheka zone Honey purchase sheet.pdf
78	ndubulula buyingsheet junejuly 2024 WhatsApp Image 2024-08-22 at 10.43.30_4f3fdb9djpg
79	Nguleta zone Honey purchase sheet[1].pdf
80	nyampande purchase voucher junejuly WhatsApp Image 2024-07-26 at 09.16.27_6e53672cjpg

81	simalama purchase voucher IMG-20240709-WA0005.jpg
	Community covenants
82	Malamba Saving Group-Constitution and Covenant (Bunda Bunda).PDF
83	Malilakufa Saving Group- Consitution and Covenant (Bunda Bunda).PDF
84	Mushikili Saving Group-Consititution and Covenants (Bunda Bunda).PDF
85	Mwachombela Saving Group-Consitution and Covenants (Bunda Bunda).PDF
86	Nsambilo Saving Group-Consititution and Covenant (Bunda Bunda).PDF
87	Nsunta Saving Group-Consitution and Covenant (Bunda Bunda).pdf
88	Payment Forms-Bunda Bunda Saving Groups_LZRP.pdf
89	Saviour Saving Group-Consititution and Covenant (Bunda Bunda).PDF
90	Tuchingilishe Saving Group- Consitution and Covenant (Bunda Bunda).PDF
91	Tusekele Saving Group.PDF
92	Tuyume Saving Group- Constitution and Covenant (Bunda Bunda).PDF
	Community projects (boreholes)
93	20240513_BCP V-WASHE COMMITTEE TRAINING REPORT_GRZ.pdf
94	20240513_V wash training_Mweshangombe_MC.pdf
95	20240513_V wash training_Lumwengo_MC.pdf
96	20240513_V wash training_Nyamakao_MC.pdf
97	Authorisation (1).pdf
98	Borehole Drilling Contract LCFP & LZRP-SKsigned.pdf
99	Borehole Rehabilitation-Chilimba Zone (1) (1).pdf
100	Borehole status report after rehabilitation.pdf
101	Coordinates for Rehabilitated Boreholes.pdf
	Community scouts' registries
102	LZRP 2024 SMART Report (003).doc.x
103	Conservation efforts
104	2024_LZRP_M12_VCS-Monitoring-Report-Template-v4.4_Biodiversity.docx
105	Flight Report_ RC_19_07_23(v1).docx
106	Southern-Ground-Hornbill-summary-report_BCP_2023.pdf
107	LZRP 2024 SMART Report (003).pdf
108	Flight Report Chiawa 17_09_23.docx

	Conservation farming
109	2024_Bundabunda_Bicycle&PPE_Beneficiary_agreements.pdf
110	2024_Bundabunda_Inputs_Beneficiary_List.pdf
111	Bundabunda Lead farmer agreements and PPE Registrar.PDF
112	2024_Bundabunda_Bicycle&PPE_Beneficiary_List.pdf
113	BCP Harvest Report_Final 2023-2024 season.pdf
114	Lead Farmer Lists Chinyunyu Sector 2023.xlsx
	Forest Carbon Stock Monitoring
115	LZRP_2024(M12)_Biomass_and_Proxy_Plots_Raw_Field_Data.xlsx
116	20250123_LZRP_MRV_Biomass_Leakage_Proxy_Plots_List_M12.xlsx
	Governance in Bunda Bunda Chiefdom
117	20231207_Needs Assessments in Bunda-Bunda-LZRP.pdf
	HCV
118	20230228_LCFP & LZRP HCV Report.pdf
119	BCP Protocol for HCV assessments_20231026_clean
	Teachers Salary
120	20241023_IFRA_Teachers Salaries_LZRP (1).pdf
121	LZRP_Teachers Salary Payments_ 2024.pdf
	Deforestation accuracy Assessment
122	Deforestation Monitoring register_LZRP_M12.xlsx
	Structured Biodiversity Monitoring
123	RC_transect_2024_RawData.csv
124	2024_RC_BiodiversityMonitoring_GIS.zip
	Village Banking Initiative
125	20241214_The Status of 2023 Saving`s Groups in Bunda-Bunda Chiefdom_LZRP.pdf
	Conservation Efforts
126	LZRP 2024 SMART Report (003).pdf
	NPRR evidence
127	AFOLU_NPRT_Notes_1202_2025.pdf
128	VCS_NPR_REP_ 2025.pdf
129	NPRR supporting docs.zip

130	20190531_LZRP Verification Break Even Model.xlsx
131	AMOCPA Letter.pdf
132	VCS_NPR_REP_1202_1_1_2023_12_31_2023.pdf
	Project Support Docs
133	20230502_Findings VCS VER LZRP_AENOR first round.docx
134	Authorization Letter_Chief Mpanshya_REDD feasibility__20120215.pdf
135	20240219_Zone Meeting in Chilimba_LZRP.docx
136	Chief Bunda Bunda Letter Feasibility.jpg
137	Chiefs_REDD_Permission (1) (1).pdf
138	Chiefs_REDD_Permission (1).pdf
139	Chiefs_REDD_Permission.pdf
140	Chongwe District Letter (1).pdf
141	Chongwe District Letter (2).pdf
142	Chongwe District Letter.pdf
143	FD Letter (1) (1).pdf
144	FD Letter (1).pdf
145	FD Letter.pdf
146	Greenchoice_purchase agreement_Letter (1).pdf
147	Greenchoice_purchase agreement_Letter (2).pdf
148	Greenchoice_purchase agreement_Letter.pdf
149	LZRP_Annex_E-Camp Zambia Lol (1).jpg
150	LZRP_Annex_E-Camp Zambia Lol (2).jpg
151	LZRP_Annex_E-Camp Zambia Lol.jpg
152	LZRP_Annex_E-CFU Lol (1).pdf
153	LZRP_Annex_E-CFU Lol.pdf
154	LZRP_Annex_E-DC_Rufunsa_Support Letter (1).PDF
155	LZRP_Annex_E-DC_Rufunsa_Support Letter.PDF
156	LZRP_Annex_E-FINAL_Lol_Comaco_BCP_2013.04.09 (1).pdf
157	LZRP_Annex_E-FINAL_Lol_Comaco_BCP_2013.04.09.pdf
158	LZRP_Annex_E-Rift Valley Lol (1).pdf
159	LZRP_Annex_E-Rift Valley Lol.pdf
160	LZRP_Annex_E-SunneyMoney Letter of Intent (1).pdf

161	LZRP_Annex_E-SunneyMoney Letter of Intent.pdf
162	Partnership Letter- Chief Bunda Bunda-09102012 (1).pdf
163	Partnership Letter- Chief Bunda Bunda-09102012 (2).pdf
164	Partnership Letter- Chief Bunda Bunda-09102012.pdf
165	Provincial_forestry departmement letter (1).pdf
166	Provincial_forestry departmement letter.pdf
167	ZDA Investment Certificate (1).pdf
168	ZDA Investment Certificate.pdf
169	ZDA_Investment Certificate Letter (1).pdf
170	ZDA_Investment Certificate Letter.pdf
	Title Deed
171	2011_Rufunsa_CERTIFICATE-OF-TITLE_Sable-Transport-Limited.pdf
172	2012_RufunsaConservancy_Deed-of-Conservation-Easement_Annexure3.PDF
173	2012_RufunsaConservancy_Deed-of-Conservation-Easement.pdf
174	Additionality Attestation_Sable.pdf
175	RufunsaConservancy_Preliminary-Registration.pdf
	Socio Economic Surveys
175	2012_LZRP_Social Survey Baseline.pdf
176	2017_LZRP_SocialSurvey_Report.pdf
177	2020_LZRP_Income Perception Survey_Report.pdf
178	2022_LZRP_Income Perception Survey_Report.pdf
	CVs
179	CARBON_BIODIVERSITY_Charles_CV.pdf
180	CARBON_GIS-RS_Morris_CV.pdf
181	CARBON_MANAGER_Cv_2022_Da_Ponte. .pdf
182	CARBON_R_D_Lucy Pieterse CV.pdf
183	CARBON_SENIOR_Marius_CV.pdf
184	CARBON_SPECIALIST_Besa_CV.PDF
185	2020 CV2 Nicholas Mudaly.pdf
186	COO_CV_Mike Mailloux_12122022.pdf
187	HRM_CV_20211104_CV_NNL_BCP.pdf
188	Staff Profile Information Pack 22 January 2022 (2).pdf

	Fire management
189	Rufunsa Site Fire Management Plan.pdf
190	Post Burn report 2023 RC.pdf
191	Furley-et-al.Savanna_burning_and_the_assessment_of_long-term_fire-experiments_Zimbabwe.pdf

APPENDIX 3: CORRECTIVE ACTION AND CLARIFICATION REQUESTS

1. Non Conformities (NCs)/Corrective Action Request (CARs)

NC/CAR id.	01	Date: 06/03/2025
NC/CAR description		
The VVB has identified the following issues and incongruences within the MR: 1. In Section 1.1: PAA (in GIS file) is 34,809.392 ha; PAA (in Section 1.1 of the MR) is 33,333 ha that is not the same as stated in Sections 1.8 and 4.1 of the MR and PAA (in spreadsheet 20250123_LZRP_ER_Calc_M12_BK_Tab Parameters) is 33,338 ha. Please, review the entire MR.		
Project Proponent's Response		Date: 14/03/2025

1. This finding was addressed during the M11 verification and subsequently closed (see excerpt from the M11 Verification Report). All spatial data, including AA, have remained unchanged since the last verification (M11). As a result, the MR and NER spreadsheets have not been modified, and the same spatial data from M11 have been included in the supporting documentation folder.

