



# LUANGWA COMMUNITY FORESTS PROJECT VERIFICATION



Document Prepared by AENOR INTERNACIONAL S.A.U.  
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### Summary:

*AENOR has carried out the verification of the* Luangwa Community Forests Project. The project is a large-scale REDD+ project implemented in Eastern and Lusaka Province, Zambia with initial project area of 943,676 ha. It is being implemented on communal land in 12 chiefdoms falling within Game Management Areas (GMA) and two private ranches. Implementation is in partnership with the traditional authorities and the government of the Republic of Zambia. The project generates emissions reductions through avoided deforestation, using: a combination of direct conservation support (forest monitoring and encroachment prevention), engagement and capacity building with key Government and community stakeholders, and conservation incentives for the area protected: including performance-based payments delivered to empowered community stakeholders, through local institutions, and support to deforestation mitigation activities, including sustainable, improved livelihoods activities, such as conservation agriculture, non-timber forest products, sustainable enterprise development, infrastructure development and water provision.

The project's community objective is poverty alleviation activities benefiting at least 10,000 households, specifically targeting vulnerable households and the poorest of the poor. The biodiversity objectives are maintaining a massive wildlife corridor between several national parks in the catchment of Zambia's 4th largest river system. Conserving and maintaining vulnerable and endangered species through habitat protection and reduction in poaching. The climate objectives are to avoid deforestation in the project area and assist communities and biodiversity with climate change adaptation benefits through income diversification, improved farming techniques, crop diversification and maintenance of habitat corridors.

The project start and implementation date is 1 May 2015 and will be operational until 30 April 2045. The estimated emissions reduction for the 30-year project span is 83,598,204 tCO<sub>2</sub>e at an average of 2,985,650 tCO<sub>2</sub>e/yr. The emissions reduction for the current monitoring period (01-January-2019 to 31-December-2019) is 1,495,023 tCO<sub>2</sub>e. This is a grouped project.

The purpose of the verification was to determine the conformance of the project with respect to the VCS Standard v4.0 and the validated PD and the assessment of the ex-post monitored anthropogenic GHG emissions reductions and/or removals that have occurred as a result of the project's activities. The scope of the verification was to assess the conformance of validated project, once implemented, with the VCS requirements and requirements in the validated PD. The process was performed through a combination of desk review, interviews, and communications with relevant personnel.

This is the second verification event, corresponding to the monitoring period from 1 January 2019 to 31 December 2019.

During the verification 11 CLs and 2 CAR were raised. All these issues were appropriately closed by means of corrections, more clear explanations, and other supporting documents.

Once all issues detected were appropriately resolved, AENOR carried out this final verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria, hence, the audit team concludes that the cumulative net GHG emissions reductions or removals of 1,495,023 tCO<sub>2</sub>e over the monitoring period has been quantified in accordance with VCS rules. A buffer discount rate of 11% was applied, resulting 1,330,570 VCU's eligible for issuance.

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# 1 INTRODUCTION

## 1.1 Objective

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

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description (PD), including the monitoring plan.
- The extent to which GHG emission reductions and removals reported in the monitoring report are materially accurate.

## 1.2 Scope and Criteria

The scope of the verification audit was to verify the emissions reductions and/or removals of the project, Luangwa Community Forests Project against the Verified Carbon Standard, the identified methodology and the validated PD throughout the monitoring period from 01 January 2019 to 31 December 2019.

The objectives of this audit included a verification of the Project's calculated reductions and/or removals and the non-permanence risk assessment report with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the PD.

In accordance with Section 4.1.8 of the VCS Standard, the criterion for validation and verification was the VCS Version 4, including the following documents:

- VCS Standard v4.0
- VCS Program Guide v4.0
- VCS AFOLU Non-Permanence Risk Tool v 4.0

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

## 1.3 Level of Assurance

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement reasonably assures that the project GHG assertions are materially correct and is a fair representation of the GHG data and information.

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

The threshold for materiality with respect to the aggregate of errors, omissions and misrepresentations relative to the total reported GHG emission reductions/removals was one percent (1%), as established for large projects by the VCS Standard.

## 1.4 Summary Description of the Project

The Luangwa Community Forests Project is a large-scale REDD+ project implemented in Eastern and Lusaka Province, Zambia with initial project area of 943,676 ha. It is being implemented on communal land in 12 chiefdoms falling within Game Management Areas (GMA) and two private ranches. Implementation is in partnership with the traditional authorities and the government of the Republic of Zambia. The project generates emissions reductions through avoided deforestation, using the following mitigation activities: a combination of direct conservation support (forest monitoring and encroachment prevention), engagement and capacity building with key Government and community stakeholders, and conservation incentives for the area protected: including performance-based payments delivered to empowered community stakeholders, through local institutions, and support to deforestation mitigation activities, including sustainable, improved livelihoods activities, such as conservation agriculture, non-timber forest products, sustainable enterprise development, infrastructure development and water provision. The baseline scenario is ongoing unplanned deforestation driven primarily by subsistence agriculture.

The project's community objective is poverty alleviation activities benefiting at least 10,000 households, specifically targeting vulnerable households and the poorest of the poor. The biodiversity objectives are maintaining a massive wildlife corridor between several national parks in the catchment of Zambia's 4th largest river system. Conserving and maintaining vulnerable and endangered species through habitat protection and reduction in poaching. The climate objectives are to avoid deforestation in the project area and assist communities and biodiversity with climate change adaptation benefits through income diversification, improved farming techniques, crop diversification and maintenance of habitat corridors.

The project start and implementation date is 1 May 2015 and will be operational until 30 April 2045. The estimated emissions reduction for the 30-year project span is 83,598,204 tCO<sub>2</sub>e at an average of 2,985,650 tCO<sub>2</sub>e/yr. The emissions reduction for the current monitoring period (01-January-2019 to 31-December-2019) is 1,495,023 tCO<sub>2</sub>e. This is a grouped project.

## 2 VERIFICATION PROCESS

### 2.1 Method and Criteria

The verification was performed through a combination of document review and interviews with relevant personnel, as discussed in Sections 2.2 through 2.4 of this report. At all times, the project was assessed for conformance to the criteria described in Section 1.2 of this report. As discussed in Section 2.5, findings were issued to ensure that the project was in full conformance to all requirements.

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 & 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. Any modifications applied to the Verification and Sampling plan were made based upon the conditions observed for monitoring in order to detect the processes with highest risk of material discrepancy.

The verification activities in which risks were assessed were the evaluations of the monitoring system (data flow, data control procedures, etc.) but mainly the quality of raw data as well as sources and the spreadsheet calculations. AENOR reproduced and verified 100% of sheets in the *20200529\_LCFP\_ER\_Calc\_M2\_no\_soil* for the monitoring period 01 January 2019 – 31 December 2019 for the project area. The project boundary and deforested areas in the project area for the monitoring period were 100% checked using the GIS database.

The carbon stock changes, and the land used classes in the project area were also 100% verified and crosschecked with validated values. For data provided for the reference region, AENOR carried out onsite samples of data since they had already been previously validated and posed a lower risk to the emissions reductions achieved by the project.

AENOR carried out a deep and meticulous review of the spreadsheets in order to verify the correct application of the methodology (formulae, equations.) and checked that data required calculating the GHG removals were appropriately provided. Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed emission reductions are free from material errors, omissions, or misstatements.

AENOR confirms that sufficient evidence was presented for the reported net anthropogenic GHG emission reductions and that there is a clear audit trail that contains the evidence and records that validate the stated figure in this verification report since:

- Sufficient evidence available: The project participant has provided the 100% of data used in the calculations to achieve the final amount of GHG emission reductions reported.

- Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team and were checked during the interviews.
- Cross-checked evidence: AENOR cross-checked the collected information through interviews with stakeholders and reproducing calculations.

Hence, AENOR confirms that the stated figures in the monitoring report are correct and confirms that is able to certify net anthropogenic GHG removals based on verifiable and reliable evidence.

## 2.2 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS program requirements, the methodology (VCS VM0009 V3.0), and the validated PD. Initial review focused on the Monitoring Report (MR) and included an examination of the project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals. Documents reviewed included data from monitoring, carbon rights contracts, forest management agreements, maps and aerial images, monitoring and grievance SOPs, biomass and carbon calculation spread sheets, and responses to Corrective Action Requests (CARs) and Clarifications (CLs).

The verification included a review of the validated PD and MR, relative to the field conditions and interviews with project management staff and stakeholders. Modifications to the Verification and Sampling plan were made based upon the conditions observed for monitoring in order to detect the processes with highest risk of material discrepancy.

The VCS AFOLU Non-Permanence Risk Tool was used by the Project Proponent to assess overall project risk. AENOR 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. The final score was calculated to be 11%.

For a listing of all documents received from the client for this verification, please see Appendix 1.

## 2.3 Interviews

Interviews were performed as part of the overall verification process which was additional to that provided in the project description, monitoring report and any supporting documents. The AENOR verification team met with individuals with various roles in the project. This included a series of interviews with in-country staff that support the mission of the project. In addition, interviews discussions were conducted with project members and leaders of the local communities. The following table summarizes the interviews carried out during the process.

| Name                | Title/Organization/Community                                                     |
|---------------------|----------------------------------------------------------------------------------|
| Chrispin Chikopa    | Chairperson of Community Resources Board (CRB), Rufunsa Village Action Group-VAG |
| Sebastian Nyendwa   | Chairperson, Shikabeta CRB, Lunsemfwa village action group working with 5 VAGs   |
| George Tembo        | Chairperson, Sandwe Chiefdom CRB                                                 |
| Chanx Zulu          | Chairperson, Luembe Chiefdom CRB                                                 |
| Laban Ng'ambi       | Vice-chairperson, Luembe Chiefdom CRB                                            |
| Hassan Sachedina    | Managing Director - BioCarbon Partners                                           |
| Joke Hoffman        | Chief Operating Officer - BioCarbon Partners                                     |
| David Gwenzi        | GIS/RS Manager - BioCarbon Partners                                              |
| Theron Morgan-Brown | Senior Manager, Science & Technology - BioCarbon Partners                        |
| Besa Kalinda        | Forest and Biodiversity Monitoring Coordinator - BioCarbon Partners              |
| Esau Shawa          | Site Operations Manager - BioCarbon Partners                                     |

Due to the COVID-19 pandemic situation, all interviews were carried out through videoconference, as explained in Section 2.4. The interviews were carried out between April 7<sup>th</sup> and May 26<sup>th</sup>, 2020.

## 2.4 Site Inspections

Due to the exceptional situation caused by the COVID-19 crisis and the travel restrictions established by governments for safety reasons, it was not possible to carry out a site visit as part of the verification process of the project.

