

NTAKATA MOUNTAINS REDD PROJECT VERIFICATION REPORT



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Summary

Aster Global Environmental Solutions, Inc., (herein referred to as Aster Global or the Verification Team) was contracted by Carbon Tanzania on February 02, 2021, to conduct the second monitoring period verification (VCS and CCB: 20 May 2019 to 18 May 2021) of the Ntakata Mountains REDD Project [validated Project Description (PD) dated 05 June 2020 V3.0; Monitoring Report (MR) dated 26 April 2022 V4.0]. The Project falls under the VCS sectoral scope 14: – Agriculture, Forestry, and Other Land Uses (AFOLU), under the category Reduced Emissions from Deforestation and Degradation (REDD). Specifically, the project falls under the REDD+ category Avoided Unplanned Deforestation (AUD).

The Ntakata Mountains REDD project encompasses approximately 204,807 hectares near Lake Tanganyika in the Tanganyika District, Western Tanzania. Through adherence and validation to VCS Methodology VM0007 REDD Methodology Framework and Climate, Community & Biodiversity (CCB) Standards (Third Edition, June 2017), Ntakata aims “to engage and support local communities in the protection of their village forest reserves in order to contribute to the conservation of important wildlife habitat and to mitigate climate change” as stated in the CCB & VCS Project Description.

The VCS verification assessed compliance with the VCS Version 4 Program Guide, Standard, the VM0007 Methodology, all associated updates, the validated Project Description, and implementation of the planned GHG project’s resulting GHG emission removal enhancements as stated by the Project Proponent (ISO 14064-3:2006).

The CCB verification assessed that implementation of the planned GHG project has occurred, resulting in the GHG emission removal enhancements (climate), community, and biodiversity benefits as stated by the Project Proponent (ISO 14064-3:2006). The verification objective is to ensure the validated project design documentation has been implemented in compliance with CCB Standards (Third Edition).

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

The criteria followed the verification guidance documents provided by Verra located at <https://verra.org>. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance documentation.

Verification to the VCS Program and CCB Standards resulted in findings. VCS findings are included in Appendix B, and CCB findings are included in Appendix C.

A risk-based approach was used to guide the verification and reach a *reasonable* level of assurance that no errors, omissions, nor misrepresentations resulting in a material misstatement have occurred. The materiality threshold dictated by the project size was 1%. All findings were satisfied to a *reasonable* level of assurance.

After completion of a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Project is accurate,

consistent, and complies with all VCS Version 4 criteria, CCB Third Edition criteria, the selected methodology (VM0007 v1.5), and the validated Project Description (PD). Aster Global confirms The Ntakata Mountains REDD project 2nd Monitoring Report (Version 4.0, dated 26 April 2022) has been implemented in accordance with VCS Version 4 and CCB Third Edition criteria.

Aster Global confirms all verification activities – including objectives, scope and criteria, level of assurance, and Project Description implementation adherence to VCS Version 4 (and all associated updates) and CCB Standards (Third Edition), as documented in this report – are complete. Aster Global concludes without any qualifications or limiting conditions the Ntakata Mountains REDD Project Monitoring Report (Version 4.0, dated 26 April 2022) meets the requirements of VCS Version 4 (and all associated updates), CCB Standards (Third Edition), and the validated PD. In addition, Aster Global asserts the project complies with the criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level distinction for Community, Climate, and Biodiversity.

The GHG assertion provided by Carbon Tanzania and verified by Aster Global has resulted in the baseline emissions or removals of 2,367,253 tCO₂ equivalents (CO₂e) by the project during the verification period/reporting period (VCS and CCB: 20 May 2019 – 18 May 2021 – 2 year). This value is gross of the 13% (255,963 t CO₂e) buffer withholding, based on the non-permanence risk assessment tool, and associated leakage allocation. This results in 1,514,742 t CO₂e of credits eligible for issuance as VCUs.

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1 INTRODUCTION

1.1 Objective

The objective of this verification was to ensure implementation of project activities and project compliance with the VCS Program Guide, VCS Standard, CCB Standards, selected methodology, and the validated VCS Project Description. Aster Global assessed the GHG emission removals for the AFOLU project, specifically REDD.

1.2 Scope and Criteria

The scope of a verification generally includes the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; time periods covered; evaluation of the sustainable development; and evaluation of the project's net climate, community, and biodiversity benefits. The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract periods. The scope of the project was outlined by the Project Proponent within the PD and is re-defined as follows for the GHG project:

Baseline Scenario	Continued migration to the area, deforestation, and agriculture expansion
Activities/Technologies/Processes	REDD activities utilizing VCS VM0007 and CCB Standard for Climate, Community and Biodiversity benefits (Third Edition)
Sources/Sinks/Reservoirs	Aboveground merchantable tree – Included Belowground merchantable tree – Included Dead-wood – Included Litter – Excluded Soil organic carbon – Excluded Harvested wood products – Included Biomass burning – Included Fossil fuel combustion – Excluded Use of fertilizers – Excluded
GHG Type	CO ₂ , CH ₄ , N ₂ O
Time Period (start date, crediting period, verification period)	Project State Date: 19 May 2017 Second Monitoring Period: 20 May 2019 – 18 May 2021 (2 years) Crediting Period: 19 May 2017 – 18 May 2047 (30 years)
Project Boundary	204,807 hectares Near Lake Tanganyika in the Tanganyika District in the United Republic of Tanzania

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

- VCS Program Guide (v4.1, 20 January 2022)
- VCS Standard (v4.2, 20 January 2022)
- VCS Program Definitions (v4.1, 20 January 2022)
- AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)

- VM0007 – REDD Methodology Modules (REDD-MF, v1.5)
- Validated PD and previous monitoring reports (VCS and CCB)
- CCB Program Definitions (v3.0, June 2017)
- CCB Standards (Third Edition, v3.1, June 2017)
- CCB Program Rules (v 3.1 June 2017)
- Guidance for the Use of the CCB Standards (May 2014)

1.3 Level of Assurance

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

1.4 Summary Description of the Project

The project is located near Lake Tanganyika in the Tanganyika District in the United Republic of Tanzania. The project aims at reducing emissions related to Avoiding Unplanned Deforestation (AUD). According to the PD "The overall aim of the project is to engage and support local communities in the protection of their village forest reserves in order to contribute to the conservation of important wildlife habitat and to mitigate climate change." Carbon Tanzania and the District Governments are collaborating with 8 villages and the Village Land Use Plans (VLUPs) of these villages form the basis for planned forest protection. The project also aims to improve community member livelihoods. Carbon Tanzania is working with Village Governments to improve existing governance structures. Village Game Scouts (VGS) are trained and compensated to conduct regular forest patrols. Additional livelihood interventions include training and demonstration of climate smart agriculture techniques and reproductive health services, among others.

2 VERIFICATION PROCESS

2.1 Audit Team Composition (*Rules 4.3.1*)

For VCS/CCB verifications, Aster Global maintains an experienced internal staff of Lead Verifiers, in addition to Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, M.S. Forest Biometricians, Remote Sensing/GIS Specialists, and VCS-approved AFOLU Experts in IFM, REDD, and WRC categories. Direct employees of Aster Global conducted all desktop verification activities. Aster Global completed all calculation/modeling review in-house with our team of forest biometricians, GIS/remote sensing specialists, and a soil scientist. Aster Global has been involved in over 68 VCS verifications and 36 CCB verifications, including 27 methodology assessments. Aster Global has a specialist on staff with ten years of CCB experience who oversees project review for CCB components. All Aster Global staff involved in the verification audit have ecological, biodiversity, natural resources, and forestry background to assess the requirements. During the site visit, the Aster Global team added a local translator to ensure that the project team was able to demonstrate proficiency in the relevant local language.

2.2 Method and Criteria

The verification assessed the Project's compliance with VCS Version 4; CCB Third Edition; all associated updates; the selected methodology (VM0007); and the validated PD) version 3, dated 05 June 2020. The verification team assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (20 May 2019 – 18 May 2021) through Agriculture, Forestry, and Other Land-Use (AFOLU) criteria under the categories Reduced Emissions from Deforestation and Degradation (REDD). Specifically, the Project falls under the REDD+ category Avoided Unplanned Deforestation (AUD). The verification team assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

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

The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the project description. This includes ensuring conformance with the monitoring plan.

The extent to which GHG Emission Reductions or Removals reported in the monitoring report are materially accurate.

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

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

A project specific Verification and Sampling Plan (VSP) was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the VSP 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 VSP methodology was derived from all items in our verification process stated above. Specifically, the VSP utilized the VCS and CCB guidance documents and ISO 14064-3. Any modifications applied to the VSP were made based upon the conditions observed for monitoring to detect the processes with highest risk of material discrepancy.

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

2.3 Document Review

A detailed review of all project documentation was conducted as part of the desktop verification component to ensure consistency with, and identify any deviation from, VCS Program requirements, CCB program

requirements, the methodology (VM0007), the validated PD and MR. Initial review focused on the validated PD and MR relative to the field conditions observed and interviews with project management staff. Project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included monitoring data (i.e., remote sensing/GIS data), Standard Operating Procedures (SOPs), financial analyses, boundaries, maps and aerial images, biomass, and carbon calculation spreadsheets, CCB interview/survey results, and responses to Clarification Requests (CLs).

The VCS AFOLU Non-Permanence Risk Tool was used by the Project Proponent to assess overall project risk. The VVB reviewed the Non-Permanence Risk Report provided with the verification supporting documentation and confirmed that the Project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B. The final score was calculated to be 13%.

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

2.4 Interviews

Interviews were performed during the verification site visit as part of the overall verification process. The interviews were conducted for the purpose of substantiating information provided in the PD, MR, and supporting documents provided by the Project Proponent and to solicit additional information as needed. Aster Global provided the Project Proponent with a list prior to the site visit for requested interviews with targeted project management staff, project employees, community members and other stakeholders. The Project Proponent provided appropriate arrangements for the interviews. On-site interviews and informal discussions were conducted during the site visit (13 September through 15 September 2021). Interviewees were provided the option of communicating in either English or Swahili based on personal comfort and preference.

Stakeholders are identified in the PD Appendix 1 and include: the Tanganyika District Government, Mpanda District Government, the 8 participating villages, Village Women and Women's Groups. During the site visit, Aster Global met with the District Natural Resources Officer in the Tanganyika District Government, Bruno Nicholas. Based on logistics considerations Aster Global did not request to meet with a representative from the Mpanda district as well, but based on Aster Global's internal risk assessment, meeting with Mpanda district representatives was determined to not likely affect the verification of project activities because the project falls fully within the newly designated Tanganyika district which is now the district government that engages with the project. Due to the large number of villages, logistics considerations, and Aster Global's internal risk assessment, Aster Global selected three of the eight villages for visitation, Lwega, Mwese, and Katuma, and requested meetings be arranged with representatives of different groups from these three villages. During the meetings in these three villages, Aster Global met with Village Women, Women's Groups, Village Governments, VGS, and other community members which included community members from different sub-villages. Aster Global also was able to meet with the VGS village members from two of the other villages, Mpembe and Lugonesi, during site visits with these VGS representatives.

Section 4.2.1 of the PD lists 3 community groups: all 8 villages, Women and Women's groups, and Village Game Scouts. Furthermore, section 4.5.4 of the PD identifies "Poor Households" and "Women in the

Villages” as marginalized and/or vulnerable community groups. During the site visit, Aster Global met with Women in all of the villages visited, including women in village government roles and women in the COCOBA programs who are a part of the women’s groups. Aster Global did not explicitly ask to interview anyone from poorer households, which are identified in the PD and MR as a marginalized and/or vulnerable Community Group, but Aster Global met with community members at large as well as with village carbon champions whose role includes interaction and sharing information and soliciting feedback from all households in the villages. Aster Global also met with village government representatives, who are democratically elected members of the village, with the identified role, as identified in the validated PD, to facilitate feedback from the most vulnerable members of the community.

As a point of clarification, the only people interviewed who work directly for the project in the participating 8 villages are the Carbon Champions. All other positions created through the revenue earned by the villages including VGS are employed by the village governments. Similarly, Village government leaders, who are democratically elected, are tasked with representing their communities and allocating revenue from the project in ways that maximizes benefits to their community. For instance, during the verification site visit we spoke with multiple village members who had kids in the schools where there were new classrooms built and accessed new healthcare options that were available.

Interviews were requested with, and held with, individuals representing the following groups of stakeholders:

- Management staff of Carbon Tanzania
 - David Beroff – Project Operations Manager
 - Marc Baker – Director
 - Frank Kweka – Ntakata Project Manager
 - Farajah Alberto – Community Finance Officer
- Staff TerraCarbon, LLC
 - David Shoch – Director Forestry & Technical Services
 - Ben Rifkin – Manager Forestry and Technical Services
- Leadership of Tanganyika District Government
 - Bruno Nicholas – District Natural Resources Officer
- Members of the Steering Committee
 - Mr. Wambale – Secretary of the Steering Committee
- Community members from Lwega, Mwese, Luganese, Katuma, and Mpembe villages
 - Members of village Community Conservation Banks (COCOBA)
 - Carbon Champions
 - Village government leaders and members
 - Village Game Scouts (VGS)
 - Other community members
- Community-based Organizations
 - Tuungane/The Nature Conservancy

13 September 2021:

- Interviews with staff of Tuungane/The Nature Conservancy
 - Lukindo Hiza
- Interviews with Carbon Tanzania Staff (Frank Kweka, David Beroff, Farajah Alberto)
- Interview with District Natural Resource Officer:
 - Bruno Mwaisaka

14 September 2021:

- Interview with Secretary of the Steering Committee
 - Mr. Wambale
- Interviews with VGS in Lwega village
 - Jofrey John Halund
 - William Romano Kauyuka
 - Noel Alfred Wamasala
 - Hamdi Mrisho Kakwale
 - Lucas Juma Amri
- Interviews with government members in Lwega village
 - Mr. Wambale
 - Zoinobu Ramadhon
 - Viius Nkungwe
 - Viius N Nkungwe
 - Sekanyona Evaciali
 - Amostiatha Marko
 - Lucy Jelemia
 - Redemia Kayihura
 - Jonia Alphonse
 - Rajabu Juma
 - Jofrey Musa
 - Joseph **
 - Homoratha Bayincuana
 - Sauda Omary
 - James Mulwano
 - Rashid Ramadhan
 - Elias Rajabu
 - Longo Ngidiga
 - Casio Daudi
 - Anitha Gonzalye
 - John Mlego
 - Sifa Salumu
 - Elizabeth Andrea
 - Samwel Bosco
 - Michael Sebrory Kapomolo
 - Benedicto Salumu Kiberence
- Interviews with COCOBA members in Lwega village
 - Lucy Jelemia
 - Sauda Omary
 - Casio Daudi
 - Anitha Gonzalye
 - Sifa Salumu
 - Elizabeth Andrea
 - Velema Kamiziusi
- Visited numerous businesses funded by loans from COCOBA

- Interviews with VGS in Mwese village
 - Juma Ally Mbotto
 - Christopher R. Miindo
 - Silvanus Joseph
 - Nsetory Donizi
 - Gabriel Msomi
 - Waha Ahnmadi
- Interviews with government members in Mwese village
 - Juma A. Mialimbo
 - Hapiness J. nandi
 - Majujo F. Kaiurumura
 - Gerald E. Kaiarambula
 - Lematha L Memzya
 - Maria H. Chazra
 - Benedllep P. Kisaka
 - Fausta Milomango
 - Pascal Peter
 - Ernasto Lucas
 - Anacepi P. Mhishi
 - Terezak Kasambaryn
 - Donard S. Musli
 - Peter G. Simende
 - Dismas A. Tairo
 - Albettina P Mkonkumei
- Interviews with COCOBA members in Mwese village
 - Jina Kamili
 - Beatric J. Pima
 - Terezia K kasambasha
 - Antastazia P Pandisha
 - Asha Mstata
 - Regina Slivesto
 - Rozalia Joyas
 - Peter J Mwololo
 - Hawa Ramadhani
 - Hadja M. Mgalula
 - Hawa Hussen
 - Maria Chazia
 - Januaria Kazimiy
 - Enatha Ruhamba
 - Lusua Nkololo
 - Juliana Aloys
 - Anna Dionizi
 - Salma Jumanne
 - Odetha Nzeba
 - Winifrida Victori
 - George Mtinad

- Daniel Gelyas
 - Dismas Tailo
 - Begina Modisi
 - Pudensnana Pima
 - Magreth Luwela
 - Stephania Kaiyega
 - Silivia Joseph
 - Eveline N Dioniz
 - Saha G. Mboma
 - Magreth Mambwe
- Visited numerous businesses funded by loans from COCOBA
 - Interviews with VGS in Lugonesi village
 - Informal interview as we went out on a patrol with them to see recent deforestation and no names were collected
 - Interviews with Carbon Champion in Katuma village
 - Japhet L. Maeriu
 - Yusta Nkana
 - Interviews with VGS in Katuma village
 - Frank A. Katuli
 - Hassen Kaboko
 - Angelina A. Nkana
 - Dickson P. John
 - John R. Nkana
 - Interviews with government members in Katuma village
 - Masanja Nchimani
 - Priscusi A. Shayo
 - Ngalaba John
 - Charles A. Mbasha
 - Winifrida S. Stephano
 - Monika R. Mwable
 - Rosecvieri S. Jilala
 - Peter Mascumsa
 - Visited multiple schools that were newly constructed, received upgrades, and/or received supplies (e.g., desks, chairs, etc.)
 - Visited in-progress construction of a new medical facility
 - Visited culturally important forest that is protected by the project

15 September 2021:

- Deforestation Review with VGS in Mpembe
 - Informal interview as we went out on a patrol with them to see recent deforestation and no names were collected
- Visited area where the most deforestation from the monitoring period was occurring
- Confirmed sample remote sensing accuracy points

The interviews were conducted for the purposes of substantiating to a *reasonable* degree of assurance information presented in the MR, including activities reported as undertaken or supported by the project during the monitoring period, employment practices by the Project Proponent, participation by community members in project activities, and community understanding of the grievance process. The interviewer also was tasked with identifying whether community members were aware of project monitoring results, were aware of the public posting of the MR and opportunity to comment, and whether community members or project staff had been informed of the auditor's scheduled site visit and purpose of the site visit.

2.5 Site Inspections

The verification site inspection (field visit) occurred from 13 September 2021 through 15 September 2021. The verification field activities closely followed Aster Global's VSP methodology. Sample size and techniques were based on the project parameters, scope, and best professional judgment of the Lead Verifier. Throughout the course of the site visit, the verification team visited different villages throughout the project area and as a result saw large parts of the project area and some areas in the leakage belt. The verification team did not collect forest inventory data, as the forest inventory plots were not remeasured during this monitoring period. Throughout the site visit, the verification team confirmed areas of deforestation in the project area that were reported in the MR. Additionally, the verification team verified the results of the PRA conducted by the project through both formal and informal interviews.

For the CCB verification component of the site inspection, the verifiers performed on-site reviews for representative community-based project activities identified as implemented or ongoing during the monitoring period. The interviews were conducted for the purpose of substantiating information provided in the project description, monitoring report, and supporting documents provided by the Project Proponent and to solicit additional information as needed. Aster Global provided the Project Proponent with a list prior to the site visit for requested interviews with targeted project management staff, project employees, community members and other stakeholders. The Project Proponent provided appropriate arrangements for the interviews. On-site interviews and informal discussions were conducted during the site visit. Interviewees were provided the option of communicating in either English or Swahili based on personal comfort and preference. Interviews were requested with, and held with, individuals representing different groups of stakeholders.

13 September 2021:

- Interviews with staff of Tuunganne/The Nature Conservancy
- Interviews with Carbon Tanzania Staff (Frank Kweka, David Beroff, Farajah Alberto)

14 September 2021:

- Interview with Secretary of the Steering Committee
- Interviews with VGS in Lwega village
- Interviews with government members in Lwega village
- Interviews with COCOBA members in Lwega village
- Visited numerous businesses funded by loans from COCOBA
- Interviews with VGS in Mwese village
- Interviews with government members in Mwese village
- Interviews with COCOBA members in Mwese village
- Visited numerous businesses funded by loans from COCOBA
- Interviews with VGS in Luganese village

- Interviews with Carbon Champion in Luganese village
- Interviews with COCOBA members in Mwese village
- Interviews with VGS in Katuma village
- Interviews with government members in Katuma village
- Visited multiple schools that were newly constructed, received upgrades, and/or received supplies (e.g., desks, chairs, etc.)
- Visited in-progress construction of a new medical facility
- Visited culturally important forest that is protected by the project

15 September 2021:

- Interviews with VGS in Mpemba
- Visited area where the most deforestation from the monitoring period was occurring
- Confirmed remote sensing accuracy points

2.6 Resolution of Findings

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

The process of resolution of findings involved multiple rounds by the verification team. Findings were resolved during the verification by the Project Proponent implementing corrective actions such as amending the Monitoring Report and calculations, as well as providing additional clarification and supporting documents/evidence. This resulted in project documentation that was in conformance with the requirements of the VCS Standard and CCB Third Edition for GHG projects.

Findings were characterized in the following manner:

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

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

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

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

During the verification, twenty-four (24) VCS findings were identified. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B VCS NCRS/CLS/OFI Summary. Please also see Appendix C: CCB NCRS/CLS/OFI summary.

