



REFORESTATION WITH TEAK – CO₂E TEAKMEX VERIFICATION REPORT



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Summary:

Aster Global Environmental Solutions Inc. was contracted by Swiss Carbon Value Ltd., on 31 December 2020 to conduct the verification for the second monitoring period (VCS: 16 October 2017 – 21 October 2020 - 3 years) of the *Reforestation with Teak – CO₂e TEAKMEX Project* [Validated Project Description (PD) dated 02 October 2018]. The TeakMex Project is an ARR grouped project and is achieving Greenhouse Gas (GHG) emission reductions through carbon sequestration with *Tectona grandis* forest plantations.

The goal of the project as described in the Monitoring Report (Section 1.1) is to, “promote the sustainable development of the forestry sector by providing fair job opportunities, recovering degraded soils from livestock and agriculture, and conserving natural forest areas within the project areas to enhance and protect the local biodiversity.”

The verification objective included an assessment of compliance with VCS Version 4.0 and all associated updates, the selected methodology (AR-ACM003 v2.0), and the validated Project Description (PD) *Reforestation with Teak – CO₂e TEAKMEX* dated 02 October 2018. Aster Global (herein referred to as the Validation/Verification Body – VVB/Verification Team) assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (VCS: 16 October 2017 – 21 October 2020 - 3 years) through Agriculture, Forestry and Other Land Use (AFOLU) criteria. The project activities are categorized as Afforestation, Reforestation and Revegetation (ARR).

The scope of the verification following Section 4.3.4 of ISO 14064-3:2006 included the GHG project implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The TEAKMEX Project follows the framework of project activities listed above.

The criteria followed the verification guidance documents provided by Verra located at www.terra.org. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant Verra guidance document as of August 2020.

A summary of all VCS findings (39 total) are included in Appendix B. All findings were satisfied to a reasonable level of assurance and there are no restrictions of uncertainty.

After review of all project information, procedures, calculations, and supporting documentation, Aster Global confirms that the monitoring conducted by the PP, along with the supporting Monitoring Report, are accurate and consistent with all VCS Version 4 criteria, the validated PD, and the selected methodology (AR-ACM003 v2.0). Aster Global confirms that the *Reforestation with Teak – CO₂e TEAKMEX Monitoring Report* (v1.0 dated 20 January 2021) has been implemented in accordance with the validated PD.

Aster Global confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS Version 4 (and all associated updates), as documented in this report are complete. Aster Global concludes without any qualifications or limiting conditions that the *Reforestation with Teak – CO₂e TEAKMEX Monitoring Report* (v1.0 dated 20 January 2021) meets the requirements of VCS Version 4 (and all associated updates) for the verification period/reporting period (VCS: 16 October 2017 – 21 October 2020 - 3 years).

The GHG assertion provided by Agropecuaria Santa Genoveva S.A.P.I. de C.V. and verified by Aster Global has resulted in the GHG emissions reduction or removal of 344,072 tCO₂ equivalents (CO₂e) by the project during the verification period/reporting period (VCS: 16 October 2017 – 21 October 2020 - 3 years). This value is gross of the 17% (70,472 t CO₂e) buffer withholding based on the non-permanence risk assessment tool. This results in 344,072 t CO₂e of credits eligible for issuance as VCUs.

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1 INTRODUCTION

1.1 Objective

For this project, the verification objective was to ensure implementation of project activities and project compliance with the VCS Program Guide, VCS Standard, selected methodology, and the validated VCS Project Description (PD). Aster Global assessed the GHG emission removals for the AFOLU project, specifically ARR.

1.2 Scope and Criteria

The scope of a verification includes the GHG project and baseline scenarios; physical infrastructure, activities, technologies, and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The scope of the project was outlined by the Swiss Carbon Value Ltd. (PP) within the PD and is re-defined as follows for the GHG project:

Baseline Scenario	Extensive livestock farming and citrus crops.
Activities/Technologies/Processes	TEAKMEX promotes the reforestation of lands under a VCS grouped approach utilizing AR-ACM0003 v2.0
Sources/Sinks/Reservoirs	Above-ground tree biomass (included) Below-ground tree biomass (included) Dead wood (included) Litter (Included) Soil organic carbon (excluded) Burning of woody biomass (excluded)
GHG Type	CO ₂
Time Period	Project Start: 30 June 2013 Project Crediting Period End Date: 31 May 2049 (36 years) VCS 2 nd Monitoring Period: 16 October 2017 – 21 October 2020
Project Boundary	States of Tabasco, Chiapas and Campeche in Mexico VCS Grouped Project: Approximately 3,743.06 ha (first instances) 16 properties in Balancán (Tabasco), 54 properties in Huimanguillo (Tabasco), 13 properties in Tenosique (Tabasco), 2 properties in Palenque (Chiapas), and 12 properties in Candelaria (State of Campeche). During the second phase, the grouped project spans 2,355.67ha across five properties in the municipalities of Balancán (Tabasco), 11 properties in Candelaria (Campeche), three properties in Carmen (Campeche), four properties in Escárcega (Campeche), six properties in Tenosique (Tabasco), one property in Salto de Agua (Chiapas), and one property in Palenque (Chiapas).

The criteria will follow the verification guidance documents provided by VCS located at <https://verra.org/project/vcs-program/>. These documents include the following:

- VCS Program Guide (v4, 19 September 2019)
- VCS Standard (v4, 19 September 2019)
- VCS Program Definitions (v4, 19 September 2019)
- AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)
- Program Validation and Verification Manual (v3.2, 19 October 2016)
- AR-ACM0003 – Afforestation and reforestation of lands except wetlands, Version 2.0
 - Applied Tools
 - Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities Version 01
 - Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities Version 04.2
 - Estimation of carbon stocks and change in carbon stocks in dead wood and litter in A/R CDM project activities Version 03.1

- Estimation of non-CO2 greenhouse gas (GHG) emissions resulting from burning of biomass attributable to an A/R CDM project activity Version 04.0.0
- Estimation of the increase in GHG emissions attributable to displacement of pre-project agricultural activities in A/R CDM project activity Version 02.0

1.3 Level of Assurance

The level of assurance was used to determine the depth of detail the verification team used in the Verification and Sampling Plan to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3:2006). The verification team assessed the project's implementation of general principles, data collection and processing, sampling descriptions, documentation, ex post calculations, etc., to provide reasonable assurance to meet the Project Level requirements of the VCS Program. Based on the verification findings, a final evaluation statement reasonably assures the project GHG representations are materially accurate. The evidence used to achieve a reasonable level of assurance is specified in subsequent sections of this report.

1.4 Summary Description of the Project

This grouped ARR project is located within three states of Mexico; Tabasco, Chiapas and Campeche. The reforestation activities occur on land that was previously used for livestock grazing or citrus crops. According to the Project Description, "The project will significantly contribute to the sustainable development of these Mexican states through creating a sustainable supply chain for Teak. This involves: i) providing formal employment opportunities in regions largely characterized by informality; ii) converting land that has previously been cleared for livestock and agriculture purposes into forested lands, so increasing carbon sequestration for the mitigation of global warming; and iii) maintaining fixed conservation areas within commercial plots, in order to enhance and conserve biodiversity in these lands." The project crediting period is 36 years (June 30, 2013 – May 31, 2049).

2 VERIFICATION PROCESS

2.1 Method and Criteria

This verification assessed the Project's compliance with VCS Version 4 and all associated updates, the selected methodology (AR-ACM0003 v2.0), and the validated Project Description (PD), Version 4.0, dated 02 October 2018. The Verification Team assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (16 October 2017 – 21 October 2020) using the Agriculture, Forestry, and Other Land-Use (AFOLU) criteria under the category Afforestation, Reforestation and Revegetation (ARR). The Verification Team assessed whether the PP adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

The non-permanence risk analysis was assessed for this verification. Further, following Section 2.1.2 of the VCS Validation & Verification Manual, V3.2, the objectives of the verification exercise were to evaluate the monitoring report and assess:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description. This includes ensuring conformance with the monitoring plan.
- The extent to which GHG Emission Reductions or Removals reported in the monitoring report are materially accurate.

The criteria followed the verification guidance documents provided by VCS. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document. Please also see Section 1.2 of this report.

In the verification process, there is a risk that potential errors, omissions, and misrepresentations will be found; therefore, a risk-based approach was used to guide the collection of appropriate and sufficient evidence to support a reasonable level of assurance. A risk-based approach means that the verification team focused on items that might result in a material misstatement of the reported GHG assertion.

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan was to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error was reduced to a reasonable level. The Verification and Sampling Plan methodology was derived from all items in our verification process stated above. Specifically, the sampling plan utilized the VCS guidance documents and ISO 14064-3 standard. Any modifications applied to the Verification and Sampling plan were made based upon the conditions observed for monitoring to detect the processes with highest risk of material discrepancy.

A detailed field plan was also developed to guide the verification site visit and is embedded within the Verification and Sampling Plan. For the field sampling effort, direct measurement, observation, interviews, and review of the monitoring period emission reductions in the key areas were determined to be the greatest risk, followed by ground-truthing and review of project activities. Field sampling and techniques were based on the project parameters/scope and best professional judgment of the verification team to meet a reasonable level of assurance as directed by the professional judgment of the Lead Verifier.

Because the biomass inventory (ARR) utilizes permanent sampling plots which require periodic re-inventory for stock estimates and to monitor disturbance, inventory plots were selected for detailed review/re-measurement. Stratification was assessed via GIS (Geographic Information System).

Please see Section 2.3 and 2.4 of this report for more details regarding the site visit during the COVID-19 global pandemic.

2.2 Document Review

A detailed review of all project documentation was conducted as part of the desktop verification to ensure consistency with, and identify any deviation from, the VCS Program requirements, the methodology (AR-ACM0003), and the validated PD. The initial review focused on the validated PD and Monitoring Report (MR) relative to the field conditions observed and interviews with project management staff. Project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included monitoring data, remote sensing/Geographic Information System (GIS) and forest inventory data, Standard Operating Procedures (SOPs), financial analyses, boundaries, maps and aerial images, fire-specific monitoring data, biomass and carbon calculation spreadsheets, and responses to Clarification Requests (CLs).

The VCS AFOLU Non-Permanence Risk Tool was used by the PP to assess overall project risk. The verification team reviewed the Non-Permanence Risk Report provided with the verification supporting documentation and confirmed that the Project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B. The final score was calculated to be 17%.

For a listing of all documents received from the PPs for this verification, please see Appendix A.

2.3 Interviews

As a result of the global COVID-19 pandemic, the verification team hired an in-country subcontractor to conduct the site visit. Aster Global has internal procedures in place to ensure a reasonable level of assurance is reached without physically going onsite. Aster Global has prepared a procedure entitled “Procedures For The Use Of Information And Communication Technology (ICT) For Validations And Verifications During Extraordinary Events Or Circumstances.” This procedure is prepared in consideration of IAF Informative Document for Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certification Organizations (Issue 1, IAF ID 3: 2011, 08 November 2011), IAF Mandatory Document For The Use of Information and Communication Technology (ICT) For Auditing/Assessment Purposes (Issue 2, IAF MD 4:2018, 04 July 2018), and ANAB Accreditation Rule 9 (Issue Date 01 January 2014).

During the site visit, interviews were performed as part of the overall verification process. The interviews were conducted for the purpose of substantiating information provided in the project description, monitoring report, and supporting documents provided by the PP and to solicit additional information as needed. On-site interviews and informal discussions were conducted during the site visit (10 February 2021 – 12 February 2021). Interviews were requested and held with individuals representing the following groups of stakeholders:

Victor Hugo Fernandez	Forestry manager in GVSA
Maria Fernanda Buitrago	Senior Lead ARR and IFM Projects in South Pole
David Vásquez Ospina	Senior Project Coordinator – AFOLU Projects in South Pole
Juan Velázquez	Forestry supervisor in Candelaria
Tomás González	Forestry assistant in Candelaria
Eliseo Cruz	Forestry assistant in Candelaria
Pascual Arcos López	Forestry assistant in Carmina
Eustaquio Alejo Jerónimo	Forestry assistant in Carmina
Joel Masariegos Martínez	Forestry assistant in Carmina
Luis Gustavo López	Forestry assistant in Carmina
Teodoro Paredes	Forestry supervisor in Carmina
Ángel Ballina Cruz	Supervisor in Tenosique
Daniel Pablo Lopez	Forestry assistant in Tenosique
José Juan Flores López	Forestry assistant in Tenosique

Leonel Vázquez	Supervisor in Balancán.
Luis Sánchez	Operational manager in Balancán
Javier López	Forestry assistant in Balancán
Francisco Reyes	Forestry assistant in Balancán

The interviews were conducted for the purposes of substantiating to a reasonable level of assurance the information presented in the MR. That review included activities reported by the project during the monitoring period, employment practices by the PP, plantation management practice, and training received.

2.4 Site Inspections

The verification site inspection (field visit) occurred from 10 to 12 February 2021. The verification field activities closely followed Aster Global's Verification and Sampling Plan methodology. Sample size and techniques were based on the project parameters, scope, and best professional judgment of the Lead Verifier. Plots selected for detailed review were chosen at random and under the discretion of the Forest Biometrician and the Lead Verifier. A risk-based approach was used to select the plots to allow a review of multiple plots targeted to represent a wide geographic range that was sufficient to provide the necessary sample size to meet a reasonable level of assurance, as directed by the professional judgment of the Lead Verifier.

For this verification, 18 of the Project's permanent biomass sampling plots were remeasured out of the total 294 plots. The re-sampled permanent sampling plots confirmed that the Project's SOPs for field data collection were followed. The verification team compared the data collected from the site visit to the data from the original Project data sheets to ensure accuracy. The sample observations showed consistency and conservativeness with the original data collected by the PP.

During the site visit the verification team took georeferenced photos and points to confirm that boundaries are correctly mapped and match the on-the-ground boundaries. Additionally, the verification team visited areas that were added as new instances during this monitoring period to confirm applicability conditions. The verification team also confirmed the appropriateness of natural risk scores through interviews with project staff and visual evidence collected during the site visit.

2.5 Resolution of Findings

During the verification process, there was a risk that potential errors, omissions, and misrepresentations would be found. The actions taken when errors, omissions, and misrepresentations were found included notifying the PP of the issue(s) identified and expanding our review to the extent that satisfied the Lead Verifier's professional judgment.

The process of resolution of findings involved three formal rounds of assessment by the verification team. Findings were resolved during the verification by the PP implementing corrective actions such as amending the MR and calculations, as well as providing written responses. This resulted in project documentation that was in conformance with the requirements of the VCS Standard for GHG projects.

Findings were characterized in the following manner:

Non-Conformity Reports (NCRs) were issued as a response to material discrepancies in a part of the project and generally fell into one category:

- Non-conformity to a VCS guiding document listed in Sections 1.2 and 2.2 above
- Consistency among project documentation or calculations was lacking
- Mathematical formulae were incorrect
- Additional information was required by the verification team to confirm reasonable assurance for compliance

Clarifications (CL) were issued when language within a project document needed extra clarification to avoid ambiguity.

Opportunities for Improvement (OFI) were issued to the PPs when an opportunity for improvement was identified.

During the verification, forty-two (42) VCS findings were identified. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B VCS NCRS/CLS/OFI SUMMARY. All NCRs/CLs were satisfactorily addressed and closed.

2.5.1 Forward Action Requests

Criteria 3.2.10 of the VCS Standard V4.0 states “Projects with tree harvesting shall demonstrate that the permanence of their carbon stock is maintained and shall put in place management systems to ensure the carbon against which VCUs are issued is not lost during a final cut with no subsequent replanting or regeneration.” Currently, the PP has registered management plans that cover the initial rotation (18 years); however, the verification team, in line with guidance provided by VERRA, is issuing a Forward Action Request (FAR) that the management plans be updated prior to the next verification to cover the entire crediting period.

Additionally, a FAR is being issued for the next verification to ensure that management plans are updated with lessons learned to ensure the adaptive management component of the Non-Permanence Risk Tool is implemented.

2.6 Eligibility for Validation Activities

Aster Global Environmental Solutions, Inc. is accredited to conduct validations under VERRA.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The verification team is not aware of project involvement in other forms of environmental credits from its activities. The project has not been registered, and is not seeking registration, under any other GHG programs. The TeakMex Project currently only seeks carbon credits under the VCS program. This was confirmed through a risk-based internet review and interview with the PPs. Therefore, the verification team deems the project eligible to participate under the VCS Program.

3.2 Methodology Deviations

There were no new methodology deviations applied during the monitoring period.

3.3 Project Description Deviations

There were three PD Deviations applied during the monitoring period. In the first PD Deviation, the project applies the root-shoot ratio specified in the methodology which is a function of real biomass. The final two PD Deviations concern changes in Section 1.8 of the validated PD. The second PD Deviation is related to a change in the thinning regime specified in the validated PD. As with all decisions related to thinning, volume is an important consideration. As a result, during this monitoring period the project proponent decided to utilize a different thinning regime than what was described in the PD. As required by the methodology and VCS Standard, changes in the thinning regime were reflected in the ex-post VCUs credited during this crediting period and the ex-ante Long-term Average GHG Benefit. The final PD Deviation clarifies Section 1.8 of the validated PD where the Project Activity is described. Importantly, the project proponent clarified that upon a final harvest in year 18 every plantation will be replanted.

The verification team assessed each PD Deviation in relation to the requirements of Section 3.18 of the VCS Standard v4.0 and confirmed these PD Deviations do not affect the applicability of the methodology, additionality or the appropriateness of the baseline scenario. Section 3.2.2 of the MR appropriately describes and justifies the PD Deviation. The verification team is reasonably assured the project remains in compliance with the VCS rules and the PD Deviation is valid.

3.4 Grouped Project

The criteria for the inclusion of new project activity instances are outlined in section 3.3.1 of the MR. The project added 31 additional project instances during this monitoring period representing an additional 2,355.67 hectares. The verification team reviewed each of the new project instances and confirmed that all fall within the validated geographic region consisting of three states in Mexico: Chiapas, Campeches, and Tabasco. The PP provided high quality eligibility maps for each new project instance which included forest cover and wetland analyses. Furthermore, ownership documents were provided for each new project instance. The verification team conducted an independent eligibility assessment utilizing remote sensing data, national wetlands maps, ownership records, and site visit observations to confirm the new instances are in compliance with the applicability requirements described in section 1.13 of the PD. The verification team is reasonably assured that the new project instances are valid.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

The project activities and MP related to the first instances and first verification were maintained. The most significant change during this second verification period was the establishment of 2,385.4 ha of newly planted areas in the form of new project instances. The verification team confirmed the project activities (afforestation efforts) continued throughout this monitoring period. A comparison of the implemented project activities and MP with those of the validated PD shows the project continues to be implemented as described in the validated PD. There are no material discrepancies between the monitoring system and MP.

Most importantly aboveground biomass was monitored through the implementation of 294 permanent sample plots as described in the validated PD and in-line with the selected methodology. As described in Section 2.4 of this report, the verification team selected a 6% sample of the permanent sample plots and confirmed that plot measurement SOPs were followed. Additionally, through independent data checks the verification team confirmed the ex-post stratification, data collection, and QA/QC procedures adhered to the validated MP. Climate objectives achieved included avoiding the emission of 344,072 tCO₂e.

For this period, the verification team confirmed the project has continued to implement the MP as originally described in the PD Section 4.3 and subsequently described in Section 4.3.3 of the MR. The existence of any material discrepancies between project implementation and the project description was confirmed through the overall verification process including interviews and documentary review. The implementation status of the monitoring plan and the completeness of monitoring, including the suitability of the implemented monitoring system was confirmed through review of AR-ACM003 adopted procedures and comparison of monitoring results against the validated PD.

No new methodology deviations relating to monitoring and/or measurement of GHG emission reductions or removals were applied by the PP/identified by the verification team during this monitoring period verification (please see Section 3.2). One new PD deviation was applied during this period which is described in Section 3.3.

The GHG emission reductions generated by the project have not been included in an emissions trading program other than the VCS program and it has not received or sought any other form of environmental credit as confirmed through a risk-based review by the verification team (see Section 3.1).

Sustainable development contributions are applicable to this project. The project was confirmed to be actively supporting many UN SDGs as reported in Section 1.11 of the MR, through the site visit interviews, and the document review. The goals of the project activities are to promote the sustainable development of the forestry sector by providing fair job opportunities, recovering degraded soils from livestock and agriculture, and conserving natural forest areas within the project areas to enhance and protect the local biodiversity. Verifiers concluded that the project has been implemented as described in the validated PD.

