

ISANGI REDD+ PROJECT VCS CCB VERIF 14



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Summary:

This is a Final Verification Audit Report of Jadora LLC's Isangi REDD+ project in the Democratic Republic of Congo. The verification report purpose is to provide a systematic way of identifying conformance to the VCS and CCB Standards as well as areas of non-conformance and observations. This audit occurred as part of a concurrent validation and verification audit.

The VCS Standard Version 3 and the CCB Standards 2nd Edition, along with the VCS VM0006 v2.1 methodology are the relevant criteria used for this evaluation. The method is desk based and field based. A prevalidation report was conducted in the weeks prior to the field audit, which served to identify areas of potential non-conformance and to guide the audit and sampling plan. The field audit was conducted from April 20-May 1 and involved 4 full days at the project site, along with several days in Kinshasa and Kisangani conducting interviews of key informants, government agencies, and other stakeholders. The audit was combined with a VCS and CCB validation audit for which a separate validation report will be issued. Given the large scope of the audit, two Rainforest Alliance senior auditors were assigned to the audit, along with a Rainforest Alliance auditor, and a local consultant and content expert.

Twenty two nonconformances (NCRs) were identified during the field audit and the subsequent desk review, along with eleven observations. Several areas of full conformance to the VCS or CCB Standards were observed during the field audit and initial documentation stage.

The Isangi REDD+ Project provided sufficient evidence of corrective actions and corrective action implementation following the Draft Verification Report. This evidence was sufficient to close all open NCRs and observations. Please see Appendix 1 for detailed descriptions of all non-conformances and observations.

The audit team has determined positive conformance to the VCS Version 3 and CCB Standards 2nd Edition based on the Monitoring and Implementation report version 2.2 from 19 November 2014 (file: Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2). The audit team has determined that 1,391,623 VCUs were created during the current monitoring period which dates from 12 September 2009-31 December 2013.

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1 INTRODUCTION

Rainforest Alliance certification and auditing services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation decisions are under the purview of the RA-Cert Division, hereafter referred to as Rainforest Alliance or RA. Rainforest Alliance is an ANSI ISO 14065:2007 accredited validation and verification body; additionally, Rainforest Alliance is a member of the Climate, Community, and Biodiversity Alliance (CCBA) standards, and an approved verification body with a number of other forest carbon project standards. For a complete list of the services provided by the Rainforest Alliance, see http://www.rainforest-alliance.org/climate.cfm?id=international_standards.

Dispute resolution: If Rainforest Alliance clients encounter organizations or individuals having concerns or comments about Rainforest Alliance and our services, these parties are strongly encouraged to contact the local Rainforest Alliance regional office or the RA-Cert Division headquarters directly. Formal complaints or concerns should be sent in writing.

1.1 Objective

The purpose of this report is to document the conformance of the Isangi REDD+ Project with the requirements of the Verified Carbon Standard Version 3 and the Climate, Community, and Biodiversity Standards, Second Edition. This verification audit evaluates conformance of the project implementation to the validated PD and VCS and CCB Standards. The project was developed by Jadora, LLC, hereafter referred to as "Project Proponent". The report presents the findings of qualified Rainforest Alliance auditors who have evaluated the Project Proponent's systems and performance against the applicable standard(s).

1.2 Scope and Criteria

Scope: The scope of the audit is to assess the conformance of the Isangi REDD+ Project in the Democratic Republic of Congo against the Verified Carbon Standard and the Climate, Community, and Biodiversity Standards, Second Edition. The objectives of this audit included an assessment of the project's conformance with the standard criteria for validation. The project covers an area of 187,571 hectares. The land is government owned land leased to a private concession. The project has a lifetime of 30years, and estimates 1,699,905 tCO₂e of ex post emissions reductions over the course of the monitoring period. The ex post VCUs claimed during the monitoring period are 1,391,623. The monitoring period is from September 12, 2009 through December 31, 2013.

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

- Verified Carbon Standard Program Guide Version 3.5;
- Verified Carbon Standard Version 3.4;
- Verified Carbon Standard AFOLU Requirements Version 3.4;
- Verified Carbon Standard AFOLU Non-Permanence Risk Tool Version 3.2;
- Verified Carbon Standard Program Updates
- VCS VM0006 v2.1
- Climate Community and Biodiversity Standards, Second Edition

Materiality: The Isangi REDD Project *ex ante* estimates that it will produce over 300,000tCO₂e in reductions per year, hence it is a VCS Large Project and subject to a 1% materiality threshold.

1.3 Level of assurance

The assessment was conducted to provide an indication of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement indicates that the project documentation addresses all the required components of the relevant standards, and is materially correct. The audit is conducted to a reasonable level of assurance.

1.4 Summary Description of the Project

Jadora LLC (Jadora) develops carbon offset projects to conserve and enrich environments around the world. Jadora's projects provide socio-economic opportunities for impoverished peoples while mitigating the effects of global climate change. Jadora and Saffois, Ltd have

reached a formal agreement to develop carbon offsets on a 348,000 ha logging concession that Safbois leases from the Congolese government. A significant portion of this concession has been determined to be a prime area for a REDD+ project. The original Safbois concession consists of **two sections, a large concession (252,000 ha) just south of the Congo River near the town of Isangi and** a smaller, adjacent concession (96,000 ha) to the south.

The REDD+ project area contains one parcel of forest spanning both concessions totaling 187,571 ha. Active deforestation is occurring on three sides adjacent to the exterior boundaries of the project area. The coordinate centroid of the project area is 0° 24' N, 23° 55' E. The official name of the project is the Isangi REDD+ project.

The primary climate objective of the Jadora-Isangi REDD+ project is to address the issue of deforestation in the DRC on a local level, preventing emissions that would otherwise occur from the conversion of forest to areas for subsistence agriculture. The project's biodiversity and community objectives are to protect a threatened, biologically diverse forest with thousands of rare and declining species while improving the livelihoods of the area's forest-dependent people. A more detailed description of the project's climate, community, and biodiversity objectives can be seen in Section 1.1.1 below.

This Monitoring and Implementation Report (MIR) has been prepared by Jadora to demonstrate monitoring and implementation results from the project's first crediting and implementation period from the Isangi REDD+ Project. These results include the net greenhouse gas (GHG) emissions reductions and net positive community and biodiversity impacts resulting from project activities conducted during the first monitoring period (see Section 1.6 below). The project was validated under the Verified Carbon Standard (VCS) and the Climate, Community and Biodiversity Alliance (CCBA) by Rainforest Alliance on 6 September, 2014.

2 VALIDATION PROCESS, FINDINGS AND CONCLUSION

2.1 Validation Process

This verification audit is occurring concurrently with a validation audit. The related validation Draft Report (Jadora VCS valid 14) identified multiple non-conformances which shall be closed before the verification report can be finalized.

Provide the following:

- *Method and Criteria: Describe the method and criteria, including the sampling plan, used for undertaking the validation.*

The validation audit combined desk audit and field audit techniques. A pre-validation audit was initially conducted in April 2014 to determine whether the proponent was prepared for a field audit. The result of the pre-validation audit was that the field audit was scheduled. The pre-validation also serves to guide the sampling plan by identifying potential areas of non-conformance or discrepancies. The sampling plan utilized a combination of direct observation, stakeholder interviews, and field-based measurements. A risk-based sampling approach was used in which areas of potential non-conformance or material discrepancies were afforded higher sampling intensity. The audit team included two Rainforest Alliance Senior Auditors, as well as a regional forest governance expert based in Cameroon, and a local expert used for cultural and linguistic interpretation and guidance. An additional external expert consultant contributed to evaluation of the geospatial analyses conducted by the proponent.

Auditor team names and positions	Auditor qualifications
Campbell Moore	Campbell is a tropical forestry and REDD+ expert with international professional experience in Africa, Central America, South America and

	Southeast Asia. He is Carbon Expert with Rainforest Alliance where he conducts audits against six forest carbon standards, supervises methodology assessments, and acts as technical expert on carbon for RA-Cert globally. Campbell has experience on both the technical and policy sides of REDD+. Previous professional experience includes consulting work for GIZ Philippines performing carbon stock assessments of different forest types including agroforestry and plantation systems, as well as work centered on reforestation in Sri Lanka for the Environmental Leadership and Training Initiative. He additionally has worked for Climate Focus on LULUCF policy issues. From 2009-2011 Campbell pursued his Master of Forestry from the Yale University School of Forestry and Environmental Studies. This period included a variety of forestry projects including developing a management plan for Connecticut forest preserve, planning timber sales in a New England hardwood forest, and designing and modeling carbon sequestration potential of agroforestry systems for the Nature Conservancy's Global Climate Team. Prior to his time at Yale, Campbell worked in The Gambia for over two years as a Peace Corps Volunteer designing and implementing a wide variety of forestry, agroforestry, and agricultural projects. In addition to his Master of Forestry degree, he holds a M.A. in Environmental Studies from St. Mary's College. Campbell is fluent in Pulaar and Wolof and has experience with Spanish.
Ian Starr	Ian is a forester and resource manager with personal and professional experience in North America, Central and South America, and Africa with an emphasis on REDD+ projects. He currently serves as the Climate Technical Specialist for the Rainforest Alliance's Climate Program. To date he has participated in auditing or advising on over a dozen forest carbon offset projects in Africa and South America either designed for the voluntary markets or as development projects. Ian also conducts trainings on the voluntary carbon standards and provides technical expertise to other Rainforest Alliance departments and projects. In addition he has collaborated on a variety of forestry and natural resource management projects in both Amazonia, and the temperate hardwood forests of the Northeastern United States. These projects have included modeling the carbon sequestration potential of various reforestation systems as well as designing and participating in several forest inventories in the northern United States to plan timber sales based on natural regeneration. Ian received his Masters degree in Forestry from the Yale School of Forestry and Environmental Studies with a focus on tropical forest and resource management, and received his B.A. from Colgate University where he concentrated in Native American Studies with a focus on Central and South America. He is fluent in Spanish and Portuguese.
Achille Djeagou	Achille Djeagou is a Forest legality and Chain of Custody assessor. He has now worked in forestry concessions assessments, as an auditor instructor and forest policy analyst to link with international timber trade in the Congo basin and West African countries for more than ten years. His career to date has taken him to work with forest management companies, government agencies, processors, specialized researchers, local communities, national and international NGOs. Achille has a distinguished academic background combining a Bsc. in Information system management and a post graduate diploma in international environmental law, with key experiences in the timber industry and professional qualifications in forest auditing, GIS & remote sensing applications, climate change diplomacy, GHG accounting and sound strategic thinking.
Leon Muba (translator/	Local expert for cultural and linguistic translation.

local expert)	
Nick Wilson (content specialist) Remote Sensing and Geospatial expert	Nick is a remote sensing and spatial analysis expert who has worked a range of domestic and international projects focused on land cover and land use change issues. He provides technical expertise to the Rainforest Alliance on REDD+ project conformance to VCS methodologies, accuracy assessment, and remote sensing. He is also a lead developer of the UrbanFootprint Scenario Planning Model, an open-source modelling platform for assessing the impact of future land use and policy decisions. As a lead analyst on the Vision California project he helped develop long range, high resolution land use scenarios for the State of California. Nick has also worked extensively with the Idrisi Land Change Modeler, a common land cover model used for assessing REDD+ baselines. His field experience includes nearly 3 years as a Peace Core Volunteer in the West African nation of The Gambia where he worked with the Gambian Forest Service and the National Beekeepers Association of the Gambia. He holds a Master's degree in Geography from Clark University and a Bachelor's degree in International Development and Anthropology from Dalhousie University.

- *Document Review: Describe how the validation was performed as an audit where the project description, monitoring & implementation report and any supporting documents were reviewed and compared with identified and stated requirements.*

The audit team was led by two Rainforest Alliance Senior Auditors, who are highly familiar with VCS and CCB requirements. The PD, MIR, all supporting annexes, and other documentation received as part of the audit were compared to the actual status of implementation on the ground as well as the VCS Standard v3.4, VCS AFOLU Requirements v3.4, VCS AFOLU Non-Permanence Risk Tool v3.2, relevant program updates, the VCS VM0006 v2.1 methodology, as well as the CCB Standards Second Edition.

- *Interviews: Describe the interview process and identify personnel, including their roles, that were interviewed and/or provided information additional to that provided in the project description and supporting documents.*

The audit team interviewed a wide range of stakeholders (please see 3.3 Interviews) including participating villages, village chiefs, employees of the proponent, the Governor of Orientale Province, representatives of MCENT, the proponent's lawyer, and other stakeholders and key informants.

- *Site Inspections: Describe the method and objectives for any on-site inspection performed.*

The audit team spent four full days at the audit field site. During this time the four person audit team split into teams of two to conduct a wide range of interviews and make direct observations. Project activities that were already implemented were observed by the audit team across the project area. Spatial domains (project area, leakage area) were confirmed via usage of GPS units. Direct measurement of forest carbon stocks was made throughout the single strata of the project area forest. Additionally, the proponent's forest inventory team was directly observed demonstrating inventory measurement procedures.