In accordance with VERRA's COVID-19 Travel Guidance for Projects (dated 18 March 2020) and since that the VCS Programs does not explicitly mandate site visits, an exemption of the site was requested on the ground of the crisis situation and considering that a reasonable level of assurance was achievable by other means. AENOR as VVB proposed to carry out a remote verification audit that ensured the achievement of the assurance level required by both the JNR and VCS programs.

The remote audit was based on the following auditing techniques:

- Document review and cross checks between the information provided in the in the MR, the PD and supporting information and evidence provided by the PP Emissions calculations, GIS database, and supporting information and evidence provided.
- Review, based on the selected methodologies, tools and the other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations.

- Telephone, teleconference and/or e-mail interviews for the implementation of project activities and the elaboration of project's documents.
- Cross checks between information provided by interviewees to ensure that not relevant information has been omitted.

For the verification of project activities and monitoring, in addition to the interviews described in Section 2.4, the following means were used:

| Project activity                               | Mean of verification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conservation farming and Lead farmers training | <ul style="list-style-type: none"> <li>• Training's attendance lists</li> <li>• Conservation agriculture report to the Ministry of Agriculture</li> <li>• Farmers training narrative and financial progress report to the Ministry of Agriculture</li> <li>• Signed testimonies: <ul style="list-style-type: none"> <li>○ Ernest Mwale – Jumbe Chiefdom</li> <li>○ Jonathan Jumbe– Jumbe Chiefdom</li> </ul> </li> <li>• Video testimonies: <ul style="list-style-type: none"> <li>○ Kelvin Mwale – Sandwe Cheifdom</li> <li>○ Elizabeth – Sandwe Cheifdom</li> </ul> </li> </ul> |
| Beekeeping                                     | <ul style="list-style-type: none"> <li>• Signed testimony: Charity Chulu – Nsefu Chiefdom</li> <li>• Video testimonies: <ul style="list-style-type: none"> <li>○ Kelvin Mwale – Sandwe Cheifdom</li> <li>○ Tedson Phiri – Sandwe Cheifdom</li> <li>○ Elizabeth – Sandwe Cheifdom</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                           |
| Boreholes development                          | <ul style="list-style-type: none"> <li>• Signed testimonies: <ul style="list-style-type: none"> <li>○ Hellen Banda – Jumbe Chiefdom</li> <li>○ Elizabeth Mwanza – Jumbe Chiefdom</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                           |
| Mothers shelter                                | <ul style="list-style-type: none"> <li>• Signed testimony: Magret Muleya – Msoro Chiefdom</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Schools construction                           | <ul style="list-style-type: none"> <li>• Video testimonies: <ul style="list-style-type: none"> <li>○ Kelvin Mwale – Sandwe Cheifdom</li> <li>○ Tedson Phiri – Sandwe Cheifdom</li> <li>○ Elizabeth – Sandwe Cheifdom</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                       |
| Community scouts                               | <ul style="list-style-type: none"> <li>• Video testimony: Tedson Phiri – Sandwe Cheifdom</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

## 2.5 Resolution of Findings

All documentation provided by the PP was assessed against the applicable version of the relevant VCS guidance document. Several clarification requests (CL) and corrective action requests (CAR) were raised and submitted to the PP, which addressed them either by providing to the audit team the requested information or by making the appropriate corrections. Updated versions of the documentation were submitted by the PP and the audit team reassessed them against the guidance documentation. This process was repeated iteratively until all CL and CAR were fully closed. Specifically, 11 CLs and 2 CARs were raised.

All findings issued by the AENOR audit team during the verification process have been closed. In accordance with Section 4.1.13 of the VCS Standard, all findings issued during the verification process, and the inputs for their closure, are described in Appendix 2 of this report.

### 2.5.1 Forward Action Requests

No FARs were raised to the PP during the verification process.

## 2.6 Eligibility for Validation Activities

AENOR holds accreditation for validation for the relevant sectorial scope 14 under which this project activity is classified.

# 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.

## 3.2 Methodology Deviations

No new methodology deviations were applied during the monitoring and quantification of VCU for this monitoring period. A detailed description of the previous methodology deviations can be found in Section 2.3.1 Methodology Deviations of the MR for previous monitoring periods.

### 3.3 Project Description Deviations

One Project Description Deviation has occurred during this monitoring period: parameters  $t^{[i-1]}$ ,  $t^{[m]}$ ,  $t^{[m-1]}$ ,  $U_B^{[m]}$ ,  $U_{EM}^{[m]}$  have been included as data and parameters monitored. These parameters were mistakenly excluded from Section 3.3.2 Data and Parameters Monitored in the PD but have been monitored anyway from the beginning of the project. The deviation has been appropriately described and justify and do not affect the applicability of the methodology, the additionality of the project nor the appropriateness of the baseline scenario. Thus, the audit team considers the deviation to be valid and that the project remains in compliance with the VCS rules.

The Project Description Deviation from the previous monitoring period of conservatively exclude the SOC pool in the accounting of emissions continues for this monitoring period.

### 3.4 Grouped Project

No new instances were added to the project during this monitoring period.

## 4 VERIFICATION FINDINGS

### 4.1 Project Implementation Status

The Luangwa Community Forests Project is a REDD+ project which activities fit in threes categories:

- Activity Area 1: Infrastructure Development, Social Service Delivery
- Activity Area 2: Apiculture, Agricultural Improvement, Diversification and Economic Opportunities
- Activity Area 3: Forest Encroachment and Wildlife Monitoring and Poaching Reduction

*The MR provides in its Section 3.1 a detailed description of the activities implemented by the project since its start.* During this verification process, AENOR has not detected project changes in regards of the project title, its purposes and objectives. As such, the project activity accurately reflects the proposed project which consists of *avoiding deforestation through direct conservation support*, engagement and capacity building with key Government and community stakeholders, *performance-based payments to community stakeholders delivered through local institutions*, and *promotion of alternative livelihood activities*.

During the verification process, the audit team checked the actual implementation of project activities through the analysis of evidences provided by the PP and through interviews to local stakeholders and project staff. No discrepancies have been found between the gathered evidence and the implemented activities reported in the MR, as well between the MR and the planned activities in the PD.

The project is designed as grouped project, and then the inclusion of new instances is acceptable. For the present monitoring period, *no* new instances were included.

Carbon pools addressed and emissions of non-CO<sub>2</sub> GHGs are the same than those validated in the PD, with the exception SOC. This carbon pool was conservatively excluded for the previous monitoring period due to the lack of accurate data regarding carbon contents on soils. This exclusions continues for the current monitoring period.

After the review of the MR, spreadsheet calculations and the other document to support calculations such as GIS information, surveys and others, AENOR deems that project status is in compliance with applicable methodologies and implementation is in support of the VCS principles of Conservativeness and Accuracy.

Related to the compliance with the Monitoring Plan, section 4.3 of the MR provides information about the monitoring plan and actions carried out for the current monitoring period. AENOR reviewed the procedures put in place to perform the biomass inventories and deems that they are in accordance with the procedures described in the validated monitoring plan. AENOR checked the monitoring plan contained in the validated PD and compared it with the MR to verify whether there was any difference that would cause an increase in estimates of the GHG emission removals in the current monitoring period. AENOR has confirmed that there are no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodologies. Also, the project proponent effectively monitors the required parameters to determine the project's removals by sinks and emissions by sources as required by the monitoring plan and the applicable methodologies

The parameters reported, including source, frequency and review criteria as indicated in the monitoring plan were verified to be correct and in line with the monitoring plan of the validated PD. As described in Section 3.3 of this verification report, the parameters  $t^{[i-1]}$ ,  $t^{[m]}$ ,  $t^{[m-1]}$ ,  $U_B^{[m]}$ ,  $U_{EM}^{[m]}$  were monitored, in spite of not being included in the original monitoring plan of the validated PD. These parameters were mistakenly excluded from Section 3.3.2 Data and Parameters Monitored in the PD but have been monitored anyway from the beginning of the project Necessary management system procedures including responsibility and authority of monitoring activities have been verified to be consistent with the PD. Knowledge of personnel associated with the project activity was also found to be satisfactory.

Regarding leakage emission, they account 0. In this regard, AENOR has checked evidence provided which confirms the information included in the MR. In addition, no biomass loss events were reported during this verification period.

There is no evidence of double counting or that the project has participated nor been rejected under any other GHG programs. GHG emission reductions or removals generated by the project are not included in an emission trading program or any other mechanism that includes GHG allowance trading. The project has not received or sought any other form of environmental credit.

Regarding the sustainable development, AENOR interviewed local stakeholders, and verified the claimed impacts of the project and the contribution to the achievement of the 7<sup>th</sup> National Development Plan.

There are no new methodology deviations for this monitoring period. The previously validated methodology deviations are:

### **1. Demonstration of Forest Age**

The methodology requires (in PDR.22) that a digital GIS-based) map of the project accounting areas, including aerial or satellite imagery showing that they are comprised of forests or native grasslands as of the project start date and 10 years prior to the project start date. The project did not meet this requirement because it chose to map forests in the project area with PALSAR radar data and the earliest available data for that sensor is from 2007. However, this is justified on several grounds. The project areas are virgin forests that were previously remote and are inaccessible. Thus, there is no history of large disturbances in the area that would have been followed by regeneration between 2005 and 2007. An accurate 2007 forest map of these areas should be virtually indistinguishable from a 2005 map. Additionally, using the 2007 PALSAR imagery results in a much more accurate map of the forests that existed 10 years prior to the start date than would be possible with optical imagery. The optical imagery best suited to mapping the project area is generally from April-June. It is at this time of year, that relatively cloud free imagery can be obtained when the forests still have leaves and are not dotted with burn scars. Even so, the passing of just a couple of weeks during this period, which is immediately after the rains, results in significant changes in the appearance of the forest in optical imagery. The project initially tried mapping forests with optical imagery, but found significant changes between years that were the result of seasonality rather than real changes in forest areas. These effects are much reduced when using PALSAR radar data. This is because, in addition to being cloud penetrating, L band radar has a relatively long band-width and thus does not generally interact with the leaves of trees, but does interact with large branches and stems. Finally, VM0009 does not require a remote sensing analysis of an area, but rather to visual show that it is unconverted as of the project start date and 10 years prior.

### **2. Leakage Plot Protocol**

There was a minor deviation of the visual approach for leakage monitoring (Appendix R, VM0009). Instead of Forest Inventory Team members estimating degradation, they were required to geo-reference every felled tree in the permanent plots and the total number of felled trees were compared against the average density of trees/ha in the project accounting area, again avoiding biased estimations/erroneous counting of trees in 1ha plots. This value was then placed in a degradation category as per VM0009.