2.6.1 Forward Action Requests

The verification team issued one (1) Forward Action Request during this verification. The verification team is requesting the next verifier ensure that the Project Proponent monitors the PROP_{IMM} in-line with the requirements of the VM0007 methodology. Please refer to Section 3.2 below for additional information.

2.7 Eligibility for Validation Activities

Validation activities are not applicable.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The verification team reviewed various registries and found no evidence of project involvement in other forms of environmental credits from its activities. This was also substantiated through interviews with the Project Proponent. The project has not been registered, and is not seeking registration, under any other GHG programs. The project currently only seeks carbon credits with the CCB label under the VCS program. This was confirmed through a risk-based internet review and interviews with the Project Proponents. Therefore, the verification team deems the project eligible to participate under the VCS Program.

3.2 Methodology Deviations

Two (2) methodology deviations were identified during this verification period. These deviations are described in Section 2.2.2 of the MR.

Methodology Deviation	Verification Team's Assessment
The parameter, ARRL, was last monitored in 2019, but as it does not drive project accounting, its omission during this monitoring period has no impact on the quantification of GHG emission reductions or removals. The ARRL will be updated with the next baseline update.	This is the first new methodology deviation applied during this monitoring period. The Verification Team confirmed that this deviation is appropriate as this parameter has no impact on the quantification of GHG emission reductions or removals during this monitoring period.
The approach to estimate PROP _{IMM} deviates from the methodology. District scale government population growth data was used preferentially over more limited scale PRA approach. PROP _{IMM} , the proportion of area deforested by population that has migrated into the area in the last 5 years, applying a projected growth rate based on the 2012 government census and validated with household data from a 2021 government insurance survey in the project area. The government insurance survey data generated highly accurate population data within the project area where individuals had a large incentive to participate in exchange for free health insurance. These villages make up 8 out of the roughly 15 villages that are within the project area and 2 km of the leakage belt. The 2021 survey data was compared with the 2012 census population data to estimate	This is the second new methodology deviation applied during this monitoring period. The Verification Team confirmed that this deviation is appropriate. This parameter is derived from the latest version of the Tanzanian census. Additionally, the project used data collected during this monitoring period from the project area to demonstrate that the application of the census derived data is conservative. Furthermore, the verification team is issuing a Forward Action Request to ensure this parameter is appropriately monitored during the next verification period.

annual % growth, described in more detail in section 3.1.3 and in “Ntakata Population Estimate_*.xlsx”. The actual population growth rate in the project area was estimated to be 1.4% per year or 7.2% over 5 years. It is conservatively assumed that this entire population increase is attributed to immigration, not births. However, the 2021 survey data is not available for communities outside of the project area. Therefore, knowing that the proportion of immigrants to the project area and leakage belt over the past 5 years is closer to 7.2%, we apply the more conservative population growth projection value for the Katavi region of 3.2% annually, or 14.2% over 5 years. Therefore, PROPIMM is estimated to be 14.2%.

The verification team assessed all the methodology deviations and determined that they meet the criteria and specifications identified for permitted methodology deviations identified in the VCS Standard v4.2. The methodology deviations do not negatively impact the conservativeness of the quantification of GHG reductions or removals, are more accurate, and are related to monitoring and measurement. The verification team concludes the methodology deviations applied to the project are allowable.

3.3 Project Description Deviations (*Rules 3.5.7 – 3.5.10*)

There were no PD deviations applied to the project during this verification period.

3.4 Minor Changes to Project Description (*Rules 3.5.6*)

Rule 3.5.6 allows minor changes to the validated project design at verification. During this verification period, three minor changes to the PD were identified: two minor changes related to the biodiversity monitoring plan and one minor change related to clarifying a reporting error in the PD. The two minor changes related to the biodiversity monitoring plan included the identification of a trigger species and clarification regarding a misclassified High Conservation Value (HCV) species. The third minor change to the PD is related to a misreporting of the accounting period in the PD. The validated PD incorrectly stated that the accounting period was 20 years, which conflicted with the crediting period which is 30 years. A detailed description of the minor changes is provided in Section 2.2.3 of the MR. The auditor has reviewed the biodiversity monitoring deviations and determined that the changes from the PD and biodiversity monitoring plan do not meet any of the situations listed in Rule 3.5.7 that would require a new validation or the validation of a PD deviation. The change from the validated PD and biodiversity monitoring plan would be considered minor and have been addressed in the explanation provided in Section 2.2.3 of the MR. Additionally, the VVB reviewed the minor change to the PD related to the error in reporting the GHG accounting period. The CCB Standards v3.1 states “The ‘project GHG accounting period’ is defined as the time period over which changes in GHG emissions reductions and/or removals resulting from project activities are monitored for use as offsets.” As a result, the crediting period and “project GHG accounting period” should be same, which was clarified by the Project Proponent. The VVB confirmed this an appropriate minor change.

3.5 Grouped Project (G1.13 – G1.15, G4.1)

The Ntakata Mountains REDD project is not a grouped project. This section is not applicable.

4 VERIFICATION FINDINGS

4.1 Public Comments (Rules 4.6)

The public comment period was held from 03 September 2021 to 03 October 2021. There were no comments received on the Verra website.

4.2 Summary of Project Benefits

Please see Section 1.4 of this report for a summary description of The Ntakata Mountains REDD Project. The project aims at reducing emissions related to Avoiding Unplanned Deforestation. Section 1 of the MR describes unique project benefits, including climate, community and biodiversity, and standardized benefit metrics, including achievements specific to metrics. The verification team confirmed the achievements during this monitoring period through on-site interviews with project participants and a thorough document review.

The climate impacts described in the MR reduce emissions by reducing deforestation in the Project Area. The avoided emissions claimed for climate impacts are evaluated elsewhere in this review and allow the verification team to corroborate the claims.

4.3 General

4.3.1 Implementation Status (G1.9)

A comparison of the implementation schedules in the MR and PD shows the project has met key milestones identified in the PD for the period from the Project start date through the monitoring period and has identified additional key dates and milestones for the monitoring periods, including continued operations. The verification team reviewed the PD and MR and determined there are no discrepancies between the stated project lifetime and its start and end dates. A discrepancy was observed between the MR and the PDD regarding the GHG Accounting Period. Additional clarification and revision of project documents resolved this discrepancy. As a result, no discrepancies exist between project implementation and the project description. The verification team reviewed the MR and PD and determined the monitoring plan was implemented in full accordance with the validated project design.

The verification team requested to visit examples of all activities during the site visit and subsequently confirmed the implementation of items related to climate, community, and biodiversity. Climate objectives achieved included avoiding the net emissions of 2,367,253 tCO₂e.

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

Section 2.1.10 of the MR states the project has contributed to goals outlined in Tanzania's National Development Vision of 2025. While the project contributes to these goals, the project does not plan to specifically monitor achieving national state sustainable development priorities. These assertions are consistent with sustainability goal contributions and monitoring documented in the PD.

During this verification period, the project implemented two Methodology Deviations, which are described in detail in Section 3.2 of this report. The verification team reviewed the deviations and determined them to be valid. No PD Deviations were implemented during this verification period, as detailed in Section 3.3 of this report. Three Minor Changes to the PD were implemented during this verification period, which are described in detail in Section 3.4 of this report. The verification team reviewed the minor changes and determined that the changes from the PD and biodiversity monitoring plan do not meet any of the situations listed in Rule 3.5.7 that would require a new validation or the validation of a PD deviation. Overall, the verifiers determined the project has been implemented as described in the PD.

The project reported seven (7) previously verified methodology deviations that were validated during the initial validation and first verification. These deviations are described in Section 2.2.2 of the MR. The seven previously validated and verified methodology deviations are described below.

Methodology Deviations Previously Reported and Verified
Parameter UP,SS,i,pool will be monitored at least once every 10 years, on re-measurement of forest carbon stocks. While module X-UNC requires that monitoring of this parameter occur every ≤ 5 years, this requirement is inconsistent with the VM0007 pools modules, which specify that stock estimates (from which uncertainty is calculated) are assumed valid for 10 years. Therefore, a deviation to module X-UNC is applied to permit parameter UP,SS,i,pool to be monitored every ≤ 10 years, putting it into alignment with modules CP-AB and CP-D.
The similarities of the project boundaries were assessed using population density rather than settlement density. This methodological deviation is warranted due to inconsistencies in the available data on the location of settlements within Tanzania. Use of population density data still meets the intent of the methodology as both population and settlement density reflect the relative density of resident populations (and level of pressures associated with those populations).
The parameter TOTFOR has not been "limited to forest areas within 5km of roads and rivers suitable for conversion to agriculture / livestock" as specified in the methodology, for lack of relevant data on suitability. As the resulting TOTFOR value is greater, the AVFOR value is also greater. The PROPLB parameter is therefore smaller thus resulting in more leakage outside the leakage belt and hence a conservative estimate. This deviation results in conservative accounting of leakage outside the leakage belt.
The parameter COLB has not been "limited to areas demonstrated to be suitable for agriculture or livestock ranching" as specified in the methodology, for lack of relevant data on suitability.
Two deviations are employed in the treatment of wood products to correct errors in the methodology and improve accuracy. In eq. 4 of CP-W, an additional term (incorporating volume-weighted specific gravity of commercial volumes) is applied to convert volume in m^3/ha (from application of 1/BCEF) back to $t CO_2e/ha$ (units of output parameter CXB). Also, per current treatment in BL-UP, there is double counting of emissions from wood products because in eq. 24 the entirety of aboveground tree biomass is emitted at the time of deforestation, and in addition, the fraction of aboveground tree biomass entering the wood products pool is steadily emitted over 20 years. Eq. 24 of BL-UP was modified to subtract CWP (fraction of aboveground tree biomass extracted, not immediately emitted and entering wood product pool at time of harvest) from $\Delta C_{A tree}$ to avoid double counting of emissions in the baseline.
To calculate $PROP_{CS}$ for outside leakage belt leakage, mean live aboveground tree biomass $t CO_2/ha$ was replaced with mean stem volume m^3/ha . The available national data in the NAFORMA 2015 Report for Tanzania is inaccurate. The aboveground biomass in stem wood is overinflated when multiplied by the appropriate BCEF (selected from the IPCC 2006 Vol 4 Table 4.5), making it ineffective to compare mean live aboveground tree biomass within the project area from the inventory to the national data. Therefore, mean live stem volume was used in its place, dividing mean live aboveground stem volume within the project area by the area weighted average mean live aboveground stem volume in Tanzanian forests based on the provided volumes in the NAFORMA 2015 Report.
In the baseline modeling scenario in section 3.2.1, the landscape factor of slope steepness ratio is not included because it is evident that all slope classes are subject to agricultural conversion. Therefore, the

ratio of slope steepness between the PA and the LB/RRD is not important to the determination of the RRD and LB areas. Table 3.5b below illustrates comparable amounts of agricultural activity across all steepness classes in both the PA, RRD, and LB

There were no previously reported Minor Changes to PD nor PD Deviations.

4.3.2 Risks to the Community and Biodiversity Benefits (G1.10)

Natural and human-induced risks to the expected project benefits are identified in 2.2.6 of the MR and are consistent with those identified in Section 2.1.18 and Appendix 2 of the PD. The natural risk identified is climate change resulting in species compositional shifts and negatively impacting conservation target species. Human-induced risks include increased mining, new major roads, change in national REDD+ policy, diminished village engagement, the project attracting new immigrants, and insufficient carbon revenue.

The MR identifies measures taken to mitigate these risks. To verify whether reasonable steps were taken to mitigate identified risks, the verifiers assessed each identified risk through project and supplemental document review, clarifications from the Project Proponent, and site interviews and observations. Site visit interviews and observations substantiate that the Project Proponent continues to strengthen ties with the village, district, and national governments and that the Project Proponent is in active collaboration with these governments. The verification team determined the continued collaboration and participation with these governments were effective in mitigating identified human-induced risks, including increased mining, new major roads, change in national REDD+ policy, and diminished village engagement. The verifiers substantiated through site visit interviews and observations that VLUPs were developed and implemented during this monitoring period and that the VLUPs were largely understood by local community members. The verification team determined the implementation and resulting widespread community understanding of the VLUPs was effective in mitigating the risk of the project attracting new immigrants. Through additional clarification and supplemental documentation provided by the Project Proponent, the verification team determined the risk of insufficient carbon revenue was successfully mitigated during the verification period.

The verifiers substantiated through site visit interviews with VGS that regular forest patrols occurred during the verification period. Site visit interviews and observations with community members and review of the chimpanzee habitat suitability modeling in Appendix 1 substantiate that project activities are reducing the risk of habitat loss. The verification team determined these substantiations indicate the project was effective in mitigating the identified natural risk. Through the review and substantiation of the mitigations of each identified risk, the verification team determined that the project has been successful in mitigating natural and human-induced risks to expected project benefits during this verification period.

The risks described appear to be reasonable and complete based on the verification team's knowledge of the region from the site visit. Through the review and substantiation of the mitigations of each identified risk, the verification team determined that the project has been successful in mitigating the risks to expected project benefits during this verification period. The verification team concludes the risks are adequately addressed through these activities designed to mitigate them.

4.3.3 Community and Biodiversity Benefit Permanence (G1.11)

The verification team reviewed the PD for actions identified as needed for comparison to actions identified in the MR as having been taken to maintain and enhance CCB benefits beyond the project lifetime. The verification team substantiated the capacity building actions taken by the Project Proponent through site visit interviews and observations and additional clarification from the Project Proponent. Site visit interviews

and observations substantiate the VLUPs are being implemented during this verification period and that they are well understood by community members. The verification team determined that the capacity building activities that took place during this monitoring period and the effective and well understood land-use planning resulting from the implementation of the VLUPs are reasonable measures to enhance project benefits beyond the project lifetime.

4.3.4 Stakeholder Access to Information (G3.1- G3.3)

The verification team reviewed the PD for actions identified as needed for comparison to actions identified in the MR to ensure stakeholder access to information. The verifier interviewed community members to substantiate the access to information documented in the PD and the MR. Through site visit interviews, review the of the Verra Project web page, and additional clarification provided by the Project Proponent, the verification team substantiated that the full project documentation has been made accessible in both to communities and other stakeholders during this verification period.

The efforts made to provide relevant and adequate information about potential costs, risks, and benefits to community members are consistent between the PD and MR and include meetings with Village Governments and target villages and the creation of a “carbon champion program.” The verifiers substantiated through site visit interviews that community members were largely aware of the potential costs, risks and benefits and that village meetings were held to democratically vote on whether to join the project. The verifiers substantiated through site visit interviews that the “carbon champion program” had been implemented through site visit interviews with carbon champions.

The MR describes actions taken to explain the verification process to community members and other stakeholders. Villages were informed of the verification process and the verification site visit in face-to-face meetings conducted by Village governments and information regarding the verification process was spread by the carbon champions. Site visit interviews with community members substantiated that most village members were aware of the verification site visit, and the verifiers saw a physical copy of the notice in two villages. Due to illiteracy rates in the villages, the verifiers noted that some community members were unaware of the some of the intricacies of the verification process. Additional clarification was provided by the Project Proponent to explain how this barrier was overcome, and the verification team is reasonably assured that the appropriate actions were taken to explain the verification process to communities and other stakeholders.

4.3.5 Stakeholder Consultation (G3.4 – G3.5)

The MR describes actions taken and implementation of project activities during this verification period that demonstrate the Project Proponent has consulted with stakeholders on project implementation. The verification team reviewed the MR and substantiated that the actions taken were consistent with those described in the PD. Through review of project documentation and site visit interviews and observations, the verifiers substantiated that each identified action occurred during the verification period. Site visit interviews and observations substantiated that villages have adopted VLUPs, and the creation of these VLUPs were participatory in nature. The verifiers substantiated through site visit interviews that Project Proponent and project partners are actively involved in the project but do not make decisions on how the project funds are distributed in the communities. Rather, site visit observations and interviews with village government representatives and community members substantiated that local villages are responsible for prioritizing activities to be funded by project revenue, create their own spending plans, and that a local Project Proponent staff member regularly communicates with community members and is available to discuss issues with the project.

The verification team substantiated claims in the MR that multiple meetings have occurred with Village Governments and that Village Government officials are responsible for conveying information to sub-villages through site visit interviews and observations. Site visit interviews with Village governments and community members substantiate the Village Government officials are legitimate representatives, as they are democratically elected, and all village members are eligible for election. The verifiers substantiated that these officials, as well as the carbon champions, shared information with community members both directly, and through distribution of leaflets in Swahili to community members. Overall, the verification team determined the Project Proponent has been effective in community consultation during this verification period.

4.3.6 Stakeholder Participation in Decision-making and Implementation (G3.6)

The MR describes the actions the Project Proponent has taken to enable effective participation of all communities in the project, including presenting opportunities to participate in the project through face-to-face meetings with community members and suggesting to Village Governments that women be allowed to be VGS. The verification team reviewed the documentation in the MR and supplementary documents and conducted site visit interviews to substantiate that community members, including women have been involved in project implementation, monitoring, and evaluation. The verifiers substantiated through site visit interviews and observations that the process of creating the VLUPs relied on democratic input from community members and that VGS are recruited from local communities. Additionally, verifiers met with one of the two female VGS, substantiating the project has made progress in overcoming cultural gender bias in the local communities. Overall, site visit interviews and observations and a review of documentation substantiate community member interest and involvement with the project and the widespread understanding of community members ability to provide feedback on the project.

4.3.7 Anti-discrimination (G3.7)

Company and human resource policies in place to prevent and define discrimination relating to gender, religion, and sex, as well as a grievance procedure, are described in the MR. Additionally, all employees sign a code of conduct, which includes anti-discrimination. Through review of project documentation, additional clarification from the Project Proponent, and review of provided company policies, the verification team substantiated that the actions taken during this verification period are consistent with those described in the validated PD and is reasonably assured that the Project Proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination or sexual harassment with respect to the project.

4.3.8 Stakeholder Feedback and Grievance Redress Procedure (G3.8)

A grievance redress procedure is outlined in the validated PD. While site visit interviews suggest that all project employees and individuals involved with the project may not fully understand the formal grievance redress procedure, the verifiers substantiated that these individuals were aware of who to bring grievances to, should they arise. The MR states that no grievances were raised during this verification period. The verifiers substantiated this claim through site visit interviews with community members, none of whom had filed a grievance or knew of anyone who had. The verification team is reasonably assured that no grievances arose during this monitoring period and is thus relying on the Project Proponent's anticipated adherence to the grievance redress policy outlined in the PD should a grievance arise.

4.3.9 Worker Relations (G3.9 – G3.12)

The verification team reviewed information presented in the MR, reviewed supplemental materials provided by the Project Proponent, and conducted site interviews with Project Proponent representatives and

employees. Interviews with community leaders, community members, other stakeholders, and site visit observations substantiate all trainings documented in the MR occurred during the verification period and that progress towards building capacity was achieved. The verification team is reasonably assured the capacity built will not be lost, as the village and district governments will continue to exist regardless of the project. The young age of many of the community members whose capacity has been increased will ensure its longevity.

The MR states that all community members are eligible and encouraged to apply for project employment positions and that their applications are assessed fairly and without bias. During the site visit, the audit team interviewed Frank Kweka, an employee of Carbon Tanzania and from the project area, to confirm that the Project Proponent is actively encouraging members from the participating communities to apply to open positions. Additionally, the Village Governments are encouraged to ensure that women and other marginalized groups are informed of job opportunities within the communities and are encouraged to apply. During the site visit, interviews and observations substantiated that existing employees' general belief was that the process involved for project employment was fair and unbiased. While the MR states that only 5 of the 48 full-time equivalent project employees are female, the Project Proponent provided additional clarification that the limited number of female employees is a result of the cultural preferences and desires for certain positions, and not a result of unfair or biased hiring practices. The verification team substantiated this through site visit interviews and observations, noting that a significant amount of the official village leadership are females, many females hold COCOBA leadership positions, and two VGS are females. The MR also states that all employees of the Ntakata Mountains REDD Project were employed from the project area. The verifiers substantiated this through site visit interviews and observations, noting all project employees who were interviewed lived within the project area.

The MR states that the Project Proponent is organizationally committed through internal policy to follow the Employment Act and Labor Institutions Act of 2004 and the Code of Good Practice Rules of 2007. Evidence provided to the verification team in the form of project employee receipts and pay slips substantiated that the Project Proponent is in compliance with the laws and regulations covering workers' rights in Tanzania. Risks during project activities identified in the MR are consistent with those identified in the PD and include vehicle accidents, insect or snake bites, and conflict related violence during enforcement operations. The Project Proponent states that the risks of employment or involvement with the project are well within a normal range. Workers are informed about these risks at orientation, and measures to mitigate these risks include promoting driver safety, avoiding travel by public busses, providing appropriate equipment, use of tents/mosquito nets, and training to deal peacefully and effectively with conflict. The verification team reviewed documentation regarding VGS training and substantiated through site visit interviews and observations that workers are informed of risks, and the training measures described have been implemented to minimize identified risks.

4.3.10 Management Capacity (G4.2 – G4.3)

Information presented in the MR and provided to the verification team through supplemental materials substantiates the current project management team has demonstrated their expertise and ability to implement and manage this project over an extended period, and appropriate provisions exist to ensure the key technical and management skills are in place to continue to manage the project successfully over the project lifetime.

The verification team reviewed supplemental materials and conducted interviews with community leaders and members that substantiated the Project Proponent is taking appropriate steps to assist community

groups to improve key technical, managerial, and governance skills that should help ensure continued local community involvement in project implementation over the project lifetime.