CAR ID.	02	Date: 16/04/2024
CAR description		
During the verification process, the audit team had a specific GIS meeting via video conferencing. Within this meeting, the already revalidated PAA, proxy area, reference region and leakage area GIS files were shared to the audit team. However, some of these original documents polygons do not coincide in size as they were (properly) disclosed in the MR and shared calculations, specifically the PAA, proxy area and leakage area. The values obtained from the shapefiles provided defined the size of these three files as: • Project Accounting Area: 34,809.392 ha • Proxy Area: 43,433.12 ha • Leakage Area: 40,833.221 ha The PP was contacted to resolve these doubts, and the explanations provided are the following: 1. Proxy Area: The proxy accounting area, as noted in the MR, is 42,794 hectares. This figure excludes areas with slopes greater than 20% from the original 43,433.12-hectare shapefile. 2. Leakage Area: The leakage accounting area spans 27,805 hectares, excluding non-forest areas and areas with slopes greater than 20%. For further clarification, please refer to PDR.108 and PDR.109 in the project document. 3. Accounting Area: For insights into the calculation of the accounting area, please consult PDR.23 and MR.6 of the PD and MR respectively. The project arrived at a size of 33,338 hectares for the accounting area, conservatively calculated as the conservancy shapefile		

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size (excluding areas with slopes >20% and non-forested areas) minus the encroached area. This approach ensures the utmost conservatism in estimating the accounting area. After assessing this information, it was clear for the audit team that the figures used in the MR and in the calculations, spreadsheet always refer to those already corrected, excluding non-forest areas, areas with slopes greater than 20% and the encroached area. Being that the case, the audit team requires to have the corrected shapefiles for the PAA, proxy area and leakage area, as those are the final documents used for disclosing significant data in the MR, and computing the baseline, project and leakage emissions and final ERs.	
Project Proponent's Response	Date: 23/04/2024
1. The shapefiles for Proxy, Leakage and Accounting areas that have the corresponding area sizes as the MR has been provided in the following folder - VVB_Findings-First_Round/CAR#2	
Documentation provided by the project proponent	
1. 2020_Leakge_Accounting_Area_shp 2. 2020_Project_Accounting_Area.shp 3. 2020_Proxy_Accounting_Area.shp	
WB's evaluation	Date: 06/05/2024
The audit team has reviewed the new shared PAA, leakage area and proxy area files and now all of them have disclosed the same numbers as those reported in the last version of the VCS MR. Thus, CAR 02 is closed.	

Documentation provided by the project proponent

1. 2020_LZRP_Project_Accounting Area.shp	
WB's evaluation	Date: 03/04/2025
1. The PP has submitted evidence to demonstrate the ground truth of the Project Accounting Area that is deemed correct by the audit team. However, Section 1.1 of the MR remains the same: “<i>accounting area of 33,333 ha.</i>” The figure does not match either the evidence provided (GIS file) or the statements in Section 1.8 and 4.1 of the MR and PAA (in spreadsheet 20250123_LZRP_ER_Calc_M12_BK_Tab Parameters). Please modify Section 1.1 of the MR. Therefore, CAR 01 is not closed.	
Project Proponent's Response	Date: 07/04/2025
1. Section 1.1 and 4.1 of the MR has been modified to correct the error. The 33,333ha was a typo.	
Documentation provided by the project proponent	
WB's evaluation	Date: 09/05/2025
1. The PP has updated Section 1.1 of the MR and now all figures from MR, spreadsheet and GIS file match properly. Item closed. Therefore, CAR 01 is closed.	

CAR ID.	02	Date: 06/03/2025
CAR description		

The following issues of the MR are not in accordance with the VCS Template and/or the VCS Standard:

1. Section 2.1.1 the second column table font does not follow the general formatting requirements of the MR template.
2. Section 2.1.4 does not list the concerns raised by the Nyamakio community during the meeting with Chilimba Cooperatives and the Village Banking Group regarding the strained relationship with the Village Scouts, who work with BCP to protect both the forest area and the communities and how this has been resolved.
3. Section 2.1.5 Provide an explanation for “not applicable” as per the first page of the VCS MR template instructions.
4. Section 2.2.1 is not included in the Monitoring report as per the VCS Monitoring report template V. 4.4
5. Section 2.2 table of the MR is not the correct one used in section 2.2.2. of the VCS template. The section provides inadequate instructional information compared to section 2.2.2. template instructions.
6. Section 2.2.2 of the VCS template, table row on hazardous materials and chemical pesticides and fertilizers). The risks and mitigation measures shall be described in the context of some lead farmers who have attested to be using them.
7. Section 2.3.5 under the Benefit sharing during the monitoring period, describe the implementation of the benefit sharing plan, including a summary of the outcomes that resulted from the benefit sharing plan. Where affected stakeholder groups deem certain benefit sharing outcomes as sensitive information, those may be shared in a commercially sensitive document.

Project Proponent's Response

Date: 14/03/2025

1. Section 2.1.1 of the MR has been modified to follow the requirements of the MR template.
2. **Section 2.1.4** of the MR has not been updated with the concerns raised during the field audit conducted in March 2025, as the incident occurred outside the monitoring period under review (01/01/2024 – 31/12/2025). It will be included and its closure reported on in the next monitoring period(M13) to ensure transparency and accountability.

However, to ensure proper resolution and follow-up, the project has taken the following actions:

- A **fresh grievance** has been recorded in the 2025 grievance register to ensure the concern is formally addressed. (The 2025 Grievance Register has been shared in the supporting documentation folder)
- A **community meeting** was conducted on the 20th of March to engage the local community (Meeting minutes have been shared in the supporting documentation folder)
- In collaboration with the Community Resource Board (CRB), the project held a meeting to update scouts on the progress regarding the recruitment of additional scouts. During this meeting, scouts were also reminded of the expected standards of conduct when operating within the community.(Meeting minutes have been provided in the supporting documentation folder)
- Furthermore, **CRB and BCP** jointly issued a **memo** to all BCP-supported scouts, outlining the following key points: 1)The project acknowledges the existing **manpower challenges** and is actively working with the CRB to address them, and 2) Scouts were reminded of the **code of conduct**, with strong emphasis on CRB and BCP's **zero-tolerance policy on human rights violations**. The memo is provided in the supporting folder.

3. Section 2.1.5 has been modified to include an explanation for N/A.
4. Section 2.2 has been edited to include section 2.2.1
5. The table in section 2.2 has been modified to meet the section 2.2.2. of the VCS template requirements.
6. Section 2.2.2 of the MR has been edited to include information on government programs that may use low-risk chemicals to fight FAW infestation country-wide. The risks and mitigation measures have also been described.
7. Section 2.3.5 has been updated to include additional information on the implementation of the benefit plan in the current monitoring period. Supporting documentation has been provided.

Documentation provided by the project proponent

12_14_25_7_03_2025_Man power challenges letter BCP 07-Mar-2025 10-03-59.pdf - lzrp_scouts_Meeting minutes.pdf 2025_Chinyinyu_LZRP Grievance Register.xlsx 20250320_Kanyetu grievance resolution meeting_SM.pdf 20250320_Nyamakao Grievance resolution meeting_SM.pdf	
VB's evaluation	Date: 03/04/2025
- Section 2.1.1 has been updated by the PP following the requirements of the VCS MR template. - The PP has explained the issue regarding Section 2.1.4 of the MR. However, the section is not updated and described as the VVB established that the incidence occurred during the M12. - The PP has updated Section 2.1.5 to include an explanation for N/A as per the MR template instructions. - Section 2.2.1, which was previously not in the MR is now included and well explained by the PP. - Section 2.2.2 has been updated by the PP to meet the VCS template requirements. - Section 2.2.2 of the MR has been updated by the PP to describe information on chemical use as recommended for use by the Government of Zambia in case scenarios. - Section 2.3.5 has been revised by the PP to incorporate more details regarding the implementation of the benefit plan during the current monitoring period. However, better explanation are required based on the evidence provided and remove 'Supporting documentation has been provided to the VVB' since it's not appropriate within the MR context, as the VVB's involvement occurs only after the MR has been submitted. CAR ID 02 is not closed.	
Project Proponent's Response	
Section 2.3.5 has been modified to include additional information on the implementation of the BSP according to the RCFSA and the evidence provided. 'Supporting documentation has been provided to the VVB' has been removed.	
VVB Evaluation	Date: 09/05/2025
Section 2.3.5 has been updated by the PP to include information on the benefit sharing plan and implementation of it in accordance with the RCFSA 2024. Therefore, CAR ID 02 is closed.	

CAR ID.	03	Date: 07/03/2025
CAR description		
The following issues of the MR are not in accordance with the VCS Template and/or the VCS Standard: 1. Section 3.1 paragraphing, interspacing and typographical errors shall be corrected by the Project proponent. 2. Section 3.1 on sustainable honey production. Provide further details and explanations of the current training situation by Nature's Nectar and the next steps to ensure beekeepers are fully operational.		
Project Proponent's Response		Date: 21/03/2025
1. Section 3.1 has been edited to ensure that all paragraphing, interspacing and typographical errors are corrected. 2. Section 3.1 of the MR has been modified to include an explanation of the reason why beekeeping training was not conducted in the current monitoring period, and the next steps that will be taken to ensure beekeeping is fully operational in the project.		
Documentation provided by the project proponent		
VB's evaluation		Date: 03/04/2025
1. The PP has updated section 3.1 to ensure that paragraphing, interspacing and typographical errors have been corrected. 2. The PP has modified Section 3.1 of the MR to include an explanation of beekeeping training and the next steps to ensure the community is continuously trained. Therefore, CAR ID 03 is closed.		

NC/CAR id.	04	Date: 07/03/2025
NC/CAR description		
After NPR review: Natural Risk: historic natural risk (Pest and disease outbreaks: PD): 1. According to the instructions for completing the NPR: Project proponents shall clearly document and substantiate the risk score selected for the project. Therefore. Provide further information and evidence to demonstrate the historical significance (Not applicable) for Pest and disease outbreaks (PD), Extreme weather (W) and Geological risk (G). In addition, also demonstrate the historical Likelihood (Once every 100 years or less frequently, or risk is not applicable to the project area) for Pest and disease outbreaks (PD), Extreme weather (W) and Geological risk (G). Natural Risk: Future climate impact: 2. According to the instructions for completing the NPR: For CID categories that are expected to positively impact the project, reference an external source(s) (e.g., peer-reviewed literature or a report published by a government agency) to justify the positive impact. Hence, provide evidence for Mean precipitation and Soil moisture. Please, upload the NPR to Verra Project Hub.		
Project Proponent's Response		Date: 10/04/2025

1. **Pest and disease:** Additional narrative has been included as requested: “*Miombo woodlands exhibit remarkable resilience to pest and disease outbreaks, a trait attributed to several ecological and management factors. Firstly, the high biodiversity within these ecosystems plays a crucial role. With an estimated 8,500 species of higher plants, over 54% of which are endemic, the rich species diversity creates a natural barrier against the rapid spread of pests and diseases, as these typically target specific hosts. Furthermore, the presence of natural predators and ecological balance within miombo woodlands contributes to their resilience. The complex food webs, including various insects, birds, and other fauna, help regulate pest populations, preventing any single species from becoming overly dominant. Additionally, the adaptive growth patterns of miombo species, such as root sprouting and coppicing, enable rapid recovery from disturbances, further enhancing their resilience. Lastly, the natural fire regimes in miombo woodlands, characterized by low-intensity, early dry-season fires, play a role in controlling insect populations and preventing the establishment of invasive pathogens. These fires maintain the ecological balance and health of the woodlands*”

Gumbo, D.J., Dumas-Johansen, M., Muir, G., Boerstler, F., & Xia, Z. (2018). Sustainable management of Miombo woodlands. Food and Agriculture Organization of the United Nations (FAO).