### **3. Biomass estimation**

The project uses two different allometric equation to estimate above ground biomass. One was developed from data provided by Prof. Chudimayo from Zambian Miombo and was tested on trees up to 55 cm DBH. It was used to estimate the biomass of trees up 63 cm dbh, with the biomass of trees

between 55 cm and 63 cm dbh assumed to be equal to a 55 cm dbh tree. Then, a second equation developed by Mugasha et al. in Tanzanian Miombo was used to estimate the biomass of trees between 63 cm dbh and 110 cm dbh with trees with a greater than 110 cm dbh assumed to have a biomass equal to a 110 cm dbh tree.

After a complete review of the different documents provided and the information gathered through the remote audit process, AENOR is able to confirm that the project implementation is in accordance with the validated PD. There are not material discrepancies between project implementation and the project description.

## 4.2 Safeguards

### 4.2.1 No Net Harm

The project was validated under the Climate, Community and Biodiversity Standards (CCB), in addition to the VCS, and the PD describes in its Section 2.1.11 the potential negative impacts of the project. The identified potential negative impacts were:

- Conflicts related to the equitable distribution of benefits and workload.
- Increased cost of living if value of crops increases.
- Potential contamination of boreholes if communities place latrines too close to boreholes, or borehole drillers drill too close to latrines.

To mitigate these impacts, the PP works with the Community Resources Boards (CRB) and Village Action Groups (VAG) to distribute the benefits on the project in a transparent, participatory, and fair way.

Interviews with the local stakeholders demonstrated that the PP has properly identified the potential negative impacts and that reasonable steps have been taken to mitigate such impacts.

### 4.2.2 Local Stakeholder Consultation

The PP has been carrying out consultation process since the inception of the project, starting with meetings with key government and community authorities. The process evolved from consultations at national level to consultation at village level. During this process, stakeholders were identified and free, prior, and informed consent (FPIC) was achieved.

The participatory structure for the management of the project, in which CRB and VAG have the competencies to determine the way to use the project funds for the financing of project activities in the relevant interest of each village, ensures that the opinion of stakeholders is fully taken into account.

Interviews with CRB members confirmed to the audit team that these participatory bodies are democratically elected and that are an effective mean of communication between the PP and the local community stakeholders. Additionally, the PP provides capacitation to each member of the CRB in order to improve their performance in the development of their responsibilities.

It is the opinion of AENOR, based on the information gathered during the audit process, that the PP communicates the necessary relevant information about the project implementation, risks, costs and benefits, relevant laws and regulations and the process of VCS Program to local stakeholders. All interviewed community members were aware of the nature of the project, its implementation, and its results, as well as the basics regarding the VCS program and the auditing process.

### 4.3 AFOLU-Specific Safeguards

The MR describes activities carried out to mitigate risks to local stakeholders due to project implementation. The main affected stakeholders would be those poaching and illegal charcoal producing. The mitigation measure is the creation of jobs and livelihood alternatives. The project has created approximately 60 community jobs, mainly for Community Scouts (CS). The CS role requires physical endurance, knowledge of bushcraft, and a willingness to spend one's work time in the outdoors. People with poaching experience are naturally inclined to be high performing CS with a change in mindset towards legally earned income and with the passing of training. Additionally, the improvement in quality of life (water, education, health services) and investment in food security and income diversification through project activities, reduce the risk for community members to incur in illegal poaching and charcoal production.

Regarding land tenure, the project has not altered property nor use rights. The land was previously in game management areas managed by CRB, which are still the responsible for the management. The PP has signed community forest management agreements with the CRB, in which their rights are recognized, including rights over carbon assets.

The PP has continuous communication with local stakeholders through on-field staff and the CRBs. All community forest management agreements signed include the description of the grievance mechanism, which is well known by community members. Additionally, a Stakeholder Grievance Response SOP has been developed and provided to all lead members of the engagement team and to all CRB. Furthermore, all community meetings have an agenda item titled 'Grievances' to ensure that at each meeting there is a public opportunity to air grievances in a formal, more regular and logged forum. The MR reports 13 grievances received and addressed during this monitoring period. Most of the grievance were associated to encroachments and delay in the delivery of inputs.

The documentation reviewed and the interviews with local stakeholders confirmed that the project is mitigating its negative impacts. All interviewees have knowledge of the grievance and redress procedure and manifested that it is being properly implemented for the resolution of any conflict. The Stakeholder Grievance Response SOP and the Community Engagement SOP are efficient in their designed and are aligned with the principles set in by the validated PD.

## 4.4 Accuracy of GHG Emission Reduction and Removal Calculations

Procedures for quantifying the baseline emissions were conducted in accordance with the methodology (VCS VM0009 v3.0 *Methodology for Avoided Ecosystem Conversion*). The verification team performed an intensive review of all input data, parameters, formulas, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS documentation, methodology and associated tools, and the PD and MR. Further, the verification team reproduced calculations for selected samples to ensure accuracy of the results. Conversion factors, formulas, and calculations were provided by project proponents in spreadsheet format to ensure all formulas were accessible for review. The verification team recalculated subsets of the analysis to confirm correctness. Project proponent also provided a step-by-step overview of select calculations to ensure the verification team understood the approach and could confirm its consistency with the methodologies, PD and MR. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice.

### Baseline emissions

Section 5.1 of the MR and the calculation spreadsheet submitted to AENOR provide information related to the baseline emissions calculations. Baseline emissions ( $E_{(B\Delta)}^{[m]}$ ) for the current monitoring period (01-January-2019 to 31-December-2019) were calculated using Equation F.15 and F.16 of VM0009 v3.0.

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

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

Cumulative baseline emissions were calculated using a logistic biomass emission model (BEM), validated in the PD, based upon a point interpretation of forest state in the reference area applying equation F.24.

$$E_{B\,BM}^{[m]} = BEM_{SP}(c_{P\,1\,BM}^{[m=0]}, c_{B\,BM}^{[m]}, t^{[m]}, x^{[m]}) = BEM_{U2,3/P1}(c_{P\,1\,BM}^{[m=0]}, c_{B\,BM}^{[m]}, t^{[m]}, x^{[m]}) \quad [F.24]$$

when  $E_{B\,BM}^{[m]} \geq A_{P\,1}^{[m=0]}(c_{P\,1\,BM}^{[m=0]} - c_{B\,BM}^{[m]})$

then  $E_{B\,BM}^{[m]} = BEM_{U2,3}(wc_{P\,1,2\,BM}^{[m=0]}, c_{B\,BM}^{[m]}, t^{[m]}, x^{[m]})$

when  $E_{B\,BM}^{[m]} \geq A_{P\,1}^{[m=0]}c_{P\,1\,BM}^{[m=0]} + A_{P\,2}^{[m=0]}c_{P\,2\,BM}^{[m=0]} - c_{B\,BM}^{[m]}(A_{P\,1}^{[m=0]} + A_{P\,2}^{[m=0]})$

then  $E_{B\,BM}^{[m]} = BEM_{U2,3/P1}(wc_{P\,1,2,3\,BM}^{[m=0]}, c_{B\,BM}^{[m]}, t^{[m]}, x^{[m]})$

...

$$E_{B\,BM}^{[m]} = A_{P\,1}^{[m=0]}c_{P\,1\,BM}^{[m=0]} + A_{P\,2}^{[m=0]}wc_{P\,1,2\,BM}^{[m=0]} + \dots + A_{P\,n}^{[m=0]}wc_{P\,i,n\,BM}^{[m=0]} - c_{B\,BM}^{[m]}(A_{P\,1}^{[m=0]} + A_{P\,2}^{[m=0]} + \dots + A_{P\,n}^{[m=0]})$$

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

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

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

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

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

| Parameter                                                                                                                 | Equation used<br>(VM0009 v3.0) | Value<br>(tCO <sub>2</sub> e) |
|---------------------------------------------------------------------------------------------------------------------------|--------------------------------|-------------------------------|
| $E_{(B\Delta)}^{[m]}$ Baseline emissions for the current monitoring period                                                | F.15                           | 1,570,998                     |
| $E_{(B\Delta)}^{[m-1]}$ Cumulative baseline emissions from previous monitoring period                                     | F.16                           | 4,630,987                     |
| $E_{B\ BM}^{[m]}$ Cumulative baseline emissions from biomass at the end of the current monitoring period                  | F.24                           | 6,007,698                     |
| $C_{B\ BGB}^{[m]}$ Carbon not decayed in BGB at the end of the current monitoring period                                  | F.32                           | 41,196                        |
| $E_{B\ BGB}^{[m]}$ Cumulative baseline emissions from below-ground biomass at the end of the current monitoring period    | F.30                           | 2,121,041                     |
| $E_{B\ BGB}^{[m-1]}$ Cumulative baseline emissions from below-ground biomass at the end of the previous monitoring period | F.30                           | 1,585,531                     |

The SOC carbon pool was conservatively excluded for the monitoring period as explained in Section 3.3 of this report.

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

### Project emissions

Section 5.2 of the MR describes the calculations for the project emissions. Current emissions from changes in project carbon stocks were calculated with equation F.41 VM0009 v3.0.

$$E_{P\ \Delta}^{[m]} = E_{P\ \Delta\ BRN}^{[m]} + E_{P\ \Delta\ LS}^{[m]} + E_{P\ \Delta\ SF}^{[m]} + A_{PAA} \left( C_P^{[m-1]} - C_P^{[m]} \right) - C_{P\ \Delta\ WP}^{[m]} \quad [F.41]$$

The project accounting area stocks at the end of this monitoring period were equal to 114,128,431 tCO<sub>2</sub>e compared to 114,204,406 tCO<sub>2</sub>e at the end of the previous monitoring period. Thus, project emissions for this monitoring period were -75,975 tCO<sub>2</sub>e.

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

### Leakage

As reported in Section 5.3 of the MR, leakage emission for the current period ( $E_{L\Delta}^{[m]}$ ) was calculated using equations F.44 and F.45 of VM0009.