- *Public Comments: Describe how comments received during CCBA public comment period were addressed during the validation process.*

The CCB public comment period lasted from 21 March through 20 April 2014. Comments were received from a range of villages in the project zone, and were incorporated into the audit plan and sampling. The audit team was able to meet with several of the individuals that made the relevant comments.

- *Resolution of Any Material Discrepancy: Describe the process for the resolution of any material discrepancies (corrective actions, clarifications or other findings) raised by the validation team during the validation process.*

Material discrepancies and non-conformances have been identified through the issuance of nonconformity reports (NCRs) which the proponent shall provide evidence or response to sufficient for closure of such reports.

2.2 Validation Findings

2.2.1 Gap Validation

Identify, discuss and justify conclusions regarding the additional project description (and any supporting documents) produced in accordance with the VCS rules on participation under approved GHG programs.

This verification occurs as part of a concurrent validation and verification audit. A gap validation is not relevant.

2.2.2 Methodology Deviations

Identify, discuss and justify conclusions regarding any methodology deviations.

The proponent applied a single methodology deviation at validation regarding measurement of forest carbon stocks which is approved through the validation report (Jadora VCS valid 14), and which does not impact the verification audit as forest carbon stocks are not re-measured during

the monitoring period, but rather are appropriately considered to be static in areas unaffected by deforestation or degradation.

2.2.3 Project Description Deviations

Identify, discuss and justify conclusions regarding any project description deviations.

A single project description deviation has occurred which is that the proponent is conservatively omitting emissions reductions from soil carbon in this monitoring period due to a lack of available soil carbon data. The proponent intends to directly measure soil carbon in future monitoring periods as described in the validated PDD.

2.3 Validation Conclusion

Clearly state whether the project conforms with the validation criteria for projects, as set out in VCS Version 3 and CCB Standards Second Edition, and include any qualifications or limitations.

The Isangi REDD+ project was validated on 5 September 2014 having demonstrated full conformance with the VCS Version 3 and CCB Standards 2nd Edition. This validation audit occurred as part of a combined validation/verification audit.

3 VERIFICATION PROCESS

3.1 Method and Criteria

Describe the method and criteria, including the sampling plan, used for undertaking the verification.

As this was a concurrent validation and verification audit, the audit team economized its information gathering such that the description of the audit process provided in section 2.1 is representative of the strategy used to conduct the project verification. Please refer to this section for details.

3.2 Document Review

Reference Number	Document/File name
1	Annex A LULC Leakage Data MR 1 v1.3.xlsx
2	Annex B LULC Project Data MR 1 v1.4.xlsx
3	Annex C Ex-Post MR v1.1.xlsx
4	Annex F Appendix YY Jadora and Safbois Agreement.pdf
5	Annex H Implementation plan budget.xlsx
6	Annex AA LULC 2013-14.pdf
7	Annex D Participatory maps - Compressed.zip
8	Annex E Appendix XX Letter du Attestation.pdf
9	Annex G Isangi Implementation Plan v1.10.pdf
10	Annex I Project Activity Implementation Schedule v1.6.xlsx
11	Annex J FloralDiversityTreeSpecies v1.2.xlsx
12	Annex K Isangi Biodiversity Spreadsheet 1.xls
13	Annex L Standard Operating Procedure for

	Biodiversity Surveys.pdf
14	Annex M Standard Operating Procedure for Health and Safety for Working in the Forest v1.0.pdf
15	Annex N Appendix V Trained_Jadora_Staff_v1_02.pdf
16	Annex O Appendix I Community_Assessment_&_Consultation_v1_02.pdf
17	Annex P legalopinion_carbonrights_pt1and2_english.docx
18	Annex Q LULC 1994-95.pdf
19	Annex R LULC 2008-09.pdf
20	Annex S Isangi Community Map Original.png
21	Annex T Standard Operating Procedure for Forest Monitoring v1.0.pdf
22	Annex U Isangi A Faunal Observation Data 2011-2012 updated.xlsx
23	Annex V Summary of Community Consultation Meetings v1.1.xlsx
24	Annex W Participatory Rural Appraisal.pdf
25	Annex X WORK REPOR1.pdf
26	Annex X WORK REPOR2.pdf
27	Annex X WORK REPORT.pdf
28	Annex X Yafunga WORK REPORT.pdf
29	Annex Y Jadora Isangi REDD+ Project MIR Summary - english.pdf
30	Annex Y Jadora Isangi REDD+ Project MIR Summary - french.pdf
31	Annex Y Jadora Isangi REDD+ Project MIR Summary - lingala.pdf
32	Annex Z Jadora Isangi REDD+ Project PDD Summary - english.pdf
33	Annex Z Jadora Isangi REDD+ Project PDD Summary - french.pdf
34	Annex Z Jadora Isangi REDD+ Project PDD Summary - lingala.pdf

Please see Section 3.6 below for documentation that was reviewed in the process of evaluating corrective actions.

3.3 Interviews

The following interviews were conducted as part of the field audit.

Interviewee or Village Chief	Village or other Location	Date	Number of participants
Albert BONGILO, village chief ; Robert LITUWA, Baptist church pastor; Maurice DIBA , Primary school Headmaster	Yatwengo	24/4/2014	25

Kombozi Lisele, Village Chief	Yabetuta	24/4/2014	10
Joseph BOSIMO, village chief ; Léon YAHONDA KOMBOZI, teacher Chadrack LISOMANONGO, village wise man Yahula 2 village	Yabotetele	24/4/2014	15
LOLECHA IYONGA, village chief	Bolene	25/4/2014	20
General open meeting : Isangi AT, All project area village representative, students, journalist, priest	Isangi Office, Yafunga Village	25/4/2014	100
Philemon, Community Liason Manager, Isangi Project Manager	Yafunga	24/4/2014-28/4/2014	1
Bossalo Lobela Maurice, Former head of SAFBOIS Inventory Team	Yafunga	27/04/2014	1
Isangi Forest Inventory Team, multiple interviews	Yafunga, Project Area Forest	24/04/2014-28/04/2014	12
Lambert MATONGO MUHINA, Territorial administrator (AT) ; Jean Marcel BONGONDO, chief of post migration Joseph NGWANGWA, Chief of the chiefdoms KOMBE Guillaume MAYINGOLO, Sector chief Bambelota	Kombe	25/4/2014	8
Mafuta Mingi, cloth tailor, President Bokawa Mbela, housewife, secretary	Women's focus group in Yafunga	25/04/2014	2
Meeting with teachers of Mekiba II school	Yafunga	26/04/2014	6
Bosongo Yaweli François and other village wise men including women and children	Yabetuta, second visit	27/04/2014	11
Bamanisa Saidi Jean, Governor of Orientale Province	Governor's office, Kisangani	29/04/2014	5
José ILANGA LOFONGA, Director in charge of studies and planning (DEP) ; Frederick DJENGO BOSULU, Expert director, at the directorate of study and planning (DEP)	Ministry of environment, nature conservation and tourism (MECNT)	30/4/2014	7
Pierre OKENDEMBO MULAMBA, SAFBOIS Attorney	Attorney office(DIUMULA & OKENDEMBO Avocats associé), immeuble SIDISA-Gombe	30/04/2014	6

3.4 Site Inspections

The field audit was conducted at the following locations.

Location	Date
Kinshasa, DRC, Opening meeting, strategic interviews with project proponent	21 April-23 April 2014

Kisangani, DRC, strategic interviews and document review with project proponent	23 April 2014
Project Zone, Multiple Villages, Jadora Office and Headquarters	24 April - 27 April 2014
Kisangani, DRC, Office of Governor of Orientale Province	28 April-29 April 2014
Kinshasa, Ministry of Environment, Nature, Conservation and Tourism, (MCENT) Office	30 April 2014
Kinshasa, Office of Pierre OKENDEMBO MULAMBA, SAFBOIS Attorney	30 April 2014
Kinshasa, Grand Hotel, Multiple meetings with project proponent	30 April 2014

3.5 Public Comments

The CCB public comment period lasted from 21 March through 20 April 2014. Comments were received from a range of villages in the project zone, and were incorporated into the audit plan and sampling. The audit team was able to meet with several of the individuals that made the relevant comments. No other stakeholders provided comments.

3.6 Resolution of Any Material Discrepancy

Describe the process for the resolution of any material discrepancies (corrective actions, clarifications or other findings) raised by the verification team during the verification process.

Documents reviewed as part of the closure of nonconformances.

Reference Number	Document/File name
MIR	Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
1	Annex A, B, C VM0006 Accounting Isangi v6.1
2	Annex B LULC Project Data MR 1 v1.4.xlsx
3	Annex C Ex-Post MR v1.1.xlsx
4	Annex D Grievance Process Document v1.1, Isangi Grievance Log
5	Annex E Isangi Implementation Plan v1.10
6	Annex F Isangi REDD+ Non-Permanence Risk Report v1.7, 29 Aug 2014
7	Annex G Isangi Community Benefits Process v1.2
8	Annex H Net Revenue and Cashflow v1.5
9	Annex I AVIS Safbois2, Legal Opinion on Right of Use
10	Annex K Isangi Theory of Change Document v1.0
11	Annex L Weekly Reports December 2013
12	Annex M Visiting Student Records 2014_02_11_10_04_16
13	Annex N Faunal observations 2011, 2012 Human evidence in monitoring 2011, 2012
14	Annex O Isangi Faunal Observations Data 2011-2012
15	Annex P Community Agreements establishing

	community conset
16	Annex Q Isangi Community and Biodiversity Monitoring Indicators-Phase 1 v1.2
17	Annex R Standard Operating Procedures for Remote Sensing v1.0
18	Annex S Agreement establishing start date 20140819122538
19	Annex R LULC 2008-09.pdf
20	Annex T Ex-Post Project Area Map
21	Annex U Ex-Post Project Area LULC Map
22	Annex U Isangi A Faunal Observation Data 2011-2012 updated.xlsx
23	Annex V Ex-Post Leakage Area LULC Map
24	Annex W Isangi Project Area 4_1 v3
25	Annex X Isangi forest plot data V7 Dec 2011 v1.9
26	Annex Y Isangi Plot Locations
27	Annex Z Jadora Isangi REDD+ VCS CCB Project Description v3.0
28	Annex AA Isangi Policy Document 1.1
29	Annex AB Jadora and Saffois Agreement
30	Annex AC Isangi Implementation Plan v1.10
31	Annex AD Implementation plan budget v2.0
32	Annex AE Project Activity Implementation Schedule v1.6
33	Annex AF FloralDiversity Tree Species v1.2
34	Annex AG Isangi Biodiversity Spreadsheet 1
35	Annex AH Jadora Isangi Monitoring SOP v1.1
36	Annex AI SOP Health and Safety for Working in the Forest v1.0
37	Annex AJ Trained_Jadora_Staff_v1_02
38	Annex AK Isangi Community Map Original
39	Annex AL Standard Operating Procedure for Forest Monitoring v1.0
40	Annex AM isangi Reference Area v1.1
41	Annex AN Summary of Community Consultation Meetings v1.1
42	Annex AO Participatory Rural Appraisal
43	Annex AP Work Reports 2014
44	Annex AQ PDD Summary in Lingala
45	Annex AR PDD Summary in French
46	Annex AS Contrat de partenariat_signed
47	Annex AT Appendix XX Letter du Attestation v2
48	Annex AU MCENT conformance with Ministerial

	order 004
49	Annex AV Horizontal Accuracy Report v1.3
50	Annex AW Thematic Accuracy Report v1.3
51	Annex AX Isangi Project Activity Map v1.5
52	Annex AY Women's employment and focus group documentation

VERIFICATION FINDINGS

4 GENERAL

4.1 Summary Description of the Project (G3)

Document the evidence used to determine that the project still satisfies G3.1.

Section 1.1 describes some climate, community, and biodiversity objectives of the project and includes the requisite level of clarity and specificity and is in alignment with that provided at validation in the PDD. The audit team conducted numerous interviews and community meetings in and around the project area and found that the proponent has made sufficient progress towards advancing its overarching climate, community, and biodiversity objectives. Logging has ceased in the project area, logging roads cutting through the project area are no longer maintained and are closing in with vegetation, no evidence of logging equipment was found in the forest. Therefore the audit has determined that the proponent has made progress on its climate objectives in the fashion described in the PD available at validation. The proponent's community objectives were also determined to have advanced in accordance with the proponent's implementation plan. The audit team visited examples of all of the proponent's major project activities including tree plantings, tilapia ponds, demonstration farms showcasing examples of improved agriculture, and support to a local school. The team also found sufficient documentation to support the claim that various types of workshops and trainings had occurred regarding improved agricultural techniques and public health topics. Since climate objectives are being used as a proxy for biodiversity objectives, and climate objectives were found to have advanced, biodiversity objectives have also been met. In addition, the team found abundant photographic and field data used to monitor the status of wildlife and bush-meat trade. In sum, the team found sufficient evidence that the major CCB objectives have seen important advances that are in line with those activities described in the PD.