Chiteculo, V., Ribeiro, N., & Grundy, I. (2023). Resilience of the Miombo Woodland to Different Fire Frequencies in the LevasFlor Forest Concession, Central Mozambique. *Forests*, 16(1), 10.

Campbell, B., Frost, P., & Byron, N. (1996). Miombo woodlands and their use: overview and key issues. In B. Campbell (Ed.), *The Miombo in transition: woodlands and welfare in Africa* (pp. 1-10). Center for International Forestry Research (CIFOR).

Frost, P. (1996). The ecology of Miombo woodlands. In B. Campbell (Ed.), *The Miombo in transition: woodlands and welfare in Africa* (pp. 11-57). Center for International Forestry Research (CIFOR).

Ryan, C.M., & Williams, M. (2011). How does fire intensity and frequency affect miombo woodland tree populations and biomass? *Ecological Applications*, 21(1), 48-60.

Extreme weather: Already addressed in the [CL ID 04](#) and [05](#).

Geological risk “ Additional narrative has been incorporated as requested: “*Earthquake occurrences in Eastern Zambia are infrequent and typically minor, with magnitudes rarely exceeding 4.0 on the Richter scale. These events are generally limited to minor tremors resulting from distant seismic activity rather than localized fault movements. Additionally, the region's geology is devoid of volcanic formations or activity, which further reduces the likelihood of geological disasters. The primary geological processes at play in Eastern Zambia involve slow, natural weathering and erosion of rock formations, which contribute to soil formation and landscape evolution rather than posing direct risks to human settlements or infrastructure. Because of this stable geological environment, risks associated with landslides, earthquakes, and volcanic eruptions are virtually nonexistent*”.

Ojo, O., & Chiwala, H. (2023). *The Luangwa Rift Active Fault Database and Fault Reactivation Along the Southwestern Branch of the East African Rift*.

Wikipedia contributors. (2025). *Mwembeshi Shear Zone*. Wikipedia, The Free Encyclopedia. Retrieved from

2. Kindly note that evidence and narrative has been already provided for soil moisture. See as it follows:

Soil moisture: The initial general pattern in density does not seem to be affected much by the severity of the moisture stress imposed. In the present formulation, moisture stress only reduces the amount of annual growth. Establishment is unchanged. It may well be that some species will not regenerate successfully if moisture stress is excessive. For example, Ernst (1988) concludes that growth of seedlings of *B. spiciformis* could be improved by protecting seedlings from direct insolation. Information on the establishment of most species remains incomplete. When more data are available, it will be useful to refine the establishment phase in the model to reflect effects of timing and intensity of moisture stress on seedling growth and survival. *This would be useful in studying possible effects of changing climate.*

Ernst, W.H.O. (1988). Seed and seedling ecology of *Brachystegia spiciformis*, a predominant tree component in miombo woodlands in South Central Africa. *Forest Ecology and Management*, 25(3-4), 195–210.

Desanker, P.V. and Prentice, I.C., 1994. MIOMBO a vegetation dynamics model for the miombo woodlands on Zambezian Africa. *Forest Ecology and Management*, 69(1-3), pp.87-95.

In regards to mean precipitation additional narrative has been included as follows: “As the climate becomes drier, the expansion of dry miombo is expected to accelerate due to its inherent resilience to lower moisture levels. Dry miombo woodlands, characterized by their drought tolerance, are better suited to withstand reduced precipitation and higher temperatures compared to wetter forest types, such as tropical rainforests and moist miombo. Projections indicate that by 2050, dry miombo may increase by up to 17.3%, with a further rise to 22.7% by 2070. This expansion is not merely a result of changing rainfall patterns but also of the overall warming of the climate, which enhances evapotranspiration and further depletes available soil moisture. Dry miombo, with its deeper root systems and ability to withstand extended dry periods, can thrive even as moisture availability declines, unlike other forest types that are more vulnerable to these shifts”.

Bond, W. J., & Midgley, G. F. (2001). *Environmental controls on the distributions of the world’s dryland vegetation*. In *Vegetation: Patterns, Processes, and Changes* (pp. 131-152).

Frost, P. G. H., & Harding, J. S. (2006). *Impact of climate change on the future distribution of the miombo woodlands*. *Climatic Change*, 77(1–2), 101-117.

Jeltsch, F., & Weber, G. (2000). *A model for the potential expansion of miombo woodlands under different climate change scenarios*. *Global Ecology and Biogeography*, 9(4), 289-300.

Sankaran, M., & Staver, A. C. (2009). *African drylands and the response of miombo woodlands to climate change: A review*. *Journal of Vegetation Science*, 20(2), 231-244.

Finally since the NPR is an online tool, the report is already available on the VERRA registry, eliminating the need to upload a separate “NPR report”.	
Documentation provided by the project proponent	
WB’s evaluation	Date: 03/04/2025
1. The PP has provided information and evidence to demonstrate the historical significance (Not applicable) for Pest and disease outbreaks (PD), Extreme weather (W) and Geological risk (G). However, the historical Likelihood (Once every 100 years or less frequently, or risk is not applicable to the project area) for Pest and disease outbreaks (PD), Extreme weather (W) and Geological risk (G) has not been justified nor evidenced. 2. The PP has provided evidence for Mean precipitation and Soil moisture positive impacts. Item closed. 3. The NPR publicly available in Verra Registry is not the same as one provided by the PP: share folder (AppendixG_NonPermRisk). The NPR shared to the VVB has <u>Date of issue 2025-01-24</u>. On the other hand, the <u>NPR uploaded to Verra Registry has Date of issue 2024-05-13</u>. Therefore, upload to Verra Registry the most updated version of the NPR and provide such evidence to the audit team for review. Therefore, CAR 4 is not closed.	
Project Proponent’s Response	Date: 04/10/2024

1. Pest and Disease Outbreaks. The narrative has been adjusted as requested: *The likelihood of significant pest and disease outbreaks in the project area is extremely low. The region's dominant vegetation miombo woodlands exhibits high ecological resilience due to its biodiversity and structural dynamics. These ecosystems host an estimated 8,500 species of higher plants, with over 54% being endemic (Frost, 1996). This diversity naturally limits pest and disease spread, as most pathogens are host-specific. Additionally, pest populations are regulated by a range of natural predators, maintaining a robust ecological balance (Desanker et al., 1997). Miombo species are also disturbance-resilient through mechanisms such as coppicing and root sprouting (Campbell, 1996), while natural fire regimes suppress pest and fungal load. Importantly, no significant pest or disease outbreaks have been recorded in Eastern Zambia's miombo woodlands in the past century. This absence is consistent across literature, national environmental reports, and international disaster databases such as EM-DAT (Emergency Events Database), which lists no pest- or disease-related ecological disasters for the area. Therefore, pest and disease risk is considered extremely rare or negligible.*

References:

EM-DAT. (2024). The International Disaster Database. CRED, Université catholique de Louvain. <https://www.emdat.be/>

Frost, P. (1996); Desanker et al. (1997); Campbell, B. (1996)

Extreme weather events. The narrative has been adjusted as requested: *Extreme weather events such as tropical cyclones, hurricanes, or large-scale floods are not a historical or forecasted threat in the project area. The region's landlocked geography places it outside the influence of cyclonic systems, and severe convective storms, hail, or tornados are virtually absent in meteorological records. While seasonal rains occur between November and April, these are typically moderate and well within normal variability. Additionally, the landscape's gentle terrain and absence of major floodplains limit flood risk. There are no recorded extreme weather disasters (such as hurricanes, destructive floods, or windstorms) affecting this region in EM-DAT, UNDRR country profiles, or Zambia's own Disaster Risk Reduction Strategy documents over the last 100 years. Furthermore, ecological features such as drought-tolerant vegetation (miombo woodlands) reinforce the region's resilience (Chidumayo & Gumbo, 2010). Based on historical data and climate models, the risk of extreme weather events is considered negligible.*

References:

EM-DAT. (2024). <https://www.emdat.be/>

UNDRR. (2020). Disaster Risk Reduction in Zambia: Status Report.

Chidumayo & Gumbo (2010)

Geological risk: The narrative has been adjusted as requested: *The project area lies within a tectonically stable zone, far from active fault lines or volcanic systems. Geological activity in the area is minimal and consists mainly of erosion and weathering rather than seismic or volcanic processes. Seismic data from USGS and regional hazard assessments (Midzi et al., 1999) show*

that Eastern Zambia only experiences minor tremors, typically below magnitude 4.0, and these are generally distant echoes from the East African Rift System.

No significant geological events (earthquakes, landslides, or volcanic activity) have ever been recorded in the province according to EM-DAT, USGS Earthquake Archive, and Zambia's National Contingency Plan. This absence of historical geological disasters over a period exceeding 100 years further supports classification of geological risk as not applicable or negligible to the project.

References:

USGS (2023). Global Earthquake Archive. <https://earthquake.usgs.gov/>

EM-DAT (2024). <https://www.emdat.be/>

Midzi et al. (1999)

3. An updated versión of the PD has been provided in folder \2025_M12\AENOR_Second_Round_of_Findings\NC_CAR#4

Documentation provided by the project proponent

WB's evaluation

Date: 09/05/2025

1. Explanations and evidence are deemed correct by the audit team. Item closed.
3. The updated NPR has been shared to the VVB (report and notes) but the VVB does not have access to Verra Project Hub for this project. The PP states in this report the following: "Finally since the NPR is an online tool, the report is already available on the VERRA registry, eliminating the need to upload a separate "NPR report". However, according to VCS Standard v4.7 (section 3.2.10): "Projects shall prepare a non-permanence risk report in accordance with the AFOLU NonPermanence Risk Tool at validation and verification. The non-permanence risk report shall be prepared using the AFOLU Non-Permanence Risk Assessment Calculator." Therefore, provide such evidence to demonstrate compliance with art 3.2.10 of VCS Standard. Item still open. X

Therefore, CAR 04 is not closed.