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

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

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

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

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

| Parameter                                                                                                                             | Equation used (VM0009 v3.0) | Value  |
|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------|
| $E_{L\Delta}^{[m]}$ Emissions from leakage for the current monitoring period.                                                         | F.44                        | 0      |
| $E_{LASF}^{[m]}$ Cumulative emissions from activity-shifting leakage in forested areas at the end of the current monitoring period    | F.46                        | 0      |
| $E_{LASF}^{[m-1]}$ Cumulative emissions from activity-shifting leakage in forested areas at the end of the previous monitoring period | F.46                        | 0      |
| $p_{LDEG}^{[m]}$ Portion of leakage due to degradation in forest at the end of the current monitoring period                          | B.9                         | 0.0769 |
| $p_{LDEG}^{[m=0]}$ Portion of leakage due to degradation prior to first verification event                                            | B.9                         | 0.0815 |

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

### Net GHG Emissions Reductions and Removals

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

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

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

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

The following table summarizes the uncertainty parameters calculated:

| Parameter                                                                                                                                                   | Equation used<br>(VM0009 v3.0) | Value<br>(tCO <sub>2</sub> e) |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|-------------------------------|
| $E_U^{[m]}$ Confidence deduction based on uncertainty in emissions models, carbon stock estimates in the project accounting area and carbon stock estimates | F.57                           | 0                             |
| $U_{EM}^{[m]}$ Total uncertainty in Baseline Emissions Models                                                                                               | F.14                           | 13,342                        |
| $U_P^{[m]}$ Total uncertainty in project accounting area carbon stock estimate                                                                              | B.10                           | 9,813,595                     |
| $U_B^{[m]}$ Total uncertainty in proxy area carbon stock estimate                                                                                           | B.10                           | 15,411                        |

VCUs were estimated using equation F.55, in which emissions allocated to the buffer account are calculated using a non-permanence risk rating of 11% (see Section 4.6 of this report).

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

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

| Year | Baseline emissions or removals (tCO <sub>2</sub> e) | Project emissions or removals (tCO <sub>2</sub> e) | Leakage emissions (tCO <sub>2</sub> e) | Net GHG emission reductions or removals (tCO <sub>2</sub> e) | Buffer pool allocation | VCUs eligible for issuance |
|------|-----------------------------------------------------|----------------------------------------------------|----------------------------------------|--------------------------------------------------------------|------------------------|----------------------------|
| 2019 | 1,570,998                                           | -75,975                                            | 0                                      | 1,495,023                                                    | -164,453               | 1,330,570                  |

The net anthropogenic GHG reduction due to the project activity for the monitoring period (01-January-2019 to 31-December-2019) amount 1,495,023 t CO<sub>2</sub>e. The total number of buffer credits that need to be deposited into the AFOLU pooled buffer account are 164,453 and the VCUs eligible for issuance are 1,330,570.

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

AENOR verified for the parameters available at validation, the values reported or the references to the documents where they are used or explained by reviewing, reproducing and crosschecking the evidence provided by the PP. AENOR checked the values of these parameters to be appropriate and correctly used in equations. Data and parameters available at validation are the ones stated in section 4.1 of the MR.

The data and parameters monitored to calculate the VCUs to be issued are the ones stated in section 3.1.2 of the MR. AENOR checked that the list of parameters to be monitored was complete and consistent with information in the monitoring plan of the PD.

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

AENOR verified the consistency and accuracy of each parameter detailed in it Section 4 of the MR by crosschecking the information in the MR with the information in PD as well as checking values and reproducing the calculations in the spreadsheet calculation package (see Appendix 1) and did not find inconsistencies. Therefore, AENOR deems that values reported for the parameters are accurate and consistent.

The following tables summarize the data and parameters used by the PP to calculate the GHG emission reductions, which has been assessed by AENOR.

| Data/Parameter available at validation                                                             | Value     | Assessment procedure and result                                                            |
|----------------------------------------------------------------------------------------------------|-----------|--------------------------------------------------------------------------------------------|
| $\alpha$<br>Combined effects of $\beta$ and $\theta$ at the start of the historic reference period | 0.2188    | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets. |
| $\beta$<br>Effect of time on the cumulative proportion of conversion over time                     | 0.0003271 | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets. |

| Data/Parameter available at validation                                                                          | Value   | Assessment procedure and result                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------|
| $\gamma$<br>Time shift from beginning of historic reference period to project start date                        | 10,589  | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets.                                             |
| $\hat{\sigma}_{EM}$<br>Estimated standard deviation of the state observations used to fit the logistic function | 0.4273  | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets.                                             |
| $A_{PAA}$<br>Area of project accounting area                                                                    | 485,495 | Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets.                  |
| $A_{PX}$<br>Area of proxy area                                                                                  | 3,840   | Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets.                  |
| $n_d$<br>Number of spatial points in the reference area                                                         | 2,600   | Value is consistent with validated PD, previous MR, and GIS data. Correctly inputted in the calculation spreadsheets.                  |
| $P_{LME}$<br>Portion of leakage related to market                                                               | 0       | Value is consistent with validated PD.                                                                                                 |
| $q$<br>Lag between start of degradation and conversion                                                          | 620     | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets.                                             |
| $r_{RS}$<br>Expansion factor for above-ground biomass to below-ground biomass (root/shoot ratio)                | 0.54    | Value is consistent with validated PD and original source (Chidumayo, E. N. 2013). Correctly inputted in the calculation spreadsheets. |
| $r_U$<br>Onset proportion of conversion immediately adjacent to project area                                    | 0.084   | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets.                                             |
| $t$<br>Time since project start date                                                                            | 1,705   | Calculation reproduced. Value correctly estimated.                                                                                     |
| $t_{PL}$<br>Length of project crediting period                                                                  | 10,957  | Value is consistent with validated PD. Correctly inputted in the calculation spreadsheets.                                             |

| Data/Parameter available at validation                                   | Value           | Assessment procedure and result                        |
|--------------------------------------------------------------------------|-----------------|--------------------------------------------------------|
| $w_i$<br>Weight applied to the $i$ th sample point in the reference area | Multiple values | Calculation reproduced.<br>Values correctly estimated. |

| Data/Parameter monitored                                                                           | Value                                                | Assessment procedure and result                                                                            |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| $A_{P_1}^{[m=0]}$<br>Area of project accounting area stratum 1 prior to first verification event   | 485,495                                              | Value is consistent with validated PD and GIS data.<br>Correctly inputted in the calculation spreadsheets. |
| $c_B^{[m]}$<br>Baseline carbon stocks at the end of the current monitoring period                  | 15.6                                                 | Calculation reproduced.<br>Value correctly estimated.                                                      |
| $c_{B\ BGB}^{[m]}$<br>Carbon not decayed in BGB at the end of the current monitoring period        | 41,196                                               | Calculation reproduced.<br>Value correctly estimated.                                                      |
| $c_{B\ b}^{[m]}$<br>Baseline scenario average carbon stock in selected carbon pools                | 15.6                                                 | Calculation reproduced.<br>Value correctly estimated.                                                      |
| $c_{B\ BM}^{[m]}$<br>Baseline carbon stocks in biomass at the end of the current monitoring period | 15.6                                                 | Calculation reproduced.<br>Value correctly estimated.                                                      |
| $c_P^{[m]}$<br>Project carbon stocks at the end of the current monitoring period                   | 236.2 in intact forest and 15.2 in encroached forest | Calculation reproduced.<br>Values correctly estimated.                                                     |
| $c_P^{[m-1]}$<br>Project carbon stocks at the beginning of the current monitoring period           | 236.2 in intact forest and 15.2 in encroached forest | Calculation reproduced.<br>Values correctly estimated.                                                     |
| $c_P^{[m=0]}$<br>Project carbon stocks prior to first verification event                           | 236.2                                                | Calculation reproduced.<br>Value correctly estimated.                                                      |
|                                                                                                    |                                                      |                                                                                                            |

| Data/Parameter monitored                                                                                       | Value       | Assessment procedure and result                       |
|----------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------|
| $c_{P\ 1\ BM}^{[m=0]}$<br>Project carbon stocks in stratum 1 prior to first verification event                 | 236.2       | Calculation reproduced.<br>Value correctly estimated. |
| $c_{P\ BM}^{[m=0]}$<br>Project carbon stocks in biomass prior to first verification event                      | 114,668,494 | Calculation reproduced.<br>Value correctly estimated. |
| $c_{P\ b}^{[m]}$<br>Average carbon in biomass in the project accounting area                                   | 236.2       | Calculation reproduced.<br>Value correctly estimated. |
| $c_{P\ 1\ b}^{[m=0]}$<br>Average carbon in biomass for project accounting area stratum 1                       | 236.2       | Calculation reproduced.<br>Value correctly estimated. |
| $E_{\Delta GER}^{[m]}$<br>GERs for the current monitoring period                                               | 1,495,023   | Calculation reproduced.<br>Value correctly estimated. |
| $E_{\Delta GER}^{[i]}$<br>GERs for monitoring period i                                                         | 79,743,052  | Calculation reproduced.<br>Value correctly estimated. |
| $E_{\Delta NER}^{[i]}$<br>NERs for monitoring period i                                                         | 70,971,304  | Calculation reproduced.<br>Value correctly estimated. |
| $E_B^{[m]}$<br>Cumulative baseline emissions at the end of the current monitoring period                       | 6,007,698   | Calculation reproduced.<br>Value correctly estimated. |
| $E_B^{[m-1]}$<br>Cumulative baseline emissions at the beginning of the current monitoring period               | 4,436,700   | Calculation reproduced.<br>Value correctly estimated. |
| $E_{B\ \Delta}^{[m]}$<br>Change in baseline emissions                                                          | 1,570,998   | Calculation reproduced.<br>Value correctly estimated. |
| $E_{B\ \Delta BGB}^{[i]}$<br>Change in baseline emissions from below-ground biomass during monitoring period i | 28,151,222  | Calculation reproduced.<br>Value correctly estimated. |
| $E_{B\ BGB}^{[m]}$                                                                                             | 2,079,845   | Calculation reproduced.<br>Value correctly estimated. |

| Data/Parameter monitored                                                                                                                 | Value     | Assessment procedure and result                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------|-----------|---------------------------------------------------------------------------------------------------|
| Cumulative baseline emissions from below-ground biomass at the end of the current monitoring period                                      |           |                                                                                                   |
| $E_{B\ BGB}^{[m-1]}$<br>Cumulative baseline emissions from below-ground biomass at the beginning of the current monitoring period        | 1,500,532 | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_{B\ BM}^{[m]}$<br>Cumulative baseline emissions from biomass at the end of the current monitoring period                              | 6,007,698 | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_{BA}^{[m]}$<br>Cumulative emissions allocated to the buffer account at the end of the current monitoring period                       | 601,440   | Consistent with Non-permanence risk report. Calculation reproduced.<br>Value correctly estimated. |
| $E_L^{[m]}$<br>Cumulative emissions from leakage at the end of the current monitoring period                                             | 0         | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_L^{[m-1]}$<br>Cumulative emissions from leakage at the beginning of the current monitoring period                                     | 0         | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_{L\ \Delta}^{[m]}$<br>Change in emissions due to leakage                                                                              | 0         | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_{L\ ASF}^{[m]}$<br>Cumulative emissions from activity-shifting leakage in forested strata at the end of the current monitoring period | 0         | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_{P\ \Delta}^{[m]}$<br>Change in project emissions                                                                                     | 75,975    | Calculation reproduced.<br>Value correctly estimated.                                             |
| $E_u^{[m]}$<br>Cumulative confidence deduction at the end of the current monitoring period                                               | 0         | Calculation reproduced.<br>Value correctly estimated.                                             |
| $P_{L\ DEG}^{[m]}$                                                                                                                       | 0.0769    | Calculation reproduced.<br>Value correctly estimated.                                             |

| Data/Parameter monitored                                                                        | Value  | Assessment procedure and result                                                     |
|-------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------------------|
| Portion of leakage due to degradation at the end of the current monitoring period               |        |                                                                                     |
| $p_{L\ DEG}^{[m=0]}$<br>Portion of leakage due to degradation prior to first verification event | 0.0769 | Consistent with previous MR.<br>Correctly inputted in the calculation spreadsheets. |
| $t^{[m]}$<br>Time from project start date to end of current monitoring period                   | 1,705  | Calculation reproduced.<br>Value correctly estimated.                               |
| $t^{[m-1]}$<br>Time from project start date to beginning of current monitoring period           | 1,339  | Calculation reproduced.<br>Value correctly estimated.                               |
| $U_B^{[m]}$<br>Total uncertainty in proxy area carbon stock estimate                            | 15,411 | Calculation reproduced.<br>Value correctly estimated.                               |
| $U_{EM}^{[M]}$<br>Total uncertainty in Baseline Emissions Models                                | 13,342 | Calculation reproduced.<br>Value correctly estimated.                               |
| $U_P^{[m]}$<br>Total uncertainty in proxy area carbon stock estimate                            | 15,411 | Calculation reproduced.<br>Value correctly estimated.                               |

AENOR did not find inconsistencies between the PD, technical annex, monitoring report and spreadsheet calculation.