4.2 Safeguards

4.2.1 No Net Harm

According to section 5.1 of the PD, the project is not expected to generate negative impacts on the environmental and the community if the mitigation measures proposed are followed. During the monitoring period, multiple mitigation measures were demonstrated by the PP to prevent negative impacts on flora and fauna, soils, air, water, and health.

4.2.2 Local Stakeholder Consultation

Surveys were carried out during the first verification period throughout farms in the five municipalities. There are no communities within the project area, but the people surveyed were likely to interact with or work for the company. The objectives of the surveys were to determine the perception of forestry and the role of forest plantations in climate change.

The verification team confirmed that there are lines of communication the company has created for employees to report issues to Human Resources. Additionally, signage is posted along property boundaries that show the company's phone number. Evidence was also provided that the company responded to and addressed community needs through activities such as road repair.

4.3 AFOLU-Specific Safeguards

Implementation of project activities does not have risks that could impact local stakeholders. During validation, surveys were conducted with the communities surrounding the project area. The new areas included during this monitoring period were established around the same local communities, and therefore no new surveys were carried out.

During the site visit, the verification team found no evidence that there were negative impacts on local stakeholders as a result of project activities.

4.4 Accuracy of GHG Emission Reduction and Removal Calculations

The verification team conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties, and output data to ensure consistency with the VCS Standard, the validated PD, and AR-ACM003 v2.0. Data with associated conversion factors, formulas, and calculations were provided by the PP in spreadsheet format to ensure all formulae were accessible for review. The verification team independently recalculated subsets of the analyses to confirm correctness and assess if data transposition errors occurred to achieve a reasonable level of assurance and to meet the materiality requirements of the project, as required by the VCS Standard. The PP also provided answers to questions on calculations to ensure the verification team understood the approach and could confirm its consistency with AR-ACM003 and the validated PD.

An overview of the data and parameters monitored, along with verification team findings, are included in the table below. This is not an exhaustive list of all MRV parameters that are available for verification, but all were data checked as part of the comprehensive desktop review:

Data Unit / Parameter	Accuracy of GHG emission reductions and removals	<i>Whether methods and formulae set out in the PD have been followed</i>	<i>Appropriateness of default values</i>
A – Project Area in hectares	Verification team confirmed this parameter was calculated correctly and reported correctly in the MR.	This parameter was reviewed and re-calculated using methods set forth in the methodology and the PD and confirmed.	Not applicable.
A _i – Area of stratum i in hectares	Verification team confirmed the ex-post stratification was calculated correctly in line with the validated PD and AR-ACM003 methodology.	This parameter was reviewed and re-calculated using methods set forth in the methodology and the PD and confirmed.	Not applicable.
N	Verification team confirmed the number of plots is correctly reported in the MR.	This parameter was reviewed and re-calculated using methods set forth	Not applicable.

		in the methodology and the PD and confirmed.	
DBH (cm)	Verification team confirmed DBH measurements followed the validated plot measurement SOPs.	This parameter was reviewed and during the site visit the verification team confirmed the methods set forth in the methodology and the PD were followed.	Not applicable.
H (meters)	Verification team confirmed height measurements followed the validated plot measurement SOPs.	This parameter was reviewed and during the site visit the verification team confirmed the methods set forth in the methodology and the PD were followed.	Not applicable.

For this monitoring period, the project relied upon a network of forest inventory plots to monitor actual on-site carbon stock estimates. For new project instances, new permanent forest inventory plots were established and for project instances from the first monitoring period, permanent sample plots were remeasured. During the site visit the verification team remeasured a ~6% sample of the permanent inventory plots and confirmed the validated measurement SOPs were followed. Both DBH (cm) and height (meter) were collected as part of the plot measurements.

The verification team reviewed the calculation methods during a calculation walkthrough meeting with the PP where the features of AR-ACM003 were discussed. It was confirmed that the project's on-going analysis methods for monitoring conform with the methodology. The verification team reviewed the monitoring period inventory results independently and confirmed that data sources are suitable and in compliance with AR-ACM003 requirements.

The methods and formulae set out in the PD for calculating baseline emissions, project emissions, and leakage were confirmed to have been followed. The total end of the 2019 monitoring period carbon stocks in all project activities for all relevant pools resulting from carbon stock changes were correctly quantified. Analysis of project inventory data used appropriate formulas, conversions, and parameters, supported by scientific literature. Where ranges of parameters exist, or other types of formulaic uncertainty, appropriately conservative values were used in data analysis.

Uncertainty calculations for all project activities were reviewed at length as prescribed by the methodology and confirmed to result in a correct estimate of uncertainty. No uncertainty deduction was required for this monitoring period.

In conclusion, the quantification methods for GHG emission reductions and removals have been performed correctly and in accordance with the validated PD and AR-ACM003 V2.0.

4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

During this verification assessment, the evidence provided by the PP was sufficient in both quantity and quality to support the determination of GHG emission removals reported by the project. Throughout the verification, the PP demonstrated a commitment toward conservativeness and took all measures appropriate to ensure the reliability of evidence provided.

The threshold for materiality with respect to the aggregate of errors, omissions, and misrepresentations relative to the total reported GHG emission reductions and/or removals was met for this project as defined in the Verification Sampling Plan. Materiality is a concept that errors, omissions, and misrepresentations could affect the GHG reduction assertion and influence the intended users (ISO 14064-3:2006). As defined by VCS Version 4, the materiality will be 5% for this project.

The evidence provided to determine emission reductions reported in the Monitoring Report included values, notations, units, and sources. This evidence has been cross-checked with supplied emission reduction calculation spreadsheets. The procedure for data recording, transfer and final transposition was also verified and found to be in compliance with the monitoring plan outlined in the PD. The verification team confirmed through cross checks that adequate monitoring mechanisms are in place where the required parameters need to be monitored.

The verification team was provided access to the project's series of monitoring worksheets and inventory data where monitoring data is compiled for quantification and reporting. These tools ensure accurate information flow for monitoring efforts. Section 4.3.3 of the MR provides additional detail on project data management methods and structure.

Interviews conducted (oral evidence) are outlined in Section 2.3 above, and the final documents received from the PP supporting the determination of GHG removals can be viewed in Appendix A.

4.6 Non-Permanence Risk Analysis

The Reforestation with Teak – CO₂e TEAKMEX project Monitoring and Implementation Report utilized the AFOLU Non-Permanence Risk Tool to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The verification team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements Section 3.7.3 and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. At all levels, the verification team evaluated the rationale, appropriateness, and justifications of risk

ratings chosen by the PP Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	The verification team confirmed that the management team includes individuals with the necessary qualifications and that there is an adaptive management plan in place.	A risk rating of -4 is appropriate given the rationale provided and all statements made are substantiated.
Financial Viability	The project breakeven point is greater than 10 years from the current assessment and the project has secured 40% to 80% of funding needed to cover the total cash out required before the project reaches breakeven. The mitigation credit is applicable as the project has available as callable financial resources at least 50% of total cash out before the project reaches breakeven.	A risk rating of 2 is appropriate given the rationale provided.
Opportunity Cost	The project has provided an NPV analysis demonstrating that the project scenario is expected to be at least 50% more profitable than the most profitable alternative land use activity.	A risk rating of -4 is appropriate given the rationale provided.
Project Longevity	The project lifetime is 36 years and there are no legal agreements that cover the project area for the entirety of the project.	A risk rating of 17 is appropriate given the rationale provided.

Total Internal Risks		The project has a total Internal Risk score of 11 .
External Risks		
Land Tenure	The verification team reviewed the ownership documents and registration documents with SEMARAT and is reasonably assured that ownership rights and resource rights are held by the same entity. Additionally, the verification team found no evidence that land disputes over the project area exist.	A risk rating of 0 is appropriate given the rationale provided.
Community Engagement	There are no communities living within the project area and there are no communities reliant on the project area.	A risk rating of 0 is appropriate given the rationale provided.
Political Risk	Mexico has a governance score of -0.32. Mexico participates in REDD+ readiness and is a member of World Bank FCPF.	A risk rating of 0 is appropriate given the rationale provided.
Total External Risks		The project has a total External Risk score of 0 .
Natural Risks		
Natural Risk	There is a risk of fire, pest and disease outbreak, and extreme weather in the project area, and mitigation efforts are in place.	A risk rating of 6 is appropriate given the rationale provided.
Total Natural Risks		The project has a total Natural Risk score of 6 .
Overall Risk Rating = 17		

Non-Permanence Risk Rating = 17

In summary, PPs have accounted for risk factors in a reasonable manner and have reached an overall risk rating that encompasses all risks of non-permanence. The project has applied a Non-Permanence Risk Rating of 17%. As required, risk will be reassessed and given risk scores at each verification period.

5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, and supporting documentation, Aster Global confirms that the monitoring conducted by the PP, along with the supporting Monitoring Report, are accurate and consistent with VCS Version 4 and all associated updates, the validated PD, and the selected methodology (AR-ACM003). Aster Global confirms that The Reforestation with Teak – CO₂e TEAKMEX Monitoring Report (v1.0 dated 20 January 2021) has been implemented in accordance with the validated PD.

Aster Global confirms all verification activities, including objectives, scope and criteria, level of assurance, validated PD implementation, and project MR adherence to VCS Version 4 (and all associated updates), as documented in this report are complete. Aster Global concludes without any qualifications or limiting conditions that The Reforestation with Teak – CO₂e TEAKMEX Monitoring Report (v1.0 dated 20 January 2021) meets the requirements of VCS Version 4 (and all associated updates) for the verification period/reporting period (VCS: 16 October 2017 – 21 October 2020 - 3 years).

The GHG assertion provided by Agropecuaria Santa Genoveva S.A.P.I. de C.V. and verified by Aster Global has resulted in the GHG emissions reduction or removal of 414,544 tCO₂e by the project during the verification period/reporting period (VCS: 16 October 2017 – 21 October 2020 - 3 years). This value is gross of the 17% (70,472 tCO₂e) buffer withholding based on the non-permanence risk assessment tool. This results in 344,072 tCO₂e of credits eligible for issuance as VCUs.

Verification period: From 16 October 2021] to 21 October 2021

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

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions	Buffer pool allocation	VCUs eligible for issuance

				or removals (tCO ₂ e)		
2018	7,858	142,237	-	118,057	24,180	118,057
2019	26,239	125,711	-	104,340	21,371	104,340
2020	5,354	146,596	-	121,675	24,921	121,675
Total		414,544	-	344,072	70,472	344,072

APPENDIX A: LIST OF DOCUMENTS RECEIVED

Use appendices for supporting information. Delete this appendix (title and instructions) where no appendix is required.

Document Name	Date Received
1st Verification.rar	January 22, 2021
Plantations_2017.rar	January 22, 2021
Eligibility-20201027T210149Z-001.zip	January 22, 2021
KMZ-20201027T205331Z-001.zip	January 22, 2021
PDF (property covers)-20201027T204806Z-001.zip	January 22, 2021
Shape-20201027T204715Z-001.zip	January 22, 2021
Eligibility_2002_2012.cpg	January 22, 2021
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Eligibility_2002_2012.shx	January 22, 2021
plots.kmz	January 22, 2021
project_area.kmz	January 22, 2021
EL CHUBASCO.pdf	January 22, 2021
EL CONQUISTADOR.pdf	January 22, 2021
FRACCION I DEL PREDIO PASO NUEVO.pdf	January 22, 2021
FRACCION II DEL PREDIO TRES HERMANOS.pdf	January 22, 2021
LA ESCONDIDA.pdf	January 22, 2021
LA FRANELA II.pdf	January 22, 2021
LA FRANELA.pdf	January 22, 2021
LA GUADALUPE.pdf	January 22, 2021
LA GUARIDA.pdf	January 22, 2021
LA ILUSION.pdf	January 22, 2021
SAN CARLOS.pdf	January 22, 2021
TRES HERMANOS FRACCION I.pdf	January 22, 2021
DOÑA CARMINA.pdf	January 22, 2021
HIDALGO.pdf	January 22, 2021
EL NIDO.pdf	January 22, 2021
EL PARAISO.pdf	January 22, 2021
LA CAOBA LOTE 90.pdf	January 22, 2021

LOTE 85.pdf	January 22, 2021
LOTE 96.pdf	January 22, 2021
LOTE NUMERO 84 MACULIS.pdf	January 22, 2021
MACHICHE LOTE 79.pdf	January 22, 2021
PREDIO 78.pdf	January 22, 2021
PREDIO 86.pdf	January 22, 2021
PREDIO EL REGALO.pdf	January 22, 2021
PREDIO RUSTICO (A.Castillo).pdf	January 22, 2021
PREDIO RUSTICO (CANDIDA ZACARIAS).pdf	January 22, 2021
PREDIO RUSTICO (Ruperto Montoya).pdf	January 22, 2021
PREDIO RUSTICO(Socrates Zacarias).pdf	January 22, 2021
PROPERTY 74.pdf	January 22, 2021
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LA TRINIDAD.pdf	January 22, 2021
LOTE 1 A (Gregorio Mendez).pdf	January 22, 2021
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LOTE 1 B.pdf	January 22, 2021
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LOTE 10 (Gregorio M).pdf	January 22, 2021
LOTE 10 -A.pdf	January 22, 2021
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LOTE 11 (pino Suarez).pdf	January 22, 2021
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LOTE 16.pdf	January 22, 2021
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LOTE 18.pdf	January 22, 2021
LOTE 2 (Mercedes Gamas).pdf	January 22, 2021
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LOTE 21(PINO SUAREZ).pdf	January 22, 2021
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LOTE 3 Y 5.pdf	January 22, 2021

LOTE 30.pdf	January 22, 2021
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LOTE 32 (PINO SUAREZ).pdf	January 22, 2021
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LOTE 44.pdf	January 22, 2021
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VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex.xlsm	February 6, 2021
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Campeche3.rar	February 6, 2021
Campeche4.rar	February 6, 2021
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Huimanguillo2.rar	February 6, 2021
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Tabasco_Balancan2.rar	February 6, 2021

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0622-2016 FRACC II PREDIO RUST TRES HERMANOS.pdf	February 6, 2021
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424-2013 LA FRANELA Y LA FRANELA II.pdf	February 6, 2021
425 -2013 EL SACRIFICIO FRACCION II.pdf	February 6, 2021
363-2013 EL CONQUISTADOR.pdf	February 6, 2021
405-2013 LA ESCONDIDA Y TRES HERMANOS FI.pdf	February 6, 2021
0362-2013EL RODEO PRIMAVERAS PROVIDENCIA COMPLETO.pdf	February 6, 2021
284-2013 D CARMINA HIDALGO.pdf	February 6, 2021
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4129-2009 FINISTERRA.pdf	February 6, 2021
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1367 - 2016 LOTE 85 (HERIBERTO VARGAS).pdf	February 6, 2021
1368 - 2016 RANCHO LA LUZ (ANGELA ARCOS).pdf	February 6, 2021
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1825 - 2016 RÚSTICO (CÁNDIDA ZACARÍAS).pdf	February 6, 2021
1826 - 2016 RUSTICO (RUPERTO MONTOYA) AGRI NORTE 2016.pdf	February 6, 2021
Worldwide Governance Indicators - Mexico.xlsx	February 6, 2021
Cost effectiveness of plantations - AGSA.xlsx	February 6, 2021
Financial report - South Group Pole.xlsx	February 6, 2021
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River-Cespedes (s.p).pdf	February 6, 2021

Bermejo et al 2004.pdf	February 6, 2021
CATIE 2013.pdf	February 6, 2021
Cermeli et al 2002.pdf	February 6, 2021
Chaves _ Fonseca 2001.pdf	February 6, 2021
General introduction for employees 2016-2017.ppt	February 6, 2021
Human resources summary.docx	February 6, 2021
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Huimanguillo.rar	February 6, 2021
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PMF LOTE 85.pdf	February 6, 2021
PMF LOTE NUM 84 MACHICHE LA CAOBA EL REGALO EL PARAISO.pdf	February 6, 2021
PMF LOTE NUMERO 74 SETENTA Y CUATRO.pdf	February 6, 2021
PMF LOTE NUMERO 96.pdf	February 6, 2021
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PMF Lote Número 86.pdf	February 6, 2021
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PMF PREDIO RUSTICO 52.96 HAS.pdf	February 6, 2021
PMF RANCHO LA LUZ.pdf	February 6, 2021
PM 5 mayo roma la ilusion.pdf	February 6, 2021
PM EL CONQUISTADOR.pdf	February 6, 2021
PMF EL CHUSBASCO Y OTROS.pdf	February 6, 2021
PMF FRACC II DEL PREDIO TRES HERMANOS.pdf	February 6, 2021
PMF LA FRANELA Y LA FRANELA II.pdf	February 6, 2021
PMF LA GUADALUPE.pdf	February 6, 2021
PMF SAN CARLOS.pdf	February 6, 2021
PMF TRES HERMANOS FRACC I Y LA ESCONDIDA.pdf	February 6, 2021
PMF DOÑA CARMINA.pdf	February 6, 2021
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PMF P.P. DOÑA CARMINA E HIDALGO PARTE 2.pdf	February 6, 2021
PMF 1 - B.pdf	February 6, 2021
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PMF La Trinidad.pdf	February 6, 2021
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PMF Lote 07.pdf	February 6, 2021
PMF Lote 09.pdf	February 6, 2021
PMF Lote 1 - A.pdf	February 6, 2021
PMF Lote 1 A.pdf	February 6, 2021
PMF Lote 1.pdf	February 6, 2021
PMF Lote 2.pdf	February 6, 2021

PMF Lote 5 y 3.pdf	February 6, 2021
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PMF Lote 49.pdf	February 6, 2021

PMF LOTE NUMERO SEIS.pdf	February 6, 2021
PMF Predio Rústico 27 y 28.pdf	February 6, 2021
PMF Santa Mónica.pdf	February 6, 2021
PMF Santa Patricia.pdf	February 6, 2021
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PM EL SACRIFICIO.pdf	February 6, 2021
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PM LOTE 41 Y OTROS.pdf	February 6, 2021
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PM LOTE NUMERO DIECISIETE.pdf	February 6, 2021
PM SAN OCTAVIO.pdf	February 6, 2021
PMF LOTE NUMERO 03.pdf	February 6, 2021
PMF Lote Número 20.pdf	February 6, 2021
PMF PREDIOS RUSTICOS DE 47 Y 96 HAS.pdf	February 6, 2021
Flooding risk report.pdf	February 6, 2021
Flores et al 2016.pdf	February 6, 2021
Insurance.pdf	February 6, 2021
Kairo et al 2000.pdf	February 6, 2021
Martínez-Rivero 2007.pdf	February 6, 2021
Richter 1935.pdf	February 6, 2021
PROGRAMA_INCENDIO_2017_Ranchos Tabasco_ Candelaria_ Chiapas.pdf	February 6, 2021
Protocolo control de la cochinilla.pptx	February 6, 2021
Protocolo para ENFRENTAR HURACANES_29.07.2017.docx	February 6, 2021
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S09LM01ppm02.xlsx	February 19, 2021
LA GUARIDA_5deMayo_Lallusion_Roma.zip	March 3, 2021
SHP BONO CARB FINISTERRA 25.11.2020.zip	March 3, 2021
SHP BONO CARB_ElLeonElParral.zip	March 3, 2021
SHP_CampecheSur_Tabasco.zip	March 3, 2021
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PLANTACION 5 DE MAYO.dbf	March 3, 2021
PLANTACION 5 DE MAYO.prj	March 3, 2021
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PLANTACION LMF 43 FINISTERRA-2019.shx	March 3, 2021

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PREDIO FINISTERRA (Palenque).prj	March 3, 2021
PREDIO FINISTERRA (Palenque).qpj	March 3, 2021
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PREDIO EL LEON .qpj	March 3, 2021
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PLANTATION DOCE DE MAYO .qpj	March 3, 2021
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PLANTATION DOCE DE MAYO .shx	March 3, 2021
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PROPERTY DOCE DE MAYO.dbf	March 3, 2021
PROPERTY DOCE DE MAYO.pdf	March 3, 2021

PROPERTY DOCE DE MAYO.prj	March 3, 2021
PROPERTY DOCE DE MAYO.qpj	March 3, 2021
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PLANTACION PREDIO LA ILUSION.qpj	March 3, 2021
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PROPIEDAD SANTA FLORA.pdf	March 3, 2021
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PREDIO CASTILLA.pdf	March 3, 2021
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20201130_Eligibility_General_Location_Chiapas.jpg	March 5, 2021
20201130_Eligibility_General_Location_Tabasco.jpg	March 5, 2021
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423-2018 SAN ROQUE.pdf	March 5, 2021
5 MAYO Escritura 48296.pdf	March 5, 2021
EL LEON ESC. 1225-2017.pdf	March 5, 2021
EL TEXANO ESC. 1284-2017.pdf	March 5, 2021
ESC 532-2014 FRACCION II DEL PREDIO TRES HERMANOS.pdf	March 5, 2021
ESC PUB 1342 2017 LA MARTINICA.pdf	March 5, 2021
ESC. 27,169 DOCE DE MAYO.pdf	March 5, 2021
ESC. 27,170 SANTA FLORA.pdf	March 5, 2021
ESC. 608-2018 LA VOLUNTAD DE DIOS.pdf	March 5, 2021
ESC. DOS HERMANAS SAN FRNACISCO EL RECURDO 1283 2017.pdf	March 5, 2021
Escritura 27,167 LOS MANANTIALES.pdf	March 5, 2021
Escritura 27,168 RANCHO NUEVO.pdf	March 5, 2021
Escritura 48669 ROMA.pdf	March 5, 2021
Escritura 49397 LA ILUSION.pdf	March 5, 2021
LA ESCONDIDA 834.PDF	March 5, 2021
LA ESPERANZA 424 - 2018.pdf	March 5, 2021
LA FRANELA 836.PDF	March 5, 2021
LA FRANELA II 850.PDF	March 5, 2021
LA PROVIDENCIA 1640.PDF	March 5, 2021
SAN JUANITO ESC 398 2018.pdf	March 5, 2021
TRES HERMANOS 852.PDF	March 5, 2021
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APPENDIX B: LIST OF CLS/NCRS/OFIS

Item Number	1
Section	3.2 AFOLU-Specific Matters
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.2.6 The PP shall demonstrate that project activities that lead to the intended GHG benefit have been implemented during each verification period in accordance with the project design. Where no new project activities have been implemented during a verification period, PPs shall demonstrate that previously implemented project activities continued to be implemented during the verification period (e.g., forest patrols or improved agricultural practices of community members).
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	N
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Site Visit observation and MR documentation
Aster Global Findings - Round 1	The MR section 3.2.2 of the MR states that no methodology deviations have occurred during this monitoring period. However, the VVB noted that a couple of parameters available at validation in section 4.1 of the MR have changed since validation. These changes should be reflected in the PD Deviations section of the MR.
Round NCR/CL/OFI	1 CL: All parameters that were listed in the "Data and Parameters Available at Validation" that have changed since validation of the PD should be included in the PD deviation section of the MR.