The Project Proponent is identified as the organization responsible for financial implementation. Section 2.4.4 of the MR states the Project Proponent is an established company with a sound financial basis for operations over the project lifetime. The verification team reviewed financial information provided by the Project Proponent and confirmed the information provided satisfactorily demonstrated the financial health of the implementing organization is adequate to support project implementation.

Section 2.4.5 of the MR attests the Project Proponent and its partners are not complicit in any form of corruption. Interviews and discussions with the Project Proponent, project management staff, Village and District Government representatives and community members did not identify any concerns that the project or project staff are complicit in any form of corruption. Community members interviewed confirmed that projects they have requested and prioritized to be funded through the REDD revenues are being delivered as anticipated, and the Villages receive postings about the project governance and what has been done with the money received. In conclusion, the verification team is reasonably assured that the project has the capacity to implement the project in accordance with the PD.

4.3.11 Commercially Sensitive Information (Rules 3.5.13 – 3.5.14)

The MR states that no commercially sensitive information is included in the MR document but supporting documents including commercially sensitive information will not be made publicly available. The verification team substantiates the Project Proponent's assessment that the monitoring report does not deliberately exclude commercially sensitive information.

4.3.12 Rights Protection and Free, Prior and Informed Consent (G5.1-G5.5)

Statutory and Customary Property Rights are identified in Section 2.5.1 of the PD, and the Project Proponent's recognition of property rights are described in Section 2.5.2 of the PD. The verification team confirmed these are consistent with the description in Section 2.5.1 of the MR. The VLUPs provide the basis for understanding tenure rights in the project area. Under the Village Land Act, these VLUPs are legally enforceable. Site visit interviews and observations substantiated that community members understand the VLUPs and that community members did not have any concerns over the VLUPs, as they were developed by the communities for the communities to protect key resources. Additional clarification by the Project Proponent substantiated the efforts the project has made in supporting the Villages completing the VLUPs and in helping secure statutory rights.

Section 2.5.1 of the MR states that most villagers do not have certificates of customary rights to occupancy (CCROs) due to the slowness of the registration, leading to unclear property boundaries and potential for land disputes. These disputes generally involve small plots of agricultural land and are sometimes linked to grazing. Site visit interviews with community members substantiated that outsiders are the source of conflicts of land use.

The MR states that community members gave Free, Prior, and Informed Consent (FPIC) for participation in the project through multiple consultations in each village and the subsequent negotiation and signing of project contracts with each participating village, consistent with the PD. The verifiers substantiated the establishment of FPIC through site visit interviews with community members and Village government officials who acknowledged the widespread willingness of community members to participate in the project. During the site visit, the verifiers identified no evidence of uninvited encroachment on private, community or government land.

The verification team reviewed Section 2.5.3 of the MR regarding property rights protection in comparison to the validated PD. The verification team determined the PD had been validated as demonstrating the villages were voluntarily participating in the project and that the lands affected by the project consisted of community lands agreed by each of the participating villages to be set aside as forest reserves, as committed to through individual VLUPs. The verification team requested additional clarification from the Project Proponent regarding payments from carbon credit sale revenues to the villages whose lands are included in the project. Review of the supplemental materials provided by the Project Proponent, including contracts between the Project Proponent and the villages and evidence of payments made corroborated by interviews with District and Village government officials, substantiate the payments were based on the benefit-sharing mechanism described in Section 4.4.4 of the MR. Verification team assessment of these payments is further addressed in Section 4.5.12 of this verification report.

Section 2.5.3 of the MR states the project does not require the involuntary removal or relocation of communities or important activities to livelihood and culture, which is consistent with the PD. The verifiers substantiated this claim through site visit interviews with Village Government representatives and community members, who substantiated the participatory nature of developing and implementing the VLUPs and that the project does not force them to relocate activities important to their culture or livelihood.

Illegal activities that could affect the project's impacts are identified in Section 2.5.4 of the MR and are consistent with those identified in the PD. Illegal activities identified include logging/clearing of forest and illegal hunting of wildlife. Actions taken to mitigate these activities include the hiring and training of VGS and implementation of complementary village development activities to help reduce pressure on the forests.

The verifiers substantiated the hiring and training of VGS through site visit interviews with VGS staff and District Government representatives. The verifiers learned of informant networks of community members who assist in identifying illegal activity. Site visit observations and interviews with community members substantiate that the VLUPs are widely publicized and well understood and that illegal activities identified are principally the result of individuals outside the community. At the time of validation, the PD states there were no ongoing or historical disputes over land ownership or resources, and the MR states the VLUP process has been effective in resolving previous land disputes involving the village forest reserves. The verifiers substantiated that no activities are undertaken by the project that could prejudice the outcome of unresolved disputes over land through site visit interviews and observations with Village Government representatives and community members. No individuals interviewed had knowledge of any ongoing disputes, and Village Governments substantiated the Project Proponent does not exert undue influence on local community decisions. Through substantiation of all claims made in the MR pertaining to protecting rights of Indigenous Peoples, communities and other stakeholders, the verification team determined the Project Proponent was in accordance with the CCB Standards and the validated PD throughout this verification period.

4.3.13 Legal Status (G5.6)

A list of laws and regulations considered relevant to the project are provided in Section 2.5.6 of the MR and are the same laws identified in the PD. The MR and PD both provide a summary for the relevance of each of these laws and regulations to the project, and several identify the applicable law or regulation as setting standards or basis for actions undertaken or followed by the project. The verification team asked for additional clarification regarding whether there had been any changes in national laws and regulations since the last verification and how compliance with identified laws is determined and achieved. The verification

team reviewed the Project Proponent's response to these clarifications and concluded that the MR adequately addressed the concerns of the verification team. As such, the verification team is reasonably assured that the project is in compliance with all national and local laws and regulations relevant to project activities.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

Aster Global conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS Standard, the validated PD, and VM0007. Data with associated conversion factors, formulae, and calculations were provided by the Project Proponent in spreadsheet format to ensure all formulae were accessible for review. The verification team recalculated subsets of the analyses to confirm correctness and assess if data transposition errors occurred to achieve a *reasonable* level of assurance and to meet the materiality requirements of the project, as required by the VCS Standard. The Project Proponent also provided answers to questions on calculations to ensure the verification team understood the approach and could confirm its consistency with VM0007 and the PD.

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

Data Unit / Parameter	Accuracy of GHG emission reductions and removals	Whether methods and formulae set out in the PD have been followed	Appropriateness of default values
$\Delta C_{BSL,PA,unplanned}$ (t CO ₂ -e)	The verification team confirmed that the validated parameter value was applied during this monitoring period and that the baseline period has not expired. The validated value of this parameter for the 2-year monitoring period is 2,367,253 tCO ₂ e.	This parameter was derived from the validated baseline as described in the PD.	Not applicable.
$\Delta CP,Def,i,t$ (t CO ₂ -e)	The verification team confirmed that this parameter was appropriately calculated in-line with the VM0007 methodology and procedures described in the PD. The calculated value of this parameter for the 2-year monitoring period is 272,502 tCO ₂ e.	This parameter was calculated in-line with the validated PD and VM0007 methodology.	Not applicable.
GHGP-E,i,t (t CO ₂ -e)	The verification team confirmed that this parameter was appropriately calculated in-line with the VM0007 methodology and procedures described in the PD. The calculated value of this parameter for the 2-year monitoring period is 18,019 tCO ₂ e.	This parameter was calculated in-line with the validated PD and VM0007 methodology.	Not applicable.
$\Delta CP,LB$ (t CO ₂ -e)	The verification team confirmed that this parameter was appropriately calculated in-line with the VM0007	This parameter was calculated in-line with the	Not applicable.

	methodology and procedures described in the PD. The calculated value of this parameter for the 2-year monitoring period is 964,800 tCO ₂ e.	validated PD and VM0007 methodology.	
ΔCLK-ASU-OLB (t CO ₂ -e)	The verification team confirmed that this parameter was appropriately calculated in-line with the VM0007 methodology and procedures described in the PD. The calculated value of this parameter for the 2-year monitoring period is 107,783 tCO ₂ e	This parameter was calculated in-line with the validated PD and VM0007 methodology.	Not applicable.
ΔCLK-AS,unplanned (t CO ₂ -e)	The verification team confirmed that the validated parameter value was applied correctly during this monitoring period and that the baseline period has not expired. The calculated value of this parameter for the 2-year monitoring period is 1,031,504 tCO ₂ e	This parameter was derived from the validated baseline as described in the PD.	Not applicable.
NER _{REDDERROR,t}	The verification team confirmed that the validated parameter value was applied during this monitoring period and that the baseline period has not expired. The validated value of this parameter for the 2-year monitoring period is 25.1%.	This parameter was derived from the validated baseline as described in the PD.	Not applicable.

For this monitoring period, the project relied on the network of forest inventory plots and resulting analyses confirmed at validation and allowed by VCS Standard v4.1. To monitor deforestation in the project area and leakage belt, the project conducted a remote sensing analysis as described in Section 3.1.3 of the Monitoring Report v4.0 (April 26, 2022). The verification team acquired multispectral satellite imagery to review for disturbance or deforestation, in addition to ground-truthing efforts from the site visit. Sentinel 2 sensor data was downloaded for the beginning and end of the reporting period to monitor the project area and detect any land cover changes. The project conducted a Participatory Rural Appraisal (PRA) in 2021, which was used to determine if forest degradation was occurring within the project area and determine the level of immigration. The verification confirmed the results of the PRA through on-site interviews and a review of supporting documentation.

The verification team observed analysis methods during a calculation walkthrough meeting with the Project Proponent where the features of VM0007 were discussed. It was confirmed that the project's on-going analysis methods for monitoring conform with the methodology. The verification team reviewed the monitoring period quantification results independently and confirmed that data sources are suitable and in compliance with VM0007 requirements.

Uncertainty calculations were reviewed in detail as prescribed by the methodology and confirmed. As uncertainty was 25.1%, the project appropriately applied an uncertainty deduction for this monitoring period.

The methods and formulae set out in the PD for calculating baseline emissions, project emissions, and leakage were confirmed. The total end of the monitoring period carbon stocks in all project activities for all relevant pools resulting from carbon stock changes were correctly quantified. Where ranges of parameters or other types of formulaic uncertainties exist, appropriately conservative values were used in data analysis.

In conclusion, the quantification methods for GHG emission reductions and removals have been performed correctly and in accordance with the validated PD and VM0007.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

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

The threshold for materiality with respect to the aggregate of errors, omissions and misrepresentations relative to the total reported GHG emission reductions and/or removals was met for this project as defined in the Verification Sampling Plan. Materiality is a concept that errors, omissions and misrepresentations could affect the GHG reduction assertion and influence the intended users (ISO 14064-3:2006). As defined by VCS Version 4.1, the materiality was 1% for this large project.

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

The verification team was provided access to the project's series of monitoring worksheets, where monitoring data is compiled for quantification and reporting. These tools ensure accurate information flow for monitoring efforts. Section 3.1.3 of the MR provides additional detail on project data management methods and structure.

4.4.3 Non-Permanence Risk Analysis

The Ntakata Mountains REDD Project Monitoring Report utilized the VCS AFOLU Non-Permanence Risk Tool to assess internal, external, and natural risk and mitigation measures for minimizing risk. The verification team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements Section 3.7.3 and confirmed that the project adheres to the requirements. The verification team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the Project Proponent. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	The management team includes individuals that have the necessary skills and experience to implement all project activities. The Project Proponent has successfully managed projects that have generated GHG credits. During the site visit, the verification team confirmed that the Project Proponent has an office in Arusha and is able to travel to the project site in less than a day of travel.	A risk rating of -2 is appropriate given the rationale provided and all statements made are substantiated.

	The verification team confirmed that the VLUPs in place qualify as adaptive management.	
Financial Viability	Financial documents provided demonstrate cash flow breakeven is 4 years or less from the current risk assessment.	A risk rating of 0 is appropriate given the rationale provided.
Opportunity Cost	The project baseline is subsistence driven and project activities have shown net positive community impacts. A contract provided to the verification team substantiates that the project is protected by a legally binding commitment to continue management practices.	A risk rating of -2 is appropriate given the rationale provided.
Project Longevity	There is a legal agreement in place that continues the management practice for 30 years.	A risk rating of 15 is appropriate given the rationale provided.
Total Internal Risks		The project has a total Internal Risk score of 11 .
External Risks		
Land Tenure	Individuals have rights to resource access, but the government retains the right to ownership. A contract provided to the verification team substantiates that the project is protected by a legally binding commitment to continue management practices.	A risk rating of 0 is appropriate given the rationale provided.
Community Engagement	The project has received CCB validation/verification demonstrating exceptional community benefit.	A risk rating of -5 is appropriate given the rationale provided.
Political Risk	Tanzania is engaged in the World Bank Forest Carbon Partnership Facility and is implementing REDD+ readiness activities. The Governance Score is -0.49	A risk rating of 2 is appropriate given the rationale provided.
Total External Risks		The project has a total External Risk score of 0 .
Natural Risks		
Natural Risk	Fire was identified as the most significant natural risk. The verification team confirmed the LS based on evidence provided and confirmed that mitigation is in place through site visit observations. Earthquakes were also identified as a natural risk. The verification team confirmed the LS was appropriate based on the Project Proponent's justification.	A risk rating of 2 is appropriate given the rationale provided.
Total Natural Risks		The project has a total Natural Risk score of 2 .
Overall Risk Rating = 13 Non-Permanence Risk Rating = 13%		

In summary, the Project Proponent has accounted for risk factors in a reasonable manner and has reached an overall risk rating that encompasses all risks of non-permanence. The project has applied the Non-Permanence Risk Rating of 13%. As required, risk will be re-assessed and given risk scores at each future verification period.

4.4.4 Dissemination of Monitoring Plan and Results (CL4.2)

The verification team reviewed the MR and PD to evaluate the actions taken to disseminate the results of the Monitoring Plan during this verification period against the actions described in the PD and CMP. The verification team confirmed the MR Summary in Swahili is available on the Verra project page. Site visit interviews with village government leaders, members, and WMA and Village Council representatives confirmed that copies of the MR summary were distributed, and the verifiers saw a copy in some of the village government offices. Additionally, the verification team confirmed through interviews that the project documentation was distributed to the district governments. Review of supplemental support documents, along with site visit interviews and observations, confirm the results of the community monitoring for this verification were disseminated in accordance with the validated PD. The verification team is reasonably assured that the results of climate monitoring were disseminated in accordance with the validated PD.

4.4.5 Optional Gold Level: Climate Change Adaptation Measures (GL1.3)

Actions taken to assist communities and biodiversity to adapt to the probable impacts of climate change are described in Section 3.3.1 of the MR and are consistent with the measures needed and designed for adaptation described in Section 4.3.1 of the PD. These measures include land use planning, diversification of livelihoods, investment in health facilities and interventions, climate smart adaptive agriculture and grazing regimes, and investment in training in good governance. The PD notes that addressing these measures will reduce effects on the communities and pressure on biodiverse habitats and the natural resource base. The verification team substantiated through site visit interviews and observations and a review of supporting documentation that each of the actions taken during this verification period were implemented, in line with the measures described in the PD. The results of these actions are described in further detail in Section 4.4.6 of this report.

4.4.6 Optional Gold Level: Climate Change Adaptation Benefits (GL1.4)

The verification team reviewed the actions taken, described in Section 4.4.5 of this report, and substantiated that they are consistent with the measures identified in the PD. Through site visit interviews and observations, the verifiers substantiated that VLUPs are continuing to be implemented in all 8 villages during this monitoring period; these VLUPs account for forest protection and community uses needed for livelihood; and they have dedicated land reserved for agricultural and grazing purposes. Diversification of livelihoods were further substantiated through site visit interviews and observations with COCOBA groups and beneficiaries of the small loan program. The verifiers substantiated through site visit interviews and observations that climate smart agriculture and good governance training were conducted during this verification period and that progress was made in helping bring health facilities and education to the communities. Review of remote sensing data, corroborated by site visit observations, substantiated that forest loss is still occurring, though far less than what was forecasted in the absence of the project. These actions substantiate the implemented actions have been effective in reducing pressure on biodiverse habitat and the natural resource base. Overall, the verification team substantiated that the measures identified in the PD were effectively implemented during this verification period, and the results of their implementation have been effective in assisting communities and biodiversity to adapt to the probable impacts of climate change.

4.5 Community

4.5.1 Community Impacts (CM2.1)

The verification team reviewed the community impacts and methods identified for assessing these impacts identified in the PD, as the basis for review of community impacts presented in the MR. The verification team concludes the methodology presented in the MR for measuring and monitoring impacts of the project on local communities is based on cause-and-effect logic (causal model) and associated theories of change presented in the validated PD. The verification team reviewed information provided in the MR, supplemental materials provided by the Project Proponent, and interviews with Project Proponent representatives, community leaders, and community members to assess the general quality and accuracy of the impact assessment.

The project uses appropriate methodologies to estimate impacts on communities resulting from planned project activities. The MR identifies the impacts, type of benefits/cost/risk, and associated change in well-being for all community groups, including all 8 villages, women and women's groups, and VGS. The verifiers substantiated through site visit interviews and observations, paired with additional clarification from the Project Proponent, that the changes in well-being presented for the impacts identified were generally aligned with documentable or community-acknowledged progress being made for all identified community groups. Site visit observations and interviews did not identify any additional unplanned impacts not identified in the MR and PD. Overall, the verification team determined through review of project documentation, additional clarification from the Project Proponent, and site visit interviews and observations that the assessment of impacts during this verification period is accurate.

4.5.2 Negative Community Impact Mitigation (CM2.2)

The verification team reviewed the potential negative community impacts identified in the MR and found them to be consistent with those identified in the PD. The MR and PD identify restrictions on encroachment of remaining forest area could be negatively perceived by some families that do not have enough land to divide among all their children. The verifiers substantiated through site visit interviews and observations that this potential negative impact was mitigated by the initiation of climate smart agriculture by the Project Proponent during this verification period. The MR states this potential negative impact is further mitigated through alternative livelihoods, such as small business opportunities created as result of project activities and the employment of some community members as VGS. During the site visit, verifier interviews and observations substantiated increased alternative livelihoods through the COCOBA program for small businesses and the employment of community members as VGS. Overall, the verification team determined through review of project documentation, additional clarification from the Project Proponent, and site visit interviews and observations that the assessment of impacts during this verification period is accurate.

4.5.3 Net Positive Community Well-being (CM2.3)

Section 4.1.3 of the MR states that all community groups identified received net-positive impacts from implementation of project activities during this verification period and provides information on the positive impacts each community group received as result of implementation of project activities during this verification period. Site visit interviews substantiate the widespread belief that the project has had a net-positive impact on community well-being. Review of provided documentation, corroborated by site visit interviews and observations, substantiates necessary mitigation impacts were implemented. Given the substantiated positive impacts for all community groups and the appropriate mitigation of potential negative impacts, the verification team determined that the impacts on all identified community groups was net positive for this verification period.

4.5.4 Protection of High Conservation Values (CM2.4)

Community-related HCVs identified in the PD include village water sources, Matambiko spiritual sites, and beekeeping/honey hunting areas. The MR states that these HCVs were not negatively impacted during this verification period. The verification team requested additional clarification from the Project Proponent regarding specifics of several identified HCVs and how they were not negatively affected during this verification period. During the site visit, the verification team interviewed Village government leadership, community leaders, community members, and other stakeholders to understand how HCVs are protected and whether that protection is effective. The verification team substantiated through site visit interviews and observations, paired with additional clarification from the Project Proponent, the overall protection provided to all listed community well-being HCVs. The verification team determined that none had been negatively affected by the project.

4.5.5 Other Stakeholder Impacts (CM3.2-CM3.3)

Other stakeholders identified in Section 4.3.1 of the PD include the Tanganyika and Mpanda District Governments. The MR states there are no anticipated negative impacts to these stakeholders, so direct mitigation was not necessary. The verification team substantiated through site visit interviews with representatives of the District Governments that the project did not create any identified or known negative impacts on the District Government that would have required mitigation.

4.5.6 Community Monitoring Plan (CM4.1, CM4.2, GL2.2, GL2.3, GL2.5)

The verification team reviewed the Community Monitoring Plan (CMP) framework in Appendix 5 of the PD and the supplemental CMP document. The verification team reviewed the results of the community monitoring implemented during this verification presented in the MR against variables identified in the PD and CMP and the frequency and methods for monitoring and reporting on results. Dates, frequency, and sampling methods were confirmed to be in accordance with the PD and CMP. Review of the PD and CMP, paired with additional clarification from the Project Proponent, substantiated that appropriate measures were taken to maintain or enhance the identified community HCVs for this verification period. Review of supplemental support documents, additional clarification from the Project Proponent, and site visit interviews substantiate that monitoring was carried out in accordance with the frequency and sampling methods provided in the validated PD and CMP.

The Ntakata Mountains REDD Project has been validated to the Gold Level for exceptional community benefits. As such, the monitoring results must include additional identified indicators. The verification team reviewed the results of the community monitoring for this verification period and confirmed the identified indicators for well-being of impacts and risks on smallholder/community members and women were appropriately monitored in accordance with the project's validated design. Thus, they meet the criteria for Gold Level exceptional community benefits. Gold Level exceptional community benefits are assessed in greater detail in Sections 4.5.8 – 4.5.14 of this report. Overall, through review of project documentation and supplemental documentation corroborated by site visit interviews, the verification team substantiated the community monitoring plan was appropriately implemented during this verification period.