4.2 Project Location (G1 & G3)

Document the evidence used to determine that the project still satisfies G1.1, G1.3 and G3.3.

VCS

The proponent provides details in section 1.2 of the MIR that address the VCS Standard's requirements for the project location and project area. The required maps and KML files have been provided for the basic physical parameters of the project area and other spatial domains as well as for documenting *ex post* impacts to the project area and relevant spatial domain.

G1.1 - As mentioned above the basic location of the project has been identified in the PD (Annex I and Annex J, Annex N). The proponent's identification of the soil type, geology, and climate type (Koppen classification) is sufficient to characterize the basic physical parameters of the project.

G1.3: - The proponent has provided the project area and project zone boundaries in the MIR and has provided the relevant basic physical and social information about the project area.

G3.3 – The proponent has provided a map identifying the locations of the project area and where project activities have occurred during this verification period.

4.3 Conditions Prior to Project Initiation (G1)

Document the evidence used to determine that the project still satisfies G1.2 and G1.5-8.6.

This verification audit is concurrent with a validation audit, hence the findings for G1.2 and G1.5-G1.8 of the validation report should be referred to. No relevant changes can be reported in this verification report.

4.4 Project Proponent (G4)

Document the evidence used to determine that the project still satisfies G4.1.

The same proponent is identified in this verification audit as in the concurrent validation audit. Jadora LLC is identified in Section 1.3 of the MIR as the sole proponent in conformance with G4.1.

4.5 Other Entities Involved in the Project (G4)

Document the evidence used to determine that the project still satisfies G4.2.

VCS + CCB G4.1 (continued) + G4.2

Section 1.4 of the MIR identifies Safbois S.P.R.L. and Jadora S.P.R.L. as other entities involved in the project and contact information has been provided. The roles and responsibilities of Safbois has been understood as providing logistical support to the project, while Jadora S.P.R.L. has been identified as legal entity to process financial matters related to the project. These descriptions are sufficient for these entities. The MIR also identifies EcoPartners as the responsible entity for implementation of the responsibilities of the Climate Director until otherwise directed by Jadora. The roles and responsibilities of EcoPartners are now clear and demonstrate conformance with VCS AFOLU 3.1.4 and CCB Standards G4.1 Key skills are of involved partners are identified in the MIR in conformance with CCB Standards G4.2.

4.6 Project Start Date (G3)

Indicate the project start date, specifying the day, month and year.

The project start date has been identified as 12 September 2009, which is consistent with the PD.

4.7 Project Crediting Period (G3)

Document the evidence used to determine that the project still satisfies G3.4.

The project crediting period has been identified in Section 1.6 of the MIR as 12 September 2009 through 11 September 2039. This is identical to the PD and is still in conformance with G3.4.

5 IMPLEMENTATION OF DESIGN

In the sections below, identify, discuss and justify conclusions with respect to the following:

- *Implementation status of the project activity(s), including any material discrepancies between the project and the project description.*
- *Implementation status of the monitoring plan and the completeness of monitoring, including any material discrepancies between the project and the project description.*
- *Any remaining issues from previous validation or verification.*

5.1 Description of the Project Activity (G3)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description including with respect to the requirements of G3.2.

The proponent identifies the implementation status of project activities in Section 2.2 of the MIR. As this is a concurrent validation and verification, there is a high level of congruency with the project design document.

Section 2.2.1 of the MIR describes the cessation of the creation of logging roads and abandonment of existing logging roads as the primary means of reducing GHG emissions from the baseline. Annex F, the agreement between Jadora (the proponent) and Safbois (the concession holder) is indicated as the primary documentation of cessation of logging. The audit team's visual inspection of much of the project area, as well as interviews with several stakeholders across multiple communities, and relevant government representatives (such as the Administrateur du Territoire), suggests that logging activities have not occurred in the project activity during the project implementation phase and that logging roads have been abandoned. Relevant observations include:

-The logging infrastructure (saw mill area) is decayed and rusting.

-Audit team traveled several old logging roads by foot or by motorcycle as the forest had taken over the road to the point that larger vehicles could not travel these roads.

-Audit team observed maps of the proposed roads in the project area in the baseline (if the REDD project had not happened). These roads have not been constructed.

-Community members interviewed indicated that no logging has been occurring in the project area near their communities.

The assertion that deforestation results from the creation of logging roads providing access to agents of deforestation, rather than from logging itself is considered accurate by the audit team. Communities are clustered almost entirely along logging roads and have deforested significant areas near these roads. The audit team visited areas logged before the project start date and observed that the forest was intact and was missing only 1-3 trees per hectare, which would not result in deforestation.

The audit team interviewed community members and relevant government representatives to inquire whether a different social or economic trend could be credited with the reduction in deforestation and found no evidence for attribution of reduced deforestation to another source other than the cessation of logging roads.

The audit team has reviewed the *ex post* remote sensing imagery used to document land use changes during the verification period as well as the SOPs provided to justify documentation of land use change. Conformance was demonstrated.

Section 2.2.2 of the MIR describes project activities that have been implemented resulting in community and biodiversity benefits. The project activities are grouped under program areas, which are described in detail in the Theory of Change document (Annex K) and Theory of Change Matrix (Annex AU) provided as annexes to the PD. The MIR documents actual implementation of project activities identified in Phase 1 of the project (ending at the end of this verification period). The audit team has verified implementation of these project activities, including:

-Improved agriculture: The audit team confirmed distribution of improved pineapple and manioc seeds via interview with farmers that were recipients of these seeds and onsite training at their farms by Emmanuel Alongoli, a Jadora agriculture outreach officer. The audit team also visited the Jadora experimental and demonstration farm and tree nursery area. Review of documentation indicates that the farm area has been used for onsite trainings of local communities. Additionally community members benefit from informal receipt of farm material and knowledge through picking their own produce at the farm and taking planting material. The farm is fully established. Review of documentation and interview with farm employees indicates that Jadora is implementing an adaptive management approach at the farm with records being kept to track crop and variety performance. The daily and monthly summary reports reviewed are meticulously maintained by farm staff as hard copies. Philemon Liombo, the project manager, provides a weekly summary report to the project management team. Several of the crop varieties have been made available through a partnership with Yangambi research center and are novel in the project area.

-Agroforestry and tree planting: The audit team visited the agroforestry demonstration area where new crops and methods are being introduced into the project area including coffee and cacao crops, intercropped with native nitrogen fixing *Acacia* species. These are novel crops in this region of the country and the proponent is monitoring performance in different levels of sun, facilitating adaptive management. Caterpillar trees (which host edible caterpillars) have been planted widely in and around the agroforestry demo area and on adjacent roadsides. The proponent is also monitoring performance of these species.

-Tilapia ponds and training: The audit team visited three tilapia ponds and confirmed successful implementation. Interview with community members confirmed that an additional 9-10 tilapia ponds have been constructed by communities in the project area based on the knowledge and techniques brought to the region by the proponent. Some of these ponds have also received improved fish fry from the proponent

-REDD trainings/awareness raising: Interview with community members, including discussion with 90+ community members at a multi-village meeting, indicate that communities feel well consulted on the project. Communities expressed a feeling of exasperation regarding the high amount of training and sensitization about REDD, expectations upon them, potential benefits, etc that has been delivered by Jadora representatives. The only complaint received from communities about this issue was that the project has not been able to drastically increase the reach of its project activities throughout the project zone, which is due to the early stage of implementation of the project.

-School teacher hiring and training: Seven teachers are employed directly by the proponent. The audit team held a meeting with these teachers. The school itself was constructed by Safbois before the project start date. Once the REDD project started, Jadora took responsibility for the school. The teachers confirmed receipt of payment by Jadora. The school was open and

functioning for the entire monitoring period but has since closed due to funding issues with the proponent.

-Women's group: The audit team had the opportunity to observe a meeting between the proponent and the women's group.

The project activities identified in Section 2.2.2.1 of the MIR (with those visited by audit team assessed above) are meant to serve both the community and biodiversity objectives of the project. The proponent asserts that cessation of road building and provision of alternative sources of protein will reduce the biodiversity threats of forest destruction and biodiversity destruction. The audit team finds this to be a credible assumption based on the field audit and hence the above activities can be considered to represent implementation of biodiversity conservation project activities.

5.2 Management of Risks to Project Benefits (G3)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G3.5 and G3.7.

VCS

The proponent asserts that its risk rating of 20% established at validation remains unchanged. However an NCR was issued because the proponent has not referred to or provided its Non-permanence risk report as part of the MIR. In addition, the risk assessment provided at validation is incomplete.

G3.5

Section 2.3 of the MIR includes a very thorough description of human risks to project benefits as well as mitigation measures that have been implemented for each of those risks. The identified risks are relevant and valid based on the evidence collected during the field audit and include: Political instability, social instability/inequal distribution of benefits, failure to generate carbon credits, customary use rights, hunting leakage. Detailed and reasonable mitigation measures are identified for each risk.

G3.7

The proponent describes the investment made in education (7 teachers) to be a strategy for maintaining project benefits beyond the project lifetime, as this will increase the human capacity of the project area and provide new opportunities for people. Additionally, the proponent notes that they are in discussions with Safois about extending the logging moratorium beyond the project lifetime. While these identified measures to maintain benefits are limited in scope they have been described as required by the CCB Standards.

5.3 Measures to Maintain High Conservation Values (G3)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G3.6.

Sections 8.1.5 of the MIR reports on implementation of activities designed to maintain HCVs.

The proponent identifies the cessation of road building, which creates the REDD project, as a measure to maintain HCVs. The distribution of synthetic leopard skins to elders and chiefs is also claimed as a measure to maintain HCVs as this is thought to supplant hunting of leopards. These

two measures are considered likely to maintain the HCVs related to forest cover and leopard populations. Additionally, agroforestry activities which provide sources of food and materials that are culturally or economically important to local communities have been implemented which helps maintain community HCVs. The project has successfully protected forest cover during this monitoring period, compared to the baseline deforestation rate which also helps protect community HCVs including areas fundamental for community identity which in the project area includes sacred sites in the forest. The MIR asserts correctly that the above measures simultaneously help to maintain and enhance HCV 1, HCV 2, HCV 4, and HCV 5 which the audit team has confirmed exist in the project area.

5.4 Project Financing (G3 & G4)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G3.11 and G4.7.

As this is a concurrent validation and verification there are no material discrepancies between the PD and the MIR with regard to project financing. The proponent has provided sufficient documentation to demonstrate that indicator G3.11 and G4.7 are met. Additionally due to the generation of ex post emissions reductions and net positive community and biodiversity benefits as confirmed by the audit team, the proponent has justified that financial mechanisms have been sufficient and that the financial health of implementing organizations has been sufficient during this monitoring period.

5.5 Employment Opportunities and Worker Safety (G4)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G4.3-4 and G4.6.

G4.3-4.4

The proponent describes that Jadora employed more than 30 individuals during the 2010-2012 time period as team members, and that 20 of these individuals were given technical training in project implementation as described in MIR Annex N. The audit team has reviewed this annex and confirmed training of highly technical skills including GPS usage, tree identification, computer skills, agricultural trainings, etc. The audit team observed several of these individuals completing their work during the field audit and can attest to the high quality of human capital developed among local community members employed by Jadora during this verification period.

The proponent has provided the Worker's Safety Risk Analysis as an appropriate annex to the PDD (not required as an annex to the MIR). This analysis is thorough and complete. Additionally the proponent has taken sufficient actions to demonstrate successful training and implementation of mitigation measures including holding an multiple first aid trainings, creating a first aid log book to ensure first aid kits are consistently taken to the field, and equipping the project boat with flotation devices.

G4.6

The proponent identifies Annex N, the Standard Operating Procedures for Health and Safety for Working in the Forest v1.0 as the means of conformance with G4.6. The audit team has reviewed Annex N and confirmed that the risks to worker safety in the document are representative of the on the ground conditions, and that the SOPs appear appropriate to mitigate these risks. Additionally, interviews with employees of the project confirmed that they felt aware of the risks. As noted above the audit team has been able to confirm implementation in the field, demonstrating conformance.

5.6 Stakeholders (G3)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G3.8-10.

The full identification of stakeholders is described in the PD, which is considered accurate as this is a concurrent validation and verification. The proponent has provided information in Section 2.7 of the PD to enable verification of ongoing inclusion of appropriate stakeholders.

G3.8

The proponent is including stakeholders in ongoing project decision making as required by the CCB Standards. The community consultation coordinator/project manager and other relevant staff have held several meetings with communities throughout the project area during the verification period. This was verified through interviews by the audit team as well as by review of records of community meetings.

As further evidence of participatory decision making, the audit team observed that a committee is in development (selected by communities, local government representatives, and the proponent) to determine which projects submitted by the communities will be funded with future funding from sales of emissions reduction credits. During a large multi-community meeting that the audit team observed it was clear that there was overwhelming support by communities for this participatory approach

G3.9

The proponent has identified that communities were informed about the public comment period via community meetings with the project manager. The audit team has received verification of this in the form of several comments from communities submitted to CCBA. The audit team confirmed that the PD and MIR were available for community members and that those summaries, in locally appropriate language (Lingala, French) were distributed throughout the project area to stakeholders. Community members interviewed emphatically expressed that they felt consulted by the proponent and informed of the project development process.