Round 1 Response from PP (DD MonthYYYY)	Root-shoot-ratio (R) parameter announced in section 4.1, was updated for this verification and included in section 3.2.2. according to CDM_AR_TOOL_14. "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities"; which states that, unless transparent and verifiable information can be provided to justify a different value, its value can be estimated using the following equation: $R = (e^{(-1.085 + 0.9256 \cdot \ln B)}) / B$. The up to date of the ex ante estimation were also added to this section, and the ex - ante file is presented in the supporting information: Supporting documents\Estimations\260426_Ex_ante_update
Aster Global Findings - Round 2	The audit team reviewed the updated MR and confirmed that the change in the root-to-shoot ratio that was used for this Monitoring Period was included in the MR under the PD deviations section. However, the VCS Standard states "the deviation shall be described and justified in the monitoring report. This shall include a description of when the changes occurred and the reasons for the changes." This additional language required by the VCS Standard was not found in the updated MR.
Round 2 NCR /CL/OFI	CL: Please update the Project Deviations section of the MR to comply with the VCS Standard.
Round 2 Response from PP (DD MonthYYYY)	In section 3.2.2 of the MR, in order to describe and justified when the changes occurred and, the reasons for the changes in the monitoring report, the following additional language was included: This equation was used in the present monitoring period. The value used in previous verification was a generic value provided by literature which can be used in a very broad and unspecific scope. The formula used now involves the real biomass estimated for the project, which provides a more accurate value for the parameter.
Aster Global Findings - Round 3	The audit team reviewed the updated MR and confirmed that the PD Deviation is adequately described. This criteria is satisfied. No further action is needed.

Item Number	2
Section	3.2 AFOLU-Specific Matters
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.2.8 Where ARR, ALM, IFM or REDD project activities occur on wetlands, the project shall adhere to both the respective project category requirements and the WRC requirements, unless the expected emissions from the soil organic carbon pool or change in the soil organic carbon pool in the project scenario is deemed below <i>de minimis</i> or can be conservatively excluded as set out in the VCS Program document <i>VCS Methodology Requirements</i> , in which case the project shall not be subject to the WRC requirements.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Eligibility Assessment Documents
Aster Global Findings - Round 1	The audit team was unable to find a evidence that the new project instances were assessed for whether or not they were implemented in wetlands.
Round 1 NCR/CL/OFI	CL: Please provide verifiable evidence that none of the new instances for this verification were on wetlands.
Round 1 Response from PP (DD MonthYYYY)	In section 2.3.1 of the MR, it was included the analyses developed with GIS, with the intersections between the new project instances with the dataset of potential and existing wetlands in Mexico (INEGI) using official country dataset from the National Institute of Statistics and Geography (INEGI acronym in Spanish) , showing they do not intersect with wetland zones (see Figure 14 to Figure 16). The data can be consulted at the following link: www.inegi.org.mx/temas/humedales/ Maps of the intersection of wetlands with the project can be found in: Supporting documents\New areas
Aster Global Findings - Round 2	During the site visit, the audit team found no presence of wetlands in the visited parcels. Additionally, the PP provided an analysis using a national wetlands layer for Mexico that demonstrated that no new instances occur on wetlands. The results of this analysis are shown in section 2.3.1 of the MR. Additionally, the audit team confirmed that this analysis was carried out appropriately and the results were confirmed. This criteria is satisfied.

Item Number	3
Section	3.2 AFOLU-Specific Matters
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.2.10 Projects with tree harvesting shall demonstrate that the permanence of their carbon stock is maintained and shall put in place management systems to ensure the carbon against which VCUs are issued is not lost during a final cut with no subsequent replanting or regeneration.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	It is unclear to the audit team how this criteria is satisfied.
Round 1 NCR/CL/OFI	CL: Please clarify how this criteria is satisfied.

Round 1 Response from PP (DD MonthYYYY)	The permanence of the carbon stock was added to MR (Section 2.3.2), explaining the process and the intention to continue with the establishment of forest plantations indefinitely. The permanence of their carbon stock will be maintained to ensure the carbon against which VCUs are issued, will not be lost during a final cut with no subsequent replanting or regeneration. Supporting documents and a letter of commitment from the company can be found in: Supporting documents\AGSA_IndefiniteReplantingIntentionLetter
Aster Global Findings - Round 2	Thank you for the updates to the MR and support letter. The audit team understands that this criteria specifically requires "management systems" e.g. management plans in place that ensure the permanence of the carbon stock. The audit team found no language in the management plans that requires the replanting of plantations upon the final harvest. If this language exists within the management plans please provide the section number where this language is contained. If the PP believes that currently the management plans in place meet this criteria the PP has the option to reach out to Verra for clarification and the VVB will follow Verra's decision.
Round 2 NCR /CL/OFI	CL: Please clarify in line with the finding.

Round 2 Response from PP (DD MonthYYYY)	Management plans are established and recorded for the specific 18 years in which a final harvest is expected. The specific language of subsequently replanting is unfortunately not explicit in these management plans. However, in one of the Management Plan objectives (numeral 5.1,second bullet point) it is mentioned that the reforestation project has as the main objective of achieving the benefit of carbon capture (in spanish: <i>lográndose también la reforestación para el beneficio de la captura de carbon</i>), which points to the company intention to keep the carbon project and to replant indefinitely (this was previously stated with the letter provided by the PO, with the intention to continue with the establishment of forest plantations indefinitely). As a suggestion by Aster we reeached out to VERRA for clarification, and they suggested to proof the financial viability of the project that could guarantee the budget for replanting and thus the permanence. As part of this alternative, we are submitting the files that support the financial viability analysis also presented for the NPRT, wherein the "Cash flow" file, the result of the return of the internal rate is 16%, a Liquidity- Current ratio of 5,9 , Solvency of 2 and a Profitability - Ebitda margin of 55%, which represents that the project is financially feasible (see Supporting documents\NPRT\Internal Risk\Financial viability\20210722_Cash_flow_TeakMex and Supporting documents\NPRT\Internal Risk\Financial viability\FinancialStatements), and therefore the PO can maintain their intention (also in their intention letter) of replanting after each harvesting cycle. This demonstrates that the project can ensure that also financially they can support and have all the resources necessary to replant and thus guarantee the permanence of their carbon stock, and to guarantee that the issued VCUs will not be lost during a final cut with no subsequent replanting and regrowth. This has been also added in section 3.2.2 Project description deviations, page 24, so that it remains clear as a proper activity of the project.
Aster Global Findings - Round 3	Criteria 3.2.10 of the VCS Standard V4.0 states "Projects with tree harvesting shall demonstrate that the permanence of their carbon stock is maintained and shall put in place management systems to ensure the carbon against which VCUs are issued is not lost during a final cut with no subsequent replanting or regeneration." Currently, the project has registered management plans that cover the initial rotation (18 years); however, the audit team, in line with guidance provided by VERRA, is issuing a Forward Action Request (FAR) that the management plans be updated prior to the next verification to cover the entire crediting period. This finding is closed. No further action is needed.

Item Number	4
Section	Long-term Average GHG Benefit

VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.2.21 Where ARR or IFM projects include harvesting, the loss of carbon due to harvesting shall be included in the quantification of project emissions. The maximum number of GHG credits available to projects shall not exceed the long-term average GHG benefit. The GHG benefit of a project is the difference between the project scenario and the baseline scenario of carbon stocks stored in the selected carbon pools and adjusted for any project emissions of N ₂ O, CH ₄ and fossil-derived CO ₂ , and leakage emissions. The long-term average GHG benefit shall be calculated using the following procedure:
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR,PD
Aster Global Findings - Round 1	The audit team reviewed the long-term average GHG benefit analysis conducted in the validated PD. Due to the inclusion of new project activity instances the long-term average GHG benefit analysis should be updated.
Round NCR/CL/OFI 1	CL: Please clarify as to why the validated long term average GHG benefit analysis conducted in the validated is appropriate as the project area has grown since the first validation. Otherwise, please update the long term average GHG benefit analysis and include the updated results in the MR.
Round 1 Response from PP (DD MonthYYYY)	The Long Term Average and the Ex-ante estimations were updated with the inclusion of the new project instances. The section 3.2.2.1 is included as a new section in the existing 3.2.2 Project description deviations, with the update of the Ex-ante estimations. The up to date of the ex ante estimation were also added to this section, and the ex - ante file is presented in the supporting information: Supporting documents\Estimations\260426_Ex_ante_update

Aster Global Findings - Round 2

1. The audit team reviewed the updated ex-ante long term average estimation. According to this workbook, thinnings occurred at years 4, 6, 10, and 13. The audit team is unclear if these thinnings have occurred in the project area to date.
2. The audit team notes that in Row 21, corresponding to Age 18, of the Estimations tab of the 260426_Ex_ante_update workbook there are volumes that do not reflect the final harvest in year 18. Currently it appears that the Age 18 carbon stocks are pre-harvest volumes in year 18 and the year 0 carbon stocks appear to be Year 18 carbon stocks that represent post-harvest carbon stocks. The audit needs more clarity as to how the carbon stocks and carbon stock changes in columns V - AO correspond to the years of the project implementation. Importantly the long-term average calculation needs to include the final harvest in year 36. The audit team understands that there are different ways to account for the pre and post harvest carbon stocks, which is why we are requesting additional clarity on the issue. Please note that VCS has multiple examples of these calculations which can be found at https://verra.org/wp-content/uploads/2018/03/VCS-Guidance-Harvesting-Examples_0.pdf.
3. The audit team noted that the diameter and height growth equations used in the ex-ante long-term average estimation are different, it is unclear why this is.
4. The audit team noted that 816 trees per hectare is used in the ex-ante analysis; however, within the project area there appear to instances where a higher density planting is used.
5. The audit team noted that the thinnings used in the ex-ante long-term average estimation do not match the thinnings specified in the management plans.
6. The audit team noted that only values from the strata ExcelenteSemilla are used, it is unclear to the audit team how is appropriate.
7. The long-term average chart in the MR shows years that extend beyond the crediting period and it is unclear why this is.
8. The audit team does not understand why carbon stocks in citrus trees are included in the long-term average calculation.
9. The audit team noted that in the LTA calculation (cell AO48) is calculated incorrectly.
10. The audit team understands that the long-term average calculation should reflect what has actually happened to date, which would include a combination of ex-post estimates and ex-ante estimates. The current analysis does not accurately reflect the ex-post estimates.

Round 2 NCR /CL/OFI	CL: Please clarify if year 4 and 6 thinnings have occurred in the project area. If they have occurred please clarify where this is accounted for in the ex-post estimation. CL: Please update the ex-ante long-term average estimation to comply with section 3.2.21 of the VCS Standard and provide additional clarity about how the carbon stocks in each year satisfy the requirements in 3.2.21 of the VCS Standard. CL: Please clarify in line with Finding 3. CL: Please clarify in line with Finding 4 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 5 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 6 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 7 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 8 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 9 and if needed update the ex-ante long-term average estimation. CL: Please clarify in line with Finding 10 and if needed update the ex-ante long-term average estimation.
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Round 2 Response from PP (DD MonthYYYY)	1. Although thinning activities were expected to be done in years 4, 6, 10, and 13, according to the management practices and the conditions of the plantations, the thinnings of the current plantations were not made until 2020, due to differences with the growth of the first years of the planted units. The first thinning to areas planted in 2013 is expected to be done in 2021, which would be year 8. This variation corresponds to differences in growth rate, efficiency of each stratum and natural conditions, which were expected for the first experiences (first planted trees). Better growth is expected with the clones (newest planted trees). Following this scenario, the ex-ante estimations were updated, and the thinning schedule was changed according to the PO management indications, which are consistent with the collected data for each current management unit. Please see the Supporting documents\Estimations\Ex-ante file, sheet "Key data". This clarification was also included in the MR, on page 23, section 3.2.2.1 Ex-ante estimations for net GHG emission reductions and removals. 2. The ex-ante long-term average estimation was updated following the suggestions presented in the CAR and the VCS examples recommended by the auditor. Please see the Supporting documents\Estimations\Ex-ante file, sheet "Estimations", cell CE 42. 3. For the case of the diameter and the height, it was used the model presented by Tamarit (2013) and, for each stratum it was defined a coefficient, in order to have the specific data for the each different profile presented in the project plantations. The details are shown in the "Growth Model" sheet, where we have presented two tables with the coefficients values. See [Supporting documents\Estimations\Literature\REPORT OF VALIDATION _ecuacion volume] and [Supporting documents\Estimations\Docs\Tamarit_2013]. A detailed explanation was included in the MR Section 3.2.2.1, subsection Step 1. 4. 816 trees per hectare is used in the ex-ante analysis due to the fact that this is the initial planting density for all plots. The value of 100 trees per 1,225 m², also corresponds to 816 trees per hectare. Until the year 2020 no thinning was made yet, therefore the initial density is maintained except in the cases of losses and mortality which is a common phenomenon for all the reforestation projects. The tree density for each plot could be verified in the Ex-post file in "DB" sheet. In this sheet, for each site (Sitio), lot (ID. Lote) and plot (PPM) it is presented the tree measurements. For each case, 100 trees per plot were presented. See [Supporting documents\Estimations\ex-ante and ex-post]. 5. As indicated in the first point of this CAR, the initially proposed thinning rate presented variation in response to natural conditions, growth rate, and efficiency of each stratum. Therefore, the current management was adapted consequently to the information registered in the field. For this reason, this activity presented a variation from the periods initially defined in the management plans. This clarification and an update were made in the Supporting documents\Estimations\Ex-ante file, sheet "Key data", and in the MR, on page 23, section 3.2.2.1 Ex-ante estimations for net GHG emission
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	reductions and removals. 6. According to the requirement and, in order to keep consistence between the ex-ante and the ex-post estimations, the management units were unified as follows: In the “Estimations” sheet of the ex-ante file, all the strata presented in the monitoring report in “Table 12: Stratification for actual net GHG removals by sinks of the period 2013-2019” were included, similar to the strata in the ex ante. With this modification, also all the strata and management unites were included in the LTA estimation. See [Supporting documents/Estimations/ex-ante]. This modification was also included in the MR section 3.2.2.1 7. The LTA was changed including only the crediting period of the project (2012-2049). The estimations and the Ex-ante were updated accordingly. Please see cell “CH 41” of “estimations”, sheet , “ex-ante” file. See [Supporting documents/Estimations/ex-ante]. 8.The biomass of the citrus trees are included as a baseline for the estimations of the emission reduction, because some sites presented this tyoe of vegetation before the start date of the project. In the “Ex-ante” file, the “Key data” sheet includes the value of tCO₂e for this type of vegetation presented by Yepes et al (2011). This value is used for the baseline estimations. With this value, in the “CE” column, the “Baseline scenario: to date GHG emission reductions and removals at year t(BE) (tCO₂e)” of the sheet “Estimations” are used to calculate the baseline reduction, according to the citrus presence in areas for the first intance of the project. This clarification can be also be consulted in the MR section 3.2.2.1, subsection Step 6 page 30 See [Supporting documents/Estimations/ex-ante]. 9. The LTA was re-calculated, only for the crediting period of the project (2012-2049), please see the cell CH 41 of the sheet “Estimations” See [Supporting documents/Estimations/ex-ante]. 10. Taking into account the change in the LTA and the adjustments presented in the sub-numerals above, the long-term average calculation now reflects what has actually happened to date, including the combination of ex-post estimates and ex-ante estimates, keeping logical consistency between them. This can be seen in the “Ex-ante” file, in the support documentation, “Estimations” folder.
Aster Global Findings - Round 3	The audit team reviewed the new ex-ante long-term average calculation and noted that the root-to-shoot ratio used is different than what is applied in the project. It is unclear to the how audit team how this is appropriate. The audit team reviewed the updated ex-ante long-term average calculation and confirmed that the errors found in the previous round of findings have been corrected. Additionally, the audit team is reasonably assured that the ex-ante long term average calculation conforms to the requirements of the VCS standard.
Round 3 NCR /CL/OFI	CL: Please update the long-term average calculation to be inline with the PDD and MR.

Round 3 Response from PP (DD MonthYYYY)	To be consistent with the information used in the Ex-post estimations, we also updated the Ex ante with the equation from the CDM, $R=e^{(-1,085+0,9256*\ln B)/B}$, CDM_AR_TOOL_14-"Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities", Page 25; This change can be seen in the excel file "Ex-ante" and in the MR on page 28, where it is presented as a variation of the PDD. These changes can be seen in the Tab "Key data" of the Excel document "Ex-ante".
Aster Global Findings - Final	The audit team confirmed the update of the relevant equation in the mentioned files. This item is closed.

Item Number	5
Section	Monitoring Report
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	Monitoring Report 3.4.3 The PP shall use the VCS Monitoring Report Template or an approved combined monitoring report template available on the Verra website, as appropriate, and adhere to all instructional text within the template.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The audit team noted that the MR does not contain page numbers which are included in the MR template.
Round 1 NCR/CL/OFI	CL: Please add page numbers to the MR.
Round 1 Response from PP (DD MonthYYYY)	Page numbers had been added to MR
Aster Global Findings - Round 2	The audit team reviewed the updated MR and confirms that the requested change was made. This criteria is satisfied.

Item Number	6
Section	Monitoring Report
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.4.4 The monitoring period of the monitoring report shall be a distinct time period that does not overlap with previous monitoring periods. Projects shall not be eligible for crediting of GHG emission reductions generated in previous monitoring periods. In addition, monitoring periods shall be contiguous with no time gaps between monitoring periods.

Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The Monitoring Period is not listed in the MR.
Round 1 NCR/CL/OFI	CL: Please fill out completely all sections of the MR.
Round 1 Response from PP (DD MonthYYYY)	Monitoring Period has been listed in the MR, which is from October 16th of 2017 to October 15th of 2020. All the sections have been completely filled. This can be found at first on the cover page with the general information of the project (Project title, version, Project ID, contact information, etc). Also, section 1.1. Summary Description of the implementation status of the project (page 1) and, section 1.6 Project Crediting Period (page 3) contains clearly this period.
Aster Global Findings - Round 2	The audit team reviewed the updated MR and confirms that the requested changes were made. This criteria is satisfied.