Project Proponent's Response

Date: 11/05/2025

3. The NPRT has been submitted to VERRA and shared with the VVB as well. Notes and report content can be found in folder \2025_M12\AENOR_Third_Round_of_Findings

Documentation provided by the project proponent

1. AFOLU_NPRT_Notes_1202
2. VCS_NPR_REP_1202_1_1_2024_12_31_2024

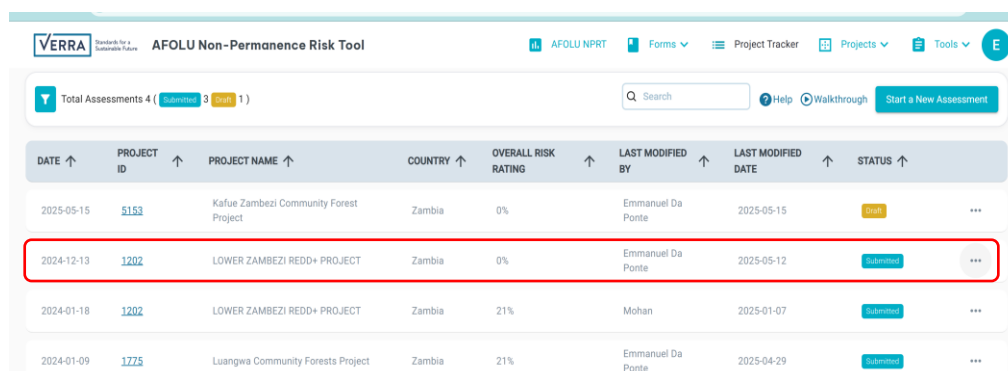
WB's evaluation
Date: 16/05/2025

3. Evidence provided. This item cannot be closed until the PP upload their NPR to Verra Project Hub. Item still open. X

Therefore, CAR 04 is not closed.

Project Proponent's Response
Date: 16/05/2025

Please note the updated NPR was uploaded on Verra's project hub on the 12th of May shared with AENOR on the same day. See below



DATE	PROJECT ID	PROJECT NAME	COUNTRY	OVERALL RISK RATING	LAST MODIFIED BY	LAST MODIFIED DATE	STATUS
2025-05-15	5153	Kafue Zambezi Community Forest Project	Zambia	0%	Emmanuel Da Ponte	2025-05-15	Open
2024-12-13	1202	LOWER ZAMBEZI REDD+ PROJECT	Zambia	0%	Emmanuel Da Ponte	2025-05-12	Submitted
2024-01-18	1202	LOWER ZAMBEZI REDD+ PROJECT	Zambia	21%	Mohan	2025-01-07	Submitted
2024-01-09	1275	Luangwa Community Forests Project	Zambia	21%	Emmanuel Da Ponte	2025-04-29	Submitted

Documentation provided by the project proponent
VVB Evaluation
Date: 16/05/2025

The PP has uploaded the NPR to the project Hub

Therefore, CAR ID 04 is closed.

2. Clarifications (CLs)

CL ID.	01	Date: 07/03/2025
CL description		
The following evidence and modifications shall be provided to support affirmations, arguments and assumptions made in the MR, in accordance with the VCS Template and/or the VCS Standard: 1. Section 2.1.4, Provide evidence of the meetings held to raise concerns by the Nyamakio community regarding the strained relationship with the Village Scouts, who work with BCP to protect both the forest area and the communities together with evidence of resolution. 2. Section 2.2, Clarify how the PP has reinforced the incentives of the people in the 2.96 ha encroached area and evidence of meetings with the PP, Chief overseeing Chifita area and the headman to explain the issues and resolution mechanisms in place to prevent further encroachment. 3. In Section 2.3.2, provide evidence of recent stakeholder meetings held by the Tuelekeshe Women Savings Group regarding the stakeholder consultations and the grievance redress mechanism.		
Project Proponent's Response		Date: 14/03/2025
1. See Response for CAR ID. 02 above 2. The project has strengthened incentives for communities near the deforested area by supporting 5 CSA lead farmers, recruited in 2023, with inputs and training to enhance their climate-smart agriculture activities during the current monitoring period (M12). Additionally, meetings were held in the Chifita area to reinforce grievance resolution efforts initiated in M10.(Report shared in the supporting documentation folder). Further measures, including additional meetings and incentives such as village savings groups, are planned for the next monitoring period to help prevent further encroachment. These activities will be reported in the next monitoring period, as they fall outside the current review period. 3. Stakeholder meetings with Tuelekeshe women were conducted on 20/03/2025, however, the MR has not been modified and details of the meetings will be included in the next monitoring period, as it occurred outside the monitoring period under review. The meeting minutes have been provided in the supporting documentation folder for your appreciation.		
Documentation provided by the project proponent		

20241129_Meeting with HRH Bunda-Bunda and Chifita Village_LZRP_MC.pdf 20250320_Kanyetu grievance resolution meeting_SM.pdf 20250320_Nyamakao Grievance resolution meeting_SM.pdf	
VB's evaluation	Date: 03/04/2025
- Section 2.1.4 evidence provided by the PP suggests that the incidence occurred out of the M12, please provide evidence of such or update the section to include the Nyamakio community grievances as an incidence within the M12. - The explanation seems like an incidence that led to the loss of the forest area or encroachment during M12. Please update section 2.3.4 with additional information. - Section 2.3.2 evidence provided is outside the MP. Tuelekeshe Women Savings Group have had meetings regarding the 'stakeholder consultations' and the 'grievance redress mechanism' during the M12 which the PP is seeking to assess. Therefore, CL ID 01 is not closed.	
Project Proponent's Response	Date: 14/04/2025
- Evidence in the form of all community meeting minutes conducted in and around the Nyamakai Community during the monitoring period under review has been provided. These records demonstrate that, although community members mentioned during the field audit that the incident occurred in 2024, it was neither reported nor formally communicated to the project proponent at the time. Accordingly, Section 3.1 of the Monitoring Report (MR) has been revised to state that no grievances were raised by the community through community meetings during the monitoring period under review.. As a result, the project has treated the matter raised during the 2025 field audit as a new grievance. It was formally recorded and resolved in 2025, with supporting documentation for its closure already submitted. However, the formal reporting of this grievance and its resolution will be included in the next monitoring report, i.e., Monitoring Report 13 (M13), covering the subsequent monitoring period. - The explanation provided does not indicate that any specific incident led to the forest loss in 2024. However, it highlights the following actions conducted as incentives to avoid further encroachment: - The project proponent (PP) strengthened community incentives in areas near the deforested site by supporting five CSA lead farmers recruited in 2023 with agricultural inputs and training to enhance their climate-smart agriculture activities during the current monitoring period (M12). - Meetings were conducted in the Chifita area to reinforce grievance resolution efforts concluded in M10. - Additional measures, including further community meetings and incentives such as the establishment of village savings groups, are planned for the next monitoring period (M13) to help prevent further encroachment.	

Nonthe less , Section 2.3.4 of the MR has been updated the additional information. 3. Meeting minutes for a meeting held in Chilimba village have been provided where community members from Nyamakau community and some members from the Tuelekeshe Women Savings Group participated where grievance readiness mechanisms was discussed.	
VVB Evaluation	Date: 09/05/2025
1. The PP has provided explanations regarding the grievances that happened in the previous year under the current monitoring period, but this has been captured for the next monitoring period. 2. Section 2.3.4 has been updated by the PP to include information on the actions undertaken and incentives to avoid further encroachment: 3. The project proponent has provided minutes of the meetings held by the women savings group and assessed them properly. Therefore, CAR ID 01 is closed.	

CL ID.	02	Date: 07/03/2025
CL description		
The following evidence and modifications shall be provided to support affirmations, arguments and assumptions made in the MR, in accordance with the VCS Template and/or the VCS Standard: 1. Section 3.1; Provide further details and evidence regarding the recruitment process of the Village Scouts, specifically for the eight individuals currently serving two conservancies. 2. Section 3.1; provide additional evidence of the number of beehives distributed and training evidence conducted or reasons for the contrary opinion in the project area during the MR12 monitoring period. 3. In Section 3.1; please clarify whether lead farmers have received chemical pesticides for demonstrations and why some have used this when it's not listed in the section.		
Project Proponent's Response		Date: 14/03/2025

1. Section 3.1 of the MR has been modified to include clarification on the scout's recruitment process and supporting documentation provided. In addition, Two community meeting was conducted to explain the scouts recruitment process and meeting minutes are provided in the supporting documentation folders. 2. Section 3.1 of the MR Explicitly highlights the following <i>"In the current monitoring period (M12), the total number of beekeepers and beehives remained unaltered totaling 409 and 3,760 respectively "</i>, the only activity as far as sustainable honey production is concerned in the current monitoring period was honey harvest and linkage to markets which is highlighted in the MR and supporting documentation already provided to the VVB. 3. Section 3.1 of the MR has been modified to include a clarification on the country wide government program that provides low-risk Fall Armyworm (FAW) control chemicals to farmers in instances of serious FAW infestation country wide.	
Documentation provided by the project proponent	
1. 20250305_Scouts Advert_LZRP (1).PDF 2. GRZ Faw Army Worms Manual.pdf 3. 20250320_Kanyetu grievance resolution meeting_SM.pdf 4. 20250320_Nyamakao Grievance resolution meeting_SM.pdf	
VVB's evaluation	Date: 03/04/2025
1. The PP has updated Section 3.1 of the MR to include clarification on the scout's recruitment process and supporting documentation. 2. The PP has updated Section 3.1 to include explanations on the number of beehives distributed and training conducted during the M12 monitoring period. 3. The PP has updated Section 3.1 to clarify the lead farmers' use of chemical pesticides only where Government led programs such as control of FAW have been recommended. Please provide further evidence of the Zambia Government statement about the FAW outbreak during the M12. Therefore, CL ID 02 is not closed.	
Project Proponent's Response	Date: 14/03/2025
3. Section 3.1 has been updated to include a footnote with a link to an article on the official Ministry of Agriculture website. The article reports on the official launch of the Integrated Pest Management (IPM) training for Senior Agricultural Officers and Crop Husbandry Officers. It highlights the Fall Armyworm (FAW) infestation during the 2024/2025 farming season and details the government's response, including the procurement and distribution of low-risk FAW control chemicals across all provinces of Zambia.	
VVB Evaluation	08/05/2025
The PP shared a link to the official website of Zambia's Ministry of Agriculture. The article talks about the launch of a training program on Integrated Pest Management (IPM) for senior agricultural staff. It also	

discusses the Fall Armyworm (FAW) outbreak during the 2024/2025 farming season and explains how the government is responding by buying and distributing safer FAW control chemicals to all provinces in Zambia.

Therefore, CL ID 02 is closed.

CL ID	03	Date: 07/03/2025
CL description		

Please, provide the following evidence:

Section 4.1:

1. During the verification process, revalidated PAA, proxy area, reference region and leakage area GIS files have been shared to the audit team. However, these files do not match in size as they were disclosed in the MR and calculations, specifically the PAA, proxy area and leakage area.

The area values obtained from the shapefiles provided are as follow:

- Project Accounting Area: 34,809.392 ha.
- Proxy Area: 43,433.121 ha.
- Leakage Area (Area of activity-shifting leakage area): 40,833.221 ha.