After a deep and thorough review and reproduction of calculations and the corresponding tracks to the other spreadsheets, AENOR deems the parameters monitored and available at validation are correct, reliable, and consistent. Information in the monitoring report is in compliance with the PD, the calculations provided and the applicable methodology. Then, the results showed in the monitoring report are reliable, consistent, and accurate.

## 4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

The data and parameters used to determine GHG emission reductions and removals are listed in Section 4 of the MR.

During AENOR's verification, the evidence provided by the PP was enough in both quantity and quality to support the determination of GHG emission removals reported by the project.

Quality assurance and control is an essential part of company procedures in order to assure the accuracy of inventory data, modeling results, and carbon accounting. Quality assurance procedures are done in order to minimize and correct any potential data transcription, calculation, or formatting errors that may result in inaccurate carbon accounting results.

The majority of field data is collected using digital tools on smart phones and are either directly loaded to the database or saved on GDrive where it is checked and then transferred to the database. All data submitted to the central database is subjected to quality control by appropriate staff. The PP has developed SOP and Field manuals which covers all aspects related to carbon inventory. Spot checks and internal audits are conducted to make sure all data collection is carried out following the standards.

In accordance with VCS, the PP is committed to storing all project data in a secure and retrievable manner for at least two years after the end of the project crediting period. In order to facilitate project management and long-term accounting, all primary data outputs supporting annual verification including the spatial database is stored and maintained.

Roles and responsibilities are clearly identified in the MR. QA/QC procedures were developed by the PP for maintaining consistency and quality of field inventories over time. Interviews with the PP and inspection of data and results demonstrated that the PP possess all of the competencies required for reporting of GHG emissions removals on accurate way.

Data presented to the audit team were clear and coherent and processing steps could be traced to the corresponding sections of the methodology and monitoring plan with transparency.

Above procedures to ensure this are described in Section 4 of the MR, in terms of general QA/QC of the monitoring plan and specific QA/QC procedures applied to data and parameters monitored.

Throughout the verification, the PP demonstrated a commitment toward conservativeness and took all measures appropriate to ensure the reliability of evidence provided. Interviews conducted (oral evidence) are outlined in Section 2.4, and the final documents received from the PP supporting the determination of GHG reductions can be viewed in Appendix 1.

AENOR deems that the PP performed good practices in this assessment and concludes that GHG reductions were quantified correctly in accordance with the PD and applied methodology, and that the that evidence is sufficient in quantity and appropriate in quality to determine the GHG reductions of the project.

## 4.6 Non-Permanence Risk Analysis

PP has elaborated a VCS Non permanence Risk Report (NPRR) for the validation process according to the AFOLU Non-Permanence Risk Tool v4.0. As required by the VCS Program, the non-permanence risk rating is reassessed for each verification event.

Below, it is explained the assessment and the issues raised on regard the non-permanence risk rating determined by the PP in the NPRR dated on 29<sup>th</sup> May 2020 version 1.3.

| Risk factor                                                                     | Risk Rating                      | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | CARs/CLs                             |
|---------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| <b>Internal Risks</b>                                                           |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                      |
| Project Management:<br>It is assessed using table 1 of the VCS AFOLU Risk Tool. | -4 (total may be less than zero) | <p>a) The project does not use any planted trees for GHG credits generation. Risk rating=0 is justified.</p> <p>b) For M1 and M2 monitoring periods, the cumulative encroachment in the project area has been under 3 %, thus enforcement is only required to minimize further encroachment but not to protect more than 50% of stocks on which GHG credits have previously been issued. Risk rating=0 is justified.</p> <p>c) BCP has already successfully verified six times the Lower Zambezi REDD+ Project and one time the LCFP. Thus, BCP has the staff with the necessary experience in AFOLU project design and implementation, carbon accounting and reporting (e.g., individuals who have successfully managed projects through validation, verification and issuance of GHG credits) under the VCS Program or other approved GHG programs. Risk rating=0 is justified.</p> <p>d) BCO has its head office based in Mfuwe within the Project Area with further offices in Lusaka, Chinyunyu and Nyimba. All project areas are accessible within a day's drive from any of the offices. Risk rating=0 is justified.</p> <p>e) Management team includes individuals with significant experience in AFOLU project design and implementation, carbon accounting and reporting. Risk rating=-2 is justified.</p> | Corrective action requested (CAR 02) |

| Risk factor                                                                   | Risk Rating                         | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | CARs/CLs                         |
|-------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
|                                                                               |                                     | f) The LCFP has a basic adaptive management plan in place for each activity instance that accompanies each Community Forest Management Agreement and has been submitted to the Department of Forestry. The plan outlines monitoring basics for all the major activities and the feedback system that is in place to ensure corrective actions are taken. Management hold regular meetings (at least every quarter) to review the impact of project activities. There are several other SOPs for specific components such as forest monitoring and community engagement (referenced as annexes in the monitoring report and submitted to the VVB), all of which describe monitoring feedback systems that ensure corrective actions are taken. Risk rating=-2 is justified.                                                                                                                                                                               |                                  |
| Financial viability: It is assessed using table 2 of the VCS AFOLU Risk Tool. | 1 (total may not be less than zero) | <p>a)-d) At an average price of \$4.50 per ton (as this is currently the average price at which BCP sells the project credits, and it is less than stated in the VCM 2013 Report by Ecosystem Marketplace), the project would hit break even within 6 years from the current risk assessment. Risk rating=1 is justified.</p> <p>e)-h) The project proponent has established a not-for-profit organization (BioCarbon Partners Trust) to help counter the risk of low carbon prices affecting community benefits from the project. The Trust has leveraged donor funds specifically to support and build upon community benefits. To date, the Trust has benefited from the support of local donors such as USAID, CSEF and Musika Project has secured 80% or more of funding needed to cover the total cash out required before the project reaches breakeven. Risk rating=0 is justified.</p> <p>i) Not applicable<br/>Risk rating=0 is justified.</p> | Clarification requested (CL 11). |
| Opportunity Cost: It is assessed using table 3 of the                         | -2 (total may be less than zero)    | a)-f) Baseline activities are subsistence-driven. The project was validated under CCB and net positive community impacts were demonstrated by PP. Risk rating=0 is justified.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Clarification requested (CL 11). |

| Risk factor                                                                 | Risk Rating                          | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                         | CARs/CLs                                                |
|-----------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| VCS AFOLU Risk Tool.                                                        |                                      | <p>g) Not applicable.</p> <p>h) Project is protected by legally binding commitment to continue management practices over the length of the project crediting period. The LCFP is within Game Management Areas, which have provisions for management and conservation of wildlife habitat, guided by the Wildlife Act of Zambia. Risk rating=-2 is justified.</p> <p>i) Not applicable.</p> |                                                         |
| Project Longevity: It is assessed using table 4 of the VCS AFOLU Risk Tool. | 15 (total may not be less than zero) | <p>a) Not applicable</p> <p>b) 30-year project longevity with Legal Agreement or requirement to continue management practice. Risk rating=15 is justified.</p>                                                                                                                                                                                                                             | No corrective actions or clarifications were requested. |

**Total internal risk=10 (total may not be less than zero)**

#### External Risks

|                                                                                               |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                         |
|-----------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Land Tenure and resources access/impact: It shall be assessed using table 6 of the Risk Tool. | 0 (total may not be less than zero) | <p>a) Not applicable</p> <p>b) Ownership and resource access/use rights are held by different entities. Risk rating=2 is justified.</p> <p>c)-d) There are no disputes over land tenure or ownership of the project area in more than 5 % of the project area nor disputes over access/use rights (or overlapping rights). Risk rating=0 is justified.</p> <p>e) Not applicable.</p> <p>f) The resources in the Project Area are guided by the 2015 Wildlife Act and 2015 Forest Act. The Project Area is in Game Management Areas, that is an area of land declared under section twenty-eight of the Wildlife Act 2015; "28. (1) The 2015 Forest Act states that 3. The ownership of all trees standing on, and all forest produce derived from, customary areas, National Forests, Local Forests, State Land, botanical reserves and open areas is vested in the</p> | No Corrective Actions or Clarifications were requested. |
|-----------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|

| Risk factor                                                                | Risk Rating                      | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | CARs/CLs                                               |
|----------------------------------------------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
|                                                                            |                                  | <p>President, on behalf of the Republic, until lawfully transferred or assigned under this Act or any other written law.</p> <p>To harmonise and safeguard these property rights and guarantee the project permanency the Department of National Parks and Wildlife (DNPW), Forestry Department and Traditional Authorities have been consulted. letter of support and Memorandums of Understanding were signed with the Government departments. Importantly, based on the Forest Act of 2015 there are signed agreements with all community groups and Community Forest Management Groups have formally been established.</p> <p>Risk rating=-2 is justified.</p> <p>g) Not applicable.</p>                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                        |
| Community engagement: It shall be assessed using table 7 of the Risk Tool. | -5 (total may be less than zero) | <p>a)-b) BCP has consulted widely with local communities around the project area. The project is being implemented on communal land and the project area was designated by local community members themselves after an FPIC and interactive mapping process. All community members that have been consulted have been registered in a database and all of these stakeholders that have already received benefits have been recorded and this number now exceeds 10 000 households in over 85% of the Village Action Groups surrounding the project area.</p> <p>Risk rating=0 is justified.</p> <p>c) The monitoring report covering this monitoring period lists all activities that are having positive community impacts and BCP has consulted extensively with all community stakeholders in order to understand the drivers of deforestation within the project zone and to formulate the most efficient mitigation strategy and beneficial projects. The project will certainly have positive socio-economic benefits and is being validated under the CCB Standards</p> <p>Risk rating=-5 is justified.</p> | No Corrective Actions or Clarifications were requested |