Item Number	7
Section	Inclusion of New Project Activity Instances
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	2) Comply with at least one complete set of eligibility criteria for the inclusion of new project activity instances. Partial compliance with multiple sets of eligibility criteria is insufficient.
Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD , MR, Eligibility assessment documents

Aster Global Findings - Round 1	The audit team reviewed the eligibility analysis conducted by the PP and conducted our own eligibility analysis using ArcMap and historic imagery. The audit team noted that in the parcel Dos_Hermanas there appears to be substantial forest cover in 2011. As a result, this parcel is ineligible. In Lote_Numero_97 in the 2018 instances, some of the eligible forest area falls outside the property boundary. All eligible forest area should be contained within the property boundaries. According to the raster of Land Cover of Mexico at 250 meters from 2008, areas that were classified as eligible in the La Alondra parcel appear to be forested. According to the raster of Land Cover of Mexico at 250 meters from 2009, areas that were classified as eligible in the Rancho Nuevo parcel appear to be forested. According to the raster of Land Cover of Mexico at 250 meters from 2009, areas that were classified as eligible in the Doce Mayo parcel appear to be forested. According to the raster of Land Cover of Mexico at 250 meters from 2009, areas that were classified as eligible in the Murcia parcel appear to be forested. It is unclear to the audit team how the determination of whether or not there were wetlands present within the new instances was made. Additionally, it is unclear to the audit team how the determination was made on whether there the forested area was planted forest or natural forest.
Round NCR/CL/OFI	1 CL: Please address in line with the findings.

**Round 1 Response from
PP (DD MonthYYYY)**

For detailing eligibility more precisely, a new validation is performed for the requested parcels with different sources of information to those used in the eligibility such as AVNIR-2 ORI images and Geoeye images: 1. The ALOS Ortho Rectified Image Product (ALOS-ORI) consists of the AVNIR-2 ORI product compiled from images acquired by the Advanced Land Observing Satellite "DAICHI" (ALOS) operated during the period from 2006 to 2011 with a spatial resolution of 10 m, verification link. 2. Inspection with high spatial resolution (1 m) multitemporal imagery. Multispectral image repository of the Google Earth platform, Microsoft Bing Maps and Esri Basemap

Parcel Dos_Hermanas: Eligible area changed from 14.3 to 10.47. 2011 inspection was carried out using GeoEye satellite images from the Google Earth platform, where the eligible areas were eliminated in the period 2008 - 2018, which in 2006 changed from high secondary vegetation to forest in 2011 due to natural succession. The rest of the areas within the property are considered eligible because the land covers that make up the property do not meet the definition of country forest. Evidence map in: Supporting documents/ New area/GIS_CARs_Teak_Mexico.

Lote_Numero_97: Eligible area changed from 45.30 ha to 44.54 ha. The requested adjustment was made, the eligible area is correctly now within the boundaries of the parcel. Evidence map in: Supporting documents/ New area/GIS_CARs_Teak_Mexico.

La Alondra parcel: The eligible area remains the same: 68.10 ha. The presence of forest in the eligible areas of the Alondra parcel was verified with different sources of information such as AVNIR-2 ORI in 2007 (year close to the beginning of 2008, which is the requested year to review) and GeoEye in 2011 and 2013. From this analysis, it can be noticed that historically the parcel is composed of wooded pastures that do not meet the forest definition of Mexico. Evidence map in Supporting documents/ New area/GIS_CARs_Teak_Mexico.

Rancho Nuevo parcel: Eligible area changed from 353.90 ha to 328.77 ha. The presence of forest in the eligible areas of the Rancho Nuevo parcel was verified with different sources of information such as AVNIR-2 ORI in 2009 (year requested for verification) and GeoEye in 2011 and 2014, and eligible areas were eliminated in the period 2009 - 2019 that by natural succession went from high secondary vegetation to forest. The rest of the areas represent wooded pastures that do not meet the definition of forest in the country. Evidence map: Supporting documents/ New area/GIS_CARs_Teak_Mexico.

Doce de Mayo Parcel: Eligible area remains the same: 21.70 ha. The presence of forest in the eligible areas of the Rancho Nuevo parcel was verified with the AVNIR-2 ORI image in 2009 (year requested for verification). Eligible areas were represented by low stubble cover and high secondary vegetation that do not meet the forest definition of the country; no shadows visible for the coverage (as seen in the images), indicating a low structure of the vegetation that represent these areas. Evidence map in Supporting documents/ New area/GIS_CARs_Teak_Mexico.

Murcial parcel: The eligible area remains the same: 82.10 ha. The presence of forest in the eligible areas of the Murcial parcel was verified with different sources of information such as AVNIR-2 ORI in 2009 (year

	requested for verification) and GeoEye in 2003 and 2013, and it is evident that historically the parcel is composed of wooded pastures and stubble that do not meet the forest definition of country. Evidence map in: Supporting documents/ New area/GIS_CARs_Teak_Mexico. The eligibility areas were adjusted and updated in section 3.3 of the MR. The analysis for the specific parcels with images is included in Supporting documents/ New area/GIS_CARs_Teak_Mexico.
Aster Global Findings - Round 2	The audit team reviewed the updated eligibility analysis and confirms that areas that were forested less than 10 years ago were appropriately removed. For parcels where area was not removed the audit team reviewed the updated eligibility analysis and confirmed that no areas that were forested less than 10 years before the start date were included. The audit reviewed the wetland analysis and confirmed via our own independent data checks that no area of wetlands were included in the project area. However, the audit team found that the parcels Roma and San Juanito in Campeche appear to have acquisition dates that are later than the planting date. As a result, these parcels are not eligible.
Round 2 NCR /CL/OFI	CL: Please clarify how the parcels Roma and San Juanito in Campeche meet the eligibility criteria as they appear to have been planted prior to the acquisition. If these parcels need to be removed from the project area please update the MR and all downstream calculations.

Round 2 Response from PP (DD MonthYYYY)	A visual verification using satellite images of high resolution and supported with google Earth for the years mentioned by the auditor, was made for these specific parcels, Roma and San Juanito in Campeche. For each case, the year before the establishment of the plantation was analyzed. For Roma, an image from 2016 was used, and for San Juanito an image from 2017. for both parcels, before the start of the plantation activities, the previous land cover was grasslands with low presence of low height shrubs and no evidence of plantations before the dates indicated in the MR (2017 for Roma and 2018 for SanJuanito). This information is presented in Supporting documents\GIS\06_Images
Aster Global Findings - Round 3	Thank you for providing the additional documentation. Aster Global reviewed the analysis and confirmed via a review of the imagery that this criteria is satisfied. No further action is needed.

Item Number	8
Section	Inclusion of New Project Activity Instances
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3) Be included in the monitoring report with sufficient technical, financial, geographic and other relevant information to demonstrate compliance with the applicable set of eligibility criteria and enable sampling by the validation/verification body.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR Section 3.3.2, Eligibility Analysis files
Aster Global Findings - Round 1	The audit team reviewed the eligibility analysis and associated shapefiles provided by the PP; however, this detail is required in the MR.
Round NCR/CL/OFI	1 CL: Please clarify how these parcels satisfy this criteria.

Round 1 Response from PP (DD MonthYYYY)	Section 3.3.1 Eligibility criteria for second instance areas was complemented with the Definition of Mexico's forest according to the Clean Development Mechanism (CDM) that defines the forest as a minimum continuous area of 1 hectare, with a crown cover greater than 30% and a minimum potential in situ height of 4 meters. Available in: https://cdm.unfccc.int/DNA/index.html. Section 3.3.2. Methodology was expanded showing the five main steps that makeup the methodological flow for the identification of eligible areas for afforestation and reforestation projects: Step 1: Data acquisition from official sources and satellite images (free access) Step 2: data standardization (geometric correction and pixel resampling). Step 3 forest and non-forest classification by visual inspection of the extreme years of the baseline. Step 4 identification of the areas that meet the eligibility criteria. Step 5 verification of the absence of wetlands and forests (intermediate years) in the eligible areas. The above to explain how the parcels satisfy the criteria in concordance to the shapes files attached again to the complete information in: Supporting documents/ GIS
Aster Global Findings - Round 2	The audit team reviewed the additional language added to the updated MR and is reasonably assured that this process was followed. Additionally, the audit team conducted an independent spatial analysis following the eligibility analysis described in the MR. This criteria is satisfied.

Item Number	9
Section	AFOLU Projects
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3.5.18 Activity-shifting, market leakage and ecological leakage assessments, where required, shall be undertaken as set out in Section 3.14.5 – 3.14.15, and the methodology applied, on the initial group of instances of each project activity and reassessed where new instances of the project activity are included in the project.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The MR states that there is no leakage. However, the VVB is unclear on the reasoning for this leakage estimation.
Round 1 NCR/CL/OFI	CL: Please provide an explanation/analysis as to why there is zero leakage.

Round 1 Response from PP (DD MonthYYYY)	Section 5.3 Leakage, of the MR, was updated explaining why leakage emission is accounted as zero, given that non-decreasing carbon stocks (biomass and SOC) are expected from lands outside the project boundary associated with livestock or agricultural activities since the baseline activities were replaced by the new reforestation activities and the new activities have not displaced the agriculture and livestock to new areas. The owners of the acquired livestock lands are adults who sold their lands with the intention of moving away from field-based activities in particular moving to some cities and/or migrating to areas already degraded which therefore presents no displacement of emissions, therefore the project is expected to do not generate leakage activities towards other areas.
Aster Global Findings - Round 2	The audit team reviewed the additional language included in the MR. The audit team understands that there is currently a significant shift in population occurring in the project region as a shift in rural to urban population is occurring. Additionally, the audit team understands that the project region has been substantially degraded as a result of National Agriculture and Livestock policies from the 1950s-1970s. However, the MR states "Finally, the change of land use from areas of natural vegetation to pastures is not a viable scenario due to the high cost of soil preparation and the current legislation that prohibits such actions in forest areas." The audit team is unclear what this law is and requests clarification.
Round 2 NCR /CL/OFI	CL: Please provide a reference for the statement in the MR referencing the prohibition of converting forestland to agriculture/pasture land.
Round 2 Response from PP (DD MonthYYYY)	The language included in the MR for the statement referring the "prohibition of converting forest land to agriculture/pasture land", was changed in concordance to the Law of Sustainable Forest Development of the Ministry of Environment and Natural Resources of Mexico (Last reform published 04-13-2020), which in its Article 3 refers to its specific objectives, highlighting numeral X. <i>"Promote the conservation of forest ecosystems, promoting their delimitation and sustainable management, avoiding that the change of land use for agricultural purposes or of any other nature affects their permanence and potential"</i>. This can be found in the MR section 5.3, in the footnote on page Page 78
Aster Global Findings - Round 3	The audit team reviewed the updated MR and confirmed via the ARAM_Tool_15_v2.0 that leakage from the project area is unlikely. The audit team is reasonably assured that this criteria is satisfied. No further action is needed.
Item Number	10
Section	Respect for Local Stakeholders Resources

VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	2) To reduce damage to the ecosystems on which the local stakeholders rely: a) The project shall not introduce any invasive species or allow an invasive species to thrive through project implementation. b) The project shall justify the use of non-native species over native species, explaining the possible adverse effects of non-native species. c) The project shall justify the use of fertilizers, chemical pesticides, biological control agents and other inputs used by the project and their possible adverse effects.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The audit team was unable to confirm if fertilizer, pesticides, or herbicides were used during the most recent monitoring period.
Round 1 NCR/CL/OFI	CL: It is unclear to the audit team whether fertilizer, biological control agents, pesticides, and/or herbicides were used during this monitoring period. If they were please justify their use in accordance with this criteria.
Round 1 Response from PP (DD MonthYYYY)	This information was clarified in section 2.1.4 Control of pests and diseases of the MR. The list of fertilizers, pesticides, or herbicides used during the most recent monitoring period was included in Table 2 of the MR.
Aster Global Findings - Round 2	As stated in the updated MR, each lot type has specific fertilizer/herbicide protocols that ensure that the applications are site specific and appropriate. Additionally, the application plans of the these chemicals are developed to comply with PROFEPA and FSC. Additionally, justifications for the use of these chemicals is described in the MR and PD. The audit team is reasonably assured that this requirement is satisfied.

Item Number	11
Section	Communication and Consultation
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	1) The project design and implementation, including the results of monitoring.

Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The audit team is unclear on how/when results from monitoring are communicated to local stakeholders.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 1 Response from PP (DD MonthYYYY)	The project is developed in private farms and there are no communities living inside the project area and there is no communities relying on the project activities. Workers of the plantations are the main stakeholders. The project has developed a survey with the workers to ensure that the implementation and state of the project are socialized at every stage of the project. Section 2.1.5 Community activities and section 2.2 Local Stakeholder Consultation of the MR were complemented with this information. The supporting documents for each of the activities can be found in: -Supporting documents\NPRT\External risk\Community Engagement\AGSA Human resources summary v2021 -Supporting documents/ NPRT/External risk/Community Engagement/ CarbonProjectSurveys
Aster Global Findings - Round 2	The audit team reviewed the MR and additional evidence provided such as the Carbon Project Surveys. This criteria is satisfied.

Item Number	12
Section	Communication and Consultation
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	2) The risks, costs and benefits the project may bring to local stakeholders.
Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	It is unclear where this was communicated to stakeholders.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 1 Response from PP (DD MonthYYYY)	The project is developed in private farms and there are no communities living inside the project area and there is no communities relying on the project activities. However, the company develops activities that include and benefit the neighboring communities and has open channels to attend any grievance or petition they want to express (Email, phone billboards and box for grievances and comments) Section 2.1.5 Community activities and section 2.2. Local Stakeholder Consultation of the MR, were complemented with this information and the support of the activities can be found in: -Supporting documents\NPRT\External risk\Community Engagement\AGSA Human resources summary v2021 -Supporting documents\NPRT\External risk\Community Engagement\Health campaigns -Supporting documents/ NPRT/External risk/Community Engagement/CarbonProjectSurveys
Aster Global Findings - Round 2	The audit team reviewed the MR and additional evidence provided such as the Carbon Project Surveys. This criteria is satisfied.

Item Number	13
Section	Communication and Consultation
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	4) The process of VCS Program validation and verification and the validation/verification body's site visit.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	It is unclear where this was communicated to stakeholders.

Round NCR/CL/OFI	1	CL: Please clarify in line with the finding.
Round 1 Response from PP (DD MonthYYYY)		All the workers are informed of the activities of the project, and the status and development of the verification process. The project has developed a survey with the workers to ensure that the implementation and the status of the project is socialized. Section 2.1.5 Community activities and 2.2 Local Stakeholder Consultation of the MR were complemented with this information. The support of the activities can be found in: -Supporting documents/ NPRT/External risk/Community Engagement/ CarbonProjectSurveys"
Aster Global Findings - Round 2		The audit team reviewed the updated MR and associated supporting evidence. The audit team is reasonably assured that the necessary communication infrastructure to communicate with stakeholders is in place. Additionally, the audit team understands that the carbon project surveys are a way to communicate with and better understand how their communication strategies can be improved. This criteria is satisfied.

Item Number	14
Section	Communication and Consultation
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	2) Any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The audit team was not provided evidence that satisfies this criteria.
Round 1 NCR/CL/OFI	CL: Please provide evidence that this step is in place for handling local stakeholder grievances.

Round 1 Response from PP (DD MonthYYYY)	The Grievance s and Suggestions procedure of the company, establishes that all grievances that are not resolved by a clear negotiation, shall be referred to mediation by a neutral third party. Section 2.2. Local Stakeholder Consultation of the MR was complemented with this information, adn the supporting information with the Grievances and Suggestions Procedures can be found in the Supporting documents/ NPRT/External risk/Community Engagement/ AGSA_GrievancesSuggestionProcedure
Aster Global Findings - Round 2	The audit team reviewed the MR and additional evidence in the form of the Grievances and Suggestions Procedure. This criteria is satisfied.

Item Number	15
Section	Communication and Consultation
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3) Any grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the grievance to a competent supranational adjudicatory body, if any.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	The audit team was not provided evidence that satisfies this criteria.
Round 1 NCR/CL/OFI	CL: Please provide evidence that this step is in place for handling local stakeholder grievances.
Round 1 Response from PP (DD MonthYYYY)	Any grievances shall be referred to the Grievances and Suggestions Procedure to be solved. The section 2.2 of the Local Stakeholder Consultation of the MR was complemented with this information. The supporting information on the Grievances and Suggestion Procedure can be found in Supporting documents/ NPRT/External risk/Community Engagement/ AGSA_GrievancesSuggestionProcedure
Aster Global Findings - Round 2	The audit team reviewed the MR and additional evidence in the form of the Grievances and Suggestions Procedure. This criteria is satisfied.

Item Number	16
Section	3.20 Other Forms of Credit

VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	Concept In order to maintain atmospheric integrity, GHG emission reductions/removals that are issued as VCUs cannot also be issued as other types of GHG credits or claimed as other forms of environmental credit. PPs shall demonstrate that project emission reductions or removals are not also used under emission trading programs, other mechanisms that include GHG allowance trading, or as other forms of environmental credit.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	Section 1.10 of the MR states that "The project has not sought or received any other GHG environmental credit". The audit team found no evidence that contradicts this statement. However, the audit team notes that no mention of non GHG environmental credits has been sought or received.
Round 1 NCR/CL/OFI	CL: Please add language to section 1.10 of the MR that states whether or not the project has sought or received other forms of environmental credits.
Round 1 Response from PP (DD MonthYYYY)	Section 1.10 was clarified with the following: The project has not sought or received any other GHG environmental credits either non GHG environmental credits . GHG emission removals are issued only as VCUs under VCS certification. No other types of GHG credits or other forms of environmental credits are traded within other programs or mechanisms.
Aster Global Findings - Round 2	The audit team reviewed the updated MR and confirmed that additional language has been added to the MR. This criteria is satisfied.

Item Number	17
Section	15. The actual net GHG removals by sinks shall be calculated as follows:
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	Equation (2)
Applicability to Project (Y or N/A)	Y

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR section 5.2.2. and Site Visit Ex_post_2ndVer_28012021
Aster Global Findings - Round 1	It is unclear to the audit team if biomass burning occurred during the monitoring period.
Round 1 NCR/CL/OFI	CL: Please clarify if burning occurred within the project area during this monitoring period.
Round 1 Response from PP (DD MonthYYYY)	No biomass burning occurred during the monitoring period, as the project activities do not include the use of fires to prepare land or harvest activities. Non-CO2 GHG emissions (GHGE.t.) are considered to be zero. This point is clarified in deep in the section 5.2.2 of the MR.
Aster Global Findings - Round 2	Thank you for the clarification. During the site visit the audit team found no evidence of burning on site. Additionally, the audit team found no evidence of burning used in site preparation in the management plans. This criteria is satisfied. No further action is needed.

Item Number	18
Section	16. Change in the carbon stocks in project, occurring in the selected carbon pools in year t shall be calculated as follows:
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	Equation (3)
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Ex_post_2ndVer_28012021
Aster Global Findings - Round 1	The audit team reviewed the Ex_post_2ndVer_28012021 workbook and is unclear about where the values in column Q in the DeltaC tab are derived.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.

Round 1 Response from PP (DD MonthYYYY)	Values in column Q in the ΔC tab are derived from 1st verification Ex post estimations, they were in column P "CP,2017 tC", which were the carbon stocks in the project, in years 2013, 2014, 2015 and 2016. This clarification was also made in the updated Ex_post_2ndVer_28042021 file.
Aster Global Findings - Round 2	Thank you for the clarification. However, the audit team was unable to find the validated file in the project documents.
Round 2 NCR /CL/OFI	CL: Please provide evidence to support the statements made in the Round 1 Finding.
Round 2 Response from PP (DD MonthYYYY)	Please find the file of the first verification Ex Post estimations in: [Supporting documents/Estimations/ex-post first verification].
Aster Global Findings - Round 3	The audit team reviewed the Ex_Post_verification workbook from the first verification and confirms that the currently used numbers are accurate. This item is closed, no further action is needed.

Item Number	19
Section	8. Data and parameters used in the tool
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	See tables on pages 16-22
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Ex_post_2ndVer_28012021
Aster Global Findings - Round 1	The correct defaults are used. However, it is unclear what locations correspond to Site 7 and 8. Additionally, it is unclear what the "BE citrus , site 8 (tCO₂e/ha)" parameter in the KeyData tab of the Ex_post_2ndVer_28012021 workbook is used for and how it should be applied.
Round NCR/CL/OFI	1 CL: Please clarify which geographic locations correspond to Sites 7 and 8. CL: Please clarify in line with the findings.