4.5.7 Community Monitoring Plan Dissemination (CM4.3)

The verification team reviewed the MR, CMP, and the PD to evaluate the actions taken to disseminate the results of community monitoring during this verification period against the actions described in the PD and CMP. The verification team confirmed that a project summary document in Swahili is available on the Verra project page. Additional clarification from the Project Proponent, review of supplemental support

documents, along with site visit interviews and observations substantiate the results of the community monitoring for this verification were disseminated in accordance with the validated PD.

4.5.8 Optional Gold Level: Short-term and Long-term Community Benefits (GL2.2)

Section 4.4.1 of the MR reports short-term benefits provided by the project during this monitoring period, including providing capacity development and increased knowledge through training and education on REDD+, project governance, forest management and reproductive health, providing employment for local villagers, and conducting forest patrols. Several of the identified short-term benefits to community members are also identified as having long-term impacts, and thus are included as long-term benefits. Site visit interviews and observations substantiate the short-term benefits identified were provided during this verification period. Review of project documents and site visit interviews and observations substantiated the project is on track to provide long-term positive well-being impacts. Through substantiation of short-term benefits generated during this verification period and substantiation of long-term benefits being on track to provide long-term positive well-being impacts, the verification team determined the project was successful in providing net-positive well-being benefits for smallholders/community members during this verification period.

4.5.9 Optional Gold Level: Smallholder/community member Risks (GL2.3)

The identified risks to smallholder/community members were identified and determined to be appropriate in Section 4.3.2 of this report. Activities implemented to mitigate these risks were identified and determined to be appropriate in Section 4.5.2 of this report. Through review of supplemental project documents, site visit observations and site visit interviews, the verification team substantiates that the risks are appropriately identified and understood and that the actions taken to mitigate these risks during the verification period were appropriate and in accordance with the PD.

4.5.10 Optional Gold Level: Marginalized and/or Vulnerable Community Groups (GL2.4)

The verification team reviewed the MR and PD, which both identify poor households and women in the villages as community groups of concern for being marginalized and/or vulnerable. The MR identifies positive impacts and states there are no negative impacts anticipated for the identified groups. Potential barriers to benefit access are identified for the community groups but are stated to be mitigated by effective communication. Through review of project documentation and site visit interviews and observations, the verification team substantiated the project is generating the opportunities for the net positive benefits on the well-being of the identified marginalized and/or vulnerable community group through regular interaction and effective communication with the identified groups.

4.5.11 Optional Gold Level: Net Impacts on Women (GL2.5)

Multiple benefits impacting women specifically are identified in Section 4.4.3 of the MR, including employment of women as carbon champions and in village leadership positions, increased support on reproductive health, and the establishment of women's entrepreneurship groups. Benefits that impacted other groups are also described as benefiting women, including better protection of the natural resources base. Site visit interviews and observations substantiate the employment of women as carbon champions and village government members, the health benefits provided, and the involvement of women in the COCOBA program. As noted in Section 4.3.9 of this report, the communities involved in the project are still part of a strongly patriarchal society with relatively few women yet in leadership positions. However, the verification team substantiated through review of project documents and site visit interviews that progress is being made in gender equality and that more women are participating in or influencing decision-making.

Overall, the verification team determined that the project is making progress on generating net positive impacts on women

4.5.12 Optional Gold Level: Benefit Sharing Mechanisms (GL2.6)

The verification team reviewed the PD and compared the described benefit sharing mechanism to the benefit sharing mechanism that was implemented during this verification period. The verification team identified what was additionally thought to be a discrepancy between the benefit sharing mechanism described in the MR and the one described in the PD. The Project Proponent provided additional clarification and documentation to the verification team regarding the potential discrepancy. Through review of this clarification and documentation, corroborated by site visit interviews, the verification team substantiated that the benefit sharing mechanism implemented during this verification period was fully and effectively influenced by community members and in accordance with the project's validated design.

4.5.13 Optional Gold Level: Governance and Implementation Structures (GL2.8)

The verification team reviewed the governance and implementation structures described in the MR and confirmed they are consistent with those described in the PD. The verifiers substantiated through site visit interviews that community members have effectively participated in developing the VLUPs, and the project has used existing democratic institutions already in place to ensure smallholders/community members are represented by elected representatives for project decision-making.

4.5.14 Optional Gold Level: Smallholders/Community Members Capacity Development (GL2.9)

The verification team reviewed the approach taken by the Project Proponent to develop capacity of community members and local government institutions. During the site visit, the verifiers viewed attendance rosters and agendas of trainings the Project Proponent implemented on good governance, further corroborated by site visit interviews with community members who had attended the trainings. The verifiers substantiated the project has provided professional training and certification for VGS through site visit interviews, further corroborated by training logs and other supplemental information and that the project has hired staff who interact with the communities to assist them as needed. Site visit interviews and observations and review of supplemental documentation substantiate the project is developing the capacity of community members, relevant local organizations, and local government institutions to participate effectively and actively in project design, implementation, and management.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B2.1)

Expected biodiversity changes are identified in Section 5.2.1 of the PD and include indicators identified for monitoring and monitoring and estimation procedures. Section 5.1.1 of the MR includes biodiversity changes monitored during this verification period, including forest cover and HCVs, offsite forest cover, native tree diversity, and Eastern Chimpanzee habitat suitability. The verification team reviewed remote sensing data and substantiated that forest cover was effectively protected during this verification period when compared to the baseline scenario. Additional clarification and supplemental documentation from the Project Proponent substantiated that the protection of forest cover maintained native tree diversity. The verification team reviewed supplemental documentation regarding the Eastern Chimpanzee habitat suitability model, and with additional clarification from the Project Proponent, determined the habitat suitability for Eastern Chimpanzee was improved through implementation of project activities during this verification period. Through site visit interviews and observations, review of supplemental project documents, and additional clarification from the Project Proponent, the verification team substantiated the

accuracy and appropriateness of the monitoring data and concluded that the justifications of biodiversity changes as a result of project activities as provided in Section 5.1.1 of the MR are appropriate. Due to the evidence previously described in this section of the report, the verification team concluded that the project's assessment of changes in biodiversity resulting from project activities in the project zone during the monitoring period are accurate.

4.6.2 Mitigation Actions (B2.3)

Section 5.1.2 of the MR identifies the main threat to megafauna as habitat fragmentation and loss of landscape connectivity, consistent with the threats identified in the PD. Site visit interviews and observations substantiated the development and implementation of VLUPs that clearly delineate the forest conservation areas from other land uses within the project zone. This mitigated threat, however, is stated to be preexisting and does not result from the implementation of project activities. As such, no negative biodiversity impacts caused or anticipated to be caused by the implementation of the project are identified in the PD. The verification team substantiated through site visit interviews and observations that the project is not expected to result in negative biodiversity impacts that would require mitigation.

4.6.3 Net Positive Biodiversity Impacts (B2.2)

Section 5.1.3 of the MR states that net impacts on biodiversity resulting from the project activities are positive through the current verification period when compared to the baseline scenario. Site visit observations and interviews and review of remote sensing data substantiate that while some forest loss occurred during this verification period, the amount of forest lost is less than what would have occurred in the baseline scenario. The verification team substantiated through review of supplemental documentation and additional clarification from the Project Proponent that habitat suitability index for Eastern Chimpanzees increased through implementation of project activities during this verification period. As described in Section 4.6.2 of this report, the main threat to megafauna is identified as habitat fragmentation and loss of landscape connectivity, though this threat is not described as being caused by implementation of project activities. This threat has been reported to be mitigated through the design and implementation of VLUPs by the Village Governments during this verification period. Given the substantiated absence of any identified or anticipated negative biodiversity impacts, the verification team substantiated through site visit interviews and observations and review of supplemental documents that the actions taken during this verification period had positive impacts. The result is a net positive impact on biodiversity for this verification period.

4.6.4 High Conservation Values Protected (B2.4)

The PD identifies eight threatened mammal species and seven threatened bird species as biodiversity HCVs and states that HCVs are not anticipated to be negatively affected. The PD states the absence of negative impacts will be demonstrated through monitoring and reporting of biodiversity indicators identified in the Biodiversity Monitoring Plan (BMP). Section 5.1.4 of the MR states no biodiversity HCVs were negatively affected by the implementation of project activities during this verification period. Site visit interviews and observations substantiated the implementation of VLUPs to set aside forest reserves which contain the identified HCVs. The verification team substantiated that the project has been successful in protecting the forest reserves containing biodiversity HCVs during this verification period.

4.6.5 Invasive Species (B2.5)

The PD and MR attest that no species are grown or introduced as part of project conservation activities. Site visit observations and interviews substantiate the project is focused on forest conservation activities and that no plant species are grown for introduction or planned to be introduced in the project area. The

verification team is reasonably assured that no known invasive species have been introduced by the project or are expected to increase as a result of the project.

4.6.6 Impacts of Non-native Species (B2.6)

The PD and MR attest that no species will be introduced as part of project forest conservation activities. Site visit observations and interviews substantiate the implementation of the VLUPs which dictate the legally enforceable land uses within the project zone. Although the MR states the project did not use any non-native species, the VLUPs do not preclude the use of crop species that may not be native to the project zone. During the site visit, the verification team found no evidence that non-native species have been introduced in the area due to project activities. The verifiers have concluded that the non-native crop species used for agriculture previously used will not pose harm to the region's environment.

4.6.7 GMO Exclusion (B2.7)

The MR and PD attest the project uses no GMOs to generate GHG emissions reductions or removals and states that GMOs are illegal in Tanzania. Site visit observations and interviews substantiate GHG emissions reductions and removals are planned to be generated through conservation and protection of existing forests. The verification team is reasonably assured that these activities do not and will not use GMOs to generate GHG emission reductions or removals.

4.6.8 Inputs Justification (B2.8)

The MR and PD list several fertilizers that are used by farmers in village agricultural areas. Through additional clarification from the Project Proponent, the verification team determined that these fertilizers are not used as a part of any project activities. Site visit interviews and observations substantiate that the project does not use fertilizers, chemical pesticides, or herbicides in project activities. No actual or planned use of agricultural inputs were identified during the site visit.

4.6.9 Negative Offsite Biodiversity Impacts (B3.1) and Mitigation Actions (B3.2)

The MR identifies deforestation due to leakage outside the project area as a potential negative offsite biodiversity impact, consistent with the PD. Site visit interviews and observations did not identify any additional negative offsite biodiversity impacts and substantiate the project has adequately identified all potential offsite biodiversity impacts. Additional clarification from the Project Proponent and site visit observations and interviews substantiate the Project Proponent supported the development of VLUPs in neighboring regions/villages during this verification period. The verification team determined the Project Proponent's actions taken to mitigate the identified negative offsite biodiversity impact during this verification period were appropriate.

4.6.10 Net Offsite Biodiversity Benefits (B3.3)

Section 5.1.3 of the MR states the net impacts on biodiversity from project activity are positive when compared to the baseline case and are dependent on effective protection of forest cover. The verification team substantiated through review of remote sensing imagery and supplemental documentation that the implementation of project activities has reduced the amount of deforestation when compared to the baseline case. As documented in Section 4.6.9 of this report, negative biodiversity impacts were appropriately identified and mitigated during this verification. The positive benefits associated with reduced forest loss and the mitigation of identified negative impacts result in net-positive offsite biodiversity impacts.

4.6.11 Biodiversity Monitoring Plan (B4.1, B4.2, GL3.4)

Section 5.4.1 of the PD states all biodiversity indicators are identified and addressed in the separate Biodiversity Monitoring Plan (BMP). The verification team was provided the BMP as a supplemental support document. The verification team reviewed the summary results of the biodiversity monitoring presented in Section 5.3.1 of the MR and compared the dates, frequencies and sampling methods reported to those identified in the BMP. The verification team substantiated through review of project and supplemental documents, additional clarification and supplemental documents provided by the Project Proponent, and site visit interviews and observations that the biodiversity monitoring conducted during this verification period was in accordance with the BMP.

The Ntakata Mountains REDD Project has been validated to the Gold Level for exceptional biodiversity benefits. As such, the monitoring results must include additional identified indicators. The verification team reviewed the monitoring results, and with additional clarification and supplemental documentation provided by the Project Proponent, determined the population trends and threats to identified trigger species were carried out in accordance with the validated PD, meeting the criteria for Gold Level exceptional biodiversity benefits. Gold Level exceptional biodiversity benefits are assessed in greater detail in Sections 4.6.12 – 4.6.13 of this report. Through review of project and supplemental documentation, additional clarification, and evidence provided in site visit interviews and observations, the verification team determined the biodiversity monitoring plan was carried out in accordance with the validated PD.

4.6.12 Biodiversity Monitoring Plan Dissemination (B4.3)

The verification team reviewed the MR, BMP, and the PD to evaluate the actions taken to disseminate the results of biodiversity monitoring during this verification period against the actions described in the PD and BMP. The verification team confirmed that a project summary document in Swahili is available on the Verra project page. Additional clarification from the Project Proponent, review of supplemental support documents, along with site visit interviews and observations substantiate the results of the biodiversity monitoring for this verification were disseminated in accordance with the validated PD.

4.6.13 Optional Gold Level: Trigger Species Population Trends (GL3.3)

The verification team reviewed Section 5.4.1, and with additional clarification from the Project Proponent determined the trigger species population trends identified are in accordance with those identified in the PD. Site visit interviews and observations and additional clarification and supplemental documentation provided by the Project Proponent substantiate the protection of forest areas needed to maintain or enhance trigger species population. The verification team determined the measures taken are appropriate and should maintain or enhance the population status of each trigger species in the project zone and reduce threats to them.

4.6.14 Optional Gold Level: Effectiveness of Threat Reduction Actions (GL3.4)

The verification team reviewed Section 5.4.1, and with additional clarification from the Project Proponent determined the trigger species population trends identified are in accordance with those identified in the PD. Site visit interviews and observations and additional clarification and supplemental documentation provided by the Project Proponent substantiate the implementation of the VLUPs and increased forest patrols by VGS are appropriate measures taken to maintain or enhance the population status of each trigger species in the project zone and reduce threats to them.

4.7 Additional Project Implementation Information

This section is not applicable.

4.8 Additional Project Impact Information

The project has been able to demonstrate impacts to all CCB indicators as mentioned throughout this report, in addition to achieving CCB Gold Level status. No further steps to verify additional monitoring were warranted. The reported project impact information was sufficient and suitable for the verification of the project's CCB impacts.

5 VERIFICATION CONCLUSION

After a site inspection and review of all project information, procedures, calculations, and supporting documentation, Aster Global Environmental Solutions, Inc., confirms the Ntakata Mountains REDD Project is accurate, consistent, and complies with all VCS Version 4 criteria, CCB Third Edition criteria, the selected methodology (VM0007), and the validated Project Description (PD). Aster Global confirms The Ntakata Mountains REDD Project 2nd Monitoring Report (Version 4.0, dated 26 April 2022) has been implemented in accordance with VCS Version 4 and CCB Third Edition criteria.

Aster Global confirms all verification activities – including objectives, scope and criteria, *reasonable* level of assurance, and PD implementation adherence to VCS Version 4 (and all associated updates) and CCB Project Design Standards (Third Edition), as documented in this report – are complete. Aster Global concludes without any qualifications or limiting conditions the Ntakata Mountains REDD Project 2nd Monitoring Report (Version 4.0, dated 26 April 2022) meets the requirements of VCS Version 4 (and all associated updates), CCB Project Design Standards (Third Edition), and the validated PD. In addition, Aster Global asserts the project complies with the criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level distinction for Climate, Community, and Biodiversity.

The GHG assertion provided by Carbon Tanzania (CT, Ltd.) and verified by Aster Global has resulted in the baseline emissions or removals of 2,367,253 tCO₂e equivalents (CO₂e) by the project during the verification period/reporting period (VCS and CCB: 20 May 2019 – 18 May 2021 – 2 years). This value is gross of the 13% (255,963) buffer withholding, based on the non-permanence risk assessment tool, and associated leakage allocation. This results in 1,514,742 tCO₂e of credits eligible for issuance as VCUs. Monitoring period: From 20 May 2019 to 18 May 2021.

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

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
Year 2019	1,243,898	145,260	61,065	798,220
Year 2020	1,123,355	145,260	46,718	716,522
Total	2,367,253	290,520	107,783	1,514,742

APPENDIX A: DOCUMENTS LIST

Name	Date Received
CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx	8/14/2021
Ntakata Continued Participatory Rural Appraisal Log Sheet.pdf	8/14/2021
Ntakata_2021_Risk_Report_2021-06-30.docx	8/14/2021
Ntakata_Financial_Viability_JA070721.xlsx	8/14/2021
Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx	8/14/2021
Ntakata Community Monitoring Plan.docx	8/26/2021
Ntakata_BMP.docx	8/26/2021
Ntakata Results Chart.docx	8/26/2021
679 people.textClipping	8/26/2021
Bujombe Champion sheets.pdf	8/26/2021
Champions Payment sheet.pdf	8/26/2021
Kagunga Champion Sheets.pdf	8/26/2021
Kapanga Champion Sheets.pdf	8/26/2021
Katuma Champions Sheets.pdf	8/26/2021
Lugonesi Champion sheets.pdf	8/26/2021
Lwega Champion Sheets.pdf	8/26/2021
Mpembe Champions Sheets.pdf	8/26/2021
Mwese Champion sheets.pdf	8/26/2021
Mwese Secondary Champions.pdf	8/26/2021
298 people participating in .textClipping	8/26/2021
Attendance Bujombe.pdf	8/26/2021
Attendance Kagunga.pdf	8/26/2021
Attendance Kapanga.pdf	8/26/2021
Attendance Mpembe -Katuma.pdf	8/26/2021
Attendance Lug-Lwega-Mwese.pdf	8/26/2021
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Patrols and Incidents.textClipping	8/26/2021
54 Village Game Scouts Training .textClipping	8/26/2021
Training Schedule.docx	8/26/2021
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Kagunga Champion Sheets.pdf	4/22/2022
Kapanga Champion Sheets.pdf	4/22/2022
Katuma Champions Sheets.pdf	4/22/2022
Lugonesi Champion sheets.pdf	4/22/2022
Lwega Champion Sheets.pdf	4/22/2022
Mpembe Champions Sheets.pdf	4/22/2022
Mwese Champion sheets.pdf	4/22/2022
Mwese Secondary Champions.pdf	4/22/2022
298 people participating in .textClipping	4/22/2022
Attendance Bujombe.pdf	4/22/2022
Attendance Kagunga.pdf	4/22/2022
Attendance Kapanga.pdf	4/22/2022
Attendance Mpembe -Katuma.pdf	4/22/2022
Attendance Lug-Lwega-Mwese.pdf	4/22/2022
Frank at Training.jpg	4/22/2022
Good Governance Workshop plan.pdf	4/22/2022
Group Pic.jpg	4/22/2022
Invite Letter.pdf	4/22/2022
Stakeholder Meeting Attend (49).pdf	4/22/2022
Stakeholder meeting summary.textClipping	4/22/2022
Patrols and Incidents.textClipping	4/22/2022
54 Village Game Scouts Training .textClipping	4/22/2022
Training Schedule.docx	4/22/2022
Vgs Attendance Sheet.pdf	4/22/2022
VGS Group Pic.jpg	4/22/2022
VGS in Classroom.jpg	4/22/2022
VGS MArching .mp4	4/22/2022
VGS Receiving Certificate.jpg	4/22/2022
VGS training mobile.jpg	4/22/2022
Financial Details_Ntakata_2019-2021.xlsx	4/22/2022
Ntakata Revenue 19-21 copy 2.xlsx	4/22/2022
Cocoba Data copy.xlsx	4/22/2022
VILLAGE POPULATION PROJECTIONS FROM 2012-2017 new.pdf	4/22/2022
Provision of Family Planning data for Carbon Project in The GME.pdf	4/22/2022
LB_2021_FNF_72821.cpg	4/22/2022
LB_2021_FNF_72821.dbf	4/22/2022
LB_2021_FNF_72821.prj	4/22/2022
LB_2021_FNF_72821.sbn	4/22/2022
LB_2021_FNF_72821.sbx	4/22/2022
LB_2021_FNF_72821.shp	4/22/2022
LB_2021_FNF_72821.shp.xml	4/22/2022
LB_2021_FNF_72821.shx	4/22/2022