| Risk factor                                                                       | Risk Rating                         | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | CARs/CLs                                                |
|-----------------------------------------------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Political Risks: It shall be assessed using table 8 of the Risk Tool.             | 0 (total may not be less than zero) | <p>a-e) Zambia presents -0.31 according to the World Bank Institute's Worldwide Governance Indicators. AENOR verified the value and reliability of source. Risk rating=2 is justified.</p> <p>f) The country is implementing REDD+ Readiness activities: it is a UN-REDD Programme Partner Country Risk rating=-2 is justified.</p>                                                                                                                                                                                                                                                                                                                                                                                                                   | No Corrective Actions or Clarifications were requested. |
| <b>Total external risks=0 (Total may not be less than zero)</b>                   |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                         |
| <b>Natural risks</b>                                                              |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                         |
| Fire Risk: It shall be assessed using table 10 of the Risk Tool.                  | LS*M=0.5                            | <p>The likelihood of a natural fire is every 10-25 years affecting less than 5 % of carbon stocks</p> <p>Thus LS= 1 is reasonable.</p> <p>Mitigation (M) measures: BCP has implemented a fire management system on the RED+ zones. In the Community Forest Management Agreements (section 5), CRBs are obligated to help in fire management within the REDD+ zones. Fire management is done through introducing a system of firebreaks and controlled, rotational early burns. BCP also encourages fuel-reducing seasonal bio-enterprises, such as the harvest of thatch or grass from the REDD+ zones by women's groups for urban markets. BCP monitors fire hot spots detected by VIIRS and MODIS satellites.</p> <p>Then, M=0.5 is reasonable.</p> | Clarification requested (CL 11).                        |
| Pest and disease outbreaks: It shall be assessed using table 10 of the Risk tool. | LS*M=0                              | <p>This risk is considered unlikely, there are no records of disease or pest outbreaks causing any significant impacts (&gt;5%) to carbon stocks in Miombo woodlands. No known literature has documented forest disturbance from pests and diseases in the project area.</p> <p>Thus LS= 0 is reasonable.</p> <p>Mitigation (M) measures: Not applicable.</p>                                                                                                                                                                                                                                                                                                                                                                                         | No Corrective Actions or Clarifications were requested  |
| Extreme weather: It shall be assessed using table 10 of the Risk tool.            | LS*M=0                              | <p>Zambia is not impacted by hurricanes. Droughts could possibly be considered an extreme weather phenomenon. However, this risk is considered unlikely and there are no records of drought causing any significant impacts (&gt;5 %) to carbon stocks in Miombo woodlands. No known literature has documented forest</p>                                                                                                                                                                                                                                                                                                                                                                                                                             | No Corrective Actions or Clarifications were requested  |

| Risk factor                                                                                   | Risk Rating | Findings and mitigation activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | CARs/CLs                                               |
|-----------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
|                                                                                               |             | disturbance from extreme weather conditions in the project area.<br>Thus LS= 0 is reasonable.<br>Mitigation (M) measures: Not applicable.                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                        |
| Geological risks: It shall be assessed using table 10 of the Risk Tool.                       | LS*M=0      | Zambia is geologically stable and the risk of earthquakes and volcanoes occurring is unlikely.<br>Thus LS= 0 is reasonable.<br>Mitigation (M) measures: Not applicable                                                                                                                                                                                                                                                                                                                                                                                        | No Corrective Actions or Clarifications were requested |
| Other natural risks (elephant impacts): It shall be assessed using table 10 of the Risk Tool. | LS*M=0      | It is unlikely that elephants will increase to such high numbers as to actually threaten the existence of the project. A simulation model based on studies of Miombo in Zimbabwe have found that elephants at a density of >2 per km <sup>2</sup> can convert woodland to shrubland in a 10-year period and at densities around 0.27 per km <sup>2</sup> it will take 120 years to convert to shrubland (Mapaure 2013). Elephants do not occur at such densities in the project area.<br>Thus LS= 0 is reasonable.<br>Mitigation (M) measures: Not applicable | No Corrective Actions or Clarifications were requested |
| <b>Total natural risks=0.5</b>                                                                |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                        |
| <b>OVERALL RISK RATING=10+0+0.5=10.5. Then an overall risk rating of 11% is considered.</b>   |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                        |

AENOR has checked that information provided in the NPRR for the monitoring period is consistent with supporting documents provided. The assumptions and justifications provided to determine the risk rating of each risk factor are elaborated and they are based on provided documents using conservative assessments. AENOR deems that information provided is reliable and appropriate from reliable sources, thus, the overall risk rating is credible and realistic. Thus, the overall risk rating of 11% is credible and realistic.

## 5 VERIFICATION CONCLUSION

AENOR has verified that the Luangwa Community Forests Project is in compliance with the Verified Carbon Standard version 4.0 without qualifications or limitations. The project has been implemented in accordance with the validated Project Description and its validated variations.

AENOR is able to issue a positive verification opinion for the 1,495,023 tCO<sub>2</sub>e of verified emissions reductions, as reported in the Monitoring Report version 1.3 dated on 29 May 2020.

The verification assessment covered the monitoring period from 01-January-2019 to 31-December-2019 and verified that calculated emission reductions and/or removals were achieved during the monitoring period with a reasonable level of assurance. The overall non-permanence risk rating was 11%. Therefore, the total number of credits to be deposited in the buffer account is 164,453 VCUs and the total VCUs eligible for issuance are 1,330,570 VCUs.

AENOR is able to confirm that the Project Description Deviation validated in this verification event complies with all validation criteria for projects set out in VCS Version 4 without any qualifications or limitations.

Verification period: From 01-January-2019 to 31-December-2019

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

| Year | Baseline emissions or removals (tCO <sub>2</sub> e) | Project emissions or removals (tCO <sub>2</sub> e) | Leakage emissions (tCO <sub>2</sub> e) | Net GHG emission reductions or removals (tCO <sub>2</sub> e) | Buffer pool allocation | VCUs eligible for issuance |
|------|-----------------------------------------------------|----------------------------------------------------|----------------------------------------|--------------------------------------------------------------|------------------------|----------------------------|
| 2019 | 1,570,998                                           | -75,975                                            | 0                                      | 1,495,023                                                    | -164,453               | 1,330,570                  |

Net change in carbon stocks: 1,495,023 tCO<sub>2</sub>e.

Overall non-permanence risk rating: 11%

VCUs buffer to be deposited: 164,453 VCUs

**Total VCUs eligible for issuance: 1,330,570 VCUs**

Date: 24 June 2020



Lead Auditor  
Juan Carlos Gómez

# APPENDIX 1: LIST OF EVIDENCES PROVIDED

| General documents                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Monitoring report:</p> <ul style="list-style-type: none"> <li>- Final version: VCS Luangwa Community Forests Project MR2 v1.3</li> <li>- VCS Luangwa Community Forests Project MR2 v1.2</li> <li>- VCS Luangwa Community Forests Project MR2 v1.0</li> </ul> <p>Previous monitoring report:</p> <ul style="list-style-type: none"> <li>- VCS Luangwa Community Forests Project MR1 v1.2</li> </ul> <p>Previous verification report:</p> <ul style="list-style-type: none"> <li>- Verification Report for the Luangwa Community Forest Project v1.0</li> </ul> <p>Project description:</p> <ul style="list-style-type: none"> <li>- VCS&amp;CCB Luangwa Community Forests Project PD v2</li> </ul> |
| Community Forest Management Agreements (Appendix A)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>Chieftdoms:</p> <ul style="list-style-type: none"> <li>- Chitungulu</li> <li>- Jumbe</li> <li>- Luembe</li> <li>- Malama</li> <li>- Mnkhanya</li> <li>- Mpanshya</li> <li>- Msoro</li> <li>- Mwanya</li> <li>- Nsefu</li> <li>- Sandwe</li> <li>- Shikabeta</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Private ranches:</p> <ul style="list-style-type: none"> <li>- Munyamadzi Game Ranch Ltd</li> <li>- Pia Manzi Ranch</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Communications Agreement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Community related SOPs & Grievances (Appendix E)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>SOPs:</p> <ul style="list-style-type: none"> <li>- Stakeholder Grievance Response SOP</li> <li>- SOP concerning Free, Prior and Informed Consent in Zambia</li> <li>- SOP Concerning Community Engagement</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p>Grievances:</p> <ul style="list-style-type: none"> <li>- Grievance register</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Other</p> <ul style="list-style-type: none"> <li>- “Beyond Subsistence”: BCP’s Livelihoods Strategy</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Carbon Accounting (Appendix G)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>Spreadsheets:</p> <ul style="list-style-type: none"> <li>- 20200303_master_biomass_summary_baseline_updated_with_soil</li> <li>- 20200428_LCFP_leakage_calculations</li> <li>- 20200515_CDM_image_interpretation</li> <li>- 20200515_LCFP_ER_Calc_M2_no_soil</li> <li>- 20200515_master_biomass_summary_project_M1_updated_with_Soil</li> <li>- 20200515_master_biomass_summary_project_M2</li> <li>- 20200529_LCFP_ER_Calc_M2_no_soil</li> <li>- Copy of 20190708_CDM_image_interpretation</li> </ul> |
| <p>Allometries:</p> <ul style="list-style-type: none"> <li>- Chidumayo_2013_allometry_paper</li> <li>- Mugasha_Miombo_Allometry</li> <li>- Copy of LZRP_Annex_K_BCP_Ruf_Allom_Data_120trees_9Jul_2013</li> <li>- Copy of Mugasha_et_al_2013_species_comparison</li> </ul>                                                                                                                                                                                                                                 |
| <b>Non-permanence Risk Report (Appendix H)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>Non-permanence risk report:</p> <ul style="list-style-type: none"> <li>- Final version: NPRR Luangwa Community Forests Project v1.3</li> <li>- NPRR Luangwa Community Forests Project v1.2</li> <li>- NPRR Luangwa Community Forests Project v1.1</li> </ul>                                                                                                                                                                                                                                           |
| <p>Supporting documents:</p> <ul style="list-style-type: none"> <li>- LCFP_NPR-Calculations-V4</li> <li>- 2014-2018_Zambia_summary_WGI Table</li> <li>- The Community Forests Program (CFP) in Zambia. Environmental Mitigation and Monitoring Plan</li> <li>- LCFP 30-year financial projection confirmation letter</li> <li>- BCP LCFP REDD+ Financial Analysis</li> <li>- The Zambia Wildlife Act – 2015</li> </ul>                                                                                    |
| <b>Spatial Data (Appendix I)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>Shape files:</p> <ul style="list-style-type: none"> <li>- 20190610_LCFP_Proxy_area</li> <li>- 20190612_LCFP_Project_Area</li> <li>- 20190612_LCFP_Proxy_plots</li> <li>- 20190708_Accounting_Area</li> <li>- 20190709_Leakage_Area</li> <li>- 20190711_LCFP_Leakage_plots</li> <li>- 20190724_LCFP_soil_proxy_plots</li> <li>- 20190809_Accounting_Area_Plots</li> <li>- 20200308_Clearing_May_2016-2018-2019_accounting_area_UTM_final_by_Chiefdom</li> </ul>                                         |
| <p>TIFF file:</p> <ul style="list-style-type: none"> <li>-DEF_2007-2017_sieve_shift_11102018.tif</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Deforestation Drivers (Appendix K)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>Analysis of agents, drivers, and underlying causes of deforestation</p>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Point Interpretation (Appendix O)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p>SOP:</p> <ul style="list-style-type: none"> <li>- LCFP CDM Point Interpretation SOP</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                         |