Round 1 Response from PP (DD MonthYYYY)	Site 7 location is shown in figure 17, section 3.2.2.1 of the MR, they correspond to the area with a precipitation range between 1000-1,600 mm which are the areas located in Campeche state. Their identification is important because a default factor of 1% for carbon stock in dead wood as a DWpercentage of carbon stock in treebiomass is contemplated for this characteristic. Site 8 location is shown in figure 29, section 5.1 of the MR, corresponds to areas planted in Huimanguillo, a municipality in Tabasco, with old citrus plantations before the project starting date (baseline for these areas). Project plantations in those areas were established in years 2014 and 2015. This was also explained in numeral 2.4 Baseline in the Project Description & Monitoring Report, Reforestation with teak CO2eTEAKMEX. 2018. The citrus location hasn't changed since the first verification. New instances do not have presence of this type of vegetation In the Key data tab of the Ex post calculations the parameter: "BE citrus, site 8 (tCO2e/ha)" has been deleted, since this parameter was not used during these estimations (Ex-post). This parameter was used during the first verification, since the plantation activities of the instances located in Huimanguillo, implied the harvest of citrus plantations (106 tCO2e/ha) to prepare the land for the new plantations. This biomass was discounted from the net GHG emission reductions and removals of the instances of the first verification. For the second verification there are no new instances with those characteristics, therefore a discount with citrus biomass was not necessary. Ex-post supporting information can be found in Supporting documents\Estimations\Ex_post_2ndVer_28042021
Aster Global Findings - Round 2	Thank you for the clarifications. In addition to added material to the MR, the audit team requests validated shapefiles that clearly delineate Sites 007 and Sites 008.
Round 2 NCR /CL/OFI	CL: Please provide the validated shapefiles that show Sites 007 and Sites 008.
Round 2 Response from PP (DD MonthYYYY)	Please find the shapefiles that clearly delineate Sites 007 and Sites 008 for each instance in [Supporting documents/Sites7_8_Shapes]. They are also located in figure 16 and figure 29 of the MR
Aster Global Findings - Round 3	The audit team reviewed the provided shapefiles and confirmed the accuracy through a review of data available on the internet demonstrating rainfall and elevation. This item is closed. No further action is needed.

Item Number	20
Section	8. Estimating carbon stock in trees at a point of time

VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	(a) Estimation by measurement of sample plots;
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Ex_post_2ndVer_28012021
Aster Global Findings - Round 1	The audit team confirms that direct estimation of carbon stock is measured by re-sampling of permanent plots; however, the audit team was unable to find the tree level data for each plot. The audit team noted in the MR it states "The method "b) Estimation by measurement of sample plots." however it should read "a) Estimation by measurement of sample plots"
Round NCR/CL/OFI 1	CL: Please provide the tree level data that feeds the PlotsMeasurement2020 tab of the Ex_post_2ndVer_28012021 workbook. CL: Please update the MR to reflect the correct method.
Round 1 Response from PP (DD MonthYYYY)	The tree level data that feeds the PlotsMeasurement2020 has been added in Supporting documents\Estimations\Docs\TreeMeasurements2020 In the MR it was corrected the method used in the section "Estimating carbon stock in trees at a point in time:" "a) Estimation by measurement of sample plots". This can be found in section 5.2.1, page 69

Aster Global Findings - Round 2	1. The audit team reviewed the tree level data that was requested in the Ex_post_2ndVer_28042021.xlsx; however, the audit team was unable to locate the TreeMeasurements2020 document in the docs folder. The audit team noted that the measurement date for site 5 lote 72 PPM 1 has the incorrect measurement date applied. Additionally, the audit team was unable to find evidence to support the use of a measurement date of 15/10/2020. 2. The audit team recalculated the average DAP (CM) and average Total Height columns in the Volume_AgeQualification tab of the Ex_post_2ndVer_28042021.xlsx workbook and found numerous discrepancies. The audit team understands that these are calculated using a simple average. 3. The audit team is unclear how trees with a "-88" in the DAP column of the TreeMeasurements2020 tab are integrated into the average DAP column for each unique combination of Sitio_Lote_PPM. Additionally, it appears that there are trees without height measurements and it is unclear how these trees are integrated into the average height for each unique Sitio_Lote_PPM. 4. It is unclear to the audit team why the trees with a "-88" in the DAP column do not have a DAP measurement. Additionally, it is unclear why trees do not have height measurements. 5. The audit team noted in the updated Ex_post_2ndVer_28042021.xlsx workbook in the Project Area tab that the Pardillos parcel is allocated to the 2018 year but in the provided shapefiles and MR it is allocated to 2019.
Round 2 NCR /CL/OFI	CL: Please provide the TreeMeasurements2020 Doc referenced in the Round 1 Response. CL: Please use update the measurement date for the specified plot. CL: Please provide evidence to support the use of a measurement date of 15/10/2020. CL: Please clarify how Live Axis(Ha) column in the PlotMeasurement2020 tab of the Ex_post_2ndVer_28042021.xlsx workbook is calculated. CL: Please clarify the discrepancy noted in the average DAP (cm) and Total Height(m) columns in the Volume_AgeQualification tab of the Ex_post_2ndVer_28042021.xlsx workbook is calculated. CL: Please clarify in-line with the findings 3 and 4. CL: Please clarify in line with finding 5.

Round 2 Response from PP (DD MonthYYYY)	1. The tree-level data that was requested in the Ex_post_2ndVer_28042021.xlsx has been added in the ex-post file, in the the version submitted with first round of finding as "TreeMeasurements2020" tab in the same "Ex_post_2ndVer". Please find this file attached in the actual Ex_post_2ndVer_28042021.xlsx file. The measurements for site 5 lote 72 PPM 1, were included also in the "TreeMeasurements2020" tab and the correct measurement date was applied, according to the observation provided by Aster. As support of the "measurement date 15/10/2020", we are attaching the support document of the training in technical activities and occupational health topics for the annual measurements. This training is developed prior to the start of the measurement activities every year. The measurements developed in all plots were carried out in a period that begins from the date of the mentioned training to the end of October 2020. The specific date 10/15/2020 corresponds to the date used as the central day in the MIRASIL software, which is the software used to record the data of every tree measured in the field. By the month of November 2020, all the plots had been already measured. Please see Supporting documents\Estimations\Docs\TrainingMeasurements2020 To estimate the average diameter per plot, trees with a "-88" value as the diameter were excluded. "-88" value means that despite the tree was identified in the field, it was no possible to measure its diameter because it did not present the enough height for the DBH to be taken (1,3m). 2. In the Ex post estimations file submitted in the previous round of findings, for the trees without DBH (trees with -88), the PO and the system used the average value in the plot for the trees with diameter measured. This value was used to replace the diameter and height of missing values. With the remark from Aster, this calculation was modified in order to avoid any overestimation. From now on, the trees without diameter (-88 trees) are taken into account as follows: - The Diameter for trees -88 (height smaller of 1,3m), was exclude of the estimation, as was indicated in previous numeral. - Trees with missing heights in the excel, correspond to trees where it was not possible to measure the height in the field due to the following issues: a. Difficulty to identify the crown of the tree due to a high density in the crown layer, b. Due to high brightness, or low light at the moment of the measurement that does not allow to identify the crown. For these cases, the missing value was replaced by an average of three trees of the plot with similar characteristics (similar diameter). This correction can be found in the "DB" tap from the Ex_post_2ndVer_28042021.xlsx file, and also, this methodological approach was included in the MR (section 5.2.1, subsection Estimating carbon stock in trees at a point in time, page 71). 3. As indicated in the numeral 2 of this finding, "-88" value means that despite the tree was identified in the field, it was no possible to
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measure the diameter because it did not present the height enough for the data to be taken. To estimate the average diameter per plot, trees with a “-88” value as the diameter were excluded.

4. As indicated en numeral 2 of this finding, “-88” value means that despite the tree was identified in the field, was no possible to measure the diameter because it did not present the height enough for the data to be taken. Trees with missing heights could be the result of any problem at the moment of the measurement, such as difficulty to identify the cover crop, or the presence of high brightness, or low light. So, for those cases, the missing value was replaced by an average of three trees for the same plot with a similar diameter.

5. The Pardillos parcel is allocated to the 2018 year. The shapefiles, the MR, and the eligibility analysis was verified and corrected to be accurately allocated to 2018. The verification was done using a satellite image of high resolution and supported with Google Earth. This supporting information can be found in Supporting documents\GIS\06_Images.

Aster Global Findings - Round 3	The audit team reviewed the updated workbook and associated support files and noted the following: 1. The audit team reviewed the updated workbook and noted that the plot date was not corrected. 2 AR-Tool 14 states "When estimation is carried out by methods (a), (c) or (d) above, the date of last measurement of sample plot, or estimation of crown cover, is considered to be the date of estimation of carbon stock, even if the full process of measurement extends over a period of time." 3. The audit team confirmed that all trees with DBH that were not measured have been excluded from the calculations. The audit team also confirmed that all tree heights that were not measurable were given an appropriate and conservative tree height based on the average of three similar trees on the same plot. 4. The fourth CL from the previous round of findings does not appear to be addressed. Specifically, it is unclear to the audit team how the Live Axis (Ha) column in the PlotMeasurement2020 tab is calculated. The audit team tried to recreate the Live Axis value by dividing 10000 square meters by the plot size (generally 1225 square meters) and found that for some plot the Live axis value is close but not exact. For some of the plots it appears that the Live Axis value was rounded up, which is not conservative. 5. Additionally, the audit team noted multiple discrepancies between the Plots_2020_x_ppm_p_BonosCO2_Verification shapefile's tabular data and the DB tab of the Ex_post_2ndVer_08272021 workbook. For example the DB tab has a Site 5 Lote 59 and PPM 2 but this plot does not appear in the shapefile. It is unclear why this discrepancy occurs. 6. The audit team reviewed the Plots_2020_x_ppm_p_BonosCO2_Verification shapefile and noted that multiple plots have smaller acreage allocated to them than the actual plot size. It is unclear how this is appropriate. Additionally, the audit team is still unclear how acreage is allocated to each plot. For example, there are two polygons for Site=8, LMF=46 and there are two plots located in these two parcels; however, Site=8, LMF=46, PPM=1 has 8.78 hectares allocated to it and Site=8, LMF=46, PPM=2 has 0.33 hectares allocated to it. 7. The audit team noted that there are a few errors in the YearPlantation (Column M) of the Volume_AgeQualification tab of the Ex_post_2ndVer_08272021 tab. 8. The audit team noted multiple errors in the "Age in Years" Column (Column H). This appears to be due to inconsistent rounding rules. Please clarify how this value is calculated and what rounding rule is applied.
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Round 3 NCR /CL/OFI	CL: Please update the plot date and all downstream calculations. CL: Please update the plot measurement date in line with the Finding 2 as required by AR-Tool 14. CL: Please clearly explain how Live Axis is calculated. CL: Please ensure that in the calculation of Live Axis conservative assumptions are used and clearly demonstrate how this value is calculated in line with the methodology. CL: Please clarify in line with finding 5. CL: Please clearly explain how acreage (hectares) are allocated to each plot. CL: Please clarify why it is appropriate for a plot to have less hectares allocated to it than the actual size of the plot. CL: Please clearly explain how plot acreages are assigned. CL: Please clarify in line with Finding 7 and update the quantification workbooks if necessary. CL: Please clarify in line with Finding 8 and update the quantification workbooks if necessary.
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**Round 3 Response from
PP (DD MonthYYYY)**

1. & 2. Date has been updated to October 21st, as it can be seen in the "Volume_AgeQualification" tab, "G" Column. Please find attached the proof of the date of the last measurement of the sample plot. This change was also included in the Ex post estimations file in: Documents\ER\Docs\MeasurementForm.

3. (No further clarification is necessary according and confirmed in the last conversation with aster global).

4. The "live axis" column, which contains the live trees per hectare, was estimated according to the number of live trees present in each plot, according to the area of the plot (1225 m²), with the formula: Live trees per hectare = (Live trees per plot * plot area (m²)) / 10,000 (m²). Before the "live axis" was not calculated but taken from the company's registries, and some inconsistencies were found when using round numbers. Additionally, in the "Volume age qualification" tab, a new column was added: "I" column, with the number of survival trees.

5. The reason for this difference is that a total of 356 plots were measured, but some of them were localized outside the eligible areas of the project. Therefore, the plots located in non-eligible areas were not included in the assessment. To avoid confusion, the plots not included were removed from the database: "DB" tab.

6. Due to the multiple GIS analyses between the management unit boundaries, the riparian limits, the conservation forests, and the eligibility, we ended up with "orphan areas". Orphan areas are all the areas that ended up being clipped in small areas. For these orphan areas, we found the following solutions:

- The smaller areas (< 0.5ha) were merged to the closest management unit with the same plantation year.
- Few areas were bigger than 0.5ha. These areas were not merged, but they were assigned the closest monitoring plot with the same year of the plantation (just for monitoring purposes). The plot name was temporarily duplicated, just for monitoring calculations. It is important to mention that these duplicated plots were not considered in the error or in the stratification estimates. In the shapefile, we created an additional column named: "DELETE_PLO" where we identified the "duplicated" plots with the number 1, to be not considered in future analyses, as well as in the error and uncertainty calculations.

7. Column M (Now column N), "Year Plantation", presents the correct date for each area. These values were confirmed with the PO and with the information registered in the field. To avoid any issues, column F "Plantation Date", was updated following the values presented in column M of the excel file.

8. The column H was estimated considering the values presented in the Column N.

Aster Global Findings - Final	1 & 2. The audit team confirmed the update of date in the relevant files. This item is closed. 3. This item is closed as per the comment from the PP. 4. The audit team confirmed the update of calculation in "Column J, Volume_AgeQualification, Ex_post_2ndVer_12112021.xlsx". This item is closed. 5. The audit team confirmed the update of "DB, Ex_post_2ndVer_12112021.xlsx" compared to the previous version. This item is closed. 6. The audit team confirmed the update of Column "DELETE_PLO" in "Plots_2020_x_ppm_p_BonosCO2.shp". 7. The audit team confirmed that the years in Column N are consistent with Column F in "Volume_AgeQualification, Ex_post_2ndVer_12112021.xlsx". This item is closed. 8. The audit confirmed the clarification and agrees with the PP. This item is closed.
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Item Number	21
Section	8.1.1. Stratified random sampling
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	34. Under this method, random sample plots are installed in the strata (e.g. systematic sampling with a random start) and measured. Note. This method is more efficient when the sample plots are optimally allocated to the strata keeping in view the expected mean tree biomass per hectare and its variability in the strata. Number of sample plots and their allocation to strata may be estimated by using the A/R methodological tool "Calculation of the number of sample plots for measurements within A/R CDM project activities". FOR EXAMPLES - SEE PAGE 13 OF THE TOOL
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Ex_post_2ndVer_28012021, Growth_model_2ndVer
Aster Global Findings - Round 1	The volume equation in in the PlotMeasurements2020 tab of the Growth_model_2ndVer is misapplied. As a result, the ex-post stratification is incorrect. Please clarify how the column AD, "Species Total area" in the Ex_post_2ndVer_28012021 is calculated. Additionally, it is unclear how the area of each Lote is allocated to different strata when there are multiple plots within the same Lote but are ex-post allocated to different strata. For example, in Lote 34.

Round NCR/CL/OFI	1 CL: Please correct the ex-post stratification in line with the finding. CL: Please address in line with the findings. CL: Please address in line with the findings.
Round 1 Response from PP (DD MonthYYYY)	The former "Growth_model_2ndVer" file has been integrated to "Ex_post_2ndVer_28042021" file as a unique file for second verification estimations, please see the sheet "Growth_model". This integration was also made for the case of the SamplingError&Uncertainty calculations, please see the tabs "Sampling Error" and "Uncertainty". The "Growth model" tab uses the calculation for volume from column "T" of the sheet "Volume_AgeQualification" tab and the equation has been verified to ensure that it is correctly applied. The sheet "Volume_AgeQualification", presents the volume estimation using the equation proposed in the monitoring report. Also, in this tab it is presented the Age qualification. Column AD, "Species Total area" in the Ex_post_2ndVer_28012021 file was the lote area given by PO as minimum management unit for each plantation (it was not a calculation). This value has been omitted for the corrected estimations file and now, the area value used corresponds to the eligible area as a result of the eligibility analysis. The eligible area per lot per site, can be consulted in the tab "Project area". The tab "PlotsMeasurement2020", presents the information of the 294 plots included in the analysis. This value is the result of the correction of the eligibility area, from an initial value of 295. The problem presented for lote 34 has been corrected. Each lote area has been changed to use an eligible area assigned just to a plot. Ex post-stratification was corrected and now is developed in concordance with the same areas for all calculations. Updated Ex post estimations can be found in: Supporting documents\Estimations
Aster Global Findings - Round 2	1. The audit team reviewed the updated Ex_post_2ndVer_28042021 workbook it is unclear what the difference between "LMF" (for example in column G of the Project Area tab) and "Lote" (for example in column D of the PlotMeasurement2020 tab). These do not appear to mean the same thing as they different for numerous parcels. 2. Additionally, the audit team was unable to determine how the "Area (ha)" column (column S) in the Volume_AgeQualification tab is determined. 3. The audit team was unable to find harvest data information and according to the Cash Flow Model there have been multiple thinnings that should have taken place.

Round 2 NCR /CL/OFI	CL: Please provide a clear explanation of the difference between "Lote" and "LMF" described in finding 1. Additionally, please provide a cross-walk table that shows which Lotes correspond to which LMFs. CL: Please clearly demonstrate how the area is assigned to each plot, lote, and LMF. Additionally, please explain how plots are allocated to each lote and LMF with a table showing the designation of each plot to Lote and LMF. CL: Please clarify in line with Finding 3.
Round 2 Response from PP (DD MonthYYYY)	1. To avoid any confusion between "Lote" and "LMF", the codification was unified and from now on it will be used "ID. Lot" to indicate the specific number for each plantation. Please see this change in the updated Ex_post_2ndVer_28042021.xlsx file 2. The area values presented in column R, of the "Volume_AgeQualification" sheet, were taken from the shapefile "Plots_2020_x_ppm_p_BonosCO2_Verification". Regarding the assignation of areas to each plot, the following should be taken into account: some lots have more than one sampled plot inside, so when allocating an area to those plots and to avoid double counting, the lot area was divided by the number of contained plots; eligible area was kept constant. This was verified using the eligibility area for each lot per year. This was added in the MR in section 5.2.1 page 70. Please see the update Ex_post_2ndVer_28042021.xlsx file. 3. As indicated in the ex-ante section, until 2020, no thinning or any other harvesting activity was performed in the project. The thinning activities are expected to start in 2021 according to the trees growth and current tree development. This clarification was made in the Cash Flow and in the MR on page 23, section 3.2.2.1 Ex-ante estimations for net GHG emission reductions and removals. Cash Flow Model can be found in: Supporting documents\NPRT\Internal risk\Opportunity cost\20210722_Cash_flow_TeakMex

Aster Global Findings - Round 3	1. The audit team reviewed the Stratification_WeightAverage tab of the Ex_post_2ndVer_08272021 workbook and noted that the total number of plots in this tab does not match the number of plots in the Plots_2020_x_ppm_p_BonosCO2_Verification shapefile or the number of plots in the Volume_AgeQualification tab. It is unclear to the audit team why this discrepancy exists. 2. The audit team noted that in the Volume_AgeQualification and Growth_model tabs of the Ex_post_2ndVer_08272021 workbook, there appear to be plots that are repeated but have different areas allocated to them. It is unclear to the audit team why this occurs and if it is appropriate, as repeating will plots will undoubtedly affect the strata means. 3. The audit team noted that the strata averages (Column J) of the Stratification_WeightAverage tab and the start averages (Column F) of the Uncertainty tab differ. It is unclear why this occurs or if it is appropriate.
Round 3 NCR /CL/OFI	CL: Please clarify in line with Finding 1 and update the calculations if necessary. CL: Please clarify in line with Finding 2 and update the calculations if necessary. CL: Please clarify in line with Finding 3 and update the calculations if necessary.