• Project Accounting Area: both in the MR and spreadsheet (20250123_LZRP_ER_Calc_M12_BK_Tab Parameters) is 33,338 ha.

• Proxy Area: both in the MR and spreadsheet (20250123_LZRP_ER_Calc_M12_BK_Tab Parameters), is 42,794 ha.

• Leakage Area (Area of activity-shifting leakage area): both in the MR and spreadsheet (20250123_LZRP_ER_Calc_M12_BK_Tab Parameters) is 27,805 ha.

According to Section 1.8 of the MR, the accounting area was calculated by firstly excluding non-forested portions of the project area (bare earth and grassland). Then, all steeply sloped lands (greater than 20 degrees' slope) which are inaccessible to agents of deforestation were also excluded. Also, according to Section 5.2 of the MR, the PP has removed from the project accounting area the area encroached by clearing for illegal agricultural expansion (2.94 ha).

After assessing this information, it was clear for the audit team that the figures used in the MR and in the spreadsheet (20250123_LZRP_ER_Calc_M12_BK_Tab Parameters) always refer to those already corrected, excluding non-forest areas, areas with slopes greater than 20% and the encroached area.

Therefore, the PP must provide evidence (GIS files those already corrected, excluding non-forest areas, areas with slopes greater than 20% and the encroached area) for the PAA, proxy area and leakage area, as those are the final documents stated in the MR, and computing the baseline, project and leakage emissions and final ERs.

Section 5.1:

2. Provide an explanation regarding the proxy area inventory measurements for the proxy plots assessed in MR12, and how inventory errors during the monitoring period impact the increase in proxy area carbon stocks within the project area. Include evidence to show how these errors will affect the total uncertainty in proxy area carbon stock estimate and the final VCUs to be claimed for MR12.

Section 5.2:

3. According to Figure 12 of Section 5.2 of the MR, provide evidence (GIS file) for the encroached area (2.96 ha) by clearing for illegal agricultural expansion.
4. According to Section 5.2 of the MR, the Area of project accounting area stratum 1 prior to first verification event is 27,322 ha and the Area of project accounting area stratum 2 prior to first verification event is 6,016 ha. Please, provide GIS file evidence to demonstrate both sizes.

Project proponent's response

Date: 14/03/2025

1. This finding was addressed during the M11 verification and subsequently closed (see excerpt from the M11 Verification Report). All spatial data, including AA, LA and PA have remained unchanged since the last verification (M11). As a result, the MR and NER spreadsheets have not been modified, and the same spatial data from M11 have been provided in the supporting documentation folder. :

CAR ID.	02	Date: 16/04/2024
CAR description		
During the verification process, the audit team had a specific GIS meeting via video conferencing. Within this meeting, the already revalidated PAA, proxy area, reference region and leakage area GIS files were shared to the audit team. However, some of these original documents polygons do not coincide in size as they were (properly) disclosed in the MR and shared calculations, specifically the PAA, proxy area and leakage area. The values obtained from the shapefiles provided defined the size of these three files as: • Project Accounting Area: 34,809.392 ha • Proxy Area: 43,433.12 ha • Leakage Area: 40,833.221 ha The PP was contacted to resolve these doubts, and the explanations provided are the following: 1. Proxy Area: The proxy accounting area, as noted in the MR, is 42,794 hectares. This figure excludes areas with slopes greater than 20% from the original 43,433.12-hectare shapefile. 2. Leakage Area: The leakage accounting area spans 27,805 hectares, excluding non-forest areas and areas with slopes greater than 20%. For further clarification, please refer to PDR.108 and PDR.109 in the project document. 3. Accounting Area: For insights into the calculation of the accounting area, please consult PDR.23 and MR.6 of the PD and MR respectively. The project arrived at a size of 33,338 hectares for the accounting area, conservatively calculated as the conservancy shapefile		

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size (excluding areas with slopes >20% and non-forested areas) minus the encroached area. This approach ensures the utmost conservatism in estimating the accounting area. After assessing this information, it was clear for the audit team that the figures used in the MR and in the calculations, spreadsheet always refer to those already corrected, excluding non-forest areas, areas with slopes greater than 20% and the encroached area. Being that the case, the audit team requires to have the corrected shapefiles for the PAA, proxy area and leakage area, as those are the final documents used for disclosing significant data in the MR, and computing the baseline, project and leakage emissions and final ERs.	
Project Proponent's Response	Date: 23/04/2024
1. The shapefiles for Proxy,Leakage and Accounting areas that have the corresponding area sizes as the MR has been provided in the following folder - VVB_Findings-First_Round/CAR#2	
Documentation provided by the project proponent	
1. 2020_Leakge_Accounting_Area.shp 2. 2020_Project_Accounting_Area.shp 3. 2020_Proxy_Accounting_Area.shp	
WB's evaluation	Date: 06/05/2024
The audit team has reviewed the new shared PAA, leakage area and proxy area files and now all of them have disclosed the same numbers as those reported in the last version of the VCS MR. Thus, CAR 02 is closed.	

2. According to Section 4.3 of the MR, the project's monitoring plan for biomass and proxy plot measurements follows a 20% annual rotation cycle, ensuring systematic and comprehensive data collection. This approach updates the carbon stock dataset every five years.

The last carbon stock update was completed in M8, with the next scheduled for M13 (2025) after the full 100% revisit of biomass and proxy plots (2021–2025). This process consolidates all collected data over five years, addressing errors and uncertainties before integrating them into the new biomass carbon stock dataset.

An error was identified in one of the proxy plots (Rusp090). The plot was recorded as having zero stems, despite the presence of stems. This discrepancy was attributed to a GPS malfunction likely caused by severe cloud cover on the day of the site visit.

As a conservative measure, the project has updated the forest inventory and master carbon stock datasets using the corrected Rusp090 data ahead of the scheduled update. The revised datasets have been included in the supporting documentation folder.

The uncertainty per strata for Proxy Area OT (AGB + BGB) has increased from 132,690 to 137,680, while the uncertainty for the proxy area remains unchanged at 60,520. Consequently, no uncertainty deductions have been applied.

This update has resulted in an increase in the carbon value within the proxy stratum, rising from 414,678 to 462,552, which in turn reduces the final VCU for the current monitoring period from 193,242 to 192,128 CO₂e.

The MR and NER spreadsheets have been updated accordingly. The revised NER, forest inventory, and master carbon stock dataset are available in the supporting documentation folder.

3. All deforestation spatial data for M12 was already provided to the VVB in Appendix J. However the same has been provided in the supporting documentation folder.
4. The spatial data has been provided in the supporting documentation folders.

Documentation provided by the project proponent

2020_LZRP_Leakage_Accounting Area.shp 2020_LZRP_Project_Accounting Area.shp 2020_LZRP_Proxy_Accounting Area.shp - LZRP_M12_Deforestation.shp - LZRP_VCS_Land_CoverLightDenseTree.shp 20201120_MRV_LZRP_M4-M8_5years_updated2025_ForestInv_.xlsx 20201125_Master_carbon_stocks_calculations_v2 _updated2025_BK.xlsx 20250123_LZRP_ER_Calc_M12_BK _updated2025.xlsx	
VVB's evaluation	Date: 03/04/2025
- The PP has sent the corrected GIS files, excluding non-forest areas, areas with slopes greater than 20% and the encroached area for the PAA, proxy area and leakage area and those have been reviewed by the VVB. - The PP has provided explanations regarding the proxy area inventory measurements for the proxy plots assessed in M12 and updated the final VCU's accordingly. However, after the VVB review, the PP has not updated the master carbon, and the ER excel sheet with proxy plots tree numbers remeasured for the M12. - The PP has sent evidence (GIS file) for the encroached area (2.96 ha) by clearing for illegal agricultural expansion. - The PP has provided evidence (GIS files) to demonstrate both sizes of the Area of project accounting area stratum 1 and the Area of project accounting area stratum 2 prior to first verification event. Therefore, CL ID 03 is closed.	

CL ID.	04	Date: 11/03/2025
CL description		

[illegible]

Date: 17/03/2025

Documentation provided by the project proponent

- Date: 03/04/2025

Therefore, CL ID 04 is not closed.

Date: 14/03/2025

3. The ER spreadsheet and the Master Carbon stock datasets have been updated. The MR has also been updated based on the updated dataset. The updated datasets have been provided in CL#04 in the second round folder.	
VVB Evaluation	Date: 09/05/2025
The VVB has assessed and confirmed that the ER spreadsheet and the Master Carbon stock datasets have been updated. The MR has also been updated based on the updated dataset. However, check the NPR buffer and harmonize with the MR values. Therefore, CL ID 04 is not closed.	
Project Proponent's Response	Date: 11/05/2025
<i>The NPRT has been updated and buffer figure corrected. The updated report can be found in folder \2025_M12\AENOR_Third_Round_of_Findings</i>	
Documentation provided by the project proponent	
1. AFOLU_NPRT_Notes_1202 2. VCS_NPR_REP_1202_1_1_2024_12_31_2024	
VVB Evaluation	Date: 16/05/2025
The PP has updated the values and buffer figures corrected. Therefore , CL ID 4 is closed	

CL ID	05	Date: 07/03/2025
CL description		

After the NPR review, please provide the following explanations:

Natural Risk: Future climate impact:

1. Provide further explanation to justify tropical cyclones will not impact to the project.

Project proponent's response

Date: 17/03/2025

1. *Historically Zambia has not experienced direct hit from cyclones. Zambia, a landlocked country in Southern Africa, faces minimal direct risk from tropical cyclones due to its geographical location, meteorological conditions, and historical experiences. Unlike coastal nations exposed to the powerful effects of cyclones, Zambia is situated far inland, well beyond the typical pathways of tropical storms originating from the Indian Ocean, particularly those forming in the Mozambique Channel. Cyclones that make landfall on the eastern coast of Madagascar or Mozambique tend to lose strength rapidly as they move inland, reducing their potential impact on Zambia. The weakening of cyclones over land is primarily due to the loss of their primary energy source, warm ocean water. As these weather systems move further away from the coast, they encounter drier air and cooler temperatures, causing them to dissipate into low-pressure systems or tropical depressions. By the time these remnants reach Zambia, they usually bring heavy rainfall rather than destructive winds, which makes them far less threatening.*

The same information has been incorporated into the NPRR

References:

World Bank. (n.d.). Climate Knowledge Portal: Tropical Cyclones - Historical Data for Zambia. Retrieved from <https://climateknowledgeportal.worldbank.org/country/zambia/tropical-cyclones-historical>