G3.10

The proponent has developed a grievance process in which the Administrateur du Territoire (AT) a regional government representative is the third party mediator. The audit team has reviewed the grievance process and found it to conform to the CCB indicator.

The proponent has provided evidence that community members and relevant stakeholders have been informed of the grievance process via public posting at the project office and meetings with stakeholders. Additionally, the proponent has provided evidence that a grievance log exists including evidence of a lodged grievance that was successfully resolved.

6 LEGAL STATUS

6.1 Compliance with Laws, Statutes, Property Rights and Other Regulatory Frameworks (G4 & G5)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to G4.5 and G5.1-2.

The proponent describes the relevant laws and regulations in Section 3.1 of the MIR. Per the audit teams interviews with high level government representatives including the Governor of Orientale Province, Adminstrateur du Territoire, and representatives at the Ministry level, the project and the proponent are in conformance with relevant laws and regulations. Safbois, the owner of the concession, provided evidence to the audit team that the concession fees have been paid and are up to date.

6.2 Evidence of Right of Use (G5)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to G5.6.

The proponent describes the evidence related to Right of Use in section 3.2 of the PD and Section 3.2 of the MIR. The proponent asserts that Right of Use was established via a decree granted by the Ministry of Environment, Nature Conservation, and Tourism in the form of a Letter du Attestation (Annex AP) and a legal opinion from Congolese lawyer.

The legal analysis provided by the proponent clarifies the Right of Use by identifying the right as usage rights consistent with VCS Standard 3.11.1 1), with the competent authority identified as the MCENT. The proponent has provided the documentation of approval by MCENT, as evidenced by a signed, stamped, and dated (23 June 2014) copy of the appropriate document, "Contrat de partenariat pour la valorisation des Services environnementaux a un projet REDD+ au profit de la soociete SAFBOIS", a contract for the valorization of environmental services from a REDD+ project with SAFBOIS. As the name of the signatory was illegible, the audit team independently contacted Ilanga Joseph, the Directeur Coordonnateur DEP, of MCENT, who was interviewed during the field audit, and confirmed that MCENT has approved the project and supports it. Confirmation of this was received on August 8 2014 from Mr. Ilanga.

Per the guidance provided in the VCS Validation and Verification Manual Section 3.2.1, Rainforest Alliance is able to determine that the proponent has demonstrated that Safbois holds right of use to a reasonable level of assurance, noting that per this guidance Rainforest Alliance is not providing an independent legal opinion on ownership of GHG reductions/removals.

The proponent has provided the audit team with Annex W, the agreement between the concession holder (Safbois) and the proponent (Jadora International, LLC) transferring right of use as well as establishing the project start date conclusively as September 12, 2009. The document is signed by the CEO of Jadora and the president of Safbois and establishes that Safbois has transferred rights to carbon credits, as well as the ability to sell them, to Jadora.

6.3 Emissions Trading Programs and Other Binding Limits (CL1)

Identify, discuss and justify conclusions regarding emissions trading programs and other binding limits, including with respect to the requirements of CL1.5.

The proponent explains in section 3.3 of the MIR that the project will not be used for compliance with Emissions Trading Programs or other binding limits, and that emissions reductions are only issued as VCU's. The audit team has verified that the project does not pertain to any emissions trading program or binding limit through interview with regional and national government officials and confirming their understanding that the project will only issue emissions reductions into the VCS system.

6.4 Participation under Other GHG Programs (CL1)

Identify, discuss and justify conclusions regarding participation under other GHG programs, including with respect to the requirements of CL1.5.

The proponent asserts in section 3.4 of the MIR that it has not and will not be seeking registration under other GHG programs other than the VCS. The audit team has confirmed that the project has not been registered with other voluntary carbon standards (Plan Vivo) which potentially accept REDD credits from Africa.

6.5 Other Forms of Environmental Credit (CL1)

Identify, discuss and justify conclusions regarding other forms of GHG-related environmental credit, including with respect to the requirements of CL1.5.

The proponent asserts that it is has not and does not intend to generate any other form of environmental credit. The audit team sees no evidence that this statement is not true from the field audit and document review and confirms this is the case to a reasonable degree of assurance.

6.6 Projects Rejected by Other GHG Programs (CL1)

Identify, discuss and justify conclusions regarding rejection by any other GHG programs, including with respect to the requirements of CL1.5.

The proponent asserts in section 3.6 of the MIR that it has not submitted the project under other GHG programs nor has it been rejected by one. The audit team has verified that the project is not listed under any other GHG program.

6.7 Respect for Rights and No Involuntary Relocation (G5)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G5.3-4.

The project proponent has provided a description in section 3.7 of the MIR regarding FPIC and that no involuntary relocation is required by the project. The proponent asserts that the project does not require or involve the involuntary relocation of people or of their livelihood activities. Annex F has been provided as evidence describing Jadora's policies and principles regarding their work with local communities. Annex F describes the proponent's adherence to best practices regarding FPIC, compliance with legal frameworks, grievances and conflicts, employment policies. The document underscores that the proponent has followed the UN-REDD Programme's guidelines on FPIC (2013) when consulting with communities.

Section 3.7 of the MIR explains that voluntary terms of agreement were signed with 12 villages (out of 21 in the project zone) and that villages can opt-out of project activities at any time. The audit team reviewed a sample of 5 of the signed community agreements and confirmed in these villages that the relevant traditional representatives (village chief and elders) had signed. One example of the community agreements has been provided in Annex H. Community members interviewed confirmed that there have been substantial sensitization efforts from the proponent including village meetings, radio programs, and brochures, over a 4 year period.

The CCB Standards G5.3 footnote 31 requires that FPIC be obtained in the event that the project may encroach on community property, which includes lands traditionally used. Communities are immediately adjacent to the project area and use the forest for fuel and protein

sources. However, the Isangi project takes a voluntary approach to participation in the project and attempts to reduce deforestation and negative biodiversity impacts through an incentive-based approach rather than by restricting access to the forest, or use of forest materials. No community members experience a reduction in forest access or resource use as part of the Jadora project. The audit team confirmed this during the field audit through a variety of methods. Five village meetings were held, as well as several semi-structured interviews with key informants from the communities as well as Jadora employees. All confirmed that Jadora did not restrict access to forest resources. This same policy was repeated three times during an educational meeting Jadora held with over 90 community members from throughout the project zone, which the audit team observed. The most common response interviewees provided when questioned about whether they had experienced negative impacts associated with Jadora, was that the benefit-sharing had not flowed to communities as fast as they had hoped. The proponent has demonstrated conformance with G5.3-4 of the CCB Standards.

6.8 Illegal Activities and Project Benefits (G5)

Identify, discuss and justify conclusions with respect to implementation status of the project activity(s), including any material discrepancies between the project and the project description with respect to the requirements of G5.5.

The proponent explains in section 3.8 of the MIR that illegal activities do not pose a significant threat to CCB impacts. For example illegal logging is of small scale and low impact due to a lack of capital by local residents, and agricultural use is technically permitted under the forest code. The proponent is attempting to address the minor risk of illegal logging through generation of alternate income activities for residents of the project zone. Although not noted in the PD, there is a substantial amount of bushmeat hunting in the project zone which may violate some Congolese laws and does violate international laws when endangered species are shipped overseas, which may be coming from the project zone. However, the proponent is actively working with communities to reduce dependence on the bushmeat trade for income and protein sources, through alternative activities including tilapia farming, animal husbandry, etc. The activities already implemented (fish farming) have been observed in the field by the audit team. The proponent asserts that the project is legal in the MIR Section 3.8.2. The audit team has confirmed this through interviews with the Governor of Orientale Province, the Administrateur du Territoire, and the Ministry for Nature Conservation, Environment, and Tourism (MCENT) which regulates forest concessions in the DRC.

7 APPLICATION OF METHODOLOGY

7.1 Project Description Deviations

List any previously validated methodology deviations (each verification report should contain the exhaustive list of all and any methodology deviations in respect of the project).

Section 4.2 of the MIR identifies one methodology deviation, which consists of omitting measurement of soil organic carbon during this monitoring period. This approach is conservative and therefore in conformance.

7.2 Baseline Scenario (G2)

Document the evidence used to determine that the project still satisfies G2.1 and G2.4-5.

As this is a concurrent verification and validation audit, there has been no change from the information provided and assessed in the PDD which has been validated; hence the project satisfies G2.1 and G2.4-5. The baseline scenario remains unplanned deforestation.

7.3 Additionality (G2)

Document the evidence used to determine that the project still satisfies G2.2.

As this is a concurrent verification and validation audit, there has been no change from the information provided and assessed in the PD, which is a presentation of the application of the VCS Tool for Additionality and has been confirmed to be in conformance with the VCS and CCBA requirements for additionality. Interested readers should consult the validation report as needed.

8 QUANTIFICATION OF GHG EMISSION REDUCTIONS AND REMOVALS

8.1 Accuracy of GHG Emission Reduction or Removal Calculations (G2)

Identify, discuss and justify conclusions regarding data and parameters, including spreadsheet formulas and connections, conversions, aggregations, consistent use of data and parameters set out in the monitoring plan, possible manual transposition errors between data sets, uncertainty of technology (e.g., metering) and appropriateness of default data where specific source data is lacking.

The proponent explains in section 6.1 of the MIR that baseline emissions remain almost unchanged from the project description. The accuracy of GHG emission reductions at verification is dependent on the accuracy of the quantified baseline emissions reductions, which have been validated and confirmed by the audit team. There is however a difference in baseline emissions in the project area and leakage area in this monitoring period due to the above reported project description deviation wherein the proponent is conservatively omitting soil carbon for this monitoring period. The proponent explains and reports this difference in Tables 8 and 9 of the MIR. Project emissions are reported in Section 6.2 of the MIR. The proponent clearly describes the process of collecting the relevant activity data measuring deforestation in the project area and leakage belt during the monitoring period. The audit team has evaluated remote sensing imagery, methods and results used for monitoring land use change and conformed conformance with the VCS VM0006 methodology. Deforestation in the project area was greatly reduced from the baseline while deforestation in the leakage area increased significantly from the baseline deforestation expected in that spatial domain, indicating the appropriateness of the leakage area definition. However the net effect was a reduction in deforestation due to project implementation. Emission factors have appropriately been held constant since the validation.

The audit team has reviewed Annex C, in great detail with the project proponent as well as independently, which calculates emissions reductions due to the project activity. The audit team tested the emissions calculations by independently calculating a sample of outputs and identified no errors or discrepancies. The audit team has confirmed that the results reported in the MIR are aligned with the calculations in Annex C and that Annex C in turn corresponds to the results, assumptions, and reporting of the validated PD. The audit team has also confirmed that the data and parameters reported in the MIR in Section 5.2 correspond to those reported in the validated PD and additionally that data and parameters monitored in Section 5.3 correspond to the PD as well as VM0006 requirements. The audit team has cross-referenced these multiple sources of parameters and confirmed their consistency.

The quantification of emissions reductions has been confirmed to conform to VM0006 requirements.

8.2 Quality of Evidence to Determine GHG Emission Reductions or Removals

Identify, discuss and justify conclusions regarding the sufficiency of quantity and appropriateness of quality of the evidence, the reliability of the evidence, and the source and nature of the evidence (external or internal, oral or documented) for the determination of GHG emission reductions or removals.

The proponent has provided or referenced evidence and assumptions used to calculate net GHG emissions reductions in section 5.1.2.8 and 6 of the MIR. The audit team cannot evaluate the quality of evidence related to GHG emissions reductions at verification because the proponent has outstanding issues related to the baseline emissions that affect project emission calculations, and because many processes used to justify the appropriateness of the evidence for quantifying project emissions are incomplete. Non-conformances were issued regarding these topics.

The proponent relies upon a combination of data collected in the project area, data from peer reviewed literature, and data provided as defaults in the VCS methodology as inputs for the calculation of GHG reductions and removals.

Key data collected in the project area and leakage area includes:

- Remote sensing imagery. The proponent used two LANDSAT images available publicly to measure *ex post* deforestation in the project area and leakage area. The image metadata is transparently reported in the MIR in Table 10 and has been reviewed and confirmed by a remote sensing expert hired by the audit team. Imagery was selected from the dry season which is appropriate as it permits conformance with a VM0006 requirement that images have less than 60% cloud cover and allows more clear differentiation between forest and agricultural areas. Appropriate radiometric and atmospheric corrections were implemented, reviewed by the audit team and described in Annex AS. An accuracy assessment was conducted using appropriate ground truthing points and the accuracy was reported at 89% which exceeds the VM0006 requirement of 85%. The MIR transparently reports the confusion matrix in Table 12. Accuracy and thematic assessment were described in detail in supporting annexes.
- Carbon stocks: Carbon stock data was collected prior to the validation and was confirmed in the validated PD. The audit team has confirmed that same carbon stocks and resultant emissions factors were used in the calculation of emissions reductions. The one exception was soil organic carbon which the proponent has conservatively omitted during this monitoring period.