Round 3 Response from PP (DD MonthYYYY)	This is actually responses from the PP: 1. The discrepancy between the number of plots in the ex post file and the shapefile occurred due to presence of the "orphan areas". Orphan areas are defined as small sections of some management units that were clipped during multiple GIS analyses. These small areas (orphan areas) lost the connection to the original plot during these analyses. The solution proposed here to reconnect these eligible areas with the monitoring plots is to merge these areas to the closest plot if this plot has the same plantation year. This process was checked polygon by polygon and, for each orphan area, a plot that accomplished the last criteria was duplicated. In the shapefile we created a column named "DELET_PLO", to identify these additional plots, to can identify these duplicated plots and to not consider them during other calculations such as error or uncertainty calculations. For this reason, in the shapefile and in the "Volumen_Age Qualification" tab, a total of 379 "plots" are presented; but the total number of plots that were used in this verification is 294. This last value was used for the stratification and the error and uncertainty estimations. 2. The repetition of plot numbers is due to the presence of the orphan areas. The solution proposed to reduce the number of these areas is explained in the previous CAR (Item number 20.6). This process does not affect the estimation of either the uncertainty or sampling error, since for these calculations, a constant value of 294 plots was used. 3. The discrepancies in the volume estimations were corrected in all tabs.
Aster Global Findings - Final	1. The audit team confirmed the update of Column "DELETE_PLO" in "Plots_2020_x_ppm_p_BonosCO2.shp". The audit team confirmed the use of "294" in "Uncertainty, Ex_post_2ndVer_12112021.xlsx". This item is closed. 2. The audit team confirmed the update of Column "DELETE_PLO" in "Plots_2020_x_ppm_p_BonosCO2.shp". This item is closed. 3. The audit team confirmed the correction of discrepancies between "Stratification_WeightAverage" and "Uncertainty" tabs. This item is closed.

Item Number	22
Section	8.1.1. Stratified random sampling
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	35. Mean carbon stock in trees within the tree biomass estimation strata and the associated uncertainty are estimated as follows (all time-dependent quantities relate to the time of measurement): - <i>for equations see page 14 of the tool</i>

Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, Ex_post_2ndVer_28012021, Growth_model_2ndVer
Aster Global Findings - Round 1	During the review of the quantification workbooks, the audit team noted that the volume equation is misapplied. Specifically, $H^{0.932461}$ was misapplied as $H^{0.93246}$. Additionally, one of the plots in the PlotMeasurement2020 tab has a different plot size than the other plots. This appears to not be accounted for in the estimate of U_c (uncertainty). The audit team found that the variance was incorrectly squared when applying Equation 15. Both the t-value and btree values applied in the calculation of uncertainty are incorrect. The MR states that uncertainty value is 7.48%, it is unclear where this value came from as the quantification files suggested an uncertainty value of 5.34%. The audit team noted that in the Ex_post_2ndVer_28012021 workbook the area of "sitio 7" in 2013 and "sitio 5" in 2016 do not match the areas of these sites reported in the validated PD. The audit team noted that in the VCUs tab of the Ex_post_2ndVer_28012021 workbook cell P12 is not calculated correctly.

Round NCR/CL/OFI	1 CL: Please update the volume calculation in all workbooks and all downstream calculations. CL: Please clarify how the plot with a different plot size is accounted for in the estimate of uncertainty. CL: Please update the estimation of Equation 15 to be in line with the AR-14 Tool. CL: Please explain to the audit team where the calculation to arrive at 7.48% is located in the quantification files. Additionally, please update all values in the MR to reflect updated values. CL: Please clarify why the size of the sites referenced in the finding do not match the validated PD. If this is a mistake please update the workbook and all downstream calculations. CL: Please correct the formula in cell P12 and update the MR.
Round 1 Response from PP (DD MonthYYYY)	As it was indicated, the Volume estimation was misapplied because the last decimal digit was not included. In order to make this correction and responds to this requirement, in the volume equation was changed "$H^{0.93246}$" per "$H^{0.932461}$". Please see this adjustment the new integrated Excel field "Ex_post_2ndVer_28042021", sheet "Volume_AgeQualification", columns T and U, named "Vol TI (tam)" and "Volume_m3ha-1_Tamarit", respectively. All the plot size accounted for in the estimation of the uncertainty has been verified to have the same size and the complete calculation has been integrated to the "Ex_post_2ndVer_28042021" file. The estimation of Equation 15 was updated to be in line with the AR-14 Tool. The variance is now incorrectly squared. It can be found in "Uncertainty" tab, cell "C34" of the "Ex_post_2ndVer_28042021" file . Both the "t-value" and "btree" values applied in the calculation of uncertainty were verified and confirmed. They can be found in "Uncertainty" tab, cell "C34" of the "Ex_post_2ndVer_28042021" file. After correcting and performing the calculations again, the uncertainty value is 3.72%, and it was also verified that the MR reflected the same value in section 4.3.3.4 page 54. The right areas of "sitio 7" in 2013 and "sitio 5" are the ones used in the Ex_post_2ndVer_28012021 workbook which are in concordance with the eligibility analysis. Workbook and all downstream calculations in "Ex_post_2ndVer_28042021" file are developed for those values. Cell P12 in the VCUs tab of the Ex_post_2ndVer_28012021 workbook was rectified and now is calculated correctly in Ex_post_2ndVer_28012021.

Aster Global Findings - Round 2	1. The audit team reviewed the updated uncertainty calculation and confirmed it is correct. However, the audit team noted that in the Stratification_WeightAverage tab of the Ex_post_2ndVer_28042021 workbook the mean volume per hectare numbers are different than the average volume per hectare used in the calculation of uncertainty. It is unclear why this is. Additionally, the audit team noted that the Cuenta de ID Lote and Average Volume per hectare in the Stratification_WeightAverage tab does not match the aggregate values pulled from the Volume_AgeQualification Tab. It is unclear why this occurs and appears to be incorrect. 2. The audit team noted that the summation of hectares by year from the Volume_AgeQualification tab does not match the Project Area Tab. It is unclear how this is appropriate or correct.
Round 2 NCR /CL/OFI	CL: Please clarify in line with Finding 1. If these discrepancies are due to an error please update the calculation and all downstream calculations. CL: Please clarify in line with Finding 2.
Round 2 Response from PP (DD MonthYYYY)	1. The follow corrections were made, in order to clarify the uncertainty calculations and its discrepancies with all downstream calculations : The stratification used for all the estimations was obtained from the information presented in “PlotsMeasurement2020”. For the stratification, a weighted weight by the area of each stratum was used in order to have a total volume per year. The information from Growth_model is used to present a mean volume for each stratum, and then, the area per strata was obtained from the “Volume_AgeQualification” sheet. For the uncertainty, the same “Volume_AgeQualification” tab, mentioned before, is used as input, and it is possible to check that the area and volume per strata (columns C and F) are the same that the values used in the Stratification_WeightAverage (columns E and F). 2. To avoid any confusion with the summation of hectares by year, the “Project Area” tab was removed from the file, sicne it was a tab not necessary for teh calculations, and the data presented in the “Volume_AgeQualification” tab was used for all the calculations. As a double-check of this information, values per year were also confirmed using the spatial data information presented in the Supporting documents\GIS.

Aster Global Findings - Round 3	1. The audit team reviewed relevant workbooks with the additional clarifications provided by the PP. The audit team understands that in the Growth_Model tab of the Ex_post_2ndVer_08272021 workbook the average of the plots in each unique Site_Lote combination is calculated. However, it is unclear to the audit team how unique Site_Lote combinations without a plot in them are treated. For instance in Site 6 Lote 33 (Predio Dona Carmina) has no plot in it but is somehow accounted for in the total area.
Round 3 NCR /CL/OFI	CL: Please clarify in line with Finding 1 and update the calculations if necessary.
Round 3 Response from PP (DD MonthYYYY)	1. These specific cases such as the "orphan area" mentioned here: Site 6, Lote: 33 (Predio Doña Carmina), were treated as explained in the CAR 20 (nummeral 6). "For these Orphan areas bigger than 0.5ha,. the polygons were not merged, but they were assigned the closes monitoring plot with the same year of the plantation (just for monitoring purposes). The plot name was temporarily duplicated, just for monitoring calculations. It is important to mention that these duplicated plots were not considered in the error or in the stratification estimates. In the shapefile, we created an additional column named: "DELETE_PLO" where we identified the "duplicated" plots with the number 1, to be not considered in future analyses, as well as in the error and uncertainty calculations. "
Aster Global Findings - Final	The audit team confirmed the update of Column "DELETE_PLO" in "Plots_2020_x_ppm_p_BonosCO2.shp". This item is closed.

Item Number	23
Section	9. Estimating change in carbon stock in shrubs between two points of time
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	9. Estimating change in carbon stock in shrubs between two points of time
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Findings - Round 1	It is unclear to the audit team how shrubs are accounted for in the project scenario.

Round NCR/CL/OFI	1	CL: Please clarify how shrubs are accounted for in the project area.
Round 1 Response from PP (DD MonthYYYY)		Shrubs were accounted from the baseline scenario as the presence of citrus trees in the specific areas in site 8, Included in the ex-ante estimation: 2.1 and 2.2 strata columns "AB" and "AC "(Estimations tab). In the project scenario they were managed for years 2014 and 2015 as part of the preparation of the plantation fields located in Huimanguillo. It can be found in the first verification ex-post estimation in "deltaCART" column "G", where they were subtracted due to the preparation of the field for the plantation of the years 2014 and 2015.. For the second verification, there are no new instances with those characteristics, however, the previously planted areas are still growing and they are still contemplated as part of the plantations and this has been included in "delta C" tab column "Q" CP,2017tCO2e. In alignment with the answer 19, BE citrus parameter from the KeyData was omitted for the second verification ex-post
Aster Global Findings - Round 2		The audit team reviewed the Management Plans for the new instances and noted that roller choppers are used to prepare the plantations. For example in the Dos Hermanas, El Leon, and La Matinica Plantations it states "Preparación del terreno. En el área con vegetación de pastizal y algo de malezas se dará un paso de rodillo "chopper" para que se "acame" y se facilite la desecacion y se pueda facilitar su . En las áreas con vegetación de matorral se dará un paso con la chapeadora y con el bulldozer se juntara en forma de "chorizos" para su quema. Posteriormente se le haran las siguientes labores" Considering a mower is being used it appears that carbon in shrubs is being destroyed and thus should be accounted for.
Round 2 NCR /CL/OFI		CL: Please clarify in line with the findings.

Round 2 Response from PP (DD MonthYYYY)	In order to include the carbon in shrubs as a baseline for the specific plantations in the "Dos Hermanas", "El_Leon", and "La Matinica" farms, a GIS analysis was performed to identify the vegetation prior to the establishment of the plantations. A landsat image from 2017 was used, which is the year previous to the establishment of the plantation. With this image, and the image classification, the shrub vegetation for each site was identified and classified (see Supporting documents\GIS\05_Documents). Accordingly, a value of biomass carbon for the region was used for the Secondary Deciduous Tropical Forest, presented in the Mexico FREL, Table 4. Emission Factors and their uncertainties for carbon from above-ground woody biomass and roots from "Forest Lands" that changed to "Other Uses" were used as baseline. These assumptions were included in "keydata" tab of the updated ex-post estimations. Finally, the baseline emissions removals were discounted from the VCU's of the year 2018 (see tab "VCUs" cell "J9"). This process was also made for the ex-ante estimations and it could be consulted in the tab "Estimations", "CE" column. See [Supporting documents/Estimations/ex-ante and ex-post and GIS]. This process is also presented in the MR section 5.1 page 63 and section 5.2.1 subsection. Estimating carbon stock in trees at a point in time, page 71.
Aster Global Findings - Round 3	The audit team reviewed the approach and confirms that this is a conservative approach. The audit team apologizes if the Findings from Round 2 were unclear. The audit team cited the management plans of Dos Hermanas, El_Leon, and La Matinica Plantations as examples; however, similar wording is included all the management plans. Because all the management plans state that a mower (" la chapeadora y con el bulldozer") is used to clear shrubs, the audit team is requesting a demonstration that shows all shrubs in all parcels have been appropriately accounted for.
Round 3 NCR /CL/OFI	CL: Please provide a demonstration that shows the loss of shrubs in plantations established in this verification have been accounted for in all new instances.

Round 3 Response from PP (DD MonthYYYY)	A GIS analysis was performed using a Landsat image from a previous year of the establishment of the plantation to perform a land cover classification and to identify shrub vegetation for each site in all new instances. This classification was performed to clearly identify the baseline and the subsequent baseline deductions were applied in the ex-ante and the ex-post estimations. The baseline emissions removals, in the ex-post estimations, were discounted from the VCUs (see tab "VCUs", in the cells: "J9", "J10", "J11"). For the ex-ante estimations this baseline deduction was also performed, and it could be consulted in the tab "Estimations", column "CE". The supporting information can be found in: [Supporting documents/Estimations/ex-ante and ex-post and GIS]. This process is also presented in the MR section 5.1 page 63 and section 5.2.1 subsection, and in the "Estimating carbon stock in trees at a point in time", step 7, page 74.
Aster Global Findings - Final	The audit team confirmed the update of baseline deductions in "VCUs, Ex_post_2ndVer_12112021.xlsx" and "Estimations, Ex_ante_update_12112021.xlsx". The relevant information is also confirmed in the MR. This item is closed.

Item Number	24
Section	1. Measurement of fixed area plots
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	5. Biomass of a tree in a sample plot is estimated by using one of the following equations: - see equation on pages 25 and 26 of tool
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ex_post_2ndVer_28012021
Aster Global Findings - Round 1	The audit team reviewed the calculation of this equation and noted that the AR-14 Tool requires that for ex-post estimation a BEF = 1.15 should be used; whereas, 1.5 is currently applied.
Round NCR/CL/OFI	1 CL: Please update the BEF to the parameter specified in the AR-14 Tool.

Round 1 Response from PP (DD MonthYYYY)	AR-TOOL14, in page 26, recommends that “For ex-post estimation, the conservative default value of 1.15 must be used, unless transparent and verifiable information can be provided to justify a different value.”. However, a value of 1.5, which is the average value for tropical broadleaved species, was used according to Table 3a.1.10 Default Values of Biomass Expansion Factors (BEFs), presented by the IPCC in Chapter 3: LUCF Sector Good Practice Guidance (2003). The 1.15 value of recommended by the tool, as can be seen in this IPCC table, is mainly associated with conifers from boreal and temperate zones, which differs from the project and the species, which are located in a tropical area, with a plantation of broad-leaved species (teak is not a conifer). If the value displayed in the tool would be used, estimations would underestimate the characteristics of the trees and the specific location.
Aster Global Findings - Round 2	The audit team reviewed the cited IPCC guidelines and confirms that the default value of 1.5 is appropriate. No further action is needed.

Item Number	25
Section	Table 1 Project Management (PM)
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	f) Mitigation: Adaptive management plan in place.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team reviewed a number of the management plans that are in place. It is unclear to the audit team where "a mitigation plan for potential risks to the project" and a "process for monitoring progress and documenting lessons learned or corrections that may be needed" are included in the these management plans as specified by Section 2.2.1 bullet point 5 of the VCS AFOLU Non-Perm Risk tool.
Round NCR/CL/OFI	1 CL: Please clarify where the requested information is found in the management plans or update the mitigation score taken.

Round 1 Response from PP (DD MonthYYYY)	Management plans are in numeral 5 of the Commercial Forest Plantation Notice for the establishment of Commercial teak plantations (Aviso de Plantacion forestal Comercial para establecimiento de plantaciones Comerciales de Teca) presented to the SEMARNAT. The record for each plantation is presented in the folder: Suportting documents\Findings\NPRT\Internal risk\Project management\Management plans. The supporting documents for the implementation of mitigation's activities is now included in the "Logs and Records" folder in: Findings\NPRT\Internal risk\Project management\Management plans\01_Logs and Records
Aster Global Findings - Round 2	It is unclear how the evidence presented in the Logs and Records folder addresses point 5 of 2.2.1 of the risk tool. Specifically, "Adaptive management plans are those that identify, assess and create a mitigation plan for potential risks to the project, including those identified in this document, and any other obstacles to project implementation. They include a process for monitoring progress and documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods. The onus is on the PP to demonstrate that such plans are in place, that such plans have considered the realm of potential risks and obstacles to the project, and that a system is in place for adapting to changing circumstances."
Round 2 NCR /CL/OFI	CL: Please clarify in line with the finding.

Round 2 Response from PP (DD MonthYYYY)	All the plantation areas are registered in the SEMARNAT. As a requirement of the registration procedure, each of them has a management plan where the activities, processes, and possible risks that could affront the plantation are identified. All management measures are described inside Management plans in numeral 5.6 "Infrastructure and actions for the prevention of forest fires" (numeral In Spanish: "Infraestructura Y acciones para la prevención de incendios forestales), the numeral 5.7 "Pest and diseases (in spanish: plagas y enfermedades) For the monitoring process, the management plans also contain in numeral 5.8, "scheduled activities, shifts, dates and estimated harvest volumes" (in Spanish: actividades calendarizadas, turnos fechas y volúmenes estimados de cosecha), all the activities and management planned for the harvesting activities, and the implementation activities. All the activities are documented and are evaluated constantly, as the learned lessons, which help to improve the management plans and to develop any correction needed or identified. Besides, all the plantations have incorporated mitigation protocols for maintenance, hurricanes, and social aspects (as explained in teh NPRT). All protocols have been monitored and the activities have been registered by the company. In addition, these documents are in constant update according to the plantation requirements or the government's guidelines, such as the extreme weather protocol which is updated every year following the national security pronouncements. This information could be found in the supporting information: Internal risk\Project management\Management plans External risk\Community Engagement Internal risk\Project management\Management plans\01_Logs and Records Natural Risk folder/Fires Natural risk\Pest and Disease Natural risk\Extreme Weather
Aster Global Findings - Round 3	Section 2.2 Point 5 of the VCS Risk tool states "Adaptive management plans are those that identify, assess and create a mitigation plan for potential risks to the project, including those identified in this document, and any other obstacles to project implementation. They include a process for monitoring progress and documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods. The onus is on the PP to demonstrate that such plans are in place, that such plans have considered the realm of potential risks and obstacles to the project, and that a system is in place for adapting to changing circumstances." The referenced evidence in the previous response does not appear to show "documenting lessons learned or corrections that may be needed, and incorporating them into project decision-making in future monitoring periods" as specifically required by the VCS Risk Tool. As always, the audit team is happy to discuss this item and provide more clarity if needed.
Round 3 NCR /CL/OFI	CL: Please address in line with the finding or update the risk score for this item.

Round 3 Response from PP (DD MonthYYYY)	As discussed in our previous call and confirmed by e-mail on Oct 16th, it was highlighted that the SEMARNAT Management Plans should also be considered in the context of the additional supporting documents to these plans i.e. the documents that describe the management actions for mitigating different aspects of risk (fire, pests and disease, and extreme weather). SEMARNAT plans are updated consistently based on lessons learned. Aster will include a recommendation that the SEMARNAT management plans should be more explicit next time on how they will improve regularly on the identification and management of the current risks, natural, internal and external. The PO is committed to improve these management plans.
Aster Global Findings - Final	The project team correctly states that on Oct 16th, the project proponents provided additional clarification on the context of the management plans. The audit team is reasonably assured this criterion is satisfied and the correct risk score is applied. A forward action request will be issued by the audit team to ensure that the next verifier confirms that management plans are updated with lessons learned.

Item Number	26
Section	Table 2 Financial Viability (FV)
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	h) Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team reviewed the cost effectiveness of plantations - AGSA.xlsx and the Financial Report - South Group Pole.xlsx and it is unclear where values are presented showing the amount of funding that will be needed to cover the total cash out before the project reaches breakeven.
Round NCR/CL/OFI	1 CL: Please provide a demonstration that evidences the VCS risk tool mitigation credit claimed or provide a clarification about how the provided documents meet this requirement.

Round 1 Response from PP (DD MonthYYYY)	According to The results of the 20210415_Cash_flow_Mexico_V2 , the project has obtained 41% of the financial support required through trust certificates, prior to break-even. As a consequence, the qualification for the Risk factor “h. Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven ”, will be Zero, as this statement would not be aplicable to the project . For Risk Factor “g”, the qualification will be “1”. Please check the table Financial Viability, page 3, and the supporting documentation in: Supporting documents\NPRT\Internal risk\Financial viability\20210415_Cash_flow_Mexico_V2/ sheet “Cash Flow Model”. Note: "Cost-effectiveness of plantations - AGSA2024.xlsx" and the "Financial Report - South Group Pole.xlsx" files are still attached, and the analysis is in "20210415_Cash_flow_Mexico_V2" file.
Aster Global Findings - Round 2	The audit team reviewed the new Cash Flow model noted that it does not appear to include the purchase of additional parcels included in the project area after 2013. Additionally, it appears that total hectares in the project area remain constant in the cash flow model and this does not appear to align with what has actually occurred in the project. The audit team also noted that the "Ex post Tonnes of CO2 Vintage (Row 23) of the Cash flow model tab does not accurately reflect what has occurred in the project. For example, according to the Val/Ver Report issued by AENOR, the total number of VCUs issued was 116,628 but in the Cash Flow Model the cumulative total number of VCUs issued is 291,077. Additionally, the cash flow model does not appear to include revenue from thinnings that take place.
Round 2 NCR /CL/OFI	CL: Please ensure that all values used in the cash flow model are up-to-date and reflect what has actually occurred in the project. CL: Please clarify why revenue from thinnings are not included in the cash flow model.
Round 2 Response from PP (DD MonthYYYY)	The Cash Flow Model has been updated to include the purchase of additional parcels included in the project area after 2013 and the project area was verified. Ex post Tonnes of CO2 Vintage (Row 23) of the Cash flow model tab was also adjusted to accurately reflect what has occurred in the project. The thinning rate was included in the cash flow in row 30 of the “Cash Flow Model” sheet with the name of “Final harvest volume (m3)”. To avoid any confusion, we changed the name for “Thinning /Final harvest volume (m3)”, to be more explicit of the inclusion of the thinning rate. This could be check in the years 2019, 2021, and 2024 which presented the thinning volume in the "20210722_Cash_flow_TeakMex file.