United Nations Office for Disaster Risk Reduction (UNDRR). (2023). Southern Africa Cyclone 2023 Forensic Analysis. Retrieved from <https://www.undrr.org/resource/southern-africa-cyclone-2023-forensic-analysis>

Nature Communications. (2024). Linking Climate Change to the Increase in Cyclone Intensity: The Case of Cyclone Freddy. *Nature*, 8(4), 1-5. Retrieved from <https://www.nature.com/articles/s41558-024-02194-w>

World Meteorological Organization (WMO). (2023). Cyclone Freddy: The Longest-Lasting Tropical Cyclone on Record. Retrieved from <https://wmo.int/news/media-centre/tropical-cyclone-freddy-longest-tropical-cyclone-record-36-days-wmo>

University of California, Berkeley, Belonging Lab. (2023). Climate Displacement Case Study: Zambia. Retrieved from <https://belonging.berkeley.edu/climatedisplacement/case-studies/zambia>

Documentation provided by the project proponent

VVB's evaluation	Date: 03/04/2025
1. The PP has provided further information and evidence to justify that tropical cyclones will not impact on the project. Therefore, the VVB considers it correct. However, the updated NPRR has not been shared with the audit team. Provide the most up-to-date NPRR including all new information for review. Therefore, CL 05 is not closed.	
Project proponent's response	Date: 10/04/2025
1 The NPRR has been updated as requested, the document can be found in the following folder \2025_M12\AENOR_Second_Round_of_Findings\NC_CAR#4	
Documentation provided by the project proponent	
VVB's evaluation	Date: 09/05/2025
1. The PP has updated the NPR and notes. However, NPR report states 51,072 tCO2e to be deposited in the Afolu buffer account, that does not match with the statement both in Section 1.1 and 5.4 of the MR (51,135 tCO2e). Therefore, CL 05 is not closed.	
Project proponent's response	Date: 05/11/2025
<i>The NPRT has been updated and buffer figure corrected. The updated report can be found in folder \2025_M12\AENOR_Third_Round_of_Findings</i>	
Documentation provided by the project proponent	
1. AFOLU_NPRT_Notes_1202 2. VCS_NPR_REP_1202_1_1_2024_12_31_2024	
VVB's evaluation	Date: 16/05/2025
1. Documentation provided and corrected. Item closed. Therefore, CL 05 is closed.	

CL ID	06	Date: 07/03/2025
CL description		
After NPR review, please provide the following evidence: Internal risk: Project Management (Q2): 1. Provide evidence of Engagement Tracker to demonstrates that there are ongoing collaborative efforts to combat encroachment that may risk the reduction of GHG credits and confirming participation and engagement of families in the communities with the project. Internal risk: Opportunity Cost (Q4): 2. Provide evidence of community covenants to demonstrate the project is protected by a legally binding agreement to continue management practices that protect the credited carbon stocks over the duration of the project crediting period. Internal risk: Project Longevity (Q4): 3. Provide evidence of a management, financial and monitoring plan for the entire project longevity. Internal risk: Project Longevity (Q7): 4. Provide evidence of the lease agreement (99 years lease) between the landowner and the PP. External risk: Stakeholder Engagement (Q1): 5. Provide evidence of all surveys carried out (for example, 2017, 2018, 2022 and 2023) to demonstrate that the number of people depending on the project area is not increasing and that there is increased awareness among those that used to depend on the area for illegal activities; and certainly justify that more than 20 % of people reliant on the project area have been consulted and are aware. External risk: Stakeholder Engagement (Q3): 6. Provide evidence to ensure BCP has obtained consent from communities in the Rufunsa Conservancy to implement a REDD+ project. The VVB is requesting the 2012 survey that revealed 95% of households in the area agreed to the LZRP implementation, with nondependent on the conservancy and the 2017 survey that revealed 91% of interviewers were aware of the project's protection and 96% supported it.		
Project proponent's response		Date: 14/03/2025

1. As requested, additional evidence has been included to highlight community involvement in addressing breaches within the project areas. The same information has been uploaded into the NPRR tool. For further details, please refer to the Smart reports on conservation efforts from the project scouts
2. Evidence link 2025_M12\AENOR_first_round_of_findings\Supporting_Documentation\CL ID. 05
3. As stated in the NPRR tool The project is being implemented on private land with a 99 years lease, signed in 2011, and the project proponent has a long term carbon rights agreement in place with the title deed holder. The contractual agreement is for a 30 years' project. Activities will be carried out initially for 30 years. Title Deeds has been provided already as part of the supporting evidence. Please check the following path
4. 2025_M12\LZRP_M12_AppendixG_NonPermRisk\NPRR_supporting_docs\04_Opportunity-Cost
5. Similar to the finding above as stressed in the NPRR tool The project is being implemented on private land with a 99 years lease, signed in 2011, and the project proponent has a long term carbon rights agreement in place with the title deed holder. The contractual agreement is for a 30 years' project. Activities will be carried out initially for 30 years. A long term active adaptive management plan covering the project period is in place for LZRP and has been submitted to the Zambian Forestry Department and the Climate, Community and Biodiversity Alliance (CCBA). The long term financial plan has been submitted to a financial institution in Zambia, AMOCPA Certified Public Accountants in agreement with requirements of the VCS. Supporting evidence has been already provided in the following folder:
6. LZRP_M12_AppendixG_NonPermRisk\NPRR_supporting_docs\03_Financial Viability
7. Please refer to the response to Finding Number 2 along with the evidence provided. To clarify, the 99-year agreement is not with the project. The Project Proponent (PP) has a 30-year agreement with the private entity SABLE, which corresponds to the actual project lifetime of LZRP.
8. Please note that all surveys has been already shared in the following folder :
LZRP_M12_AppendixG_NonPermRisk\NPRR_supporting_docs\04_Opportunity-Cost
9. Please refer to the evidence highlighted in Finding Number 5. Additionally, the engagement trackers provided for the 2024 crediting period, along with the documented and verified direct

benefits resulting from 11 successful VCS verifications and 2 triple Gold, demonstrate a strong level of community acceptance and support for the project across all four zones.	
Documentation provided by the project proponent	
20241129_Meeting with HRH Bunda-Bunda and Chifita Village_LZRP_MC	
20241120_Assessing the status of the Bio-Bank in Mweshang`ombe village_LZRP	
VVB's evaluation	Date: 03/04/2025
1 Evidence provided and deemed correct. However, the updated NPR has not been shared with the VVB. 2. Evidence of a legally binding agreement to continue management practices that protect the credited carbon stocks over the duration of the project crediting period has been provided. 3. The VVB has already reviewed the evidence provided in the shared folder (LZRP_M12_AppendixG_NonPermRisk\NPRR_supporting_docs\03_Financial Viability). However, the VVB did not find the requested evidence: a management, financial and monitoring plan for the entire project longevity. Therefore, provide such evidence. 4. Explanation provided and deemed correct. Evidence of a legally binding agreement (30 years) to continue management practices that protect the credited carbon stocks over the duration of the project crediting period has been provided. 5. The VVB was no able to find among the evidence (surveys carried out (for example, 2017, 2018, 2022 and 2023)) in order to verify that the number of people depending on the project area is not increasing and that there is increased awareness among those that used to depend on the area for illegal activities; and certainly justify that more than 20 % of people rely on the project area have been consulted and are aware. Therefore, the PP should facilitate as much as possible the VVB review so that this item can be closed. 6. In this case, the VVB was able to find 2012 survey that revealed 95% of households in the area agreed to the LZRP implementation, and the 2017 survey that revealed 91% of interviewers were aware of the project's protection and 96% supported it. Therefore, CL 06 is not closed.	
Project proponent's response	Date: 10/04/2025

1. NPRR updated version can be found in folder \2025_M12\AENOR_Second_Round_of_Findings\NC_CAR#4 3. As requested additional documentation has been included in regards financial plan, management and monitoring plan. Supporting documentation can be found in folder. 2025_M12\AENOR_Second_Round_of_Findings\CL#6. Kindly note that the same information has been used to obtain CCB x3 gold last year as well as the VCS MR11 verification. 5. The IPS survey data from 2017 to 2022, shared with the VV, clearly demonstrates that more than 20% of people still rely on the project area. This trend was also observed during audit field verifications and community engagement meetings. Furthermore, as stated by the VV in point 6, the 2017 survey revealed that 91% of respondents were aware of the project's protective role, and 96% supported it. An additional IPS survey conducted in 2024 shows continued support, with 84% of respondents expressing acceptance of the project (see page 54). Moreover, the project has been running for over 12 years, with 11 successful verifications, including two CCB Triple Gold validations. Monthly meetings are held across the four zones involved in the project, regularly drawing thousands of participants. Communities have received tangible benefits from the project, amounting to over USD 2,000,000. Finally please note that within VERRA's regulation does not specify that yearly survey must be conducted in this regard. That being said a baseline reassessment is schedule for the year 2029 as per the validated PD. Over that period it is expected to certify the figures above.	
Documentation provided by the project proponent	
20170505_LZRP_EnvironManPlan_Final_signed LZRP Financial Break Even Model_Financial_Plan 17022023_CCB_LZRP_Biodiversity Monitoring Information Sharing to Communities 17022023_CCB_LZRP_Climate_ Monitoring Plan 17022023_CCB_LZRP_Community Monitoring Plan 5 2024_IPS_LZRP_BCP_FINAL_Draft_19March2025	
VVB's evaluation	Date: 09/05/2025

1 The PP has updated the NPR and notes. However, NPR report states 51,072 tCO2e to be deposited in the Afolu buffer account, that does not match with the statement both in Section 1.1 and 5.4 of the MR (51,135 tCO2e). Item still open. X

3. Management, financial and monitoring plans have been shared to the audit team. item closed.

5. The VVB has provided evidence to justify community perceptions and household income from participation in BCP REDD+ project. Item closed.

Therefore, CL 06 is not closed.

Project proponent's response

Date: 11/05/2025

The NPRT has been updated and buffer figure corrected. The updated report can be found in folder \2025_M12\AENOR_Third_Round_of_Findings

Documentation provided by the project proponent

1. AFOLU_NPRT_Notes_1202

2. VCS_NPR_REP_1202_1_1_2024_12_31_2024

VVB's evaluation

Date: 16/05/2025

1 The PP has shared project documentation and the VVB deeded it correct. Item closed.

Therefore, CL 06 is closed.