Key data from peer reviewed literature includes:

- Allometric equation: The allometric equation was not directly used in the monitoring report as carbon stocks have been held fixed from the validation and the audit team has confirmed this. No evidence of degradation was encountered by the proponent so carbon stocks were not updated. The audit team identified no evidence of degradation during the field audit from direct observation and stakeholder interviews.
- Defaults used in carbon stock quantification: Default values have been held constant since the validated PD and do not need to be updated as carbon stocks have not been updated.

8.3 Management and Operational System

Identify, discuss and justify conclusions regarding the suitability of the management system for monitoring and reporting (i.e., organisational structure, responsibilities, competencies, non-conformance handling, internal audits and management review).

The audit team interviewed or observed all key individuals in the Isangi REDD Project management system. The system is well-developed and coherent although the project staff team is currently somewhat limited with multiple responsibilities for staff due to funding constraints. For example, the project manager fills multiple additional roles including community consultation

manager. The audit team tested the maintenance of information recording through observation of forest inventory datasheets and the subsequent data entries into the carbon calculations excel spreadsheets. Forest inventory data was available at the field site in paper form. As this was a concurrent validation and verification the forest inventory data used at validation was evaluated at the same time as the field visit for verification even though carbon stocks are held constant since validation.

Monitoring of project activity implementation is robust. The audit team reviewed daily, weekly, and monthly reports submitted by the Jadora employees in the field and confirmed that these reports were provided to the project manager who has responsibility for providing summary reports which are used by the Jadora Management Team to enable adaptive management and report for verification events. Additional monitoring data observed includes camera trap photos used for biodiversity monitoring and reports of produce harvested at the demonstration sites.

The proponent uses appropriate information technology and backup systems for maintenance of documentation and data in conformance with VCS 3.17.1. All key document storage is cloud based and there is a well implemented system of ensuring that information collected in the field is kept with paper copies and digital copies. Relevant staff have the required competencies and responsibilities are clearly established. The proponent performs internal audits on relevant information sources such as forest inventory data. In general, the proponent relies heavily upon the participation of ecoPartners LLC, a consulting company that has helped to develop several VCS REDD and other AFOLU projects with several years of documented expertise. Conformance has been documented.

8.4 Climate Change Adaptation Benefits (GL1)

If applicable, identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of GL1.1-4, including any material discrepancies between the project and the project description.

Per Section 6.5 of the MIR, the project is not seeking Gold Level certification for climate change adaptation benefits this monitoring period.

9 COMMUNITY

9.1 Net Positive Community Impacts (CM1)

Identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of CM1.1-2 and CM3.1-3, including any material discrepancies between the project and the project description, effectiveness of monitoring of positive and negative impacts resulting from project activities on all constituent socio-economic and cultural groups, and demonstration that community benefits are positive for all community groups and there is no negative impact on identified High Conservation Values.

The proponent has demonstrated that the project has achieved net positive community impacts. Section 7.1 of the MIR describes implementation of activities that generate benefits, with several pages of in depth description of achievements related to community benefits which provides a sound justification for the claim of net positive community benefits. The description of project implementation corresponds clearly and directly to the theory of change model evaluated at validation and which *ex ante* was confirmed to be likely to generate net positive community benefits if effectively implemented. Sections 7.1.1, 7.1.2, and 7.1.3 provide in depth explanation of the outputs achieved in phase one of project implementation. These achievements correspond with those confirmed by the audit team in the field via interviews and direct observation.

Section 7.1.4 of the MIR assesses negative impacts to project stakeholders with Section 7.1 assessing impacts to offsite stakeholders. Both are evaluated at a hypothetical level rather than through current monitoring results. This is unavoidable and results from an NCR in the concurrent validation which resulted in a new strategy for monitoring negative impacts. Negative impacts from project implementation will be evaluated at future monitoring events. However the audit team closes this NCR as the CCB Rules 2013 page 15 require that the project is on track to generate net positive impacts, rather than that the project has achieved this at first verification. The audit team collected substantial evidence through interviews and observation during the field audit that the proponent has generated net positive impacts at this time and future monitoring will serve to confirm that this trajectory continues now that the proponent has implemented monitoring for negative impacts as well as positive.

The audit team independently interviewed over 150 local community members. Nearly all interviewees confirmed that they supported the project and preferred the current situation with Jadora LLC implementing the REDD project compared to the baseline/pre-project situation with SAFBOIS selectively logging. A handful of former employees of SAFBOIS reported that they preferred the baseline scenario, however the net positive effect on community well-being was obvious.

In summary the proponent has provided substantial justification of positive impacts, assessed negative impacts, provided appropriate reference to supporting documentation, and has provided evidence that community HCVs have not been negatively impacted by the project activities.

9.2 Offsite Stakeholder impacts (CM2)

Identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of CM2.1-3, including any material discrepancies between the project and the project description, effectiveness of monitoring of positive and negative impacts resulting from project activities on offsite stakeholder groups, and demonstration that negative impacts are effectively mitigated for offsite stakeholder groups.

The proponent has provided an analysis of negative offsite stakeholder impacts in the MIR Section 7.2. The proponent makes the argument that offsite impacts due to loss of ecosystem services from activity shifting leakage will be more than offset by positive offsite benefits from transfer of agricultural technology throughout the region. The audit team observed that representatives from nearby villages in the offsite zone did attend meetings in Isangi and expressed no harm from the project and interest in participating in future REDD projects with Jadora LLC. In addition the project implements several leakage mitigation activities designed to reduce potential leakage and associated negative impacts. The proponent did not fully monitor offsite stakeholder impacts during the first monitoring period which was identified as a nonconformance by the audit team which has subsequently been closed and future monitoring shall be implemented enabling conformance with the CCB criterion. The audit team has determined positive conformance due to the sound justification by the proponent that offsite negative impacts cannot expect to have occurred this monitoring period and the fact that offsite stakeholder interviews identified no negatives from the project and were interested in participating in the project if given the opportunity.

9.3 Exceptional Community Benefits (GL2)

If applicable, identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of GL2.1-5, including any material discrepancies between the project and the project description, effectiveness of monitoring of positive and negative impacts resulting from project activities on poorer and more vulnerable community groups, and demonstration that at least 50% of households within the lowest category of well-being within the community have benefitted substantially from the project.

Section 7.3 of the MIR clarifies that the project is not seeking Gold Level status for exceptional community benefits.

10 BIODIVERSITY

10.1 Net Positive Biodiversity Impacts (B1)

Identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of B1.1-5 and B3.1-3, including any material discrepancies between the project and the project description, effectiveness of monitoring of positive and negative impacts resulting from project activities on biodiversity including any impacts from use of non-native species, and demonstration that impacts on biodiversity are positive (considering onsite and offsite impacts), that there is no negative impact on identified High Conservation Values and that there has been no increase in populations of invasive species.

B1.1-1.2

The proponent has provided detailed assessment of biodiversity benefits in the project area due to project activities in Section 8.1 of the MIR. The assessment is logically linked to the theory of change model proposed by the proponent in the PDD which follows CCBA recommendations for establishing net positive benefits. Detailed outputs linked to project activities and program areas, are identified in Section 8.1.1, 8.1.2, 8.1.3, 8.1.4, and 8.1.5 which clearly establish progress towards net positive biodiversity benefit including protection of HCVs identified and comparison to the without project scenario. The audit team confirms based on the field audit that biodiversity is obviously higher in intact tropical forest compared to agricultural fallows and that by reducing deforestation and providing alternative protein sources to mitigate hunting pressure, the project is generating net positive biodiversity impacts.

B1.3-1.4

The proponent has identified all species used by the project and demonstrated that no known invasive species are introduced as a result of the project activities. The project utilizes a number of commonly used agricultural species and a range of native tree species. The audit team has visited the project demonstration farms, reviewed records of agricultural outreach activities, and visited the project agroforestry farms and confirmed that the information provided in the MIR is correct.

B1.5

The proponent has affirmed that no GMOs will be used by the project. The audit team has seen no evidence during the field audit of the use of GMOs.

10.2 Offsite Biodiversity Impacts (B2)

Identify, discuss and justify conclusions with respect to implementation status and impacts of the project activity(s) with respect to the requirements of B2.1-3, including any material discrepancies between the project and the project description, effectiveness of monitoring of positive and negative impacts resulting from project activities on biodiversity outside the project zone, and effectiveness of measures to mitigate negative offsite biodiversity impacts.

B2.1-2.3

The proponent has provided sufficient evidence to demonstrate conformance with indicator B2.1-B2.3. Section 8.2 of the MIR describes offsite biodiversity impacts including an increase in deforestation in the leakage area over the baseline expected deforestation in that spatial domain.

The proponent also notes that it is possible that some leakage hunting may exist, although there is no evidence of that at this point. The proponent has attempted to mitigate these negative impacts through implementing activities that reduce deforestation which have reduced deforestation rates in this monitoring period relative to the baseline scenario. Additionally, activities have been implemented to reduce demand for bushmeat as a protein source including installation of 5 tilapia farms and planting of 1104 caterpillar trees which promote production of a caterpillar which is an important protein source. Based on implemented project activities it is not expected that there has been a net negative impact on offsite biodiversity during this monitoring period.

10.3 Exceptional Biodiversity Benefits (GL3)

If applicable, document the evidence used to determine that the project still satisfies GL3.1-2.

The proponent confirms in Section 8.3 that the project is still pursuing activities to protect critically endangered and endangered species. The CCB Standards require that to met the Vulnerability Criteria that the project zone contains either a single individual that is critically endangered or endangered and/or at least 30 vulnerable species individuals. The project zone contains several endangered plant species including *Pericopsis elata*, the audit team observed multiple individuals of *Pericopsis* during the field audit. Additionally the audit team has evaluated the biodiversity monitoring system and reported information of the proponent and determined that the field staff possesses the requisite skills, the reporting processes are sufficient, and that the claims made by the proponent with regard to endangered and vulnerable species are credible. The project meets the CCB requirements for GL3.

11 VERIFICATION CONCLUSION

Clearly state whether the project conforms with the verification criteria for projects and their GHG emission reductions or removals set out in the VCS rules and the CCB Standards rules, including any qualifications or limitations. Confirm that the project has been implemented in accordance with the project description and subsequently validated variations.

The Isangi REDD+ Project has demonstrated conformance with the VCS Standard and CCB Standard rules and requirements during this monitoring period without qualification or limitation.

Reporting period: From 12 September 2009 to 31 December 2013

Verified GHG emission reductions or removals in the above reporting period:

The approved VCS VM0006 methodology does not use the equation required in the VCS Methodology Template v3.3, $ER_y = BE_y - PE_y - LE_y$ and as a result VM0006 requires summarization of GHG emission reductions as depicted below.

Individual Term of Equation 105	Description	Value (tCO2e)	Explanation
①	ΔGHG from avoided deforestation excluding ANR and harvest areas	-2,095,900	Included, major source of emissions reductions.
②	ΔGHG from deforestation due to leakage	355,315	Included as described in section 5.5.
③	ΔGHG from avoided degradation	0	Degradation is omitted as the drivers are for deforestation, as discussed in section 5.3.3.

4	ΔGHG from degradation due to leakage	0	Degradation is omitted as the drivers are for deforestation, as discussed in section 5.3.3.
5	ΔGHG from leakage by unconstrained geographic drivers	0	There are no unconstrained geographic drivers, see section 5.5.3.
6	ΔGHG from assisted natural regeneration	0	Omitted as ANR is not an included project activity.
7	ΔGHG from changes in long-lived wood products	40,678	Included per calculations in section 5.6.2.
8	ΔGHG from improved cookstoves	0	Omitted as CFE is not an included project activity.
9	ΔGHG from other and secondary sources	0	No other secondary sources exist.
10	ΔGHG from avoided deforestation from areas under harvest	0	Omitted as harvesting is not an included project activity.
NERs		1,699,905	Over entire crediting period

The risk rating from the AFOLU Non-Permanence Risk Report is 15% and as a result the allocation to the buffer pool over the monitoring period is 308,283 $((-2,095,900+40,678)*0.15)$. Net VCUs over the monitoring period are therefore:

$$1,699,905 - 308,283 = 1,391,623 \text{ VCUs}$$

The project has generated 1,391,623 VCUs over the current monitoring period.