NtakataLB_2021_benchmark.cpg	4/22/2022
NtakataLB_2021_benchmark.dbf	4/22/2022
NtakataLB_2021_benchmark.prj	4/22/2022
NtakataLB_2021_benchmark.sbn	4/22/2022
NtakataLB_2021_benchmark.sbx	4/22/2022
NtakataLB_2021_benchmark.shp	4/22/2022
NtakataLB_2021_benchmark.shp.xml	4/22/2022
NtakataLB_2021_benchmark.shx	4/22/2022
NtakataLB_update42522_FNF.cpg	4/22/2022
NtakataLB_update42522_FNF.dbf	4/22/2022
NtakataLB_update42522_FNF.prj	4/22/2022
NtakataLB_update42522_FNF.sbn	4/22/2022
NtakataLB_update42522_FNF.sbx	4/22/2022
NtakataLB_update42522_FNF.shp	4/22/2022
NtakataLB_update42522_FNF.shp.xml	4/22/2022
NtakataLB_update42522_FNF.shx	4/22/2022
NT_TOA_RadTemp	4/22/2022
NT_TOA_RadTemp.aux.xml	4/22/2022
NT_TOA_RadTemp.hdr	4/22/2022
NT_TOA_RadTemp.ovr	4/22/2022
AA_points_Intersect.cpg	4/22/2022
AA_points_Intersect.csv	4/22/2022
AA_points_Intersect.csv.xml	4/22/2022
AA_points_Intersect.dbf	4/22/2022
AA_points_Intersect.prj	4/22/2022
AA_points_Intersect.sbn	4/22/2022
AA_points_Intersect.sbx	4/22/2022
AA_points_Intersect.shp	4/22/2022
AA_points_Intersect.shp.DESKTOP-9I7C557.18468.21716.sr.lock	4/22/2022
AA_points_Intersect.shp.DESKTOP-9I7C557.18468.rd.lock	4/22/2022
AA_points_Intersect.shp.DESKTOP-9I7C557.21376.21716.sr.lock	4/22/2022
AA_points_Intersect.shp.xml	4/22/2022
AA_points_Intersect.shx	4/22/2022
AA_points_Intersect.xlsx	4/22/2022
AA_points_NT.xlsx	4/22/2022
AA_points_NT_update42522.xlsx	4/22/2022
AA_table.docx	4/22/2022
AA_update.cpg	4/22/2022
AA_update.dbf	4/22/2022
AA_update.prj	4/22/2022
AA_update.sbn	4/22/2022
AA_update.sbx	4/22/2022
AA_update.shp	4/22/2022

AA_update.shp.xml	4/22/2022
AA_update.shx	4/22/2022
Classification_NT_region_update.cpg	4/22/2022
Classification_NT_region_update.dbf	4/22/2022
Classification_NT_region_update.prj	4/22/2022
Classification_NT_region_update.sbn	4/22/2022
Classification_NT_region_update.sbx	4/22/2022
Classification_NT_region_update.shp	4/22/2022
Classification_NT_region_update.shp.xml	4/22/2022
Classification_NT_region_update.shx	4/22/2022
Classifications_NT_region_4classes.CPG	4/22/2022
Classifications_NT_region_4classes.dbf	4/22/2022
Classifications_NT_region_4classes.prj	4/22/2022
Classifications_NT_region_4classes.sbn	4/22/2022
Classifications_NT_region_4classes.sbx	4/22/2022
Classifications_NT_region_4classes.shp	4/22/2022
Classifications_NT_region_4classes.shp.xml	4/22/2022
Classifications_NT_region_4classes.shx	4/22/2022
NT_May2021_5m.tif	4/22/2022
NT_May2021_5m.tif.aux.xml	4/22/2022
NT_May2021_5m.tif.enp	4/22/2022
NT_May2021_5m.tif.ovr	4/22/2022
schema.ini	4/22/2022
PA_2021_allclasses_72821.CPG	4/22/2022
PA_2021_allclasses_72821.dbf	4/22/2022
PA_2021_allclasses_72821.prj	4/22/2022
PA_2021_allclasses_72821.sbn	4/22/2022
PA_2021_allclasses_72821.sbx	4/22/2022
PA_2021_allclasses_72821.shp	4/22/2022
PA_2021_allclasses_72821.shp.xml	4/22/2022
PA_2021_allclasses_72821.shx	4/22/2022
PA_2021_F_72821.cpg	4/22/2022
PA_2021_F_72821.dbf	4/22/2022
PA_2021_F_72821.prj	4/22/2022
PA_2021_F_72821.sbn	4/22/2022
PA_2021_F_72821.sbx	4/22/2022
PA_2021_F_72821.shp	4/22/2022
PA_2021_F_72821.shp.xml	4/22/2022
PA_2021_F_72821.shx	4/22/2022
PA_2021_FNF_72821.CPG	4/22/2022
PA_2021_FNF_72821.dbf	4/22/2022
PA_2021_FNF_72821.prj	4/22/2022
PA_2021_FNF_72821.sbn	4/22/2022

PA_2021_FNF_72821.sbx	4/22/2022
PA_2021_FNF_72821.shp	4/22/2022
PA_2021_FNF_72821.shp.xml	4/22/2022
PA_2021_FNF_72821.shx	4/22/2022
PA_2021_NF_72821.cpg	4/22/2022
PA_2021_NF_72821.dbf	4/22/2022
PA_2021_NF_72821.prj	4/22/2022
PA_2021_NF_72821.sbn	4/22/2022
PA_2021_NF_72821.sbx	4/22/2022
PA_2021_NF_72821.shp	4/22/2022
PA_2021_NF_72821.shp.xml	4/22/2022
PA_2021_NF_72821.shx	4/22/2022
Ntakata2019-VCS-Monitoring-Calcs_rev26Aug2020.xlsx	4/22/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx	4/22/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022-01-25.docx	4/22/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022-03-18.docx	4/22/2022
Ntakata_2021_Risk_Report_2021-06-30.docx	4/22/2022
Ntakata_2021_Risk_Report_2022-01-24.docx	4/22/2022
Ntakata_2021_Risk_Report_2022-01-24.xls	4/22/2022
Ntakata_2021_Risk_Report_2022-03-18.docx	4/22/2022
Ntakata_Financial_Viability_JA070721.xlsx	4/22/2022
Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx	4/22/2022
Ntakata2019-2021-VCS-Monitoring-Calcs_2022-01-24.xlsx	4/22/2022
Ntakata2019-2021-VCS-Monitoring-Calcs_2022-03-18.xlsx	4/22/2022
21025.00 Ntakata VCS Round 4_TCRresponse_2022-05-06.xlsx	5/6/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022-05-06.docx	5/6/2022
LB_changes_42522.docx	5/6/2022
Ntakata_LB_Updated_Area_42522.xlsx	5/6/2022
AA_points_NT_update42522.xlsx	5/6/2022
AA_update.cpg	5/6/2022
AA_update.dbf	5/6/2022
AA_update.prj	5/6/2022
AA_update.sbn	5/6/2022
AA_update.sbx	5/6/2022
AA_update.shp	5/6/2022
AA_update.shp.xml	5/6/2022
AA_update.shx	5/6/2022
Classification_NT_region_update.cpg	5/6/2022
Classification_NT_region_update.dbf	5/6/2022
Classification_NT_region_update.prj	5/6/2022
Classification_NT_region_update.sbn	5/6/2022
Classification_NT_region_update.sbx	5/6/2022
Classification_NT_region_update.shp	5/6/2022

Classification_NT_region_update.shp.xml	5/6/2022
Classification_NT_region_update.shx	5/6/2022
schema.ini	5/6/2022
NtakataLB_2021_benchmark.cpg	5/6/2022
NtakataLB_2021_benchmark.dbf	5/6/2022
NtakataLB_2021_benchmark.prj	5/6/2022
NtakataLB_2021_benchmark.sbn	5/6/2022
NtakataLB_2021_benchmark.sbx	5/6/2022
NtakataLB_2021_benchmark.shp	5/6/2022
NtakataLB_2021_benchmark.shp.xml	5/6/2022
NtakataLB_2021_benchmark.shx	5/6/2022
NtakataLB_update42522_FNF.cpg	5/6/2022
NtakataLB_update42522_FNF.dbf	5/6/2022
NtakataLB_update42522_FNF.prj	5/6/2022
NtakataLB_update42522_FNF.sbn	5/6/2022
NtakataLB_update42522_FNF.sbx	5/6/2022
NtakataLB_update42522_FNF.shp	5/6/2022
NtakataLB_update42522_FNF.shp.xml	5/6/2022
NtakataLB_update42522_FNF.shx	5/6/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022-05-20_Clean.docx	5/20/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022-05-20_Clean.pdf	5/20/2022
CCB_VCS_2021_Monitoring_Report_Ntakata_2022.pdf	6/7/2022

APPENDIX B: VCS NCRS/CLS/OFI

Findings Number	1
VCS Standard Requirements 22 April 2021, v4.1 (Section)	3.6 Ownership
VCS Standard Requirements Document 22 April 2021, v4.1 (Description)	6) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests project ownership in the Project Proponent.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 2.5.9 of PD
Aster Global Round 1 Findings	The audit team reviewed section 2.59 of the validated PD which states "Carbon Tanzania is the owner of the project based on the contracts and MOUs mentioned in section 2.5.8. in agreement with Section 3.11.1 Version 3. 6) An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests project ownership in the project proponent. In Tanzania, there is currently no specific legislation governing carbon rights." The audit team found no evidence of the agreement referenced in the PDD.
Round NCR/CL/OFI	1 CL: Please provide verifiable evidence to demonstrate that this criterion is satisfied.
Round 1 Response from Project Proponent (DD Month YYYY)	The Ntakata contract and MOUs have been added to the Dropbox folder. See "Ntakata_Contract_1.pdf"
Aster Global Findings - Round 2	The audit team reviewed the contract provided. However, the audit team was unable to determine what the term (i.e., how long this contract is in place for) is for this contract.
Round 2 NCR/CL/OFI	CL: Please clarify where the term length is stated within this document.
Round 2 Responses from Project Proponent	The contract term (Term of Contract.png) details have been added to the Dropbox Folder for the auditor's review.
Aster Global Findings - Round 3	The audit team reviewed the referenced document and confirmed the length of the contract is 30 years. Item closed.

Findings Number	2
VCS Standard Requirements 22 April 2021, v4.1 (Section)	3.14 Quantification of GHG Emission Reductions and Removals

VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.14.4 All GHG emission reductions shall be converted to CO2e using 100-year global warming potential (GWP) values. For GHG emission reductions occurring on or after 1 January 2021, all ex-ante estimates and ex-post calculations shall be converted to CO2e using GWP values from the IPCC Fifth Assessment Report (AR5). 9 See Table 2 for the GWP values for methane and nitrous oxide established in AR5.10 For GHG emission reductions occurring on or before 31 December 2020, all ex-ante estimates and ex-post calculations may be converted to CO2e using either the GWP values from the IPCC Fourth Assessment Report (AR4) or those from AR5. Projects that complete validation on or before 31 July 2021 may use GWP values from AR4 for ex-ante emission reduction estimates, though such projects shall use GWP values from AR5 for ex-post calculations. Table 2: Selected GWP values from the IPCC Fifth Assessment Report, Table 8.A.1 <table><tr><td>Eligible GHG</td><td>Chemical Formula</td><td>100-year GWP</td><td>value</td></tr><tr><td>Carbon dioxide</td><td></td><td>CO2</td><td>1</td></tr><tr><td>Methane</td><td>CH4</td><td></td><td>28</td></tr><tr><td>Nitrous oxide</td><td>N2O</td><td>265</td><td></td></tr></table>	Eligible GHG	Chemical Formula	100-year GWP	value	Carbon dioxide		CO2	1	Methane	CH4		28	Nitrous oxide	N2O	265	
Eligible GHG	Chemical Formula	100-year GWP	value														
Carbon dioxide		CO2	1														
Methane	CH4		28														
Nitrous oxide	N2O	265															
Requirement Met (Y, N or Pending)	Y																
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR																
Aster Global Round 1 Findings	The project uses AR4 values for ex-ante emission reductions and ex-post emission reduction calculations. It is unclear to the audit team how it is appropriate to use AR4 values for ex-post emission reduction calculations as criteria 3.14.4 states " Projects that complete validation on or before 31 July 2021 may use GWP values from AR4 for ex-ante emission reduction estimates, though such projects shall use GWP values from AR5 for ex-post calculations."																
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding and if necessary, update the emission reduction calculations.																
Round 1 Response from Project Proponent (DD Month YYYY)	Unless otherwise directed by the VCS Program, VCS Standard v4.1 requires that CH4 and N2O must be converted to CO2e using the 100-year global warming potential derived from the IPCC Fifth Assessment Report. A global warming potential of 28 and 265 are applied for CH4 and N2O respectively.																
Aster Global Findings - Round 2	The audit team reviewed the updated monitoring report and calculations workbook and confirmed that the correct GWP potential values were reported and calculations involving them were correctly updated. Item closed.																

Findings Number	3
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VCS Requirements 22 April 2021, v4.1 (Section)	Standard	AFOLU Projects
VCS Requirements Document 22 April 2021, v4.1 (Description)	Standard 4.1	3.14.12 Where the applied methodology(s) does not set out a method to determine whether leakage is <i>de minimis</i> , projects may use the process set out in the VCS Program document <i>VCS Methodology Requirements</i> or the <i>CDM A/R methodological Tool for testing significance of GHG Emissions in A/R CDM Project Activities</i> .
Requirement Met (Y, N or Pending)		Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)		
Aster Global Round 1 Findings		The audit team understands that commercial logging is not common in the project area region; however, it is unclear to the audit team how this requirement is satisfied.
Round 1 NCR/CL/OFI	1	CL: Please clarify how market leakage is determined to be de-minimis and provide verifiable evidence to demonstrate that this criterion is satisfied.
Round 1 Response from Project Proponent (DD Month YYYY)		Leakage due to market effects is not included. Per VM7 module LK-ME, leakage from market effects is included where “the process of deforestation involves timber harvesting for commercial markets (Commercial markets here defined as sale of products to end users and public and private companies with sales conducted distant (>50km) from the project area).” Agents of deforestation in the project area are principally agriculturalists, not loggers, with limited capacity to haul and commercialize any timber recovered in the process of land clearing activities. Instead, timber and fuelwood are used predominately locally for subsistence use. Therefore, timber harvesting for commercial markets, as defined in VM7 module LK-ME, is not expected to occur in the baseline as part of the forest conversion process. Further, fuelwood in the project region is predominately collected for subsistence purposes, and not commercially harvested, thus reductions in fuelwood produce no market effects (beyond activity displacement, treated above).
Aster Global Findings - Round 2		During the site visit the audit saw no evidence that commercial timber harvesting is taking place. This audit team confirms that leakage due to market effects does not need to be included. Item closed.

Findings Number	4
VCS Requirements 22 April 2021, v4.1 (Section)	Standard 3.17 Methodology Deviations

VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.17.2 Methodology deviations shall not negatively impact the conservativeness of the quantification of GHG emission reductions or removals, except where they result in increased accuracy of such quantification. Deviations relating to any other part of the methodology shall not be permitted.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 2.2.2 of MR
Aster Global Round 1 Findings	The audit team reviewed Section 3.1.6 of the PDD and Section 2.2.2 of the MR. There are multiple Methodology deviations listed in the PDD that are not listed in the MR. It is unclear to the audit team if these methodology deviations are still occurring during the current monitoring period.
Round NCR/CL/OFI 1	CL: Please clarify as to if the methodology deviations listed in the PDD are still being used.
Round 1 Response from Project Proponent (DD Month YYYY)	These deviations are still being used and have been added to the monitoring report to maintain consistency with the PDD.
Aster Global Findings - Round 2	The audit team reviewed all the methodology deviations in the MR and confirmed that they are appropriate in line with the VCS rules.

Findings Number	5
VCS Standard Requirements 22 April 2021, v4.1 (Section)	3.17 Methodology Deviations
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.17.3 Methodology deviations shall be permitted at validation or verification and their consequences shall be reported in the validation or verification report, as applicable, and all subsequent verification reports. Methodology deviations are not considered to be precedent setting.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Section 2.2.2 of MR
Aster Global Round 1 Findings	The audit team reviewed Section 3.1.6 of the PDD and Section 2.2.2 of the MR. There are multiple Methodology deviations listed in the PDD that are not listed in the MR. It is unclear to the audit team if these methodology deviations are still occurring during the current monitoring period. As stated in criterion 3.17.3 "Methodology deviations shall be permitted at validation or verification and their consequences shall be reported in the validation or verification report, as applicable, and all subsequent verification reports"

Round NCR/CL/OFI	1	CL: Please update the MR to conform to criterion 3.17.3.
Round 1 Response from Project Proponent (DD Month YYYY)		The deviations listed in Section 3.1.6 of the PDD have been added to Section 2.2.2 of the MR for consistency. The calculations for this reporting period account for these deviations.
Aster Global Findings - Round 2		Section 2.2.2 of CCB_VCS_2021_Monitoring_Report_Ntakata_2022-01-25 has been updated to include three additional deviations that were included in the PDD. However, several deviations listed in the PDD are still not included in Section 2.2.2 of the Monitoring Report. Please update Section 2.2.2 of the Monitoring Report to include all deviations still in effect that affect the quantification of VCUs for this monitoring period. The audit team understands that although a few of the deviations in the PDD only affect the baseline, which is fixed for this monitoring period, these deviations are still in effect for the overall quantification of VCUs.
Round 2 NCR/CL/OFI		CL: Please update Section 2.2.2 of the Monitoring Report to include all deviations still in effect for this monitoring period.
Round 2 Responses from Project Proponent		All relevant deviations from the PDD related to quantification of VCUs have been added to the MR.
Aster Global Findings - Round 3		The audit team reviewed the updated MR and confirmed all relevant deviations have been appropriately added and justified. Item closed.

Findings Number	6
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 1 Project Management (PM)
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	f) Mitigation: Adaptive management plan in place.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30
Aster Global Round 1 Findings	The Ntakata_2021_Risk_Report_2021-06-30 document "The VLUPs provide a framework for continued management of forest land within each village's jurisdiction and provide them agency to take adaptive measures to conserve forested areas." However, the audit team was unable to find copies of the VLUPs.
Round NCR/CL/OFI	1
Round 1 Response from Project Proponent (DD Month YYYY)	Copies of the VLUPs have been added to the Dropbox folder in the Carbon Tenure: Land Legal Agreements folder

Aster Global Findings - Round 2	The audit team reviewed the Carbon Tenure: Land Legal Agreements folder provided by the Project Proponent and confirmed all 8 VLUP agreements were provided. Item closed.
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Findings Number	7
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 2 Financial Viability (FV)
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	d) Project cash flow breakeven point is less than 4 years from the current risk assessment
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30, Ntakata_Financial_Viability_JA070721
Aster Global Round 1 Findings	The audit team noted that in the Ntakata_2021_Risk_Report_2021-06-30 the statement in the financial viability section is accurate but in the incorrect risk factor category. In the Ntakata_Financial_Viability_JA070721 workbook, the audit team noted that there appear to be two different cash flow analyses with different cost and revenue assumptions and ultimately a different cash flow outcome. It is unclear to the audit team which one of these cash flow analyses is the correct one. The audit team noted in the Ntakata_Financial_Viability_JA070721 workbook that there is \$600,000 for projected GHG Credit Sales in 2020. However, the audit team is unclear what the basis for this number is. The audit team is requesting verifiable evidence to support this value such as a purchase agreement, contract, etc.
Round NCR/CL/OFI	1 CL: Please update the risk report in line with finding. CL: Please clarify which cash flow analysis is used to support the financial viability risk rating. CL: Please provide verifiable evidence to support the \$600,000 Project GHG Credit Sales figure utilized in the Ntakata_Financial_Viability_JA070721 workbook.

Round 1 Response from Project Proponent (DD Month YYYY)	1. The risk report has been updated with financial viability in the correct categories. 2. The financial viability workbook has been updated so that the Summary tab reflects the actual cost and revenue data from the Detailed Cash Flow tab. 3. The purchase agreements have been provided in the Dropbox folder (see "Respira_CTUK_VERPA_Ntakata2021-02-15.pdf" and "Respira_CT_Ntakata_TS_23122020 Signed.pdf"). NOTE: These purchase agreements are confidential.
Aster Global Findings - Round 2	1. The audit team confirmed the risk report has been updated with financial viability in the correct categories. Item closed. 2. The financial viability workbook has been updated. Item closed. 3. The audit team reviewed the purchase agreements. Item closed

Findings Number	8
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	d) NPV from the most profitable alternative land use activity is expected to be between 20% more than and up to 20% less than from project activities; or where baseline activities are subsistence-driven, net positive community impacts are demonstrated
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30
Aster Global Round 1 Findings	The audit team noted that the risk score as stated in the Ntakata_2021_Risk_Report_2021-06-30 is incorrectly reported in Opportunity Cost table under "a)". The audit team confirms that the baseline scenario is subsistence driven and that as the project is being verified under the CCB program the audit team is reasonably assured this criterion is satisfied.
Round NCR/CL/OFI 1	CL: Please update the risk report so that the risk is scored is reported in the correct place in the Opportunity Cost Table.
Round 1 Response from Project Proponent (DD Month YYYY)	The risk score for Opportunity Cost has been updated with the risk factor selected under row "d".
Aster Global Findings - Round 2	The audit team confirmed Opportunity Cost has been updated with the risk factor selected under row "d". Item closed.