|                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Spreadsheets:</p> <ul style="list-style-type: none"> <li>- Copy of 20190708_CDM_image_interpretation</li> <li>- Copy of 20190708_R-Model_Input_CDM_Points</li> </ul>                                                                                                                                                          |
| <p>Logistic model:</p> <ul style="list-style-type: none"> <li>- Copy of LCFP_Annex_cdm_v2.0</li> <li>- Copy of logistic model summary_after_recode</li> <li>- Copy of Phased_logistic.curve_after_recode</li> <li>- Copy of proportion.deforestation_after_recode</li> </ul>                                                     |
| <p><b>Biomass Inventory (Appendix P)</b></p>                                                                                                                                                                                                                                                                                     |
| <p>SOPs:</p> <ul style="list-style-type: none"> <li>- REDD+ Field Based Carbon Stock Assessment: Field Manual</li> <li>- Biomass monitoring spot error correction protocol</li> <li>- Field Methods for developing new and validating previously developed allometric equations as per VCS methodology VM0009</li> </ul>         |
| <p>Allometries:</p> <ul style="list-style-type: none"> <li>- Chidumayo_2013_allometry_paper</li> <li>- Mugasha_Miombo_Allometry</li> </ul>                                                                                                                                                                                       |
| <p><b>Leakage (Appendix R)</b></p>                                                                                                                                                                                                                                                                                               |
| <p>SOPs:</p> <ul style="list-style-type: none"> <li>- Field methods for monitoring activity shifting leakage</li> <li>- Addendum to BCP_Biomass_Sampling_LeakageMon_8June_2013 Vers 2</li> </ul>                                                                                                                                 |
| <p><b>Remote Audit Evidences (Appendix S)</b></p>                                                                                                                                                                                                                                                                                |
| <p>Conservation agriculture training:</p> <ul style="list-style-type: none"> <li>- Training's attendance lists</li> <li>- Conservation agriculture report to the Ministry of Agriculture</li> <li>- Farmers training narrative and financial progress report to the Ministry of Agriculture</li> </ul>                           |
| <p>Video testimonies:</p> <ul style="list-style-type: none"> <li>- Elizabeth – Sandwe Cheifdom</li> <li>- Kelvin Mwale – Sandwe Cheifdom</li> <li>- Kelvin Mwale – Sandwe Cheifdom</li> <li>- Tedson Phiri – Sandwe Cheifdom</li> </ul>                                                                                          |
| <p>Signed statements:</p> <ul style="list-style-type: none"> <li>- Charity Chulu – Nsefu Chiefdom</li> <li>- Elizabeth Mwanza – Jumbe Chiefdom</li> <li>- Ernest Mwale – Jumbe Chiefdom</li> <li>- Hellen Banda – Jumbe Chiefdom</li> <li>- Jonathan Jumbe – Jumbe Chiefdom</li> <li>- Magret Muleya – Msoro Chiefdom</li> </ul> |

## APPENDIX 2: CLARIFICATIONS AND CORRECTIVE ACTIONS REQUESTED

### Clarification Requests (CLs)

|                                                                                                                                                               |           |                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| <b>CL ID</b>                                                                                                                                                  | <b>01</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                      |           |                         |
| Provide GIS package of the project (project area, project accounting area, proxy area, reference region, land use, land used change, major disturbances etc.) |           |                         |
| <b>Project participant response</b>                                                                                                                           |           | <b>Date:</b> 18/05/2020 |
| <i>The data has been added to "AppendixI_Spatial"</i>                                                                                                         |           |                         |
| <b>Documentation provided by project participant</b>                                                                                                          |           |                         |
| "2020_M2\AppendixI_Spatial\..."                                                                                                                               |           |                         |
| <b>DOE assessment</b>                                                                                                                                         |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested documents.<br><b>CL closed.</b>                                                                                             |           |                         |

|                                                                                                                                         |           |                         |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| <b>CL ID</b>                                                                                                                            | <b>02</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                |           |                         |
| In section 1.1 of the MR, provide the relevant implementation dates (e.g. project start date, implementation of main activities, etc.). |           |                         |
| <b>Project participant response</b>                                                                                                     |           | <b>Date:</b> 18/05/2020 |
| Section 1.1 has been edited to include the information requested.                                                                       |           |                         |
| <b>Documentation provided by project participant</b>                                                                                    |           |                         |
| Updated monitoring report - 20200518_LCFP_MR2.pdf                                                                                       |           |                         |
| <b>DOE assessment</b>                                                                                                                   |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested information.<br><b>CL closed.</b>                                                                     |           |                         |

|                                                                                                                                                            |           |                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| <b>CL ID</b>                                                                                                                                               | <b>03</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                   |           |                         |
| In section 2.1 of the MR, provide a brief summary of any potential negative environmental and socio-economic impacts and the steps taken to mitigate them. |           |                         |
| <b>Project participant response</b>                                                                                                                        |           | <b>Date:</b> 18/05/2020 |
| <i>Section 2.1 has been edited to include the information requested.</i>                                                                                   |           |                         |
| <b>Documentation provided by project participant</b>                                                                                                       |           |                         |
| Updated monitoring report - 20200518_LCFP_MR2.pdf                                                                                                          |           |                         |
| <b>DOE assessment</b>                                                                                                                                      |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested information.<br><b>CL closed.</b>                                                                                        |           |                         |

|                                                                                                                        |           |                         |
|------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| <b>CL ID</b>                                                                                                           | <b>04</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                               |           |                         |
| In section 3.1 of the MR, specify which activities have being implemented during the current monitoring period (2019). |           |                         |
| <b>Project participant response</b>                                                                                    |           | <b>Date:</b> 18/05/2020 |
| Section 3.1 has been edited to include the information requested.                                                      |           |                         |
| <b>Documentation provided by project participant</b>                                                                   |           |                         |
| Updated monitoring report - 20200518_LCFP_MR2.pdf                                                                      |           |                         |
| <b>DOE assessment</b>                                                                                                  |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested information.<br><b>CL closed.</b>                                                    |           |                         |

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| <b>CL ID</b>                                                                                                                                                                                                      | <b>05</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                                                          |           |                         |
| <p>In section 3.1 of the MR it is stated that: "In 2019, 48 new lead farmers were trained in participating LCFP chiefdoms including 6 in Sandwe, 24 in Luembe, and 18 in Nyalungwe."</p> <p>Provide evidence.</p> |           |                         |
| <b>Project participant response</b>                                                                                                                                                                               |           | <b>Date:</b> 18/05/2020 |
| <p><i>We have included attendance sheets and progress reports from the Ministry of Agriculture. Please note that this folder has information for all BCP sites, thus some records are for the LZRP zones.</i></p> |           |                         |
| <b>Documentation provided by project participant</b>                                                                                                                                                              |           |                         |
| <p>"AppendixS_RemoteAuditEvidence\ Conservation_Agriculture_Training\...."</p>                                                                                                                                    |           |                         |
| <b>DOE assessment</b>                                                                                                                                                                                             |           | <b>Date:</b> 28/05/2020 |
| <p>The PP has provided the requested evidence.</p> <p><b>CL closed.</b></p>                                                                                                                                       |           |                         |

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| <b>CL ID</b>                                                                                                                                                                                      | <b>06</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                                          |           |                         |
| Provide evidence of the on-going infrastructure projects stated in Table 7 of the MR: <ol style="list-style-type: none"> <li>1. Improving of 10 open wells</li> <li>2. Mothers shelter</li> </ol> |           |                         |
| <b>Project participant response</b>                                                                                                                                                               |           | <b>Date:</b> 18/05/2020 |
| <i>A few community members were interviewed and gave their consent to share the videos or signed statements with the VVB</i>                                                                      |           |                         |
| <b>Documentation provided by project participant</b>                                                                                                                                              |           |                         |
| "AppendixS_RemoteAuditEvidence\Testimonial_videos_and_statements\..."                                                                                                                             |           |                         |
| <b>DOE assessment</b>                                                                                                                                                                             |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested evidence.<br><b>CL closed.</b>                                                                                                                                  |           |                         |

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| CL ID                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 07 | Date: 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |    |                  |
| <p>Regarding SOC:</p> <ol style="list-style-type: none"> <li>1. Provide evidence/records of the soil sampling</li> <li>2. In the calculation of SOC in the accounting area, for soil samples from 0-10 cm depth, a depth of 10 cm is used in equation [B.28]. For samples from 10-30 cm and 30-100 cm depth, 20 cm and 70 cm. Clarify the criteria follow for the use of these depths (instead of average depths 5, 20 and 65 cm).</li> <li>3. In the calculation of SOC in the proxy area, a depth of 30 cm is used for samples in the range of 30-100 cm. Justify.</li> <li>4. Provide source/calculations of the cumulative baseline emissions from SOC <math>E_{(B \Delta SOC)}^{[m]}</math> (301,475 tCO<sub>2</sub>e).</li> </ol> |    |                  |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |    | Date: 18/05/2020 |
| <p><i>Our proxy area soil samples had problems and we have, therefore, conservatively excluded SOC from this monitoring period (see section 3.2 of the updated MR). Also see the updated MR and the calculation tools in Appendix G for the new values for all parameters that are affected by SOC calculations.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                |    |                  |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |    |                  |
| <ul style="list-style-type: none"> <li>- Updated Appendix G and Appendix H tools</li> <li>- Updated MR - 20200518_LCFP_MR2.pdf</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |    |                  |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |    | Date: 28/05/2020 |
| <p>The PP has conservatively excluded the SOC pool for the current monitoring period. Thus, the clarifications requested are no longer required.</p> <p><b>CL closed.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |    |                  |