CL ID

07

Date: 07/03/2025

CL description

After NPR review, please provide the following evidence:

Natural Risk: historic natural risk (FIRE: F):

1. Provide evidence to demonstrate the likelihood of a natural fire is every 100 years or less frequency or risk is not applicable to the project area. In AENOR opinion the rating is not correct as in the previous verification the likelihood of a natural fire was every 10 to less than 25 years, being insignificant to carbon stocks. Please demonstrate the current situation is totally different to 2023 or correct the historical likelihood accordingly.
2. Please, provide evidence to demonstrate the prevention measures undertaken by the PP (fire management system on Rufunsa Conservancy and also technical training for sustainable agricultural activities and maintaining forest cover and reduce deforestation pressure on forests in the project area.). Also, evidence that BCP also encourages fuel-reducing seasonal bio-enterprises, such as the harvest of thatch or grass from within Rufunsa Conservancy by women's groups for urban markets).

Natural Risk: Future climate impact:

3. Provide evidence to justify the extreme heat (does not apply) will not have future climate impact to the project.
4. According to the instructions for completing the NPR: To meet each adaptive capacity criterion the project proponent shall answer all interpretation questions and provide supporting evidence. The PP did not send any supporting evidence for each adaptive capacity criterion: variety, learning capacity, leadership, resources, fair governance and innovation.

Project proponent's response

Date: 14/03/2025

1. Effectively has been an error from the PP. The likelihood of natural fires remains between 10 to less than 25 years as stated in previous verifications. The NPRT tool has been corrected. Kindly additional information below:

Fire is a natural phenomenon in all the higher rainfall African savannahs and is essential for the maintenance of the ecosystem, however, most fires are anthropogenic in origin and natural fires caused by lightning strikes are estimated to contribute to as little as 10 % of fires (Trollope 1993). Studies on fire impacts in African savannahs generally don't distinguish between the impacts of anthropogenic and natural fires, thus the literature review below discussing the impacts of fire should be read in the context that natural fires make up as little as 10 % of fires.

Furthermore, fire is a vital, accepted management tool in southern African savannahs (Bond & Archibald 2003) and is strongly controlled by environmental factors such as rainfall and grass fuel load, often more so than human influence (Archibald et al. 2009). In fact, in southern African savannahs with rainfall below 1000 mm, such as is the case for the Lower Zambezi REDD+ project, rainfall limits tree cover and not fire (Staver et al. 2011a). It is only at higher rainfall that fire differentiates between savannah and forest (Staver et al. 2011b).

Fire does thus not significantly alter tree cover or above ground tree carbon stocks in southern African savannah (including miombo) ecosystems. A large-scale study spanning 40 years in four different savannah types (rainfall range 447-737 mm/yr) found that fire frequency, season and complete fire exclusion did not influence tree density (Higgins et al. 2007). Similarly, in a miombo system in Zambia, Chidumayo (1988) found little structural response from the tree stratum after 29 years of fire exclusion.

Fire cannot be completely excluded from the conservancy as doing so would lead to the complete loss of the grass sward, and would thus adversely impact the biodiversity through the loss of many grass species and large herbivores, as well as an entire suite of acridids (Prendini et al. 1996) and other insects. A remote sensing fire incidence study spanning eight years (Archibald et al. 2010) found that 33 % of Zambian uncultivated Savannah Woodlands (such as Rufunsa Conservancy) with a median fire return interval of 2.2 years with a peak of fires in August. It can therefore be assumed that this high frequency of fires has been occurring for some time. In spite of the frequency of this fire regime, the woodlands on Rufunsa Conservancy have remained intact since at least 1984, as can be observed from Landsat images used in the Cumulative Deforestation Model, indicating that fires are most likely of a low intensity.

Extrapolating over a 100 years, there could thus possibly be 45 fires of which approximately 5 could be of natural origin. As no data is available on the intensity of fires, or reliable data for more than 20 years on frequency, the VCS Non-Permanence Risk guidelines will be followed and it is assumed that some of the five natural fires occurring within a 100-year period may well be intense. This is not unlikely as thunderstorms only start at the end of the dry season which have conditions conducive to high intensity fires as opposed to cool fires early in the dry season. Mapaure (2013a) found a stem mortality rate of only 4 % in late burnt, un-thinned miombo treatment plots. Chidumayo (1997) states that in old growth such as those found in the project area, there is little to be achieved by fire control and in his re-analysis of the 11 year Ndola fire trials in Zambia (Trapnell 1959) that in the case of annual consecutive late season fires the mortality of trees is 1.58 %. If the average of these studies is taken then the impact is 6% and if such an event then occurred across 33 % of the project area it could potentially impact 0.02 % of carbon stocks. Based on this, the likelihood of a natural fire is every 10-25 years affecting less than 5 % of carbon stocks.

In order to mitigate fire risks, BCP runs a fire management system on Rufunsa Conservancy, in partnership with neighbouring communities, with the specific aim of preventing potentially damaging, hot, late season fires. Fire management is done through introducing a system of firebreaks and controlled, rotational early burns. BCP also encourages fuel-reducing seasonal bio-enterprises, such as the harvest of thatch or grass from within Rufunsa Conservancy by women's groups for urban markets. Access to these markets would be using BCP's 'community truck' that is used in the eco-charcoal and farming value chain businesses. BCP monitors fire hot spots detected by VIIRS and MODIS satellites and beginning 2020 BCP is targeting an annual 20 % reduction in the number of late dry season fires.

Archibald, S., D. P. Roy, B. W. Van Wilgen, and R. J. Scholes. 2009. What limits fire? An examination of drivers of burnt area in Southern Africa. *Global Change Biology* 15:613-630.

Archibald, S., R. J. Scholes, D. P. Roy, G. Roberts, and L. Boschetti. 2010. Southern African fire regimes as revealed by remote sensing. *International Journal of Wildland Fire* 19:861-878. Available: <http://www.unicef.org/infobycountry/>.

Bond, W. J. and S. Archibald. 2003. Confronting complexity: fire policy choices in South African savannah parks. *International Journal of Wildland Fire* 12:381-389.

Chidumayo, E. N. 1997. *Miombo ecology and management: an introduction*. Stockholm, Stockholm Environmental Institute.

Chidumayo, E. N. 1988. A re-assessment of effects of fire on miombo regeneration in the Zambian Copperbelt. *Journal of Tropical Ecology* 4:361-372.

Higgins, S. I., W. J. Bond, E. C. February, A. Bronn, D. I. W. Euston-Brown, B. Enslin, N. Govender, L. Rademan, S. O'Regan, A. L. F. Potgieter, S. Scheiter, R. Sowry, L. Trollope, and W. S. W. Trollope. 2007. Effects of four decades of fire manipulation on woody vegetation structure in savannah. *Ecology* 88:1119-1125.

Mapaure, I. 2013a. Short-term responses of shrub layer communities to dry season fires and tree thinning in semi-arid miombo woodlands of north-western Zimbabwe. *Afr. J. Plant Sci.* 7(9): 414-425

Mapaure, I. 2013b. A preliminary simulation model of individual and synergistic impacts of elephants and fire on the structure of semi-arid miombo woodlands in northwestern Zimbabwe. *Journal of Environmental Microbiology* 1(1): 76-93.

Ribeiro, N, Herman H. Shugart, H.H, and Washington-Allen, R.A. (2008). The effects of fire and elephants on species composition and structure of the Niassa Reserve, Northern Mozambique. *Forest Ecology and Management* 255(5):1626-1636.

Staver, A. C., S. Archibald, and S. Levin. 2011a. Tree cover in sub-Saharan Africa: Rainfall and fire constrain forest and savannah as alternative stable states. *Ecology* 92:1063-1072.

Staver, A. C., S. Archibald, and S. A. Levin. 2011b. The global extent and determinants of savannah and forest as alternative biome states. *Science* 334:230-232.

Trapnell, C. G. 1959. Ecological Results of Woodland and Burning Experiments in Northern Rhodesia. *Journal of Ecology* 47(1): 129-168.

Trollope, W.S.W., 1993. Fire regime of the Kruger National Park for the period 1980 – 1992. *Koedoe*, 36, 2: 45-52.

2. Please note that evidence regarding conversation efforts through patrols, sustainable farming has been already provided in the following folders:

Conservation efforts:

2025_M12\LZRP_M12_AppendixJ_ImplementationStatusSupportDocs

Conservation farming

\2025_M12\LZRP_M12_AppendixJ_ImplementationStatusSupportDocs\Conservation Farming

Additional evidence in regards to fire management through sensitization meetings has been provided in the following folder:

2025_M12\AENOR_first_round_of_findings\Supporting_Documentation\CL ID. 04

3. Additional narrative as well as reference has been included in the NPRT “*Miombo woodlands in Zambia are relatively resilient to environmental stresses such as extreme heat and drought due to several adaptive traits. Many Miombo species have deep root systems capable of accessing moisture from deeper soil layers, allowing them to survive extended dry periods. Additionally, these trees are predominantly deciduous, shedding their leaves during the dry season to reduce water loss through transpiration. The ecosystem's adaptation to frequent fires is another key resilience factor, with many species possessing thick bark or the ability to resprout after being burned*”

FAO. (2022). *Resilience of Miombo woodlands to climatic stressors*. Food and Agriculture Organization of the United Nations. Retrieved from [FAO Open Knowledge Repository](#)

Mwakalukwa, E. (2020). *Climate change impacts on Miombo woodlands: Species distribution and resilience*. *PubMed Central*. Retrieved from [PubMed](#)

Smith, J. (2014). *Human-induced degradation of Miombo woodlands: Charcoal production and agricultural expansion*. *White Rose eTheses Online*. Retrieved from White Rose eTheses

4. As requested supporting evidence has been provided for the capacity criterion. Please note that room for change has not been addressed in the NPRT. In addition, some evidence that reflects capacity criterion has been already shared as part of our supporting documentation (e.g. climate smart trainings, deforestation SOP, etc).

Documentation provided by the project proponent	
20240517_Sunta Oil Expeller finanancial report meeting_SM_FIRE 20240524_Savior Savings group meeting_SM_FIRE 20240529_Kantyatya project committees Meeting_SM_FIRE Fire Management Plan SOP Rufunsa Site Fire Management Plan The_National_Policy_on_Environment-2008Zambia_NPE_2008.pdf NDC Implementation Framework for Zambia - 2023 Zambia Climate Change Response Strategy-2010 National-Policy-on-Climate-Change-2016_2 National-Parks-and-Wildlife-Policy-7-2018 20190715_LCFP_PD draft National Forestry Policy-2009 2020 CV2 Nicholas Mudaly Besa_CV Charles_CV Marius_CV HR_P011_Inspiration Fund Policy CV_2024_Da_Ponte	
VVB's evaluation	Date: 03/04/2025

1. The information is deemed correct. The PP has changed the historical likelihood of a natural fire (once every 10 to less than 25 years). However, the updated NPRR has not been shared to the VVB. Provide such evidence.
2. Fire management system on Rufunsa Conservancy has been provided. Technical training in sustainable agricultural activities and maintaining forest cover and reducing deforestation pressure on forests in the project area have also been provided.
3. The information is deemed correct and the evidence as well. However, the PP shall share the updated NPR with the VVB.
4. The VVB was not able to find evidence that supports the adaptive capacity criterion: fair governance and innovation.