Findings Number	9
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	g) Mitigation: Project proponent is a non-profit organization
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	
Aster Global Round 1 Findings	The NPRT states "The Project Proponent, Carbon Tanzania, is a non-profit organization." However, the audit team found no evidence to support this statement. The VCS NPRT states "A non-profit is an organization that does not distribute any surplus funds to owners or shareholders, but instead uses them to help pursue its goals, such as poverty alleviation, community development or biodiversity conservation. Governments and government agencies, although they may meet this definition, are not considered non-profit organizations for the purpose of this tool."
Round 1 NCR/CL/OFI	1 CL: Please provide verifiable evidence to support the statement in the risk tool in line with the requirement 2.2.3 in the VCS Non-Permanence Risk Tool.
Round 1 Response from Project Proponent (DD Month YYYY)	The articles of incorporation ("Article of Incorpor CT.pdf") are provided in the Dropbox folder which designates Carbon Tanzania as a "not for profit" entity.
Aster Global Findings - Round 2	The audit team reviewed the Articles of Incorporation for Carbon Tanzania which confirmed that CT is incorporated "to conduct not for profit environmental activities within the United Republic of Tanzania and elsewhere in the world." However, the NPRT explicitly states "A non-profit is an organization that does not distribute any surplus funds to owners or shareholders, but instead uses them to help pursue its goals, such as poverty alleviation, community development or biodiversity conservation." The audit team was not provided evidence that satisfies this requirement of the NPRT.
Round 2 NCR/CL/OFI	CL: Please provide evidence to support the status of Carbon Tanzania as a non-profit that satisfies the requirements of the NPRT.
Round 2 Responses from Project Proponent	CT is no longer requesting the 2% deduction for non-profit status and this category is now considered N/A. The risk report and the MR have been updated to reflect this change. The risk score is now 13%.

Aster Global Findings - Round 3	The audit team confirmed that the MR and NPRT have been appropriately updated and that the new risk score has been appropriately applied in calculation of GHG credits eligible for issuance as VCUs. The audit team also reviewed the updated MR and confirmed that all revised calculations have been appropriately updated and reported. Item closed.
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Findings Number	10
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 3 Opportunity Cost
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	h) Mitigation: Project is protected by legally binding commitment (see Section 2.2.4) to continue management practices that protect the credited carbon stocks over the length of the project crediting period
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30, PD
Aster Global Round 1 Findings	Ntakata_2021_Risk_Report_2021-06-30 states that "The project is protected by a legally binding commitment to continue management practices that protect the credited carbon stocks over the length of the project crediting periods. The project is protected by a 30-year contract between Carbon Tanzania and the villages of Lugonesi, Mwese, Bujombe, Lwega, Kapanga, Mpembe, Katuma and Kagunga to continue management practices that protect the credited carbon stocks over the length of the project crediting period. See supporting document "Ntakata_Contract.pdf". The MOU signed between Carbon Tanzania, The Nature Conservancy, and Pathfinder are signed on May 19th, 2017, indicating the start date of the project"
	However the audit team was unable to find a copy of the Ntakata_Contract document.
Round 1 NCR/CL/OFI	CL: Please provide a copy of the Ntkata_Contract document.
Round 1 Response from Project Proponent (DD Month YYYY)	The "Ntakata_Contract-1.pdf" has been added to the Dropbox folder.
Aster Global Findings - Round 2	Pending closing of finding in Row 2.
Round 2 NCR/CL/OFI	
Round 2 Responses from Project Proponent	
Aster Global Findings - Round 3	The finding in Row 2 has been closed. Item closed.

Findings Number	11
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 7 Community Engagement
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	a) Less than 50 percent of households living within the project area who are reliant on the project area, have been consulted
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30
Aster Global Round 1 Findings	The NPRT states "Representatives from all 8 villages located within the project area who represent more than 50% of the households have been consulted as detailed in the Mpanda District Council Reconnaissance Report. Because more than 50% of households have been consulted about the project activity the risk rating can be considered 0. Meetings between village representatives and Carbon Tanzania take place every 6 months to inform households of current project developments." The audit team would like to review the Mpanda District Council Reconnaissance Report.
Round 1 NCR/CL/OFI	CL: Please provide the Mpanda District Council Reconnaissance Report.
Round 1 Response from Project Proponent (DD Month YYYY)	Mpanda District Council Reconnaissance Report provided with this response as "RECONNAISSANCE.pdf"
Aster Global Findings - Round 2	The audit team reviewed RECONNAISSANCE.pdf. Item closed.

Findings Number	12
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 8 Political Risk
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	b) Governance score of -0.79 to less than -0.32

Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30
Aster Global Round 1 Findings	The audit team reviewed the Ntakata_2021_Risk_Report_2021-06-30 document and noted that most recent five years of data was not used, it appears the 2020 data has been released.
Round NCR/CL/OFI	1 CL: Please update the Worldwide Governance Indicator using the most recent five years of available data.
Round 1 Response from Project Proponent (DD Month YYYY)	The WGI score has been updated in the risk report with the 2020 value. It is now -0.53.
Aster Global Findings - Round 2	The audit team confirms the updated WGI score is correct. Item closed.

Findings Number	13
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Section)	Table 10 Natural Risks
VCS AFOLU Non-Permanence Risk Tool, Version 4.0 19 September 2019 (Description)	a) Fire (F)
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_2021_Risk_Report_2021-06-30
Aster Global Round 1 Findings	The audit team finds the LS and mitigation measure reasonable based on the evidence given. During the site visit, the auditors saw evidence of frequent low-intensity burns, supporting the narrative of the LS and associated mitigation. During the site visit the audit team saw numerous fires throughout the project area and saw no village members responding. The current description for use of the mitigation credit does not align with what the audit team saw on the site visit.
Round NCR/CL/OFI	1 CL: Please update the mitigation credit score in the risk report or provide verifiable evidence to substantiate the taking of the mitigation credit.

Round 1 Response from Project Proponent (DD Month YYYY)	The fires observed during the site visit were predominantly grassland burns that had no significant impact on the carbon pools in the project. VGS patrol the project area to monitor, in part, for fires that might burn out of control and impact carbon stocks. In the case that a severe fire is observed, the governance structure is in place to respond to the fire and prevent further damage. No fires impacted carbon stocks during the reporting period as evidenced by VGS reports and through observation of aerial imagery. The fire prevention and mitigation measures are written into the VLUPs and Participatory Forest Management documents, the specifics of which are provided to the auditor.
Aster Global Findings - Round 2	The audit team reviewed the updated NPRT and associated VLUPs. It is clear based on-site visit observations that the VGS are active in the villages and forestland, and they have the ability to report out of control fires as needed.

Findings Number	14
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Section)	Post-processing and accuracy assessment
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Description)	As described in module BL-UP (Part 2, section 2.2.3) multi-date images must be used to reduce cloud cover to no more than 10% of any image.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx
Aster Global Round 1 Findings	The MR states multiple images were used to reduce cloud and shadow coverage. However, there is no explanation whether the requirement of cloud cover <=10% was achieved.
Round NCR/CL/OFI	1 CL: Please address in line with the findings.

Round 1 Response from Project Proponent (DD Month YYYY)	Three Landsat tiles were combined to complete coverage of the Ntakata Project Area and Leakage Buffer. LC08_L1TP_171064_20210705_20210713_01 (July 13, 2021) covering the northeastern quadrant had 0.00% cloud cover, LC08_L1TP_171065_20210705_20210713_01 (July 5, 2021) covering the southeastern quadrant had 0.00% cloud cover, and LC08_L1TP_172064_20210712_20210712_01 (July 12, 2021), containing approximately the western half of the Project Area, had 3.13% cloud cover. All cloud cover values were obtained from metadata accompanying the Landsat images.
Aster Global Findings - Round 2	The audit team noted that a description on the requirements of minimum cloud cover ($\leq 10\%$) is added in "Appendix 2: Accuracy Assessment of 2021 Landsat imagery classification" of the revised MR. The audit team is assured that this addresses Round 1 findings.

Findings Number	15
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Section)	Post-processing and accuracy assessment
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Description)	The overall classification accuracy of the outcome of the previous steps must be 90% or more.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx, AA_points_NT.xlsx
Aster Global Round 1 Findings	The overall accuracy reported in MR (Appendix 2) (94.50%) does not match with the value obtained from "AA_points_NT.xlsx" which is 92.23%.
Round NCR/CL/OFI	1 CLI: Please provide clarification on why the reported value is different from the excel file provided.
Round 1 Response from Project Proponent (DD Month YYYY)	The AA table in the MR was updated to match the accuracy assessment provided in the Excel table. The AA in the original MR was out of date.

Aster Global Findings - Round 2	The accuracy assessment table in "Appendix 2: Accuracy Assessment of 2021 Landsat imagery classification" of the MR has been updated with accuracy assessment workbook "AA_points_NT.xlsx" provided to the audit team. The audit team is assured that this addresses Round 1 findings.
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Findings Number	16
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Section)	Monitoring areas undergoing carbon stock enhancement
VCS MODULE VMD0015 REDD METHODOLOGICAL MODULE: METHODS FOR MONITORING OF GHG EMISSIONS AND REMOVALS (M-MON) Version 2.1 20 November 2012 Sectoral Scope 14 (Description)	Where significant, non-CO2 gas greenhouse emissions occurring within the project boundary must be evaluated. For example, where deforestation or degradation occur within the project boundaries or in the leakage belt and fire is used as a means of forest clearance the non-CO2 emissions may be significant.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx, Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx
Aster Global Round 1 Findings	During the site visit the audit team noted that there were significant fires (generally grass driven fires) throughout the project area and noted multiple cases in which the standing dead wood was actively burning.
Round NCR/CL/OFI	1 CL: Considering the substantial fire activity and burning of the standing dead, please clarify how this criterion is satisfied.

Round 1 Response from Project Proponent (DD Month YYYY)	The carbon stock of dead-wood at Ntakata is 1.1 tCO₂e/ha. The total carbon stocks in the pools of aboveground, belowground, and dead-wood biomass is 163.8 tCO₂e/ha. Dead-wood represents 0.6% of total carbon stocks at Ntakata. Therefore, any dead-wood burning that occurs in the with-project scenario results in emissions of non-CO₂ gases that are de minimis. Furthermore, evidence in the literature indicates that fire (unrelated to forest clearance) is a regular part of the present-day Miombo woodland ecosystem, and it has historically been a part of the ecosystem (Tarimo et al 2015, Archibald et al 2013, Butz et al 2009). Therefore, the low dead-wood stocks (1.1 tCO₂e/ha) reflect a steady-state of dead-wood inputs and outputs.
Aster Global Findings - Round 2	Thank you for the clarification. The audit team agrees with the Project Proponent's assertion that deadwood in the project area is likely in a steady-state as the level of fire intensity we observed during the site visit is common to this forest type and landscape. This finding closed.

Findings Number	17
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding unplanned deforestation (LK-ASU) (Section)	5.2 Step 2: Estimation of the Proportions of Area Deforested by Immigrant and Local Deforestation Agents in the Baseline
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASU) (Description)	Randomly sample communities living within 2km of the boundaries of the leakage belt and project area (defined in module BL-UP – Part 1). At least 10% of communities shall be sampled. If 10% of communities is less than 10 communities then the sample size shall be set as 10 (or 100% of the communities). If 10% is more than 30 communities then the sample size shall be set as 30.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	CCB_VCS_2021_Monitoring_Report_Ntakata_2021-07-30.docx
Aster Global Round 1 Findings	It is unclear to the audit team how communities were randomly sampled.
Round NCR/CL/OFI	1 CL: Please refer to the findings and provide clarification.

Round 1 Response from Project Proponent (DD Month YYYY)	The approach to estimate PROPIMM deviates from the methodology. The deviation is now noted in the MIR and is consistent with the approach validated in the PD. District scale government population growth data was used preferentially over more limited scale PRA approach. PROPIMM, the proportion of area deforested by population that has migrated into the area in the last 5 years, applying the most current estimate of population growth rate for Mpanda district of 3.2% per year . Assuming the rate was stable over the five years preceding the project start, and conservatively assuming that the entire population increase is attributed to immigration, PROPIMM is estimated to be 14.6%.
Aster Global Findings - Round 2	As stated in the findings responses, estimation of PROPIMM is a deviation from the methodology. A detailed description is added in the updated MR in section 2.2.2. However, in the review of the updated MR there appears to be conflicting language in Section 3.1.3 above Table 3.5 which states "To determine what proportion of the agents of deforestation have been resident in and around the leakage belt and project area for ≥ 5 years (PROPRES) and the proportion of area deforested by population that has migrated into the area in the last 5 years (PROPIMM), community surveys implemented in the villages within and surrounding the project area indicate immigration of 14.6%." This language appears to conflict with the approach applied during the monitoring period.
Round 2 NCR/CL/OFI	CL: Please clarify in line with the finding and update the MR if necessary.
Round 2 Responses from Project Proponent	A new approach to estimating PROPIMM has been added to the MR as described in response to finding 19.
Aster Global Findings - Round 3	The audit team reviewed the methodology deviation which relates to PropIMM. The VVB assessed the methodology deviation and confirms that it is appropriate. Additionally, the VVB will issue a FAR request to ensure the project updates the PropIMM parameter in line with the monitoring requirements of the methodology for the next verification.

Findings Number	18
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding unplanned deforestation (LK-ASU) (Section)	5.4.1

VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASU) (Description)	AVFOR = TOTFOR - PROTFOR - MANFOR
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx
Aster Global Round 1 Findings	AVFOR = 28,302,703. The audit team reviewed "Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx" confirmed that this equation is applied correctly. However, the audit team was unable to validate MANFOR value which is said to be taken from "GFRA report" in "Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx".
Round 1 NCR/CL/OFI	CL: Please clarify how MANFOR was derived. In addition, please provide "GFRA report" to the audit team for review.
Round 1 Response from Project Proponent (DD Month YYYY)	The GFRA has been provided to the verifier in the Dropbox folder. In the process of examining the GFRA values a newer version of the GFRA was found. We are now using the GFRA 2020, and the values were updated to reflect the most recent data. TOTFOR and MANFOR values come from the tables on page 31 of the GFRA from "total forest area" and "production", respectively.
Aster Global Findings - Round 2	GFRA report is provided to the audit team. Value for MANFOR has been updated with the GFRA 2020 report. However, the audit team noted a small discrepancy between the TOTFOR value applied in the monitoring workbook and TOTFOR value in the referenced GFRA 2020 report.
Round 2 NCR/CL/OFI	CL: Please ensure that the correct value from the GFRA 2020 report is used and update all downstream calculations.
Round 2 Responses from Project Proponent	The TOTFOR value has been updated from 45,745,010 to 45,745,000. All resulting calculations have been updated.
Aster Global Findings - Round 3	The audit team confirmed the TOTFOR value has been appropriately updated in the MR and calculation workbook and that all resulting calculations have been appropriately updated and reported. Item closed.

Findings Number	19
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VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding unplanned deforestation (LK-ASU) (Section)	6.2 Data and Parameters Monitored
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASU) (Description)	PROPIMM
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx
Aster Global Round 1 Findings	The audit team reviewed the MR, and it does not appear that PROPimm has been monitored in line with the requirements of VMD0010 which state "Must be monitored at least every 5 years or if verification occurs on a frequency of less than every 5 years examination must occur prior to any verification event."
Round NCR/CL/OFI 1	CL: Please clarify in line with the finding.
Round 1 Response from Project Proponent (DD Month YYYY)	It has not been 5 years since the PROPimm parameter has last been updated.

Aster Global Findings - Round 2	1.The audit team reviewed the updated quantification workbook, Ntakata2019-2021-VCS-Monitoring-Calcs_2022-01-24 and is unclear what the basis for the formula applied in cell W4 of the DefLB Actual tab is. The audit team notes that it is similar to a percent change formula but not a percent change formula. 2. Additionally, the audit team notes that the requirement for monitoring of PROPimm in the LK-ASU model states "Must be monitored at least every 5 years or if verification occurs on a frequency of less than every 5 years examination must occur prior to any verification event." The audit team reviewed the 2012 Population and Housing Census report and notes that the annual growth rate for the Rukwa district is 3.2% for the period 2002-2012. There appears to be a conflict within the monitoring requirements of the PROPimm parameter within the VMD0010 module. As a result of the discrepancy within the VMD0010 module, the VVB reached out to Verra for clarification. Verra clarified that this parameter should be monitored prior to every verification and the parameter should be reflective of immigration within the monitoring period.
Round 2 NCR/CL/OFI	CL: Please clarify in line with Finding 1 or update the calculation of PROPimm, all downstream calculations, and the MR. CL: Please clarify in-line with Finding 1 and if necessary, update the PROPimm Parameter.
Round 2 Responses from Project Proponent	1. This formula estimates the proportion of people who have immigrated to the area over the last 5 years. Therefore, the denominator is the total number of people at the end of the monitoring period, and the numerator is the number of people who have immigrated in the last 5 years based on the 3.2% annual population growth compounded over 5 years. 2. A new approach has been taken to estimate PROMPIMM for this reporting period population growth projections for the Katavi district based on the 2012 census and validated with a smaller survey conducted in 2021 within the project area. A new methodology deviation has been added to the MR, and the new approach explained in the MR along with a workbook, "Ntakata Population Estimate 2022-03-25.xlsx". Further details are provided in section 3.1.3.
Aster Global Findings - Round 3	The audit team reviewed the methodology deviation which relates to PropIMM. The VVB assessed the methodology deviation and confirms that it is appropriate. Additionally, the VVB will issue a FAR request to ensure the project updates the PropIMM parameter in line with the monitoring requirements of the methodology for the next verification.

Findings Number	20
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VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding unplanned deforestation (LK-ASU) (Section)	6.2 Data and Parameters Monitored
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASU) (Description)	PROPRES
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28.xlsx
Aster Global Round 1 Findings	The audit team reviewed the MR, and it does not appear that PROPRES has been monitored in line with the requirements of VMD0010 which state "Must be monitored at least every 5 years or if verification occurs on a frequency of less than every 5 years examination must occur prior to any verification event."
Round 1 NCR/CL/OFI	CL: Please clarify in line with the finding.
Round 1 Response from Project Proponent (DD Month YYYY)	It has not yet been 5 years since the PROPRES parameter has last been updated
Aster Global Findings - Round 2	This parameter is not used for quantification in the methodology. The audit team reviewed the methodology deviation which relates to PropIMM. The VVB assessed the methodology deviation and confirms that it is appropriate. Additionally, the VVB will issue a FAR request to ensure the project updates the PropIMM parameter in line with the monitoring requirements of the methodology for the next verification.

Findings Number	21
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Approved VCS Module VMD0005, Version 1.1 (20 November 2012), REDD Methodological Module: Estimation of carbon stocks in the long-term wood products pool (CP-W), Sectoral Scope 14 (Section)	3 APPLICABILITY CONDITIONS
Approved VCS Module VMD0005, Version 1.1 (20 November 2012), REDD Methodological Module: Estimation of carbon stocks in the long-term wood products pool (CP-W), Sectoral Scope 14 (Description)	This module is applicable to all cases where wood is harvested for conversion to wood products for <i>commercial markets</i> , for all forest types and age classes.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD, MR
Aster Global Round 1 Findings	The audit team understands that HWP were allowed in the baseline at validation. However, the MR states "Leakage due to market effects is restricted to market responses due to project activity impacts on market supply of commercial timber and fuelwood. Agents of deforestation in the project area are mainly pastoralists, not loggers, who would not have the capacity to haul and commercialize any timber recovered in the process of land clearing activities." As a result, it is unclear to the audit team how the VMD0005 (CP-W) Module is applicable. Additionally, the audit team was unable to find a methodology deviation that permits the use of the VMD0005 (CP-W) Module in the MR and PD.
Round 1 NCR/CL/OFI	CL: Please clarify for the audit team how this module is relevant considering there is no commercial harvesting.
Round 1 Response from Project Proponent (DD Month YYYY)	CP-W is not applied in the MR because it does not meet the applicability conditions, as described in more detail in response to finding 3. It was a conservative assumption to include HWP in the baseline. It is more likely that commercial harvesting would occur in a baseline scenario where harvesting occurs at a much larger scale that could overcome costs constructing roads and establishing infrastructure to transport commercial timber.

Aster Global Findings - Round 2	Thank you for the clarification. The audit team confirms that the use of VMD0005 is not applicable for the monitoring period. This was confirmed during the site visit, as the audit team found no evidence of commercial timber harvest. Any questions related to HWP in the baseline are outside the scope of this verification as the baseline was fixed at validation. This item is closed.
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Findings Number	22
Approved VCS Module VMD0005, Version 1.1 (20 November 2012), REDD Methodological Module: Estimation of carbon stocks in the long-term wood products pool (CP-W), Sectoral Scope 14 (Section)	6.2. Data and Parameters Monitored
Approved VCS Module VMD0005, Version 1.1 (20 November 2012), REDD Methodological Module: Estimation of carbon stocks in the long-term wood products pool (CP-W), Sectoral Scope 14 (Description)	Ai
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	PD; MR; Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28
Aster Global Round 1 Findings	The value calculated for Ai in the Monitoring Report and included in the calculation workbook does not match the value in the PD. Please clarify why the total area of the stratum has changed. Please clarify where the values in cells K3 and K8 in the BL_UP Parameters tab of the Ntakata2019-2021-VCS-Monitoring-Calcs_2021_07_28 workbook are stated in the PDD.
Round NCR/CL/OFI	1
Round 1 Response from Project Proponent (DD Month YYYY)	It appears that the values in cells K3 and K8 were errors and did not reflect the actual area of the project area or leakage belt. The total areas of the stratum did not change. These values do not flow through to any other calculations in the MR and have been updated to match the correct values in cells B3 and B4, which do flow through to other calculations in the workbook.
Aster Global Findings - Round 2	Thank you for clarifying. The audit team confirmed that the error noted in the findings have been corrected.