The annualized VCUs, by vintage are summarized below:

Years	Estimated GHG emission reductions or removals (VCUs in tCO ₂ e)
2009	90,398
2010	308,993
2011	320,334
2012	330,912
2013	340,986
Total estimated VCUs	1,391,623

CCB STANDARDS CRITERIA CHECKLIST:

GENERAL SECTION

G1. Original Conditions in the Project Area (Required)	YES X__	NO __
G2. Baseline Projections (Required)	YES X	NO __
G3. Project Design and Goals (Required)	YES X__	NO __
G4. Management Capacity and Best Practices (Required)	YES X__	NO __
G5. Legal Status and Property Rights (Required)	YES X__	NO __

CLIMATE SECTION

CL1. Net Positive Climate Impacts (Required)	YES X__	NO __
CL2. Offsite Climate Impacts ("Leakage") (Required)	YES X__	NO __
CL3. Climate Impact Monitoring (Required)	YES X__	NO __

COMMUNITY SECTION

CM1. Net Positive Community Impacts (Required)	YES X__	NO __
CM2. Offsite Community Impacts (Required)	YES X__	NO __
CM3. Community Impact Monitoring (Required)	YES X__	NO __

BIODIVERSITY SECTION

B1. Net Positive Biodiversity Impacts (Required)	YES X__	NO __
B2. Offsite Biodiversity Impacts (Required)	YES X__	NO __
B3. Biodiversity Impact Monitoring (Required)	YES X__	NO __

GOLD SECTION

GL1. Climate Change Adaptation Benefits (Optional)	YES __	NO X__
GL2. Exceptional Community Benefits (Optional)	YES __	NO X__
GL3. Exceptional Biodiversity Benefits (Optional)	YES X__	NO __

12 APPENDIX 1. NON-CONFORMITY REPORTS

NCR#:	01/14
Standard & Requirement:	CCB Standards G3.1
Report Section:	VCS CCB Verification Report Section 4.1
Description of Non-conformance and Related Evidence:	
In section 1.1 of the MIR the proponent provides a description of the project, however this description does not accurately summarize the project's objectives. Climate, Community, and Biodiversity objectives are not specifically mentioned or identified in this section.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Section 1.1 of the MIR was updated to provide a summary of the project's climate, community, and biodiversity objectives. A reference to the complete description of CCB objectives in Section 1.1.1 was also made in Section 1.1. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	02/14
Standard & Requirement:	VCS Standards 3.10.1; AFOLU 3.4.1 and 3.4.1, CCB Standards G1.3 and 3.3
Report Section:	VCS CCB Verification Report Section 4.2
Description of Non-conformance and Related Evidence:	
Section 1.2 of the MIR contains a brief list of the various administrative boundaries and general coordinates of the project's location, however there is incomplete and conflicting information in the MIR regarding the representation of the project area at verification. Not all of the VCS Standard (3.10.1) and AFOLU requirements (3.4.1, 3.4.2) have been discussed or sufficient evidence explained or referenced. 1. The proponent has listed the project area as occurring within "Isangi Logging Concessions of Safbois S.P.R.L", but no concession identification numbers have been provided as required by AFOLU Requirement 3.4.1 (1), and no justification has been provided for omitting this means of identification within the MIR (AFOLU 3.4.1(1)). 2. No ex-post maps of the project area are referenced or provided as part of the MIR documentation (VCS. Various uncertainties underlie this issue ((AFOLU 3.4.1(2) and CCB Standards G1.3 and 3.3)) a. Considering that Annex C (Ex-Post MR v1.1) detected land use transitions during the monitoring period (see tab v2.1 EQ107, Column H), this data indicates that the size and shape of the project area ex-post should be different as compared to the benchmark forest cover map produced at validation. No map was referenced to demonstrate updated ex-post data in a manner that clearly shows how the project and leakage area cover types changed with respect to the baseline. Annex AA is referenced in section 6.3.1, but it is difficult to use this map to understand where LULC transitions occurred relative to the benchmark map. b. The proponent, has not explained or referenced materials that explain how the definition of forest – the FAO Definition as described in 4.5.1.3 of the VCS-CCB PD - was applied to determine the project area (VM0006 Section 4.1.1). Considering that swidden agriculture occurs at the forest edge interface and that regeneration of non-forest to forest occurs in the project area limits it is important to understand how the definition's threshold for forest/non-forest was applied for the purposes of GHG accounting. c. Moreover, the MIR provides conflicting accounts of whether deforestation was detected during the monitoring period. Section 2.2.1 of the MIR states that "Jadora has monitored the forest in this period using LANDSAT imagery of the project area for any deforestation event in the project area. No deforestation event was detected during this time." However the evidence provided in Annex C contradicts this statement. 3. No ex-post KML file has been referenced, therefore the audit team could not determine whether such a file exists. See the point above for an explanation regarding the need for an updated project area KML. (AFOLU 3.4.1 (3), VCS 3.10.1)	

4. The revised size of the project area at verification has not been clearly and unambiguously stated. In fact, the proponent provides conflicting information in Section 1.1 of the MIR by stating that the project area is 201,731.5ha. This figure was provided at validation as the benchmark area, but as stated in the previous points the audit team believes that this number is incorrect for the verification purposes. 5. The proponent has not specified in the MIR whether any changes in ownership occurred. Although the audit team determined that Safbois is still the legal owner of the concession, the proponent has not discussed this point in the MIR to suitably demonstrate conformance (AFOLU 3.4.1 (5), and 3.4.2). The VCS-PDD was identified as having other issues regarding ownership as explained in the validation audit report. Those issues must be corrected prior to verification as they are underlying related issues associated with demonstrating ownership.	
	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	1. Concession identification numbers have been provided in Section 1.2 of the MIR. This aspect of the NCR is closed. 2. An updated ex-post map for the project area has been referenced in Section 1.2 as Annex T. This aspect of the NCR is closed. a. The size and shape of the project area has remained unchanged. Updated ex-post maps for the project and leakage areas showing land use change are identified in Section 6.3.1 Annex U (map of ex-post PA LULC map), and Annex V (map of ex-post LA LULC map). The audit team has reviewed these maps and confirmed their appropriateness. This aspect of the NCR is closed. b. The PD was updated for validation such that Section 4.2 of the PD describes how this requirement was been met using historical LULC classification and FACET data. As this was closed in the validation

	it is no longer relevant to the verification. c. The LULC data referenced in the PD and Annex C has been updated to accurately reflect the ex-post changes detected through the remote sensing analysis during the monitoring period. This aspect of the NCR is closed. 3. The original KML of the project area has been referenced as Annex W (KML file) in Section 1.2 of the MIR. There have been no changes made to the project area and as such this KML is appropriate. This aspect of the NCR is closed. 4. The size of the project area has been updated in Section 1.1, Section 5.3.1.1 and Section 8.1 of the MIR to reflect the accurate size of the project area that was also provided at validation (187,571 ha). As this is a concurrent validation/verification no change in the project area has occurred since validation. This aspect of the NCR is closed. 5. No changes in ownership have occurred. Ownership and right of use is also clarified in Section 1.3, Section 3.2, Annex AB (Jadora Saffois agreement), and Annex I (legal opinion ROU) in the MIR. The audit team has reviewed the annexes and confirmed that no changes have occurred since validation. This aspect of the NCR is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	03/14
Standard & Requirement:	CCB G3.10
Report Section:	VCS CCB Verification Report Section 5.6
Description of Non-conformance and Related Evidence:	
The CCB Standards require implementation of a formal grievance process including a designated third party for mediation and a written response to the aggrieved within 30 days as well as a system for tracking grievances. Interviews with community members and employees indicated that some stakeholder groups are systematically unaware of the grievance process and that Jadora does not have a formal system for grievance tracking. Additionally, Annex AO, where the process is described, does not formalize the required written response within 30 days. Finally, no mention of the grievance process is made in the MIR, nor is Annex AO provided as an annex to the MIR, but rather only for the PD.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014 Photo documentation of grievance log including documentation of specific grievance and resolution (files: 100_1920.jpg, 100_1923.jpg, 100_1970.jpg, 100_1971.jpg, 100_1972.jpg,, Jadora grievance process posted.jpg) Grievance Process Handout v1.0 English
Findings for Evaluation of Evidence:	The proponent has updated the grievance process to include and formalize the required written response within 30 days. The grievance process itself has been updated and appropriate reference and description has been added in the MIR Section 2.7.3. Additionally the proponent sent photo evidence of the grievance process being publicly posted at the project office which is within the communities where stakeholders reside. Finally, the proponent provided photo evidence that the grievance log exists and is in action through providing images of the log and images of a grievance that was lodged and resolved. Based on this evidence the non-conformance is closed.

NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	04/14
Standard & Requirement:	CCB Standards G4.6
Report Section:	VCS CCB Verification Report Section 5.5
Description of Non-conformance and Related Evidence:	
CCB Standards require that risks to worker safety are assessed, that a plan is in place to minimize such risks, and that the risks are minimized with best practices. Jadora accomplishes this through the “Worker’s Safety Risk Analysis” which was not provided in the annexes (Observation for Validation). Although the document identifies relevant risks, the audit team confirmed that some risk mitigation measures are systematically unimplemented including bringing first aid kits into the field and providing flotation devices on boats.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014 Photo documentation of first aid and life jacket usage including: First Aid log book.jpg, Jadora first aid.jpg, Jadora informational sign3.jpg, Jadora life vests.jpg
Findings for Evaluation of Evidence:	The proponent has provided the Worker’s Safety Risk Analysis as an appropriate annex to the PDD (not required as an annex to the MIR). Additionally the proponent has taken effective corrective actions to demonstrate successful training and implementation of mitigation measures including holding an additional first aid training, creating a first aid log book to ensure first aid kits are consistently taken to the field, and equipping the project boat with flotation devices. The proponent provided photo evidence of the first aid log book, the first aid training in action, and evidence of the purchase and use of flotation devices. The non-conformance is closed
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	05/14
Standard & Requirement:	CCB Standards G4.2
Report Section:	VCS CCB Verification Report Section 4.5
Description of Non-conformance and Related Evidence:	
Section 1.4 of the MIR does not provide a description of key technical skills and management team experience in the project implementation during the verification period, as required by CCB Standards G4.2.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Section 1.4 of the MIR now describes the participation and relevant technical and managerial experience of ecoPartners LLC which fulfils the role of climate director in the Isangi project. ecoPartners has several years of experience in REDD project development and implementation in a broad variety of locations and clearly demonstrates expertise necessary for successful implementation. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	07/14
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NCR#:	06/14
Standard & Requirement:	CCB Standards G4.5
Report Section:	VCS CCB Verification Report Section 5.1
Description of Non-conformance and Related Evidence:	
CCB Standards require the proponent demonstrate compliance with applicable laws and regulations. Per interview with the teachers at the Jadora school, these employees do not have written contracts as is required by the Code du Travail of the DRC.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Due to limited financial resources, Jadora has not been able to secure permanent school and teacher funding. The school was funded and fully operational during the monitoring period as confirmed by the audit team. However the school has been closed until funding is sufficient to provide teachers with new employment contracts. This is detailed in the MIR Section 7.1. As the project generates significant community benefits beyond the school this closure does not undermine the demonstration of net positive benefit by the project.
NCR Status:	CLOSED
Comments (optional):	N/A

Standard & Requirement:	VCS Standard 3.11.1
Report Section:	VCS CCB Verification Report Section 6.2
Description of Non-conformance and Related Evidence:	
The proponent has failed to demonstrate conformance with VCS Right of Use. Annex AH, the legal opinion provided to substantiate Right of Use addresses “implicit carbon rights” rather than right of use and does not identify which of the seven applicable rights of use identified in 3.11.1 is claimed. Additionally, per interview with the Director of Planification of the Ministry of MCENT, the proponent requires conformance with Ministerial Order 004, demonstrated by signature of Annex 4, the Model for Valorization of Environmental Services in the DRC.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014 The proponent has provided as evidence of conformance for validation, which consequently enables this verification NCR to be closed: An updated legal analysis of VCS Right of Use (Annex BO and Annex J) The Jadora-Safbois agreement as evidence of transfer of Right of Use to Safbois (Annex W) Approval from MCENT of the project (Annex A)
Findings for Evaluation of Evidence:	This nonconformance was issued to the verification as an outstanding NCR existed at the time of verification from demonstration of Right of Use for the VCS validation. The NCR has now been closed for validation and is consequently closed for verification due to the evidence provided below. The updated legal analysis provided by the proponent clarifies the Right of Use by identifying the right as usage rights consistent with VCS Standard 3.11.1 1), with the competent authority identified as the MCENT. The proponent has provided the documentation of approval by MCENT, as evidenced by a signed, stamped, and dated (23 June 2014) copy of the appropriate document, “Contrat de partenariat pour la valorisation des Services environnementaux a un projet REDD+ au profit de la soociete SAFBOIS”, a contract for the valorization of environmental services from a REDD+ project with SAFBOIS. As the name of the signatory was illegible, the audit team independently contacted Ilanga Joseph, the Directeur Coordonnateur DEP, of MCENT, who was interviewed during the field audit, and confirmed that MCENT has approved the project and supports it. Confirmation of this was received on