Therefore, CL ID 07 is not closed.

Project proponent's response

Date: 10/04/2025

1. The NPRR has been updated and provided as supporting documentation in folder \2025_M12\AENOR_Second_Round_of_Findings\NC_CAR#4

3. The NPRR has been updated and provided as supporting documentation in folder \2025_M12\AENOR_Second_Round_of_Findings\NC_CAR#4

4. To demonstrate innovation, the project has provided the document titled “Manual Deforestation SOP”, which showcases the use of state-of-the-art satellite imagery to detect deforestation. In addition, the project submitted the “Inspiration Fund Policy”, which supports BCP employees in pursuing higher education to enhance their technical capabilities. Lastly, the project has been promoting Climate-Smart Agriculture (CSA) techniques among lead farmers, which have demonstrated higher yields compared to conventional farming practices.

On the other hand the project demonstrates fair governance (defined as per the NPRR as i) Evidence of policies, practices, and behaviors that address climate change effectively; (ii) Availability of accountability procedures to implement climate change orientated-actions) as follows:

Climate Change Addressing Policies, Practices, and Behaviors:

- National & Local Policies: The project aligns with Zambia’s NDCs under the Paris Agreement, REDD+ framework, and the National Climate Change Policy (NCCP), aiming at reducing deforestation and promoting sustainable land use.
- On-the-Ground Practices: Key initiatives include sustainable agriculture (e.g. CSA), forest conservation (e.g., REDD+), and community-based resource management.
- Behavioral Changes: Local communities have shifted to sustainable practices like reduced slash-and-burn farming, with a focus on empowering women and youth in climate-smart activities (CSA and sensitization meetings).

Accountability Procedures:

- Monitoring & Reporting: The project undergoes **independent audits**, uses satellite imagery for carbon monitoring, and engages local stakeholders in progress reviews.
- Grievance Mechanism: A system is in place for addressing concerns from local communities.
- Technology Use: Mobile apps and remote sensing technologies enable real-time data collection and monitoring of deforestation and land use.

Finally, please note that all the above has been included into the NPRR. Supporting documentation can be found across all the supporting evidence previously provided (e.g. grievance mechanism, CSA farming, engagement meetings)

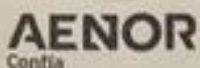
Documentation provided by the project proponent

4. - 20240305_Manual_Deforestation_Mapping_V2 - HR_P011_Inspiration Fund Policy	
VVB's evaluation	Date: 09/05/2025
1. The PP has updated the NPR and notes. However, NPR report states 51,072 tCO2e to be deposited in the Afolu buffer account, that does not match with the statement both in Section 1.1 and 5.4 of the MR (51,135 tCO2e). Item still open. X 3. This is the same assessment than above mentioned. Item still open. X 4. The PP has sent evidence that supports the adaptive capacity criterion: fair governance and innovation. Item closed. Therefore, CL ID 07 is not closed.	
Project proponent's response	Date: DD/MM/YYYY
<i>The NPRT has been updated and buffer figure corrected. The updated report can be found in folder 2025_M12 AENOR_Third_Round_of_Findings</i>	
Documentation provided by the project proponent	
1. AFOLU_NPRT_Notes_1202 2. VCS_NPR_REP_1202_1_1_2024_12_31_2024	
VVB's evaluation	Date: 16/05/2025
1. The PP has provided the updated evidence and now is considered correct. Item closed. 3. Ok. Item closed. Therefore, CL ID 07 is closed.	

Forward Action Requests (FARs)

APPENDIX 4: ATTENDANCE SHEET

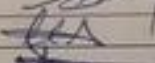
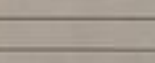
[illegible]



HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre, verdadera y de la mejor manera posible de acuerdo a mis habilidades y conocimientos. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas. Autorizo consentimiento para compartir esta información en el reporte del equipo auditor, que será público.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties. I authorize consent to share this information in the audit team's report, which will be public.

Lugar-Location	Chingango BCP Office		
Partes entrevistadas Parties interviewed	BCP staff for closing Meeting		
Fecha-Date	1/2/2025		
Equipo Auditor Auditor Team	D. Masika & M. Mygica		
Nombre Name	Empresa-Comunidad-Organización Company-Community-Organization	Rol-Oficio Role-Job	Firma-Huella Signature-Fingerprint
KALINDA BETA	BCP	PCA	
CHRISTOPHER GARCIA	BCP	TA	
Masika David	BCP	SM	
KENNY SIKUYA	BCP	SAO	
MARTA MYGICA	AENOR	Auditor	
Daniel Masika	AENOR	Auditor	

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre, verdadera y de la mejor manera posible de acuerdo a mis habilidades y conocimientos. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas. Autorizo consentimiento para compartir esta información en el reporte del equipo auditor, que será público.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties. I authorize consent to share this information in the audit team's report, which will be public.

Lugar-Location	Nyamukao Village			
Partes entrevistadas Parties interviewed	Chilimba Cooperatives & VSLA			
Fecha-Date	11/3/2020			
Equipo Auditor Auditor Team	D. Mosika & M. Mugica			
Nombre Name	Empresa-Comunidad-Organización Company-Community-Organization	Rol-Oficio Role-Job	Firma-Huella Signature-Fingerprint	
1. Sumbizi Imperato	CHILIMBA MACS	SECRETARY	[Signature]	
2. Samafela Gphat	" "	CHAIRMAN	[Signature]	
3. Mphahlele Seneke	" "	TREASURER	[Signature]	
4. Mphahlele Tshame	" "	MEMBER	[Signature]	
5. Ngwenyane Seneke	" "	MEMBER	[Signature]	
6. Mphahlele Tshame	" "	MEMBER	[Signature]	
7. Kagotho Christopher	VILLAGE BANKING	SECRETARY	[Signature]	
8. Michelo Ebert	" "	MEMBER	[Signature]	
9. Mphahlele Isaac	" "	MEMBER	[Signature]	
10. Samafela Enedy	" "	MEMBER	[Signature]	
11. Sumbizi Felby	" "	MEMBER	[Signature]	
12. Kagotho Bethe	" "	MEMBER	[Signature]	
13. Mphahlele Prisca	" "	MEMBER	[Signature]	
14. Mphahlele Lydia	" "	MEMBER	[Signature]	
15. Mphahlele Enedy	" "	CHAIR LADY	[Signature]	
16. Michelo Mavis	" "	MEMBER	[Signature]	
17. Samafela neta	" "	MEMBER	[Signature]	
18. Phiri Margie	" "	MEMBER	[Signature]	

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre, verdadera y de la mejor manera posible de acuerdo a mis habilidades y conocimientos. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas. Autorizo consentidamente para compartir esta información en el reporte del equipo auditor, que será público.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties. I authorize consent to share this information in the audit team's report, which will be public.

[illegible]

AENOR
Confia

PROJECT: BCP-L22P-MP120

MEETING TOPIC: Stakeholder engagement

LOCATION: Chilumba

DATE: 28/2/2025

ATTENDANCE LIST

No	NAME & SURNAME	ROLE/PROFESSION/STAKEHOLDER GROUP	COMMUNITY	SIGNATURE
	HANKEKE MERCY	SPONTI HEAD	CHILIMBA	M.H. Ke
	CHIKONELA MADRINE	TEACHER	CHILIMBA	M.H. Ke
	CHIRWA MACKAY	TEACHER	CHILIMBA	M.H. Ke
	CHILEMU KARUTI	SENIOR TEACHER	CHILIMBA	M.H. Ke
	EDDY PHIRI	TEACHER	CHILIMBA	for E. PHIRI
	Gerald Mampatanga	Bellive Farmer	Kasumba	ag
	Khadiza Phiri	Lead Farmer	Chikoloma	K. Phiri

AENOR			ATTENDANCE LIST	
PROJECT: BCP-LZRP MAIZ			LOCATION: Namanange	
MEETING TOPIC: Cooperatives engagement			DATE: 28/2/2025	
No	NAME & SURNAME	ROLE/PROFESSION/STAKEHOLDER GROUP	COMMUNITY	SIGNATURE
	ACKLO NEHAMANENYA	CHAIR PERSON	CHAKANDA MPC	[Signature]
	KES MWEEMBA	VICE CHAIRPERSON	CHAKANDA MPC	[Signature]
	ABRAHAM NISIMUKO	SECRETARY	CHAKANDA MPC	[Signature]
	MERCY Zulu	TREASURER	CHAKANDA MPC	[Signature]
	Lester SAKALA	Lead farmer	chundu	[Signature]
		Tuckokeke Savings Group		
	RUTH TEMBO	Chair LACD	KANYETU	[Signature]
	HARRIET TALAKINO	CM	KANYETU	[Signature]
	DISIER KARUSA	CM	KANYETU	[Signature]
	ETHEL BANDA	CM	KANYETU	S. BANDA
	BENEDICT DAKA	HEAD WOMAN	KANYETU	
	CLEMENT TEMBO	C. M	KANYETU	C. Tembo
	BAINT MUNDENDI	C. M	KANYETU	[Signature]
	DATRICK TEMBO	C. M	KANYETU	[Signature]
	BRIGHTSON MUMBA	VILLAGE SECRETARY	KANYETU	B. Mumba

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AENOR			ATTENDANCE LIST	
PROJECT: BCP - LTRP MR12			LOCATION: Mueshaangombe Bachelo	
MEETING TOPIC: Stakeholders Engagement Bachelo rehabilitation			DATE: 27/2/25	
No	NAME & SURNAME	ROLE/PROFESSION/STAKEHOLDER GROUP	COMMUNITY	SIGNATURE
1	Elisver Muchimbo	Chair	mueshaangombe	E. Muchimbo
2	Asnes Susu	member	mueshaangombe	SUS
3	Rechel Mubwade	member	mueshaangombe	R. M
4	Coro Mubwaza	member	mueshaangombe	C. Mubwaza
5	Tereth Mubwaza	member	mueshaangombe	T. M
6	John Mwaaga	"	mueshaangombe	J. Mwaaga
7	Suzen Futilo	"	mueshaangombe	S. F
<u>Beehive owners</u>				
	Philimon Nyamundale	Beehive owner	mueshaangombe	P. N
	Jetham Chiyakamba	Beehive farmer	MWASHANGOMBE	J. Chiyakamba

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