Findings Number	23
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding unplanned deforestation (LK-ASU)	6.2 Data and Parameters Monitored
VCS Methodology VMD0010 Version 1.1 March 2015 Sectoral Scope 14 Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASU) (Description)	ADefLB,i,t
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata2019-2021-VCS-Monitoring-Calcs_2022_01_24.xlsx
Aster Global Round 1 Findings	In review of the Chimpanzee model the audit team noted that in the Leakage Belt in 2017 there was 184,733 hectares. In the Monitoring Period from 2017-2019, Table 3.13 of the MR covering the previous Monitoring period states there was 2264.1 Ha of deforestation in the LB in 2017 and 4528.3 ha of deforestation in 2018, resulting in a total of 6792 ha of deforestation in the LB in the previous monitoring period. The audit team confirmed that based on the files provided the for this monitoring period there was 4081 ha of deforestation in the leakage belt (as stated in Table 3.13 of the current MR). What is unclear to the audit team is that based on the deforestation from this Monitoring Period and the previous Monitoring Period, the total deforestation in the LB is 10,873 ha which should result in ~ 173,859 ha of forested area in the LB. However, the LB_2021_FNF_72821.shp file has a value of ~176,127 ha of forested area.
Round NCR/CL/OFI	1 CL: Please clarify in line with the discrepancy noted in the finding.

Round 1 Response from Project Proponent (DD Month YYYY)	The amount of deforestation listed in the previous MR for 2018 is a typo. The <i>total</i> deforestation in the LB during the previous monitoring period was 4528.3 ha, equating to 2264.1ha of deforestation in 2017 and the same amount in 2018. By this calculation, the total forest loss in the LB since project start is 8,609 ha, which results in 176,127ha of forest remaining at the end of this monitoring period. The correct values can be verified in the calculations workbook provided by with the last monitoring report. A note has been added to this monitoring report in Section 3.2.3 to clarify the previously mis-reported value.																				
Aster Global Findings - Round 2	The audit team notified the project that there are additional issues noted by the VVB related to the RS analysis. There appears to be overlap between previously non-forested areas and current forest and deforestation that occurred during this monitoring period. Additionally, there appears to be overlap between forested areas and previous non-forested areas.																				
Round 2 NCR/CL/OFI	CL: Please provide an updated RS analysis correcting the issues noted in the finding.																				
Round 2 Responses from Project Proponent	Thanks for pointing out this discrepancy. It seems that an incorrect data layer was used as a benchmark. As you noted a number of problems resulted from that, double counting of NF and inclusion of areas that were previously removed as NF as F, I also note that some new areas of NF were exclude in the mask, so all of the previous values have changed. We have adjusted this and have shared a new Forest/Non-Forest map for the Leakage Belt. <table><tr><td>File name:</td><td>LB2021_FNF_42222.shp</td></tr><tr><td>The updated areas for these classes are:</td><td></td></tr><tr><td>2021 NEW</td><td>VALUES</td></tr><tr><td>F</td><td>172,962.39</td></tr><tr><td>NEW NF</td><td>7,247.03</td></tr></table> The previous Benchmark from 2019 is included for you to review. <table><tr><td>File name:</td><td>Ntakata_LB_2019_71019.shp</td></tr><tr><td>The total area of Forest in 2019 --</td><td>180,209.4 ha</td></tr><tr><td>Previous F</td><td>180,209.42</td></tr><tr><td>New NF</td><td>7,247.03</td></tr><tr><td>New F</td><td>172,962.39</td></tr></table> The folder "Updated_LB_042222" has been uploaded to Dropbox	File name:	LB2021_FNF_42222.shp	The updated areas for these classes are:		2021 NEW	VALUES	F	172,962.39	NEW NF	7,247.03	File name:	Ntakata_LB_2019_71019.shp	The total area of Forest in 2019 --	180,209.4 ha	Previous F	180,209.42	New NF	7,247.03	New F	172,962.39
File name:	LB2021_FNF_42222.shp																				
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The total area of Forest in 2019 --	180,209.4 ha																				
Previous F	180,209.42																				
New NF	7,247.03																				
New F	172,962.39																				

Aster Global Findings - Round 3	Thank you for your response. The audit team reviewed the updated shapefile "NtakataLB_update42522_FNF.shp" and obtained the following values: <table><tr><td>F=</td><td>172,321.004287</td><td>ha</td></tr><tr><td>NF</td><td>= 7888.414339</td><td>ha</td></tr></table> 1. It is unclear to the audit team if the provided shapefile is the shapefile referenced in the Round 2 response from the Project Proponent, as the title is different, and the F and NF values appear to be the same as the values reported in Ntakata_LB_2019_71019. Additionally, the audit team does not have access to the referenced "Updated_LB_04222" folder. 2. Using the provided shapefile, the audit team confirmed the ADefLB,u,i,t values reported for 2019 and 2020 in the updated calculation workbook. However, the audit team noted the following discrepancy: Using the values in the previous benchmark, the audit team confirmed that the remaining forest area was 180,209.42 ha at the end of the previous monitoring period. However, it is unclear why the remaining forest area (172,316.46 ha) in "Ntakata2019-2021-VCS-Monitoring-Calcs_2022-01-24/DefLB Actual" is different from the forest area obtained from "NtakataLB_update42522_FNF.shp" (172,321.004287 ha). It is unclear to the audit team why this discrepancy exists. 3. Additionally, the audit team noted that Table 3.15 of the MR has not been updated to include the updated ADefLB,u,i,t values.	F=	172,321.004287	ha	NF	= 7888.414339	ha
F=	172,321.004287	ha					
NF	= 7888.414339	ha					
Round 3 NCR/CL/OFI	1. CL: Please clarify why the provided shapefile name and values are different from the shapefile and area values referenced in the response. 2. CL: Please clarify why such discrepancy exists. 3. CL: Please update the table with correct values.						
Round 3 Responses from Project Proponent	1. The shapefile uploaded to the Dropbox folder was the correct and most recent version of the shapefile. The values described in the Round 2 Response were from a previous version. However, the values in the shapefile and in the calculation workbook are correct and should remain so. The shapefile uploaded is titled "NtakataLB_update42522_FNF.shp" 2. A folder, "AuditReview_42522" has been uploaded to the Dropbox folder with additional explanation of the discrepancies with the benchmark maps. Please reach out to us for further clarification if needed. 3. Table 3.15 has been updated.						

Aster Global Findings - Round 4	1. Thank you for your response. The audit team reviewed and confirmed the shapefile "NtakataLB_update42522_FNF.shp" and calculations in the workbook are updated correctly. 2. The audit team reviewed the updated accuracy points independently and confirmed that it satisfies the 90% threshold requirement. While the Project Proponent's response to this finding does not directly address the issue, the audit team reviewed the GIS processes and identified the source of the mentioned discrepancy. The audit team is reasonably assured that this discrepancy is a result of the methods applied. Item closed. 3. The audit team reviewed and confirmed that Table 3.15 has been updated with the correct values. This item is addressed and closed.
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Findings Number	24
VCS Standard Requirements 22 April 2021, v4.1 (Section)	AFOLU Projects
VCS Standard Requirements Document 22 April 2021, v4.1 (Description)	3.10.2 The project location for AFOLU projects shall be specified in the project description in terms of its project area. The spatial extent of the project shall be clearly specified to facilitate accurate monitoring, reporting and verification of GHG emission reductions and removals and to demonstrate that the project meets the eligibility criteria of the relevant project category. The description of the project location shall include the following information: 1) Name of the project area (e.g., compartment number, allotment number and local name). 2) Maps of the project area. 3) Geodetic polygons that delineate the geographic area of each AFOLU project activity, provided in a KML file. 4) Total size of the project area. 5) Details of ownership.
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata_REDD_Project area
Aster Global Round 1 Findings	The audit team notes that the KML of the REDD Project Area provided to the audit team and uploaded to the VCS Project Database does not appear to reflect the actual Project Area.
Round NCR/CL/OFI	1 CL: Please clarify in line with the finding. If necessary, please upload a new KML file to the VCS website that reflects the actual boundary of the project area.

Round 1 Response from Project Proponent (DD Month YYYY)	The KML has been provided to Verra and uploaded to the registry.
Findings Number	25
VCS Standard Requirements 22 April 2021, v4.1 (Section)	AFOLU Projects
VCS Standard VCS Version 4.1 Requirements Document 22 April 2021, v4.1 (Description)	3.14.15 The number of GHG credits issued to projects is determined by subtracting out the buffer credits from the net GHG emission reductions or removals (including leakage) associated with the project. The buffer credits are calculated by multiplying the non-permanence risk rating (as determined by the <i>AFOLU Non-Permanence Risk Tool</i>) times the change in carbon stocks only. The full rules and procedures with respect to assignment of buffer credits are set out in the VCS Program document <i>Registration and Issuance Process</i> .
Requirement Met (Y, N or Pending)	Y
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Ntakata2019-2021-VCS-Monitoring-Calcs_2022-03-18.xlsx, MR
Aster Global Round 1 Findings	During this review we have received feedback from Verra regarding the quantification of the buffer and they have clarified that the buffer should be calculated on the value net of leakage. This is stated in Section 3.14.15 of the VCS Standard. Specifically, it states ""The number of GHG credits issued to projects is determined by subtracting out the buffer credits from the net GHG emission reductions or removals (including leakage) associated with the project. The buffer credits are calculated by multiplying the non-permanence risk rating (as determined by the <i>AFOLU Non-Permanence Risk Tool</i>) times the change in carbon stocks only. The full rules and procedures with respect to assignment of buffer credits are set out in the VCS Program document <i>Registration and Issuance Process</i>." Additionally, the audit team noted that several parameters have not been included in Section 3.1.1 and 3.2.1 of the MR, including AVFOR, TOTFOR, MANFOR, PROTFOR, PROPLB, PROPCS, and LKPROP. The audit team notes that while none of these parameters drive project accounting, they are different from the values identified in the validated PD, as new data from the updated NAFORMA report is now being used.
Round NCR/CL/OFI	1 CL: Please update the quantification of the buffer pool in line with the finding, all downstream calculations, and the MR. CL: Please update Section 3.1.1 and 3.2.2 of the MR, as appropriate, to include the listed parameters.

Round 1 Response from Project Proponent (DD Month YYYY)	1. The buffer pool calculations have been updated in line with guidance from VCS and all calculations updated in the MR. 2. The appropriate parameters have been added to the MR.
Aster Global Findings - Round 2	1. The audit team confirmed that buffer calculations have been appropriately updated and are correctly reported in the MR. Item closed. 2. The audit team confirmed that all identified parameters have been appropriately added to the MR. Item closed.

APPENDIX C: CCB NCRS/CLS/OFI

General Section

Indicator G1.1 – Identify the primary Project Proponent which is responsible for the project’s design and implementation and provide contact details.	Carbon Tanzania (CT, Ltd) is the Project Proponent. Contact is Marc Baker, Director, Operations, Carbon Tanzania. Phone: +255 (0) 784 448761 Email: marc@carbontanzania.com Address: PO Box 425, Arusha, Tanzania
Evidence Used to Assess Conformance:	Title page boxes of the Monitoring Report (MR) and validated Project Description (PD), MR Section 2.1.3, PD Section 2.1.3
Findings:	The Project Proponent and contact information were provided in the MR and are consistent between the PD and MR. Item closed.
Date Closed:	17 September 2021

Indicator G1.2 – Define the project’s climate, community and biodiversity objectives.	This project’s climate objective is to reduce carbon emissions by protecting local village forest reserves by educating and employing local community members to aid in sustainability of natural resources. The project will train and provide Village Game Scouts (VSGs) to patrol and protect the forests. Additionally, training and contributions to village development will lead to improved local governance. The project will also increase the livelihood of community members through training and improved education and health services. Biodiversity objectives include conservation of wildlife habitat for critically important species like the chimpanzee.
Evidence Used to Assess Conformance:	PD Section 2.1, various sections of MR.
Findings:	The project objectives for climate, community and wildlife were clearly stated in the MR and PD. Item closed.
Date Closed:	20 September 2021

Indicator G1.3 – Provide the location (country, sub-national jurisdictions(s)) and a brief overview of the basic physical and social parameters of the project.	The project is located in the Tanganyika District of the United Republic of Tanzania. The project is located on the western side of the country, near Lake Tanganyika.
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Evidence Used to Assess Conformance:	MR Section 2.1.7, PD Section 2.1.5
Findings:	This indicator was addressed in the validated Project Description document and does not need to be re-evaluated during verification. Item closed.
Date Closed:	17 September 2021

Indicator G1.4 - Define the boundaries of the Project Area where project activities aim to generate net climate benefits and the Project Zone where project activities are implemented.	The project boundary is depicted in Section 2.1.7 of the validated PD. The boundaries of the Project Area and Project Zone do not appear to be clearly defined in the PD. The auditor assumes map(s) complying with requirements for Section 2.1.7 of the CCB & VCS Project Description Template were provided to the auditor separately and not as part of the PD.
Evidence Used to Assess Conformance:	PD Section 2.1.5, MR Section 2.1.7; supplemental digital files provided for the project
Findings:	The distinctions between project area(s) and project zone do not appear to be clearly defined or consistently treated throughout the MR and supplemental documents.
Clarification Request (CL):	Please provide the auditor with mapping that clearly identifies and labels the project area(s), project zone, and other features required by instructions for CCB & VCS Project Description Template used for the validated PD.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Though it is not labeled explicitly on the map in section 2.1.5 of the PD, the project zone is delineated with the red boundaries lines which includes forested land and non-forest area where villages and agriculture exist around the project area and are managed by the Ntakata communities. The project area includes all land within the project zone that was classified as forest in the initial forest/non-forest classification. Additionally, clarity has been added to the MR to explain the differences between the project zone and the project area. A map of the project zone and the project area has been added to the dropbox and the MR. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed clarification has been provided through inclusion of a map (Figure 2.1) in MR Section 2.1.7 that clearly identifies the project area and project

	zone. Figure 2.1 also identifies the villages in the project zone where project activities are implemented. Item closed.
Date Closed:	24 February 2022

Indicator G1.5 - Explain the process of stakeholder identification and analysis used to identify Communities, Community Groups and Other Stakeholders.	The process of identifying and analyzing stakeholders was described in Appendix 1 of the validated PD.
Evidence Used to Assess Conformance:	PD Section 2.1.8 and PD Appendix 1
Findings:	This indicator was closed during the successful project validation process and does not need to be re-examined during this verification event. Item closed.
Date Closed:	17 September 2021

Indicator G1.6 -List all Communities, Community Groups and Other Stakeholders identified using the process explained in G 1.5.	This indicator was successfully closed during project validation. The Tanganyika and Mpanda District Governments, 8 local villages and associated sub-villages, and village women and women's groups were all identified as stake holders in the PD.
Evidence Used to Assess Conformance:	Appendix 1 of Validated PD
Findings:	This indicator was closed during the successful project validation process and does not need to be re-examined during this verification event. Item closed.
Date Closed:	17 September 2021

Indicator G1.7 - Provide a map identifying the location of Communities and the boundaries of the Project Area(s), of the Project Zone, including any High Conservation Value areas (identified in CM1 and B1), and of additional areas that are predicted to be impacted by project activities identified in CL3, CM3 and B3.	This indicator was successfully closed during project validation. Section 2.1.7 of the PD presents a map showing project boundary, location of the eight villages included as stakeholders in the project, and HCVs identified as Priority Chimp Habitat. Animal Grazing Zone, and offsite National Parks and Forest Reserves. Project Area and Project Zone are not identified or labeled on the map in the PD.
Evidence Used to Assess Conformance:	PD Section 2.1.7
Findings:	This indicator was successfully closed during project validation. The MR does not identify any changes to

	these areas or HCVs. This indicator does not require re-examination for this verification. Item closed.
Opportunity for Improvement (OFI):	An opportunity for improvement was identified for future CCB verifications. CCB review would be facilitated if the MR included a map that clearly identifies and labels the Project Area and Project Zone as well as depicting HCVs and areas that are predicted to be impacted by project activities identified in CL3, CM3, and B3. Item closed. The proponent is free to respond to OFIs if desired, but no corrective actions are required.
Date Issued:	5 October 2021
Project Proponent Response/Actions and Date:	
Evidence Used to Close OFI:	N/A
Date Closed:	5 October 2021

Indicator G1.8 - Briefly describe each project activity and the expected outputs, outcomes and impacts of the activities identifying the causal relationships that explain how the activities will achieve the project's predicted climate, community and biodiversity benefits.	This item was addressed in the validated PD.
Evidence Used to Assess Conformance:	Section 2.1.11 of the validated PD.
Findings:	This item was successfully addressed during project validation and does not require re-examination during verification. Item closed.
Date Closed:	5 October 2021

Indicator G1.9 - Define the project start date and lifetime, and GHG accounting period and biodiversity and community benefits assessment period if relevant, and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	The project start date is identified as 19 May 2017. The project lifetime is identified in the PD as 30 years, commencing from the start date and ending 19 May 2047. The project GHG accounting period is identified in the validated PD as 20 years, running from 19 May 2017 to 19 May 2037.
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Evidence Used to Assess Conformance:	MR Sections 2.1.5, 2.1.6, 2.1.10, and 2.2.1 through 2.2.4, PD Sections 2.1.12 through- 2.1.16; MR and PD title page boxes
Findings:	A review of the MR and validated PD determined there is no discrepancy between the stated project lifetime and its start and end dates. A review of the MR and validated PD determined there is a discrepancy in the GHG Accounting Period identified in the MR compared to the validated PD. The PD title page box identifies the project GHG accounting period as a 20-year period from 19 May 2017 through 19 May 2037, which is different than the project lifetime listed in the PD title page box as a 30-year period from 19 May 2017 through 19 May 2047. However, PD Section 2.1.16 states there are no differences in assessment/project crediting periods. Instructions for the CCB/VCS Monitoring Report Template are to: Indicate the (CCB) GHG accounting/(VCS) crediting period, specifying the day, month and year for the start and end dates and the total number of years and also: Specify each if the CCB and VCS periods are different The MR does not specify a difference in the CCB GHG accounting versus VCS crediting period. A comparison of the implementation schedules in the MR and PD shows they are identical through part of 2019. The MR includes the validation of the project, completion of the initial verification, and the initiation of the second verification. The project is, thus far, following the verification timeline provided in the PD. An opportunity for improvement was noted for the table in Section 2.2.1 for including as milestone(s) in the project's development and implementation the anticipated date for the next verification as well as anticipated date for baseline update(s). MR section 2.1.10 states this project has contributed to sustainability goals outlined in Tanzania's National Development Vision of 2025. The MR states that

	although the project contributes to these goals, the project does not plan to specifically monitor achieving national stated sustainable development priorities. Statements in the MR regarding sustainability goal contributions and monitoring was determined to be consistent with validated PD section 2.1.12. MR section 2.2.2 identifies two methodology deviations related to monitoring carbon which is more appropriately addressed in the VCS program findings. MR section 2.2.3 states no minor changes to the project description occurred during this monitoring period. MR section 2.2.4 states no project description deviations occurred during this monitoring period.
Clarification Request (CL):	Please provide clarification for the discrepancy noted in the reported GHG accounting period between the validated PD and the MR. If a change to the GHG accounting period is determined to be necessary to the PD, this should be addressed in MR section 2.2.3.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The project crediting period has been updated to reflect the timeframe in PD as 20 years. (8 February 2022)
Clarification Request (CL):	The VVB noted the project GHG accounting/crediting period had been revised in the MR cover page to 20 years (19 May 2017 – 19 May 2037) but continues to be stated as a 30-year crediting period (19 May 2017 through 18 May 2047) in MR Section 2.1.6. The VVB noted this now creates a discrepancy in the MR which is consistent with the discrepancy noted in the PD. The MR is now unclear whether the crediting period is 20 years or 30 years. A review of the VCS Project Database indicates that the Crediting Period is for 30 years. Additionally, the crediting period described in the Validation Report is for 30 years. Please provide clarification for the discrepancy noted in the reported GHG accounting period presented in both the validated PD and the MR.
Date Issued:	24 February 2022
Project Proponent Response/Actions and Date:	The project lifetime and the crediting period should be the same. In this case, the correct project lifetime and crediting period are 30 years. This has been updated in the MR, and a PD deviation has been added to the MR to correct the 20-year accounting period listed in the PDD.