	August 8 2014 from Mr. Ilanga. Per the guidance provided in the VCS Validation and Verification Manual Section 3.2.1, Rainforest Alliance is able to determine that the proponent has demonstrated that Safbois holds right of use to a reasonable level of assurance, noting that per this guidance Rainforest Alliance is not providing an independent legal opinion on ownership of GHG reductions/removals. The proponent has provided the audit team with Annex W, the agreement between the concession holder (Safbois) and the proponent (Jadora International, LLC) transferring right of use as well as establishing the project start date conclusively as September 12, 2009. The document is signed by the CEO of Jadora and the president of Safbois and establishes that Safbois has transferred rights to carbon credits, as well as the ability to sell them, to Jadora. The nonconformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	08/14
Standard & Requirement:	CCB Standards G3.5
Report Section:	VCS CCB Verification Report Section 5.2
Description of Non-conformance and Related Evidence:	
The proponent has failed to provide documentation of conformance to indicator G3.5, which requires that specific measures be adopted and described to mitigate the human-induced risks to the climate, community, and biodiversity benefits. The proponent does not address this requirement in the MIR.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Section 2.3 of the MIR has been updated to provide a very thorough description of human risks to project benefits as well as mitigation measures that have been implemented for each of those risks. The identified risks are relevant and valid based on the evidence collected during the field audit and include: Political instability, social instability/inequal distribution of benefits, failure to generate carbon credits, customary use rights, hunting leakage. Detailed and reasonable mitigation measures are identified for each risk. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	09/14
Standard & Requirement:	CCB Standards G4.3; CCB Standard G4.4
Report Section:	VCS CCB Verification Report Section 5.5
Description of Non-conformance and Related Evidence:	
PD Section 2.6 does not describe how the orientation and training required in G4.3 and the employment opportunities described in G4.4 have been implemented during the verification period in a way that targets a wide range of community members including minority and underrepresented groups.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014 Jadora trained staff as of Dec 2011.xlsx Current Jadora salaries Feb 2012.xlsx
Findings for Evaluation of Evidence:	Women are the only significant potentially underrepresented group in the project area as identified by the proponent. The audit team confirmed during the field audit that no ethnic minority groups were present and accepts this assertion. Women have been employed by the project and engaged in the project in a range of ways including through designated women's groups and agricultural outreach, as confirmed during the field audit. The original NCR was issued as the MIR did not address G4.3 directly. Section 2.6 of the MIR now describes this performance adequately and addresses G4.3. Additionally the proponent has provided the audit team with payroll documents and photos demonstrating women's ongoing role in benefiting from project

	activities and in project design. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	10/14
Standard & Requirement:	VCS Standard 3.14.1
Report Section:	VCS CCB Verification Report Section 7.3
Description of Non-conformance and Related Evidence:	
The proponent's application of the VCS Tool for Additionality has not been fully completed. The audit team could not clearly determine how the descriptions in Section 4.5 of the MIR map to several requirements of the tool such as the requirements in Sub-step 1a and 1b. For example the description in PD section 4.5.1 does not clearly map to the three required scenarios of sub- step 1a of VT0001. The investment analysis (MIR 4.5.4) has not been sufficiently substantiated as no documentation has been referenced or explained to corroborate the result of the Simple Cost Analysis required by the tool. Further, the Barrier Analysis (PDD 4.5.5) has been has not clearly related the analysis to the requirements of Step 3 of the tool because the information has not been unambiguously related back to the requirements 2.3 (a) and (b) of the tool and some important references have not been provided to the audit team.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	This NCR was issued as a result of an identical NCR issued during the VCS/CCB validation of the Isangi project. The proponent selected to copy the additionality argument into the MIR (although additionality is demonstrated at validation). As a result, the errors in the additionality argument in the MIR were required to be resolved prior to verification despite the fact that the additionality is assessed at validation. The relevant validation NCR has now been closed and the justification is copied below for reference. This verification NCR is closed. The proponent has modified section 4.6 to closely follow the structure of VT0001 (VCS Additionality tool). The explanations given clearly follow the steps in the tool and the audit team was able to easily understand how the proponent's arguments mapped to the various steps in the tool. The proponent's analysis closely follows the evidence and observations gathered by the audit team concerning its additionality. There is an obvious need for investment in rural Congo and meetings with the governor of Orientale Province corroborated the fact that the government is open to private sector financing through REDD to supplement the difficulties in directing and securing funds to promote rural livelihoods in the region and by the low level of human development observed in the region. The governor was highly

	supportive of the Jadora project and expressed this clearly to the audit team. Conversations with the Territorial Administrator and a range of local residents corroborated that the Jadora project is unique in the area and that VCS revenue is necessary to support the project at scale and in the long term. Residents have had Jadora's continued presence for many years but due the time scales required to achieve verification the project has had to severely restrict its project activities to the minimum. This is sufficient evidence to demonstrate that VCS revenue is essential to the project and that no other funds of an equivalent sustaining nature are available to the project. The project complies with every step of VT0001 and identifies the most plausible scenario as a continuation of pre-project land uses (logging, agriculture), a point sufficiently corroborated in the field by the audit team. However, the audit team observed that the VCU issuance represented in the cashflow (Annex I) does not match exactly with the VCU projections in section 5.6.3 of the PD or Annex D (although it was close) and a variety of assumptions or clarifications were not found in the document including the difference between "issuance" and "adjusted issuance" and justification for the price per VCU. This issue was subsequently resolved through the proponent submitting evidence to close Validation NCR 33/14. The nonconformance is closed
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	11/14
Standard & Requirement:	VCS Principle of Transparency; VCS Standard 3.16.6
Report Section:	VCS CCB Verification Report Section 8.1
Description of Non-conformance and Related Evidence:	
The proponent has not clearly identified or presented a number of relevant values in the MIR that are necessary to understand how the proponent calculated net GHG emissions reductions during the monitoring period. Therefore not all of the template's rules have been followed (VCS 3.16.6). The manner in which baseline and project emission components are presented does not allow a reader to easily identify and follow how the proponent calculated net GHG emissions reductions during the monitoring period. There are many examples of this, which are listed below along with their respective sections in the MIR. 1. <u>Section 5.1.2.8.1.2– Emissions Factors</u>: The emissions factors chosen by the proponent have not been provided in the MIR and the source containing their underlying calculations, assumptions and justifications have not been referenced. 2. <u>Section 5.1.2.8.1.3 – Field Inventory</u>: The documents that support and explain the rationale for the forest inventory are not referenced in the MIR. 3. <u>Section 6.1 - Baseline emissions</u>: The proponent writes that “Baseline emissions remain unchanged from the project description”. However the proponent has not provided a summary of estimated baseline emissions during the project's monitoring period, nor referenced the exact sources, annexes or relevant sections of the PDD related to this point. 4. <u>Section 6.2 – Project Emissions</u>: The proponent identifies the satellite images used to produce the monitoring results of deforestation in Table 6, while Table 7 presents quantified LULC transitions. However the MIR does not clearly show baseline deforestation (ha) that allows the reader to understand the meaning of the LULC transitions at verification relative to the baseline. In addition, the proponent does not actually present quantified emissions values under the project scenario derived from the LULC activity data reported in Table 7. 5. <u>6.3 – Leakage</u>: The project provides LULC transition data during the monitoring period in table 9 however emissions from leakage derived from these activity data are not presented. This conflicts with the assertion made later made by the proponent in Table 10 (Ex-post Net Emissions Reductions) that Leakage emissions during the monitoring period equal zero (0). The reason for these conflicting data have not been explained or justified by the proponent. 6. <u>6.4 – Ex-post Actual net GHG emissions reductions</u>: Table 10 (Ex-post Net Emissions Reductions) includes emissions from avoided deforestation but it does not allow the reader to understand how these calculations were derived. In addition, the proponent presents Project Emissions as zero (0) even though section 6.2 suggests that LULC transitions occurred. These conflicting data have not been explained or justified. Finally, leakage emissions are presented as (0) yet as mentioned in the previous point the audit team does not understand how the proponent justifies a zero value when section 6.3 suggests that land use transitions have occurred in the leakage area. In summary the points mentioned above prevent the audit team or an interested reader from clearly and unambiguously understanding what the basic GHG values are and what sources or justifications support them.	

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Validation
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	1. MIR Section 5.1.2.8.1.2 has been updated to include Table 7 that includes emission factors for each LULC transition. This aspect of the NCR is closed. 2. MIR Section 5.1.2.8.1.3 has been updated to include Annex Y and Annex AL that provide plot locations and standard operating procedures for plot measurement. This aspect of the NCR is closed. 3. MIR Section 6.1 has been updated to include Tables 8 and 9 that demonstrate project area and leakage area baseline emissions for both <i>ex-ante</i> and <i>ex-post</i> calculations for comparison and PD references have been appropriately provided. The baseline <i>ex-post</i> emissions are based on the same LULC transitions presented in the Project Description. Baseline emissions for the <i>ex-post</i> are conservatively lower than for the <i>ex-ante</i> because the SOM pool has been conservatively excluded for this monitoring period, which is acceptable. This aspect of the NCR is closed. 4. MIR Section 6.2 Table 13 and Table 14 has been updated to include <i>ex-post</i> project scenario LULC changes and baseline scenario LULC changes for comparison over the monitoring and implementation period. This aspect of the NCR is closed. 5. MIR Section 6.4, Table 18, describes the leakage emissions over the monitoring period based on activity date presented elsewhere in the MIR, This aspect of the NCR is closed. 6. MIR Section 6.4 was updated to reference Annex C which calculates emission reductions appropriately. Based on corrections made to Table 18 and 19 of the MIR, leakage and project emissions have now been appropriately accounted for and summarized in the MIR. This aspect of the NCR is closed. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	

NCR#:	12/14
Standard & Requirement:	VCS Standard 3.13.1, VM0006 8.1.2.2, VCS Standard Principle of Accuracy; CCB Standards G1.4
Report Section:	VCS CCB Verification Report Section 8.2
Description of Non-conformance and Related Evidence:	
The audit team detected various non-conformances related to the accuracy of baseline emissions calculations provided at validation, and which necessarily affect the ex-post calculations. The ex-post calculations cannot be fully evaluated by the audit team until all relevant baseline non-conformances associated with GHG calculations and associated requirements are corrected and updated in the MIR documentation. For example, this relates to issues associated with carbon pool selection, emission factors, reference area, and historical and projected activity data.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The validation audit was concluded on September 9, 2014 with a positive determination of the project's conformance to the VCS and CCB standards including a fully validated baseline. The verification is measured against that baseline which is now correct and the non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	13/14
Standard & Requirement:	VM0006 5.2; AFOLU 4.3.1;
Report Section:	VCS CCB Verification Report Section 8.1
Description of Non-conformance and Related Evidence:	
The MIR project boundary definition will not lead to conservative or accurate results. The current selection of carbon pools identified in section 4.3 likely leads to an overestimation in emissions from converting forest to cropland. Table 2 of the MIR states that it is conservative to omit the dead wood pool, however the audit team gathered numerous field observations of cleared fields suggesting that it is not conservative to omit the dead wood pool from the cropland stratum due to the observed propensity for swidden agriculture to result in elevated levels of standing and lying dead wood as compared to the project scenario (forest). Therefore the audit team believes that it is not conservative to omit the dead wood pool and that the current project boundary leads to overestimated project emissions.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Updated dead wood row of Table 3 in section 4.3 of MIR to "Major carbon pool affected by project activities, included within the cropland and settlement strata as LDW (lying dead wood) and SDW (standing dead wood)." following Table 6 in the PD. Updated dead wood row in Table 6 in section 5.1.2.8 of MIR to include "Major pool, standing dead wood and lying dead wood monitored" The proponent has chosen to include the dead wood pool in the project boundary which leads to emissions quantification which is both more accurate and conservative. MIR Section 4.3, Table 3 includes this pool now, along with MIR Section 5.1.2.8, Table 6, and this has been factored into the <i>ex post</i> emissions reductions and VCUs.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	14/14
Standard & Requirement:	VCS Standard 3.5.1
Report Section:	VCS CCB Verification Report Section 8.1
Description of Non-conformance and Related Evidence:	
The audit team cannot fully evaluate the Project boundary at verification because there is an inconsistency between the project boundary identified at validation versus that of verification. This creates uncertainty at verification regarding what the proponent's data and parameters monitored are and whether the proposed deviation identified in section 4.2 in the MIR is appropriate. For example, Table 2 of the MIR states that SOM is included as a carbon pool, which justifies the project's proposed deviation in section 4.2. However, Table 34 (Selected pools monitored) from the PD says that SOM is NOT a selected carbon pool. The audit team cannot evaluate the deviation in the MIR until this inconsistency is resolved.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The proponent has clarified the issue by updating the MIR, such that Table 3 in section 4.3 describes SOM as: "Major carbon pool affected by project activities, included but conservatively excluded for the first monitoring period as per monitoring deviation in 4.2." The proponent has clarified that soil organic matter is included in general yet that it is excluded conservatively in this first monitoring period which is acceptable given that it is conservative. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	15/14
Standard & Requirement:	VCS Principles of Accuracy and Transparency; VM0006 9.3.2; CCB Standards CL1 (all)
Report Section:	VCS CCB Verification Report Section 8.2
Description of Non-conformance and Related Evidence:	
The audit team determined that the MIR's GHG emissions under the project scenario are incomplete and therefore cannot be assessed by the audit team. There were NCRs identified at validation concerning relevant carbon pools, emissions factors, as well as errors with the remote sensing methods that affect the way project scenario emissions reductions are calculated. In addition, the MIR lacks any mention of the exact remote sensing procedures used to create an updated monitoring report of project emissions for verification including an explanation of classification procedures, classification accuracy, and any uncertainty deductions required for ex-post calculation. As a result the audit team cannot properly assess the ex-post project emissions calculations until these issues are addressed and updated in the MIR.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The MIR's GHG emissions are now complete and have been evaluated by the audit team and determined to be accurate Additionally, the MIR Section 6.1 has been updated to include an explanation of the accuracy assessment of timestep 4 with further explanation of the accuracy assessment methodology provided in Annex AW. MIR Section 6.2 further explains the pre-processing and classification procedures have been outlined with reference to IPCC's guidance used. Annex AS and AR provide further detail of the radiometric calibration and classification processes. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	16/14
Standard & Requirement:	VCS AFOLU 3.7.3
Report Section:	VCS CCB Verification Report Section 8.2
Description of Non-conformance and Related Evidence:	
The proponent has not referenced or provided a Non-Permanence Risk Report as part of the MIR. Although the project has intended to use the VCS risk report provided at validation for verification purposes as well the proponent has not provided the risk report as part of the MIR package. It is not listed or referenced in the MIR in the table of contents or provided in section 2.3. In addition, the audit team identified various issues with the risk report provided which result in it being unable to assess whether its risk rating of “20” is appropriate. The issues that prevent this are as follows: V3.2 is the most recent version of the tool, and the proponent has utilized the VCS calculation tool (Annex L) to compute the risk scores. However, if a proponent uses the calculation tool it must use the VCS Non-Permanence Risk Report (Short Form). In contrast, the proponent has only provided the calculation as an annex and cuts and pastes only selected tables into the PDD. The Short Form is not used. In addition, the proponent has determined an overall risk rating of 20 and justifies this through a presentation of the usage of the Risk Tool in section 2.3.2 and the calculation tool. Although the proponent has provided some explanation to justify its self-assessed risk rating for each risk factor the proponent does not clearly document and substantiate the majority of its risk ratings (see VCS Non-Permanence Risk Tool 1.1.3) and in some cases the Risk tool is incomplete. Elements of this finding also pertain to CCB Standards G3.5 pertaining to natural and human induced risks to expected CCB benefits since the VCS tool serves as a component of this analysis, and to G4.2 regarding documentation of management capacity. Examples a. The VCS Risk tool is incomplete as several required risk factors have been omitted from the analysis including the following: 1. Table 1 (a, b, d) 2. Table 6 (c, d, e) 3. Table 7 (all) All required risk factors must be evaluated and presented in the risk report according the rules set in the tool itself (VCS AFOLU 3.7.3). The onus is on the proponent to ensure the risk tool has been filled out according to these rules. b. Not all risk factor selections have been identified or substantiated with supporting evidence. For example required risk factors that were	