Aster Global Findings - Round 3	The audit team reviewed the updated Cash Flow model and noted that the purchased of the additional parcels in 2017, 2018, and 2019 have not been included in the cashflow model. The Cash Flow Model still appears to have VCU issuances substantially above what actually occurred. It is unclear how this is appropriate.
Round 3 NCR /CL/OFI	CL: Please update the cash flow model to include all purchases of land that have been included in the project from 2013-2020. CL: Please provide verifiable evidence to support the use of the current VCU issuances and future VCU issuances. If these are incorrectly stated, please update the values and provide verifiable evidence to support the use of these figures.
Round 3 Response from PP (DD MonthYYYY)	1. The Cash Flow model has been updated with the purchase of the additional parcels in 2017, 2018, and 2019. See the tab: "Cash Flow Model", and the row 93: "Investment in land", cells, "G93" , "H93", " I 93". 2. The Cash flow has been updated using the current VCU issuances and future VCU issuances. (2016 VCUs already verified, 2020 VCUs expected for this verification, 2021 and 2022 VCUs from ex ante estimations)
Aster Global Findings - Final	1. The audit team confirmed the update of "G/H/I93, Cash Flow Model" in "20210722_Cash_flow_TeakMex.xlsx". This item is closed. 2. The audit team confirmed the update of VCUs from "VCUs, Ex_post_2ndVer_12112021.xlsx" and "Estimations, Ex_ante_update_12112021.xlsx". This item is closed.

Item Number	27
Section	Table 2 Financial Viability (FV)
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	i) Mitigation: Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team reviewed the files in the Financial Viability folder and was unable to find a value that reflected the total cash out that is needed prior to the project reaching breakeven. Additionally, it is unclear where in the Loan_bancomer document that the amount of callable resources is demonstrated.
Round 1 NCR/CL/OFI	CL: Please address in line with the findings.
Round 1 Response from PP (DD MonthYYYY)	To ensure that the Project has available as callable financial resources at least 50% of total cash must be secured before the project reaches breakeven, "20210415_Cash_flow_MexicoV2" file shows the amount of callable resources. This file contains the "Cash Flow Model" tab, where can be found that AGSA has available as callable financial resources at least 58% of total cash before the project reaches break-even, through the Trust Certificates. Please see these changes in the table "Financial Viability" page 4. Supporting documents in: Supporting documents\NPRT\Internal risk/Financial viability/Loan_bancomer and 20210415_Cash_flow_Mexico_Igo_V2 sheet Cash Flow Model]. Note: the amount of callable resources are shown in "20210415_Cash_flow_MexicoV2" file, Loan_bancomer is one of the supporting documents for the analysis.
Aster Global Findings - Round 2	The audit team reviewed the Loan_bancomer and understands that a loan of 1,629,900,378 pesos has been given to Agropecuaria Santa Genoveva; however, it is unclear to the audit team how this corresponds to the values in 2013 and 2014 for Trust Stock Certificates.
Round 2 NCR /CL/OFI	CL: Please explain how the values in the Cash Flow Model in cells C36 and D36 relate to the loan amount shown in the Loan_bancomer document.
Round 2 Response from PP (DD MonthYYYY)	The total value that Bancomer has loaned to Agropecuaria Santa Genoveva is 1,629,900,378 Mexican pesos. But this value was divided between the year 2008 to 2014. The payment schedule is presented in the "Loan_bancomer" file, in table 1, page 36. In the "Cash Flow Model" file, in the "Client Inputs" sheet, the Financial Cash Flow (cell A8), presented these values with the conversion from Mexican pesos to US dollar. Supporting documents in: Supporting documents\NPRT\Internal risk/Financial viability/Loan_bancomer and 20210722_Cash_flow_TeakMex sheet Cash Flow Model.

Aster Global Findings - Round 3	Thank you for providing the additional clarification. According to Table 1 on Page 36 of the loan documents, it appears that payments on the loan were required in 2013 and 2014; however, it is unclear to the audit team where these payments are reflected in the cash flow model workbook.
Round 3 NCR /CL/OFI	CL: Please clarify in line with Finding 1.
Round 3 Response from PP (DD MonthYYYY)	AGSA was the holder of a debt instrument of the Mexican Government, which means that AGSA had an investment in the Development of the Federal Government with a fixed interest rate and maturity, to be paid by December 5, 2024. This is really an upfront investment of AGSA. However, to receive advance payments of this investment (1,650,000,000 MN), AGSA transferred this debt instrument as well as its forestry assets through an Assignment contract to BANCOMER. Through this assignment, BANCOMER made an advance payment of the AGSA's interests and investment (see the operation and the trust equity section III. Page 35). BANCOMER with this debt title and the forestry assets opted for 40% of the forestry income, as its commission payment, while AGSA with the 60% of the income. Therefore, in the cash flow, only 40% of the forest income was discounted, because this corresponds to the BANCOMER commission (see "Forestry distribution" row 75 in the Cash flow file). Other expenses for commission, registration and maintenance of the certificates were not taken into account in the cash flow, since these are covered by the resources that enter the trust's assets.
Aster Global Findings - Final	Thank you for the clarification. The audit team confirms that this value is applied correctly in the cash flow analysis. No further action is needed.

Item Number	28
Section	Table 3 Opportunity Cost
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	f) NPV from project activities is expected to be at least 50% more profitable than the most profitable alternative land use activity
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team reviewed the study by Rivera-Cespedes and notes that the NPV analysis was only analyzed up to year 18; however, the VCS risk tools requires that "The opportunity cost analysis shall included a net present value (NPV) analysis, covering the project crediting period".

Round NCR/CL/OFI	1	CL: Please provide an NPV analysis that satisfies all criteria stated in the VCS risk tool.
Round 1 Response from PP (DD MonthYYYY)		The NPV analysis was developed and attached to this document. To ensure that the NPV from the project activities is expected to be at least 50% more profitable than the most profitable alternative land use activity. According to the requirement, the NPV analysis was developed for the complete crediting period comparing the project activities and the alternative land use identified in the additionality section of the PDD, which correspond to extensive livestock. As a result, the analysis showed that the NPV from project activities is expected to be at least 50% more profitable than the alternative land use activity (livestock). Please see these results in page 4 of the NPRT on Table Opportunity Cost. Also the supporting information can be found in: Supporting documents\NPRT\Internal risk\Opportunity cost\20210415_Cash_flow_Mexico_Igo_V2\ sheet "NPV Comparison - Livestock"
Aster Global Findings - Round 2		The NPV analysis was developed and attached to this document. To ensure that the NPV from the project activities is expected to be at least 50% more profitable than the most profitable alternative land use activity. According to the requirement, the NPV analysis was developed for the complete crediting period comparing the project activities and the alternative land use identified in the additionality section of the PDD, which correspond to extensive livestock. As a result, the analysis showed that the NPV from project activities is expected to be at least 50% more profitable than the alternative land use activity (livestock). Please see these results in page 4 of the NPRT on Table Opportunity Cost. Also the supporting information can be found in: Supporting documents\NPRT\Internal risk\Opportunity cost\20210415_Cash_flow_Mexico_Igo_V2\ sheet "NPV Comparison - Livestock"
Round 2 NCR /CL/OFI		The audit team reviewed the 20210407_Cost_Opportunity_Livestock_Mexico_Igo workbook and confirmed that the NPV analysis is performed correctly for the livestock scenario. However, this is marked pending as the NPV analysis for the project scenario will be updated based on the audit teams comments.

Round 2 Response from PP (DD MonthYYYY)	The opportunity cost was updated according to the changes made in the cash flow. Please see these results in page 4 of the NPRT on the Table Opportunity Cost. Also, the supporting information can be found in: Supporting documents\NPRT\Internal risk\Opportunity cost\20210722_Cash_flow_TeakMex\ sheet "NPV Comparison - Livestock"
Aster Global Findings - Round 3	1. The audit team reviewed the NPRT folder and associated files and noted that cell D14 of the NPV Comparison - Livestock tab of the 20210722_Cash_flow_TeakMex workbook states "NPV from the most profitable alternative land use activity is expected to be between 50% and up to 100% more than from project activities"; however, the VCS-Non-Permanence-Risk-Report-TeakMex document states " Accordingly, the analysis yielded that the NPV from project activities is expected to be at least 50% more profitable than the most profitable alternative land use activity:" and the following table indicates that the NPV from the livestock scenario is almost double that of the project (carbon project) scenario. These statements appear to be in conflict with each other. The audit team understands that the VCS-Non-Permanence-Risk-Report-TeakMex incorrectly reports the Opportunity Cost Risk Score. 2. In review of the Cash Flow Model tab of the 20210722_Cash_flow_TeakMex the audit team noted that the thinning volume per hectare is 197.61 and considering the average volume per acre according to column T in the Volume_AgeQualification tab of the Ex_post_2ndVer_08272021 work is about 56 cubic meters per hectare this seems like an unreasonably high estimate of thinning volume. 3. In review of the Cash Flow Model tab of the 20210722_Cash_flow_TeakMex the audit team noted that the thinning will occur on the entire project area which seems unreasonable considering there were stands planted in 2017-2021 and to date the stands planted in 2013 have not been thinned because they do not have enough volume on them. 4. The audit team was unable to find verifiable evidence that demonstrates that a price of \$75/m3 is appropriate. 5. The audit team does not understand what the basis for the VCU issuances in 2021-2025 are based on. Additionally, the audit team notes that no verification costs are associated with these issuances. 6. Point b of the Financial Viability Section of the states "Project cash flow breakeven point is greater than 7 and up to 10 years from the current risk assessment"; however, a risk score of 0 is given here. It is unclear if this statement is accurate.

Round 3 NCR /CL/OFI	CL: Please clarify in line with the finding and provide updated documentation to support the current statement in the VCS-Non-Permanence-Risk-Report-TeakMex or update the risk score for the Opportunity Cost section. CL: Please provide verifiable evidence to justify the use of all thinning volumes in the cash flow model. CL: Please clarify how the future thinning volumes are calculated and provide verifiable evidence to justify these volumes. CL: Please clarify how the numbers of acres that will be thinned for each thinning in the cash flow model is calculated and appropriate. CL: Please provide justifiable evidence that demonstrates the appropriateness the price of \$75/m3. CL: Please provide verifiable evidence that the VCU issuances in 2021-2025 area reasonable and creditable. CL: Please clarify in line with Finding 6 and ensure that the NPRT document is accurate.
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**Round 3 Response from
PP (DD MonthYYYY)**

- 1.This correction to the NPRT Risk Score was made in the new version of the NPRT since initially the teak plantation had been taken as a reference but this is not the baseline scenario. The baseline scenario is Livestock. The final results can be seen in the cell "D13" in the tab "NPV Comparison - Livestock". The NPV from the most profitable from the project activities is expected to be at least 50% more profitable than any other alternative use.
2. Cash flow was updated using the Thinnings volumes year by year. This information is also in Ex_ante_update_12112021_ file, "Thinning" tab.
3. Cash flow was updated using the thinning volumes year by year (not area). Futures volumes are estimated in the Ex_ante_update_12112021_ file, "Thinning" tab.
4. The ITTO Tropical Timber Market Report (TTM) (September 2021) - https://www.itto.int/files/user/mis/MIS_16-30_Sep2021.pdf, a product of the Market Information Service (MIS), show the prices of recent shipments of teak logs and sawn timber for Mexico. These teak logs are in the range of USD 369 to USD 439 / m3 (teak) and USD 373 to USD 585 / m3 (sawn timber). According to this report, if the prices of teak wood in India are taken as a reference once the export and transport costs are discounted (price called roadside), it is obtained that the price of teak logs for thinning ranges from USD 8.38 / m3 (13 cm diameter) to USD 120 / m3 (31 cm diameter), and the price of teak logs from the final harvest ranges from USD 8.38 / m3 (17 cm diameter) to \$ 232.5 / m3 (35 cm diameter). The prices of India are taken as a reference in the cash flow analysis, discounting the exportation and transport costs, with a value ranging between 40 and 233 USD / m3, depending on the average diameter of the plantations for thinning and harvesting. This has been included in the Cash Flow file, "Client Inputs" Tab
5. The VCUs volumes come from the verified VCUs from previous verifications, and for the future VCUS, we used the Ex ante estimations from the Ex ante estimations file , in the tab "Estimations", column "CP". The costs of future verifications are already included in the "Cash flow model" tab in the row 65.
6. Based on the current risk assessment: "Project cash flow breakeven point is greater than 10 years from the current risk assessment" (see 20210722_Cash_flow_TeakMex cell C142), and since the the project's cash flow results, the break-even point of the project is reached at the year 11, the final risk score was updated to a value of "3".

Aster Global Findings - Final	1. The audit team confirmed the update of "Financial Viability, 211108_VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex.xlsm/VCS-Non-Permanence-Risk-Report-TeakMex.docx" score reflecting the update of comparing carbon credits and livestock from NPV Comparison - Livestock, 20210722_Cash_flow_TeakMex.xlsx". This item is closed. 2 & 3. The audit team confirmed that the ex-ante thinning values are appropriate and applied correctly in the cash flow analysis. This item is closed. No further action is needed. 4. The audit team confirmed the reflection of the new price in "Teak log prices from final harvest (USD/m3), Row 40, 20210722_Cash_flow_TeakMex.xlsx" based on "https://www.itto.int/files/user/mis/MIS_16-30_Sep2021.pdf". This item is closed. 5. The audit team confirmed that "Cells K:L27, Cash Flow Model, 20210722_Cash_flow_TeakMex.xlsx" comes from "Cells CP12/13, Estimations, Ex_ante_update_12112021.xlsx". This item is closed. 6. The audit team confirmed the update of "Financial Viability, 211108_VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex.xlsm/VCS-Non-Permanence-Risk-Report-TeakMex.docx" score reflecting the new score of 3. This item is closed.
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Item Number	29
Section	Table 3 Opportunity Cost
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	h) Mitigation: Project is protected by legally binding commitment (see Section 2.2.4) to continue management practices that protect the credited carbon stocks over the length of the project crediting period
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team was unable to find verifiable evidence to satisfy this criteria.
Round 1 NCR/CL/OFI	CL: Please provide verifiable evidence to satisfy this criteria.

Round 1 Response from PP (DD MonthYYYY)	To ensure that the project is protected by legally binding commitment to continue the management practices that protect the credited carbon stocks over the length of the project crediting period, the project has planned its activities following carefully the management plans defined for each of the areas and approved by the Secretariat of Environment and Natural Resources (SEMARNAT) of Mexico. Besides, AGSA counts with the registration and the approval of these plantations by SEMARNAT. The company has also the intention to continue with the establishment of forest plantations indefinitely, and has expressed its intention in a formal letter and included in the document VCS-Non-Permanence-Risk-Report-TeakMex, in the table "Opportunity Cost" page 5. See supporting information in: External risk/Land Tenure/Plantation register; Internal risk/Project management./AGSA_IndefiniteReplantingIntentionLetter External risk/Land Tenure/Plantation register; Internal risk/Project management/Management plans
Aster Global Findings - Round 2	The audit team reviewed that SEMARNAT registrations but these do not appear to be a legally binding commitment to maintain the Teak plantations over the crediting period. Additionally, the letter of intent does not represent a legally binding agreement. Furthermore, in the review of the Project Longevity Calculation the PPs use the formula for a project "without legal agreement or requirement to continue the management practice".
Round 2 NCR /CL/OFI	CL: Please clarify how the SEMARNAT Registration represents a legally binding agreement. Specifically, point to clear language that satisfies this criteria or update the Risk Report to not include this mitigation.

Round 2 Response from PP (DD MonthYYYY)	The SEMARNAT Registration is a process required in the General Law of Forest Development of Mexico. This registration presented all the activities and objectives of the plantations, also the areas and species to be planted, and the cycle of rotation implemented. For the project, an 18 rotational cycle was adopted for all the plantations and registrations are made for this period. Even with the intention of the PO (AGSA) to replanting indefinitely (as shown in the intention letter attached before), we are relinquish of this item as a Mitigation measure for this exercise, also knowing that the project is financially feasible and they can maintain their intention of replanting after each harvest cycle, as shown in the financial viability analysis, wherein the "Cash flow" file, the result of the return of the internal rate is 16%. Table 3 Opportunity Cost , numeral "h" mitigation, has been updated. Supports can be found in: Supporting documents\NPRT\VCS-Non-Permanence-Risk-Report-TeakMex Supporting documents\NPRT\ VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex
Aster Global Findings - Round 3	The audit team reviewed the updated NPRT and notes that this mitigation credit has not been claimed. This criteria is satisfied. No further action is needed.

Item Number	30
Section	Table 4 Project Longevity
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	a) Without legal agreement or requirement to continue the management practice = 24 - (project longevity/5)
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	It is unclear to the project team what the project longevity is.
Round 1 NCR/CL/OFI	CL: Please clarify how the project longevity is derived and provide verifiable evidence that supports this value following all criteria in the VCS Risk Tool.

Round 1 Response from PP (DD MonthYYYY)	The project longevity was calculated according to the NPRT. The crediting period of the project, presented in the PDD section “1.6 Project Crediting Period”, is 36 years and 0 months. According to this period, the estimation of the longevity is developed with the following calculation: $= \frac{24}{24} - \frac{(\text{project longevity}/5)}{(36/5)}$ $= \frac{24}{24} - \frac{7.2}{7.2}$ $= 16.8$ $= 17$
Aster Global Findings - Round 2	The audit team reviewed the Project longevity calculation and confirmed this is correct. This criteria is satisfied. No further action is needed.

Item Number	31
Section	Table 6 Land Tenure
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	f) Mitigation: Project area is protected by legally binding commitment (eg, a conservation easement or protected area) to continue management practices that protect carbon stocks over the length of the project crediting period
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team was unable to find verifiable evidence to satisfy this criteria.
Round NCR/CL/OFI	1 CL: Please provide verifiable evidence to satisfy this criteria.

Round 1 Response from PP (DD MonthYYYY)	The project is protected by legally binding commitment and is committed to continue the proposed management practices, and to protect the credited carbon stocks over the length of the project crediting period. To guarantee this commitment the analysis of the permanence of the carbon stock was added to the MR (Section 2.3.2), explaining the process and the intention to continue with the establishment of the forest plantations indefinitely. The permanence of their carbon stock will be maintained to ensure the carbon against which VCUs are issued. The project has designed all the activities based on the management plans defined for each of the areas and approved by the Secretariat of Environment and Natural Resources (SEMARNAT) of Mexico. Besides, AGSA have also the approval of the plantations by SEMARNAT.. The company has also the intention to continue with the establishment of forest plantations indefinitely. This clarification was made in the document VCS-Non-Permanence-Risk-Report-TeakMex, and in the table “Land Tenure and Resource Access/Impacts” page 8. The supporting information can be found in: External risk/Land Tenure/Plantation register; Internal risk/Project management./AGSA_IndefiniteReplantingIntentionLetter External risk/Land Tenure/Plantation register; Internal risk/Project management/Management plans
Aster Global Findings - Round 2	The audit team reviewed that SEMARNAT registrations but these do not appear to be a legally binding commitment to maintain the Teak plantations over the crediting period. Additionally, the letter of intent does not represent a legally binding agreement.
Round 2 NCR /CL/OFI	CL: Please clarify how the SEMARNAT Registration represents a legally binding agreement. Specifically, point to clear language that satisfies this criteria or update the Risk Report to not include this mitigation.