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| CL ID                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 08 | Date: 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |    |                  |
| Provide evidence/calculations of the total uncertainty in Baseline Emissions Model $U_{EM}^{[M]}$ (41,066 according to MR).                                                                                                                                                                                                                                                                                                                                                                                      |    |                  |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |    | Date: 18/05/2020 |
| <i>The figure has changed. See the updated tool in Appendix G</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                |    |                  |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |    |                  |
| 20200515_master_biomass_summary_project_M2.xlsx                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |    |                  |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |    | Date: 28/05/2020 |
| <p>The calculation of the value <math>U_{EM}^{[M]}</math> has not been provided. Additionally, the reported value in section 4.2 (13,342) does not match with valued used in spreadsheet <i>20200515_LCFP_ER_Calc_M2_no_soil.xlsx</i> (39,328).</p> <p>CL still open.</p>                                                                                                                                                                                                                                        |    |                  |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |    | Date: 29/05/2019 |
| <p><i>The calculation is provided in Appendix G. The value for this Monitoring Period is lower than the previous because the current Monitoring Period is only 1 year (January 1<sup>st</sup> to December 31<sup>st</sup>, 2019) while the previous monitoring period covered May 1<sup>st</sup>, 2015 to Dec. 31<sup>st</sup>, 2018. In the 20200515_LCFP_ER_Calc_M2_no_soil.xlsx file, the value for this year is shown in parameters tab, cell L111. The 39,328 value is for the M1 monitoring period</i></p> |    |                  |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                             |    |                  |
| <ul style="list-style-type: none"> <li>• "AppendixG_ERC \20200515_CDM_image_interpretation.xlsx"</li> <li>• "AppendixG_ERC\20200515_LCFP_ER_Calc_M2_no_soil.xlsx"</li> </ul>                                                                                                                                                                                                                                                                                                                                     |    |                  |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |    | Date: 18/06/2020 |
| <p>The PP has provided the adequate clarifications.</p> <p><b>CL closed.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                 |    |                  |

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| <b>CL ID</b>                                                      | <b>09</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                          |           |                         |
| Provide the source of allometric equations Chidumayo (2013).      |           |                         |
| <b>Project participant response</b>                               |           | <b>Date:</b> 18/05/2020 |
| <i>The Chidumayo (2013) paper is included in Appendix G and P</i> |           |                         |
| <b>Documentation provided by project participant</b>              |           |                         |
| Chidumayo_2013_allometry_paper.pdf                                |           |                         |
| <b>DOE assessment</b>                                             |           | <b>Date:</b> 28/05/2020 |
| The PP has provided the requested evidence.                       |           |                         |
| <b>CL closed.</b>                                                 |           |                         |

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| <b>CL ID</b>                                                                                                                                                                | <b>10</b> | <b>Date:</b> 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                    |           |                         |
| Provide the source of the carbon content per sampling plot used in the calculations.                                                                                        |           |                         |
| <b>Project participant response</b>                                                                                                                                         |           | <b>Date:</b> 18/05/2020 |
| <i>SOC has been conservatively excluded for this monitoring period. See section 3.2 of the updated MR</i>                                                                   |           |                         |
| <b>Documentation provided by project participant</b>                                                                                                                        |           |                         |
| Updated MR - 20200518_LCFP_MR2.pdf                                                                                                                                          |           |                         |
| <b>DOE assessment</b>                                                                                                                                                       |           | <b>Date:</b> 28/05/2020 |
| <p>The PP has conservatively excluded the SOC pool for the current monitoring period. Thus, the clarification requested is no longer required.</p> <p><b>CL closed.</b></p> |           |                         |

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| CL ID                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 11 | Date: 27/03/2020 |
| <b>Description of CL</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |    |                  |
| <p>Regarding the Non-Permanence Risk Report:</p> <ol style="list-style-type: none"> <li>1. Provide the evidence of the legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting period.</li> <li>2. What percentage of funding is needed to cover the total cash out before the project breaks even has been secured?</li> <li>3. Provide evidence of the personal communication with Professor Emanuel Chidumayo.</li> <li>4. Provide explanations of the fire mitigation measures to justify fire mitigation score.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                         |    |                  |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |    | Date: 18/05/2020 |
| <ol style="list-style-type: none"> <li>1. <i>We have rephrased this sentence to minimize the confusion it introduced and specifically reference the Wildlife Act, that protects Game Management Areas.</i></li> <li>2. <i>It is more than 80 % (h). We have included the text to show the project has secured 80 % or more of funding needed to cover the total cash out required before the project reaches breakeven.</i></li> <li>3. <i>We could not get this. To minimize confusion, we have edited the text to specify that our literature review did not find any reports of previous occurrences of these disturbances in Zambia. Professor Chidumayo is one of the authors of the commonly referenced research papers on forest dynamics and management in Zambia. We have also included a memo that proves our past interaction with him in the build up to the first verification of the LCFP project.</i></li> <li>4. <i>The preventive measures are described under section 3.1.4 (Mitigation) of the Non-Permanence Risk Report.</i></li> </ol> |    |                  |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |    |                  |
| <p>Updated Monitoring report - 20200518_LCFP_MR2.pdf</p> <p>Updated Non permanence risk report – “AppendixH_NPR\ 20200518_LCFP_NonPerm”</p> <p>“AppendixS_RemoteAuditEvidence\Testimonial_videos_and_statements\ 20170905_Chidumayo_Support_CFMA”</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |    |                  |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |    | Date: 28/05/2020 |
| <ol style="list-style-type: none"> <li>1. PP has made adequate changes.</li> <li>2. PP has provided the requested information.</li> <li>3. PP has provided evidence proving the past interaction with Prof. Chidumayo and has made adequate corrections.</li> <li>4. PP has provided the requested information.</li> </ol> <p><b>CL closed.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |    |                  |

## Corrective Actions Requests (CARs)

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| <b>CAR ID</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>01</b> | <b>Date : 27/03/2020</b> |
| <b>Description of CAR</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |                          |
| <p>Regarding the quantification of GHG emission reductions:</p> <ol style="list-style-type: none"> <li>1. Update and used leakage data/parameters of the current monitoring period (M2).</li> <li>2. The formula used to calculate GERS in spreadsheet <i>20200312_LCFP_ER_Calc_M2.xlsm</i> is adding the confidence deduction, instead of subtracting it.</li> </ol>                                                                                                                                                                                                                               |           |                          |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           | <b>Date : 18/05/2020</b> |
| <ol style="list-style-type: none"> <li>1. Leakage data for the M2 period has now been provided.</li> <li>2. The formula adds the confidence deduction figure because it is entered into the formula as a negative figure, thus in the final value it is technically deducted</li> </ol>                                                                                                                                                                                                                                                                                                             |           |                          |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |                          |
| "AppendixG_ERC\ 20200428_LCFP_leakage_calculations"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |                          |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |           | <b>Date: 28/05/2020</b>  |
| <ol style="list-style-type: none"> <li>1. The LEM of the spreadsheet <i>20200515_LCFP_ER_Calc_M2_no_soil.xlsm</i> is not using the values of <math>p_{L\ DEG}^{[m]}</math> and <math>p_{L\ DEG}^{[m=0]}</math> reported under MR.56 and MR.57.</li> <li>2. The PP has provided adequate explanation. Closed</li> <li>3. (Additional) The values reported for <math>U_B^{[m]}</math>, <math>U_{EM}^{[m]}</math> and <math>U_P^{[m]}</math> in section 4.2 of the MR do not match with the values used in spreadsheet <i>20200515_LCFP_ER_Calc_M2_no_soil.xlsm</i>.</li> </ol> <p>CAR still open.</p> |           |                          |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           | <b>Date : 29/05/2020</b> |
| <ol style="list-style-type: none"> <li>1) The parameter values have been corrected in the NERs calculations sheet. The Values reported in MR.56 and MR.57 are correct.</li> <li>3) The values for this monitoring period are given under column L of the parameters sheet. Column H to K are all for the first monitoring period since it covered May 1<sup>st</sup>, 2015 to Dec. 31<sup>st</sup>, 2018</li> </ol>                                                                                                                                                                                 |           |                          |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |           |                          |
| "AppendixG_ERC\20200529_LCFP_ER_Calc_M2_no_soil.xlsx"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |           |                          |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |           | <b>Date: 18/06/2020</b>  |

The PP has made the appropriate corrections and provided clarifications.

**CAR closed.**

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| <b>CAR ID</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>02</b> | <b>Date : 27/03/2020</b> |
| <b>Description of CAR</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |           |                          |
| <p>Regarding the Non-permanence risk report:</p> <ol style="list-style-type: none"> <li>1. Last available version of the template is not being used.</li> <li>2. Justification for not applicability of risk factors should be provided on the report.</li> </ol>                                                                                                                                                                                                                                                                          |           |                          |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           | <b>Date : 18/05/2020</b> |
| <p><i>The latest version of the Non-permanence risk report has now been used. The justification for non-applicability is given in the explanation for the low likelihood of each respective risk.</i></p>                                                                                                                                                                                                                                                                                                                                  |           |                          |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |           |                          |
| AppendixH_NPR\20200518_LCFP_NonPerm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           |                          |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           | <b>Date: 28/05/2020</b>  |
| <ol style="list-style-type: none"> <li>1. PP has updated NPRR to the last available version of the template. Closed.</li> <li>2. PP has not provided justification for the non-applicability of Project Management risk factors a) and b).</li> </ol> <p>CAR still open.</p>                                                                                                                                                                                                                                                               |           |                          |
| <b>Project participant response</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |           | <b>Date : 29/05/2020</b> |
| <p>2. Management risk factor (a) doesn't apply to our project because we do not use planted trees for GHG credits generation. Management risk factor (b) does not apply because cumulative encroachment figures have shown that enforcement is required to minimize further encroachment but not to protect more than 50% of stocks on which GHG credits have previously been issued. The narration (section 1.1) of the NPRR has been updated to explain this. Please see the updated NPRR and the NPR calculation tool in Appendix H</p> |           |                          |
| <b>Documentation provided by project participant</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |           |                          |
| <ul style="list-style-type: none"> <li>• "AppendixH_NPR\20200529_LCFP_NonPerm.pdf"</li> <li>• "AppendixH_NPR\20200515_LCFP_NPR-Calculation-V4.xlsx"</li> </ul>                                                                                                                                                                                                                                                                                                                                                                             |           |                          |
| <b>DOE assessment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           | <b>Date: 18/06/2020</b>  |

The PP has provided appropriate justification.

**CAR closed.**