identified as “0” and required in a given risk category or table, such as the factors listed in the previous note, require justification and should be substantiated with evidence (VCS Non-Permanence Risk Tool 1.1.3). In other cases, such as in the table for Financial Risk, additional evidence required by either Standard was not provided, such as evidence regarding the financial health of implementing organizations (Risk Tool 2.2.2 (4)) and CCB G4.7). The cash flow projection was provided to the audit team (Annex E – Implementation Plan Budget) but cannot yet be evaluated until issues with GHG quantification are resolved (Risk Tool 2.2.2 and CCB G3.11).

c. Non-zero risk factors also require evidence to justify their selection. The tables in PDD section 2.3.2 omit supporting evidence for every risk factor. One such example is the analysis of the proponent’s management capacity in Table 1 of the Risk Tool. One example of many occurs in Table 1, item c) where the proponent justifies a risk rating of -2 by asserting that EcoPartners has the appropriate level of competencies to qualify for this rating. However no further information is provided or referenced to substantiate this claim. This particular point overlaps with CCB G4.2 which requests that the management team be explicitly identified and prior expertise documented. This analysis is absent from the PDD.

In conclusion, the proponent has not used the VCS Short Form nor has it provided sufficient documentation and justification for each risk factor. Therefore the audit team cannot properly assess whether the project’s overall risk rating of 20 is appropriate.

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Annex F Isangi REDD+ Non-Permanence Risk Report v1.7 (29 August 2014) Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The proponent has corrected the error by using the full long form of the VCS AFOLU Non-Permanence Risk Report rather than the Short Form and calculation tool. The risk rating is fully justified by the details provided by the proponent in the Risk Report which include reference to applicable annexes and/or PDD or MIR sections for justification. The examples cited in the NCR above were issued only as examples and as such are not addressed here as the proponent has created an entirely new Risk Report which demonstrates conformance with the VCS as identified in this report in the relevant section.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	17/14
Standard & Requirement:	CCB Standards CM1.1-1.2; CCB Rules page 14 “The Validation and Verification Process”
Report Section:	VCS CCB Verification Report Section 9.1
Description of Non-conformance and Related Evidence:	
Section 7.1 of the MIR describes the net positive community impacts. However, this section only cites Jadora’s community-oriented objectives and claims that the project is committed to provision of net positive impacts for all communities. The only mention of implemented activities is a claim that Jadora has implemented 28 activities to actualize positive community impacts. The CCB Standards, and VCS-CCB MIR Report Template, require the proponent to identify and justify impacts (positive and negative, across all socioeconomic or cultural groups) from project activities and demonstrate that the net positive impacts are positive, or are on track to be positive. CCB Rules 2013 page 15 clarifies that project activities shall at least demonstrate that they are on track to be net positive. CM1.2 also requires a demonstration that no High Conservation Values identified in the PD have been negatively impacted by the project. Although the audit team has confirmed net positive community impacts in the field, the proponent has failed to document conformance in the MIR of CM1.1-1.2 for the following reasons: 1. No assessment of negative impacts from the project activities is provided and hence the claim of net positive is not credible 2. It is unclear what the proponent is referring to in the claim that 28 activities have actualized positive impacts. The proponent may be referring to the table in Section 2.2.2.1, but this only identifies 25 activities. 3. Although the proponent has annexes which support the implementation of project activities that could be used to claim net positive benefits, the proponent has provided no reference to these annexes in Section 7.1, the section in which outside stakeholders will look for evidence of net positive impacts 4. The proponent has provided no information or analysis to demonstrate conformance with indicator CM1.2 which requires a demonstration that no HCVs have been negatively impacted by project activities.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014

Findings for Evaluation of Evidence:	The proponent has greatly expanded the detail of Section 7.1 of the MIR, adding several pages of in depth description of achievements related to community benefits which provides a sound justification for the claim of net positive community benefits. The description of project implementation corresponds clearly and directly to the theory of change model evaluated at validation and which <i>ex ante</i> was confirmed to be likely to generate net positive community benefits if effectively implemented. Sections 7.1.1, 7.1.2, and 7.1.3 provide in depth explanation of the outputs achieved in phase one of project implementation. These achievements correspond with those confirmed by the audit team in the field via interviews and direct observation. Section 7.1.4 of the MIR assesses negative impacts to project stakeholders with Section 7.1 assessing impacts to offsite stakeholders. Both are evaluated at a hypothetical level rather than through current monitoring results. This is unavoidable and results from an NCR in the concurrent validation which resulted in a new strategy for monitoring negative impacts. Negative impacts from project implementation will be evaluated at future monitoring events. However the audit team closes this NCR as the CCB Rules 2013 page 15 require that the project is on track to generate net positive impacts, rather than that the project has achieved this at first verification. The audit team collected substantial evidence through interviews and observation during the field audit that the proponent has generated net positive impacts at this time and future monitoring will serve to confirm that this trajectory continues now that the proponent has implemented monitoring for negative impacts as well as positive. In summary the proponent has provided substantial justification of positive impacts, assessed negative impacts, provided appropriate reference to supporting documentation, and has provided evidence that HCVs have not been negatively impacted by the project activities. The NCR is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	18/14
Standard & Requirement:	CCB Standards CM2.1-2.3
Report Section:	VCS CCB Verification Report Section 9.2
Description of Non-conformance and Related Evidence:	

Section 7.2 of the MIR simply claims that there have been no negative offsite stakeholder impacts as a result of the project and that none are anticipated. The proponent has not provided any justification, analysis, or description to substantiate this claim.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The proponent has provided an analysis of negative offsite stakeholder impacts in the MIR Section 7.2. Review of this addition to the MIR. The proponent makes the argument that offsite impacts due to loss of ecosystem services from activity shifting leakage will be more than offset by positive offsite benefits from transfer of agricultural technology throughout the region. The audit team observed that representatives from nearby villages in the offsite zone did attend meetings in Isangi. In addition the project implements several leakage mitigation activities designed to reduce potential leakage and associated negative impacts. The justification is credible and will be assessed continually in later monitoring periods. The non-conformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	19/14
Standard & Requirement:	CCB Standards B1.1-1.2
Report Section:	VCS CCB Verification Report Section 10.1
Description of Non-conformance and Related Evidence:	
Section 8.1 of the MIR fails to demonstrate net positive biodiversity impacts during the verification period for the following reasons: 1. Section 8.1 of the MIR claims that “Without project activities, there would have been a net loss of 201,734.5 hectares”. The wording of this sentence implies that this was the baseline estimated deforestation in the project area during the current verification period, which is not correct. Additionally, it is not credible based on current or project deforestation trends in the project area that the entire project area would be deforested during the project lifetime. 2. Section 8.1 of the MIR does not clearly describe the positive biodiversity impacts of the with-project scenario nor provide a comparison to the without biodiversity scenario, other than the above claim that 201,734.5 hectares of deforestation has been prevented, which is incorrect. In general the logic behind what the biodiversity without project scenario is, what the with-project scenario has achieved, and what the net difference is, as well as the “appropriate methodology” used to arrive at this conclusion, has not been described or justified.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The proponent has removed the erroneous assertion that without project activities the entire project area would be deforested. The proponent has provided detailed assessment of biodiversity benefits in the project area due to project activities in Section 8.1 of the MIR. The assessment is logically linked to the theory of change model proposed by the proponent in the PDD which follows CCBA recommendations for establishing net positive benefits. Detailed outputs linked to project activities and program areas, are identified in Section 8.1.1, 8.1.2, 8.1.3, 8.1.4, and 8.1.5 which clearly establish progress towards net positive biodiversity benefit including protection of HCVs identified and comparison to the without project scenario. The nonconformance is closed.

NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	20/14
Standard & Requirement:	CCB Standards B2.1-2.3
Report Section:	VCS CCB Verification Report Section 10.2
Description of Non-conformance and Related Evidence:	
Section 8.2 of the MIR assesses negative offsite biodiversity impacts. The proponent claims that impacts on forest cover in the leakage area provide the appropriate measure of offsite biodiversity impacts, and that “since there has been a net positive impact on forest cover, the net biodiversity impact of the project is positive.” However, the proponent has provided no explanation in this section of how there has been a net positive impact on forest cover, whether this is in the leakage area, project area, entire project zone, or some other spatial domain. Additionally, the proponent has not provided any information in the MIR on the hectares of forest deforested in the project area and leakage areas in the baseline and in the project scenario during the verification period. This information is contained in MIR Annex A, which is confidential. As such, only individuals with access to the confidential Annex A can arrive at any conclusion about the validity of claims made by the proponent of net positive impacts on forest cover.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Section 8.2 of the MIR has transparently provided the information demonstrating net positive impact on forest cover in the project scenario which was previously only available in the confidential MIR Annex A. The project scenario has avoided a net deforestation of 2,786 hectares which were projected to be deforested in the baseline scenario. The nonconformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	21/14
Standard & Requirement:	CCB Standards GL 2.1-2.5
Report Section:	VCS CCB Validation Report Section 9.3
Description of Non-conformance and Related Evidence:	
The proponent claims CCB Gold Level status for community benefits. While the implementation of the project may merit Gold Level, the MIR does not provide any justification according to the required CCB indicators.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Isangi Responses to Verification Findings V1.17 Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0 Changes.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.0.doc Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	Section 7.3 of the MIR now clarifies that the project is not seeking Gold Level from community benefits. The NCR is closed.
NCR Status:	CLOSED
Comments (optional):	N/A

NCR#:	22/14
Standard & Requirement:	CCB Standards G3.3
Report Section:	VCS CCB Validation Report Section 3.2
Description of Non-conformance and Related Evidence:	
The CCB Standards require that a map where project activities occur is included, yet no such map is provided for the PD nor MIR. As the MIR documents conformance and implementation of the project to the CCB Standards during the monitoring period, the MIR shall identify project activities implemented during the monitoring period.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	Prior to Verification
Evidence Provided by Organization:	Annex AX Jadora Isangi REDD+ VCS CCB Monitoring and Implementation Report v2.2, 19 November 2014
Findings for Evaluation of Evidence:	The proponent has provided a map of the project activities implemented this monitoring period in Annex AX. The nonconformance is closed.
NCR Status:	CLOSED
Comments (optional):	N/A