Round 2 Response from PP (DD MonthYYYY)	As mentioned in CAR N°29, The SEMARNAT Registration is a process required in the General Law of Forest Development of Mexico. This registration presented all the activities and objectives of the plantations, also the areas and species to be planted, and the cycle rotation implemented. For the project, an 18 rotational cycle was adopted for all the plantations and registrations are made for this period. Even with the intention of the PO (AGSA) to replanting indefinitely (as shown in the intention letter attached before),and knowing that the project is financially feasible and they can maintain their intention of replanting after each harvest cycle, as shown in the financial viability analysis, wherein the "Cash flow" file, the return of the internal rate is 16%. Mitigation measure "f" has been assigned a value of zero. Table 6 Land Tenure, numeral "f" mitigation, has been updated. Supports can be found in: Supporting documents\NPRT\VCS-Non-Permanence-Risk-Report-TeakMex Supporting documents\NPRT\ VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex
Aster Global Findings - Round 3	The audit team reviewed the updated NPRT and notes that this mitigation credit has not been claimed. This criteria is satisfied. No further action is needed.

Item Number	32
Section	Table 6 Land Tenure
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	g) Mitigation: Where disputes over land tenure, ownership or access/use rights exist, documented evidence is provided that projects have implemented activities to resolve the disputes or clarify overlapping claims
Applicability to Project (Y or N/A)	NA
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team was unable to find verifiable evidence to satisfy this criteria. Additionally, it is unclear how the this mitigation credit can be claimed as the VCS risk tool indicates that the project is claiming there does not exist disputes over access/use rights.

Round NCR/CL/OFI	1	CL: Please provide verifiable evidence to satisfy this criteria.
Round 1 Response from PP (DD MonthYYYY)		There are currently no land disputes over land tenure, ownership or access/use rights. All the properties are owned by the company and the rights of use and access remain in the company. Agropecuaria Santa Genoveva S.A.P.I. of C.V. has the possession and the rights of all the farms, and the registry of all plantations. This is supported by all the land tenure documents presented in: Supporting documents\NPRT\External risk\Land tenure\Plantation register.
Aster Global Findings - Round 2		This mitigation is not claimed in the updated risk report. No further action is needed.

Item Number	33
Section	Table 7 Community Engagement
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	a) Less than 50 percent of households living within the project area who are reliant on the project area, have been consulted
Applicability to Project (Y or N/A)	NA
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team was unable to find verifiable evidence to satisfy this criteria.
Round NCR/CL/OFI	1
	CL: Please provide verifiable evidence to satisfy this criteria.

Round 1 Response from PP (DD MonthYYYY)	There are not communities living inside the project area, and there are not communities relying on the plantations for their subsistency. Finisterra and El Parral communities are the closest communities to the project. However, they are not located into the properties of the project area. Agropecuaria Santa Genoveva S.A.P.I. of C.V. has the possession and the rights of all the farms, and the registry of all plantations. As result, we can confirm that less than 50 percent of households live within the project area and also less than 20 percent of households live within 20 km of the project boundary outside the project area, are no reliant on the project. However, the proponent also keeps constant communication and good relationship with the neighboring communities, and is willing to solve any situation related to the interaction between the neighboring communities and the project. This information can be consulted in: Supporting documents\NPRT\External risk\Community Engagement\Communities_location_map Supporting documents\NPRT\External risk\Land Tenure\Plantation register
Aster Global Findings - Round 2	The audit team confirms that there are no households living within the project area as the entire project is privately owned by Agropecuaria Santa Genova S.A.P.I of C.V. The audit team has confirmed ownership of the parcels within the project area. This criteria is satisfied. No further action is needed.

Item Number	34
Section	Table 7 Community Engagement
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	b) Less than 20 percent of households living within 20 km of the project boundary outside the project area, and who are reliant on the project area, have been consulted
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team was unable to find verifiable evidence to satisfy this criteria.
Round 1 NCR/CL/OFI	CL: Please provide verifiable evidence to satisfy this criteria.

Round 1 Response from PP (DD MonthYYYY)	There are not communities living inside the project area, and there are not communities relying on the plantations for their subsistency. Finisterra and El Parral communities are the closest communities to the project. However, they are not located into the properties of the project area. Agropecuaria Santa Genoveva S.A.P.I. of C.V. has the possession and the rights of all the farms, and the registry of all plantations. As result, we can confirm that less than 50 percent of households live within the project area and also less than 20 percent of households live within 20 km of the project boundary outside the project area, are no reliant on the project. However, the proponent also keeps constant communication and good relationship with the neighboring communities, and is willing to solve any situation related to the interaction between the neighboring communities and the project. This information can be consulted in: Supporting documents\NPRT\External risk\Community Engagement\Communities_location_map Supporting documents\NPRT\External risk\Land Tenure\Plantation register
Aster Global Findings - Round 2	The audit team reviewed the communities location map and confirmed that the project is area is privately owned and was acquired legally. As a result, this criteria is satisfied. No further action is needed.

Item Number	35
Section	Table 7 Community Engagement
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	c) Mitigation: The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex
Aster Global Findings - Round 1	The audit team reviewed the Informe de Recursos Humanos en el Proyecto de Bonos de Carbono and understands that working conditions are generally good at Agropecuaria; however, it is unclear what evidence is provided that demonstrates that "the project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area."

Round NCR/CL/OFI	1	CL: Please provide verifiable evidence to satisfy this criteria.
Round 1 Response from PP (DD MonthYYYY)		The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area. To ensure the above statement and despite the fact that there are no communities living within the project area and the neighboring communities do not rely on the project activities, Santa Genoveva keeps constant communication and relationship with the neighboring communities and is willing to solve any situation related to the interaction with the project. The project generates a net positive impact on the social and economic well being of the local communities who derive their livelihoods from the project area (Workers from the plantations). The project is a potential generator of employment and the different planting stages have created opportunities for vulnerable social groups. This information was included in the "VCS-Non-Permanence-Risk-Report-TeakMex" document in table "CommunityEngagement" page 10. The supporting information of the activities are described in the updated Human Resources Report is in Supporting documents\NPRT\Externalrisk\Community Engagement
Aster Global Findings - Round 2		The audit team understands that substantial employment is generated by the project activity (through plantation management); however, in order to get this mitigation credit the VCS Risk Tool states "To achieve the mitigation credit, it shall be demonstrated that a current participatory assessment of the positive and negative impacts of the project activities on the local communities who derive livelihoods from the project area has been completed and demonstrates net positive benefits on the social and economic well-being of these communities. A participatory assessment is considered current where it is completed at least five years prior to the risk analysis." The audit team was unable to find evidence that satisfies this criteria.
Round 2 NCR /CL/OFI		CL: Please provide evidence that satisfies the requirements in the VCS Risk tool to claim this mitigation credit.

Round 2 Response from PP (DD MonthYYYY)	As was presented before in the “Communities_location_map” map, the closest communities of the project boundary are "Finisterra" and "El Parral", but they are not localized inside the plantations and do not rely on the project activities. Regardless this, Santa Genoveva keeps constant communication and relationship with the neighboring communities and it is open to solve any situation related to the interaction with the project. In fact, the project is a potential generator of employment, especially for workers from the states of Campeche, Tabasco, and Chiapas. it also provides different personnel training in health, chainsaw handling, beekeeping, among others (this can be seen in the Supporting documents\NPRT\External risk\Community Engagement\AGSA Human resources summary v2021), but specifically, a participatory assessment of the positive and negative impacts of the project activities on the local communities who derive livelihoods from the project area has not been developed. In order to avoid any further issue, this mitigation action was not further included in the risk assessment. Table 7 Community Engagement, numeral "c" has been updated, page 11. Supports can be found in: Supporting documents\NPRT\VCS-Non-Permanence-Risk-Report-TeakMex Supporting documents\NPRT\ VCS-Risk-Report-Calculation-Tool-v4.0_TeakMex
Aster Global Findings - Round 3	The audit team reviewed the updated NPRT and notes that this mitigation credit has not been claimed. This criteria is satisfied. No further action is needed.

Item Number	36
Section	Table 8 Political Risk
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	c) Governance score of -0.32 to less than 0.19
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex

Aster Global Findings - Round 1	The audit recalculated the average governance score over the last 5 years as specified in VCS Risk Tool and notes that the correct risk rating is presented; however, the incorrect Mean Governance Score is displayed in the risk report. Currently, the 10 year average is presented.
Round NCR/CL/OFI 1	CL: Please update the VCS risk tool to display the correct 5 year average of World Governance scores.
Round 1 Response from PP (DD MonthYYYY)	The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area. To ensure the above statement and despite the fact that there are no communities living within the project area and the neighboring communities do not rely on the project activities, Santa Genoveva keeps constant communication and relationship with the neighboring communities and is willing to solve any situation related to the interaction with the project. The project generates a net positive impact on the social and economic well being of the local communities who derive their livelihoods from the project area (Workers from the plantations). The project is a potential generator of employment and the different planting stages have created opportunities for vulnerable social groups. This information was included in the "VCS-Non-Permanence-Risk-Report-TeakMex" document in table "CommunityEngagement" page 10. The supporting information of the activities are described in the updated Human Resources Report is in Supporting documents\NPRT\Externalrisk\Community Engagement
Aster Global Findings - Round 2	The audit team reviewed the updated WGI score and confirmed that the calculation was performed correctly and the appropriate Risk Rating was applied. This criteria is satisfied. No further action is needed.

Item Number	37
Section	Table 10 Natural Risks
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	a) Fire (F)
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex

Aster Global Findings - Round 1	The audit team agrees with the PP on its assertion of an LS score of 5; however, the audit team was unable to find verifiable evidence that the mitigation procedures described in this section are in fact taking place.
Round NCR/CL/OFI 1	CL: Please provide verifiable evidence that the fire risk score mitigation is appropriate.
Round 1 Response from PP (DD MonthYYYY)	The project has designed the Program for the prevention, combat and termination of forest and industrial fires in the Candelaria, Tabasco and Chiapas sites. This program schedules activities in order to mitigate fire consequences. It also includes emergency procedures in case of fire in facilities and forest, safety instructions, theoretical and practical training programs for workers, simulation planning, appointments of workers to be responsible for the handling and control, emergency care plan, fire extinguisher review programs, fire alarms and review programs for liquefied gas installations. Verifiable evidence that the mitigation procedures described in this section are in fact taking place, can be found in supporting information: Natural Risk folder/Fires. Also, supporting documents for the control activities is available in the supporting information: Supporting documents\NPRT\Internal risk\Project management\Management plans\01_Logs and Records
Aster Global Findings - Round 2	The audit team reviewed the files related to the Fire control program and confirms that a fire control system is in place. The audit team is reasonably assured that this mitigation is appropriate. This criteria is satisfied. No further action is needed.

Item Number	38
Section	Table 10 Natural Risks
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	b) Pest and Disease Outbreaks (PD)
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex

Aster Global Findings - Round 1	The audit team confirms that the risk score is appropriate. The audit team understands that there is a formal process for identifying and controlling a pest outbreak; however, it is unclear what evidence is provided that demonstrates "preventative measures" are in place to control pest outbreaks.
Round 1 NCR/CL/OFI	CL: Please provide verifiable evidence to justify the mitigation score taken in line with the requirements of VCS risk tool.
Round 1 Response from PP (DD MonthYYYY)	Prevention measures are taking in place to control pest outbreaks depending on a "lot categorization". For example, lots may be categorized as being without reports of pests, having controlled pest status, or having a large number of pests. For each lot type, protocols are defined to delimit affected or potentially affected areas, and criteria for tree sampling and identification of cochineal are outlined. In addition, monitoring plans define the specific responsibilities of field staff in the monitoring, reporting, and pest control processes. This clarification was made in the document "VCS-Non-Permanence-Risk-Report-TeakMex" in the table Pests and Disease Outbreaks (PD), page 15. Please find the supporting information of the implementation of activities to control pest and disease in the supporting information: Supporting documents\NPRT\Natural risk\Pest and Disease].
Aster Global Findings - Round 2	The audit team reviewed the additional evidence provided that demonstrates the PP has control and monitoring plans for pests for each lote. Additionally, evidence was reviewed that demonstrated the biological control agents are used in conjunction with the National Agency regulating these activities. This mitigation is appropriate. No further action is needed.

Item Number	39
Section	Table 10 Natural Risks
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	c) Extreme Weather (W)
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	N
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	VCS-Non-Permanence-Risk-Report-TeakMex

Aster Global Findings - Round 1	The audit team reviewed the cited page regarding the risk level for tropical cyclones and notes that while most of the state of Tabasco has a low risk, almost the entire state of Chiapas has a medium to very high risk, and the southeastern part of Campeche has a medium risk of cyclones. As a result the audit team is unable to confirm a that the LS Risk of Insignificant is appropriate. Based on a review of the insurance document provided, the audit team found that the insurance policy does not cover damages greater than 50% rather some damages at 70% with coverage increasing as the damage increases. Additionally, the reason for mitigation credit presented in the risk tool fails to identify "prevention measures" that mitigate these risks as specified in the VCS Risk Tool. As a result the audit team is unable to confirm the mitigation score claimed.
Round 1 NCR/CL/OFI	1 CL: Please update the risk rating or provide verifiable evidence to support the current score. CL: Please update the mitigation credit claimed or provide verifiable evidence that demonstrates prevention measures are in place to mitigate extreme weather.
Round 1 Response from PP (DD MonthYYYY)	The risk and hazard of cyclone classification were updated using the information presented by the Mexican Government and developed by CENAPRED. Page 16 presents this modification and the support information can be found in Natural Risk/Extreme Weather folder. Also, this folder contains the hurricane protocol, with the prevention measurements, evidence of its implementation, according to the Mexican Government guidelines and, the activity with workers for checking all the procedures (Minuta Huracanes 2020). The supports of these activities are available in the supporting information: Supporting documents\NPRT\Natural risk\Extreme Weather Supporting documents\NPRT\Internal risk\Project management\Management plans\01_Logs and Records. The insurance document was updated and the value of the percentage in the document was rectified. See page18 of the VCS-Non-Permanence-Risk-Report-TeakMex document and supporting information in: Supporting documents\NPRT\Natural Risk folder / Insurance.

Aster Global Findings - Round 2	The audit team reviewed the evidence for the mitigation credit taken and is reasonably assured that this score is warranted. The audit team reviewed the updated NPRT and associated evidence. The audit team was unable to locate the raw data used for the risk analysis of extreme weather. The audit team notes that there are parcels that have a very low, low, medium, and very high degree of hazard from tropical cyclones and parcels that have a very low, low, and medium degree of risk from tropical cyclones. Considering the wide range of risk and hazard factors from tropical cyclones the risk analysis needs to be completed in a way that accounts for the volume at risk in the different project areas or a conservative value should be taken for all areas.
Round 2 NCR /CL/OFI	CL: Please provide a link to the raw data or upload the raw data directly so the audit team can review it. CL: Please update the risk analysis to correspond to the different parcels or take a conservative risk score that is appropriate for all areas.
Round 2 Response from PP (DD MonthYYYY)	Unfortunately, it is not possible to add the direct link for each variable used in the extreme weather analysis, because the website of the National Risk Atlas of the Mexican Government is an online geo-visor so any link will be redirected to the initial page. To solve this issue, we made an instruction document that presented step-by-step the process for obtaining the data used in this item. Also, in this document is presented a table with the percentage of risk and hazard qualification, which support the risk factor selected in the NPRT. Because more than 80% of the total project area has very low and low qualifications. And for all the areas the probability of occurrence of a hurricane of one or five-category is less than 1 % Please see the supporting information: Supporting documents\NPRT\Natural risk\Extreme Weather/ National Risk Atlas Mexican Government_Step-by-step file
Aster Global Findings - Round 3	The audit team reviewed the updated NPRT and recreated the calculations as described in the National Risk Atlas Mexican Government_Step-by-step file document. Although the audit team was unable to recreate the exact results of this analysis, the audit confirmed that the current LS score of 5 for extreme weather is appropriate.

Item Number	40
Section	5. Conditions under which carbon stock and change in carbon stock may be estimated as zero

VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	(c) The pre-project trees are not inventoried along with the project trees in monitoring of carbon stocks but their continued existence, consistent with the baseline scenario, is monitored throughout the crediting period of the project activity.
Applicability to Project (Y or N/A)	Y
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, PD
Aster Global Findings - Round 1	Pre-project trees are not inventoried; however, it is unclear how their continued existence is monitored.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings.
Round 1 Response from PP (DD MonthYYYY)	Due to its importance for the ecology of the territory and even for the well-being of the plantations, the company ensures their continued existence in conservation areas, taking care that they are not disturbed by any legal or illegal activities. The company has developed studies that involve the study of existing biodiversity as the presence of special fauna such as white-tailed deer, thunderous deer and ocellated turkey and the identification of high conservation value forests. This information was included in the MR in section 5.1 page 61. The mentioned studies can be found in Supporting documents/ Conservation studies
Aster Global Findings - Round 2	Thank you for providing the additional evidence and adding the aforementioned language to the MR. The audit team is reasonably assured that this criteria is satisfied. No further action is needed.

Item Number	41
Section	1. Measurement of fixed area plots
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	3. The biomass of the individual trees is added and the sum is divided by the area of the sample plot to obtain the plot biomass value. Note. Where the number of saplings with diameter below the range of diameter applicable to the allometric equation is high, the mean biomass of the saplings in a sample plot can be estimated as follows: (1) Determine the diameter mid-way between the diameter of the smallest sapling existing and the smallest diameter allowed by the allometric equation. (2) Harvest from outside the plot area a few saplings having diameter close to the mid-way diameter and obtain the mean biomass per sapling; (3) Count all the saplings in the sample plot and multiply this number by the mean sapling biomass to obtain their contribution to the plot biomass.

Applicability Project (Y or N/A)	to	Y
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		MR, Ex_post_2ndVer_28042021
Aster Global Findings - Round 1		The audit team reviewed the tree-level data and noted that the calculation method does not appear to be in-line with the methodology, specifically the methodology states "The biomass of the individual trees is added and the sum is divided by the area of the sample plot to obtain the plot biomass value." The audit team understands that the average height and average diameter over each plot is calculated and then this average is used to estimate the biomass on each plot.
Round NCR/CL/OFI	1	CL: Please clarify in line with the finding.
Round 1 Response from PP (DD MonthYYYY)		As mentioned in the methodology, the biomass of the individual trees is added and the sum is divided by the area of the sample plot to obtain the plot biomass value. Equation 5 of the same annex is the equation used for biomass estimation. This equation allows calculating the biomass per strata which was the developed approach in our estimations. To do so, average height and average diameter over each plot were used to calculate the average volume, and then this average was used to estimate biomass on each strata. This clarification was made in a footnote in section 5.2.1 page 71, where the use of equation 5 is described.
Aster Global Findings - Round 2		Thank for the clarification. The audit team confirms this criteria is satisfied. No further action is needed.

Item Number	42
Section	3. This methodology is applicable under the following conditions:
VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)	(b) Soil disturbance attributable to the project activity does not cover more than 10 per cent of area2 in each of the following types of land, when these lands are included within the project boundary:
Applicability Project (Y or N/A)	to Y
Requirement Met (Y, N or Pending)	Y

Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Management Plans
Aster Global Findings - Round 1	The audit team noted that in multiple management plans for the new instances plantations are established using roller choppers and "doble pase de rastra". As a result it does not seem that this management practice is allowed within the project area. Additionally, the "encamellonado" or bedding of the land undoubtedly counts as soil disturbance.
Round 1 NCR/CL/OFI	1 NCR: Please clarify how this criteria is satisfied for the new project instances.
Round 1 Response from PP (DD MonthYYYY)	The applicability of the condition b) as described in PDD section 2.2 still apply for new Project instances since: (b) Soil disturbance attributable to the project activity does not cover more than 10 percent of area in each of the following types of land, when these lands are included within the project boundary: (i) Land containing organic soils; The soils in the project area had less than 1% of organic matter before the project started. In the land use before the project, the amount of organic matter inputs was low, due to the management practices: slash and burn to prepare the land for livestock and cropland activities. Thus, an increase in the soil carbon stock in the baseline is not expected. (ii) Land which, in the baseline, is subjected to land-use and management practices and receives inputs listed in appendices 1 and 2 to the methodology. The area of land on which this tool has been applied is not subject to any of the cropland or grassland management practices listed in Table 1 and 2 of the appendices of the methodology. The baseline before the project start date was for livestock and cropland. Roller choppers and "doble pase de rastra" are used where the land is compacted and the use of those tools is required (not for all the plantations this machinery is used) Thus, it is demonstrated that the project complies with the condition b) of the methodology. This clarification was made in section 2.3.1 page 16 of the MR, where new areas were listed.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team confirms that this criteria was addressed at validation and that the new project areas in this verification meet eligibility criteria. This requirement is satisfied. No further action is needed.