	(29 March 2022)
Clarification Request:	The VVB confirmed references to dates for the crediting period in the MR now identify a 30-year period. A minor discrepancy in the dates was noted with the end date as referenced in different locations, “19 May 2047” in the MR title page summary table, and “18 May 2047” in MR section 2.1.6, 4.3.1, and Table 3.24. The VVB was not able to confirm the MR was revised as stated in the Project Proponent’s response regarding revision to the MR to address the correction of the 20-year crediting period identified in the validated PD to the 30-year crediting period. Specifically, there is no PD Deviation presented in the MR as stated in the project’s response. However, this does not appear to necessitate the application of a PD Deviation but may be considered a minor change by the project to correct the typo as “accounting period” is only defined within the CCB Standard v3.1 and not within the VCS documentation. Please provide clarification as appropriate within the MR for the two noted discrepancies.
Date Issued	8 April 2022
Project Proponent Response/Actions and Date:	The discrepancy on the summary page has been corrected to the date 18 May 2047. A minor change has been added to the MR to specify the change in the length of the accounting period listed in the PD.
Evidence Used to Close CL:	The VVB reviewed the updated MR and determined the two discrepancies have been appropriately addressed in line with the findings. The VVB reviewed the minor change to the PD documented in Section 2.2.3 of the MR and determined it meets the requirements for a minor change to the project description based on correcting an error in the PD. Item closed.
Date Closed:	3 May 2022
Indicator G1.10 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures	Human-induced risks identified in the PD for the project include increased mining, new major roads, changes in REDD+ policy, diminished village engagement, insufficient carbon revenue, and project attracting new immigrants and thus increased pressure on natural resource.

needed and <i>taken</i> to mitigate these risks.	Natural risks identified in the PD for the project include shift in climate change resulting in species compositional shifts and negative impacts to conservation target species.
Evidence Used to Assess Conformance:	MR Section 2.2.6, PD Section 2.1.18, PD Appendix 2, site visit observations and interviews
Findings:	A review of the MR and validated PD determined there is no discrepancy between the two documents regarding the identified likely natural and human-induced risks to the expected climate, community, and biodiversity benefits during the project lifetime. The review also determined that the MR identifies measures reported as taken to mitigate these risks and determined that the measures identified as taken are consistent with the mitigation actions identified in the validated PD as needed and designed to provide appropriate mitigation for these risks. To justify a conclusion as to whether reasonable steps have been taken to mitigate the identified risks, the following were taken into consideration: • Site visit observations and interviews substantiated that the Project Proponent continues to strengthen ties with the Village Governments, District Government, and National Government and that the project is receiving government collaboration and support at the local, District, and National level in line with the activities identified as mitigation activities identified by the MR as having been conducted for Risk items #1 through 4. • Site visit interviews with Village Game Scouts (VGS) substantiated the occurrence of regular patrols as reported by the MR as part of the mitigation measures implemented for Risk item #5. The MR provides results of the 2019 chimpanzee habitat suitability modeling in Appendix 1, depicting the area with habitat change as minor in comparison the large areas of habitat remaining. Site visit observations and interviews substantiate large areas of habitat are being maintained and that community members acknowledge project activities are reducing the risk of habitat loss.

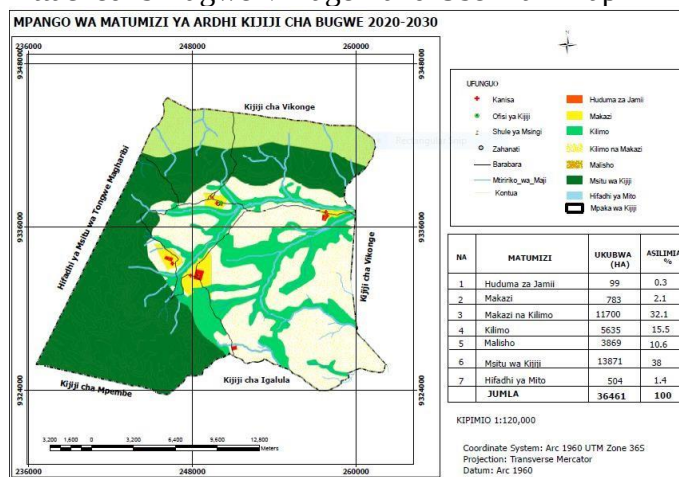
	- The MR states that village land use plans were developed and implemented as mitigation for the risk identified as #6 (Risk of VLUPs and village engagement attracting new immigrants and increased pressure on natural resources). Site visit observations and interviews confirmed VLUPs for the villages visited, and widespread community knowledge and understanding of the VLUPs within those villages. However, the PD indicates the mitigation identified as needed to mitigate this risk item as: Supporting successful development of VLUPs in other communities that create opportunities for sustainable use of resources in neighbouring regions reduces the need for migration to these villages. The MR is not clear on the progress made by the project in supporting other communities in neighboring regions outside the project zone villages in development of VLUPs . - The MR states that progress made so far on mitigating risk item #7 included signing with Josera Petfood company in 2017, and the MR identified a reference to an appendix to support this claim. However, the supporting documentation was not found in the appendices to the MR. Review of financial summaries provided to the VVB substantiates that the project has been successful in finding buyers for carbon credits generated through the REDD+ project.
Clarification Request (CL):	Two items were identified as requiring clarification: - Please clarify the status of support provided to neighboring regions/villages in developing VLUPs during the monitoring period. Please provide supporting documentation for support provided. - Please provide documentation to support the arrangement with Josera Petfood company, or clarify the statement regarding the statement made regarding this company in the MR.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	While the development of VLUP is a government process that CT cannot force, the Ntakata project has

supported neighboring regions/villages in developing VLUPs during the monitoring period.

The district is the primary party responsible for coordinating village land use planning and during this period the carbon project was one of the largest revenue sources for the district providing 38,000,000 Tsh of unrestricted revenue.

The success of the carbon project has led to many villages requesting to partake, and CT always states that an independent participatory land use plan is a prerequisite. This has encouraged land-use planning in the nearby areas. One example is Bugwe village neighboring Mpembe to the north, which passed a Land Use Plan in 2020 and will potentially be incorporated in future carbon projects.

Attached is Bugwe Village Land Use Plan Map



Signed ERPA agreement with Josera provided.
(8 February 2022)

Evidence Used to Close CL:

The VVB has reviewed the supporting documentation provided in response to the clarification request. The supporting documentation substantiates the Project Proponent has undertaken the actions identified as needing to be conducted to mitigate identified risks, and these represent reasonable steps taken to mitigate these risks.
Item closed.

Date Closed:

24 February 2022

Indicator G1.11 - Describe the measures needed and *taken* to maintain and enhance the climate,

PD Section 2.1.19 identifies two principal strategies to ensure the maintenance and enhancement of the project benefits beyond the project lifetime: capacity

community and biodiversity benefits beyond the project lifetime.	development and land-use planning. MR Section 2.2.7 states that through increased capacity development and long-term land use planning, the benefits to the local area will extend beyond the project lifetime.
Evidence Used to Assess Conformance:	MR Sections 2.2.7, 4.1.1, 4.3.1, and 4.4.6, site visit interviews and site visit observations
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 2.2.7 are: Describe the measures needed and implemented since the last CCB validation or verification to maintain and enhance the climate, community, and biodiversity benefits beyond the project lifetime. MR Section 2.2.7 is consistent with the PD for measures identified as needing to be implemented to satisfy this indicator, and states the project provides some general opportunities and the MR provides some predictions of anticipated benefits. The MR does not identify specific measures implemented since the last verification to maintain and enhance these benefits. Information on specific measures initiated towards completing land use plans and increasing capacity development appear to be presented in other sections of the MR. Site visit observations confirming VLUPs have been completed and there is widespread community knowledge of them, and site visit interviews with village and district leaders substantiate reasonable progress has been made towards enhancing project benefits beyond the project lifetime in accordance with the measures identified in the validated PD.
Clarification Request (CL):	Please provide clarification in MR Section 2.2.7 for the specific measures that have been taken or initiated to satisfy this Indicator since the last verification
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Clarification provided in MR Section 2.2.7 for the specific measures that have been taken or initiated to satisfy this Indicator since the last verification. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed that appropriate clarification has been provided in MR Section 2.2.7 to provide summary descriptions for measures taken or initiated during this monitoring period that would maintain or enhance the climate, community, and biodiversity benefits beyond the project lifetime.

	Item closed.
Date Closed:	24 February 2022

Indicator G1.12 - Demonstrate that financial mechanisms adopted, including actual and projected revenues from GHG emissions reductions or removals and other sources, provide an adequate actual and projected flow of funds for project implementation and to achieve the project's climate, community and biodiversity benefits.	Financial mechanisms outlined in Ntakata Cash Flow Analysis.xlsx.
Evidence Used to Assess Conformance:	Financial data Ntakata_2021_Risk_Report_2021-06-30, Ntakata_Financial_Viability_JA070721
Findings:	This finding was initially pending analysis of VCS risk assessment of financial planning and mechanisms. The VVB reviewed financial information provided by the Project Proponent and confirmed the information provided satisfactorily demonstrated that financial mechanisms adopted, including actual and projected revenues from GHG ERRs and other sources provide an adequate actual and projected flow of funds for project implementation and to achieve the project's CCB benefits. Item closed.
Date Closed:	24 February 2022

Indicator G1.13 - Specify the Project Area(s) and Communities that may be included under the programmatic approach, and identify any new Project Area(s) and Communities that have been included in the project since the last validation or verification against the CCB Standards.	N/A
Evidence Used to Assess Conformance:	MR Section 2.2.5

Findings:	This is not a grouped project, and the MR correctly follows the instructions for the CCB/VCS Monitoring Report Template for Section 2.2.5 to state this is not a grouped project and by deleting instructions and other template headings within Section 2.2.5.
Opportunity for Improvement (OFI):	An opportunity for improvement was identified by referring to “grouped” rather than “group” project for consistency with program terminology. Item closed. The proponent is free to respond to OFIs if desired, but no corrective actions are required.
Date Closed:	11 October 2021

Indicator G1.14 - Specify the eligibility criteria and process for project expansion under the programmatic approach <i>and demonstrate that these have been met for any new Project Areas and Communities that have been included in the project since the last validation or verification against the CCB Standards.</i>	N/A
Evidence Used to Assess Conformance:	
Findings:	Not applicable, this is not a grouped project as stated for Indicator G1.13 in the PD and MR
Date Closed:	17 September 2021

Indicator G1.15 - Establish scalability limits, if applicable, and describe measures needed and <i>taken</i> to address any risks to climate, community and biodiversity benefits if the project expands beyond those limits.	N/A
Evidence Used to Assess Conformance:	
Findings:	Not applicable, this is not a grouped project as stated for Indicator G1.13 in the PD and MR
Date Closed:	17 September 2021

Indicator G2.1 - Describe the most likely land-use scenario within the Project Zone in the absence of the	According to the validated PD, the baseline scenario is continued migration to the area and deforestation. Increased migration would lead to further expansion of agriculture, and it is estimated the current rate of
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project, describing the range of potential land-use scenarios and the associated drivers of land use changes and justifying why the land-use scenario selected is most likely. It is allowable for different locations within the Project Zone to have different without-project land use scenarios.	deforestation would continue and possibly accelerate in the absence of the project.
Evidence Used to Assess Conformance:	PD Sections 2.2.1 and 2.2.2
Findings:	The baseline scenario was established during validation and does not need to be re-examined here. Item closed.
Date Closed:	17 September 2021

Indicator G2.2 - Document that project benefits including climate, community and biodiversity benefits would not have occurred in the absence of the project, explaining how existing laws, regulations and governance arrangements, or lack of laws and regulations and their enforcement, would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would not have occurred without the project. Identify any distinct climate, community and biodiversity benefits intended for use as offsets and specify how additionality is established for each of these benefits.	The PD states that without the project, local villages are unable to implement land use plans due to limited capacities and resources. However, the flow of carbon revenues associated with the project allows the implementation of these plans and results in increased sustainability of village forest lands
Evidence Used to Assess Conformance:	PD Sections 2.2.3 and 2.2.4
Findings:	The project benefits were established in the validated PD and do not need to be reassessed. The PD also states there are no distinct community and biodiversity benefits intended to be used as offsets. Item closed.
Date Closed:	17 September 2021

Indicator G3.1 - Describe how full project documentation has been made accessible to Communities and Other Stakeholders, how summary project documentation (including how to access full documentation) has been actively disseminated to Communities in relevant local or regional languages, and how widely publicized information meetings have been held with Communities and Other Stakeholders.	Section 2.3.1 of the MR states that a copy of the full “project document” was provided to each district office and village committee to review and keep on file for public access. The MR also states that summaries were prepared in Swahili, and that CT spoke at regular meetings to convey the relevant information. MR Section 2.3.2 states that to overcome language/reading barriers, the project team planned face-to-face interactions using carbon champions to provide a summary of the PD to committees and other interested villagers. The MR states summaries of the last monitoring results were prepared and explained in regular bi-annual project meetings and that the same will occur for the present monitoring report. MR Section 2.3.3 provides a summary of the general frequency, attendees, agenda, and publicization of the informational meetings with communities and stakeholders.
Evidence Used to Assess Conformance:	MR Sections 2.3.1, 2.3.2, and 2.3.3; PD Sections 2.3.1, 2.3.2, and 2.3.3; site visit observations and interviews with community members.
Findings:	A review of the MR determined that the Project Proponent’s efforts to distribute the Project Description and previous Monitoring Report to local stakeholders were reasonable, but these actions would have been addressed by the previous verification. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.1 are to: “Describe how full project documentation has been made accessible to communities and other stakeholders.” In CCB Standards v3.1 for Indicator 3.1 footnote #40 identifies “full project documentation” as including monitoring reports, and footnote #40 states that summary documentation disseminated to communities: “...prior to CCB verification shall at least include information on monitoring results showing that the project has delivered net positive climate, community and biodiversity benefits.” A review of the Verra project webpage confirms the availability of a monitoring report summary in Swahili for this monitoring period. However, interviews with

	community members during the site visit suggested that the results of the present monitoring report were largely unknown locally prior to the verification site visit.
Clarification Request:	Please clarify and provide documentation for the efforts made prior to the verification site visit to disseminate the results or a summary of the results of the present monitoring report to community stakeholders.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The dissemination of results summary was done through the following channels: Along with the monitoring report a local language summary was uploaded to the registry before the verification. A notice letter was sent informing stakeholders of such and its surrounding procedures. The district, the overseeing authority of all governance and representative processes in the area confirmed during site visit their knowledge and use of the registry. The summary was also sent to the district directly. The summary was also sent to the project manager who shared it and informed community members and leaders. Any community leaders who are digitally available also received the digital copy. Carbon Champions also received copies and shared it and discussions in their daily interactions with community members, it was noted during site visit that even when Carbon Champions are not on an explicit deployment the community view and come to them as a source of project information. Though some community members were unable to recall specific monitoring results or documentation community members were largely knowledgeable and confirmatory on positive climate, community, and biodiversity benefits achieved during this monitoring period. In the case of the community results the majority were generated directly by the communities themselves and collated through the official and representative governance structures the project works with. It should be noted that Katavi region has one of the lowest literacy rates in a country in one of the lowest literacy regions of the world and this informs the project in its practical commitment to ensuring

	multi-directional information flow and results sharing with the participating community. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.3.1 has been revised to provide appropriate clarification for efforts made prior to the verification site visit to disseminate the results or a summary of the results of the present monitoring report to community stakeholders. The VVB concludes that based on the explanation of literacy rates, the approach undertaken by the Project Proponent to disseminate the summary of the monitoring report through the district and community leaders, carbon champions, and meetings is an acceptable and appropriate approach. Item closed.
Date Closed:	24 February 2022

Indicator G3.2 - Explain how relevant and adequate information about potential costs, risks and benefits to Communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.	The MR states costs, risks (including not being able to sell carbon credits), and benefits were communicated to Village Governments of all target villages in face-to-face meetings during project introductory meetings, which is consistent with the validated PD. The MR also states the Project Proponent prepared a leaflet on the project and its background and distributed it to Village Governments. Consistent with the PD, the MR states the Project Proponent started a “carbon champion program”, in which a champion from each village is trained on project information and is responsible for spreading key messages throughout the villages.
Evidence Used to Assess Conformance:	MR Section 2.3.4, PD Section 2.3.4, site visit interviews
Findings:	The methods described for communicating potential costs, risks, and benefits with communities were determined to be reasonable. Interviews conducted during the site visit determined that community members were largely aware of the project and potential risks and benefits. Site visit interviews with community leaders and community members substantiated that village meetings were held to democratically vote on whether to join the project. Item closed.
Date Closed:	11 October 2021

Indicator G3.3 - Describe the measures taken, and communications methods used, to explain to Communities and Other Stakeholders the process for validation and/or verification against the CCB Standards by an independent Auditor, providing them with timely information about the Auditor's site visit before the site visit occurs and facilitating direct and independent communication between them or their representatives and the Auditor.	The MR states that each village was informed of the verification process in face-to-face meetings and that the Village Governments are responsible for carrying this information to sub-villages. Additionally, carbon champions spread information door-to-door. MR Section 2.3.6 states that Communities were informed of auditor site visit through the Village Government and that the date and time were to be communicated to Village Governments at least one week before site visit, and the Village Governments in turn would be responsible for informing all villagers and reminding them one day before.
Evidence Used to Assess Conformance:	MR Sections 2.3.5 and 2.3.6, PD Sections 2.3.5 and 2.3.6; site visit interviews, and site visit observations
Findings:	Interviews with both community members and village leaders substantiate stakeholders were largely informed on the verification site visit. Site visit observations and site interviews confirmed site visit notifications were provided for the auditor's site visit; two of the villages produced the notification as verification when questioned and other villages indicated they had received the notification but did not have a physical copy readily available to show the auditor. The Project Proponent indicated that several village leaders had followed up and reached out to the Project Proponent inquiring when the auditors would be coming to their villages. Site visit observations confirmed that when the auditors arrived in every village, it appeared that community members had been informed and were waiting for the auditors' arrival. Site visit interviews and observations substantiated that community members had been made aware of the verification site visit and meetings with the representative stakeholders selected and requested by the audit team had been arranged. Site visit interviews determined that most of the community members interviewed were not aware of the specific public comment period for the monitoring report or aware of the monitoring results being covered by the verification. Further questioning regarding this aspect determined that the formal public comment period was a difficult concept to get across to many community members. Site visit interviews with community members determined that community

	members understood that if they had comments or grievances regarding the project they could go to their village leaders.
Clarification Request (CL):	Please provide clarification on how the communities were informed about aspects of the verification process involving notification of availability of the monitoring report for review and the public comment process.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The Response for Indicator G3.1 explains how communities were made aware of monitoring results. As for availability of the monitoring report for review and the public comment process this was achieved through multiple channels. A notice letter was sent informing stakeholders of the monitoring report and local language summary uploaded to the registry and the surrounding procedures. It must be noted that many community members are not literate in either Swahili or English and very small amount are digitally literate in any way. Considering this and as a supplement to the notice letter and the letter informing of communities of the upcoming verification, information was shared in face-to-face meetings and interactions with the Village Governments who are under the authority of the district government and responsible for information sharing. This was done through village government leaders, district officials, and the project manager and carbon champions who come from and are constantly within the project area and engaging with the greater community. Communities were informed they could use a digital process themselves, could ask someone to engage in a digital process on their behalf, or they could separately engage the verifiers through feedback as they were to visit the villages (as per the later letter). As noted, the formal public comment period is contextually a difficult concept to get across to many community members. As noted, community members understood that if they had comments or grievances regarding the project they could go to their village leaders, these village leaders are under and report to the district. The district was demonstrated to have a knowledge of the registry and documentation processes. As noted, community members had been informed and were waiting for the auditors' arrival in all villages, eager to share their views on the project and results.

	(8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.3.5 has been revised to provide appropriate clarification for efforts made prior to the verification site visit to notify community stakeholders about the VVB site visit and the verification process. The VVB concludes that based on the explanation of literacy rates, the approach undertaken by the Project Proponent to disseminate information about the availability of the monitoring report for review and the public comment period by utilizing communication through the district and community leaders, carbon champions, and meetings is an acceptable and appropriate approach. Item closed.
Date Closed:	24 February 2022
Indicator G3.4 - Describe how Communities including all the Community Groups and Other Stakeholders have influenced project design and <i>implementation</i> through Effective Consultation, particularly with a view to optimizing Community and Other Stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input. A plan must be developed and <i>implemented</i> to continue communication and consultation between the project proponents and Communities, including all the Community Groups, and Other Stakeholders about the project and its impacts to facilitate adaptive management throughout the life of the project.	The MR states that the project adopted village land use plans (VLUPs) created by each village as part of the overall project scheme. These VLUPs are created in a participatory nature, with input coming from representatives, including the sub-villages. The MR states that communities were also able to provide input during village meetings on how financial flow from carbon inputs could be used most effectively. The MR further states that village representatives then prioritized the activities to be funded by REDD project revenue and set their own priorities and spending plans.
Evidence Used to Assess Conformance:	MR Sections 2.3.7 and 2.3.8, PD Sections 2.3.7 and 2.3.8, site visit interviews
Findings:	Site visit interviews with village government representatives and community members substantiated the participatory nature of the creation of

	the VLUPs for each village and their incorporation into the overall project scheme which demonstrates effective consultation resulting in community stakeholders influencing project design. Site visit interviews substantiated widespread concurrence from community stakeholders that they were given opportunities through village steering committees to provide input on how village-identified activities would be prioritized based on the REDD project funds available. Site visit interviews also substantiated the Project Proponent and project partners are regularly present in the project landscape and have a lot of contact with the community stakeholders. Site visit interviews also substantiate that the Project Proponent and project partners provide governance training and meetings for adaptive management of the project, but do not make the decisions for how the project funds are distributed within the community. Site visit interviews with village government representatives and community members substantiated that local villages determine the prioritized the activities to be funded by REDD project revenue and set their own priorities and spending plans. Site visit interviews substantiated that ongoing communication is carried out in part through a CT staff member who is from the villages, Frank Kweka, who interacts with the communities and was reported as helping them with whatever they needed related to the carbon project and who was available to discuss issues with the project. Item closed.
Date Closed:	12 October 2021

Indicator G3.5 - Demonstrate that all consultations and participatory processes have been undertaken directly with Communities and Other Stakeholders or through their legitimate representatives, ensuring adequate levels of information sharing with the members of the groups.	MR states multiple meetings have occurred with Village Governments and Village Government officials are responsible for conveying information to sub-villages. Copies of leaflets in Swahili explaining the project were distributed in villages and carbon champions further spread project summary information.
Evidence Used to Assess Conformance:	MR Sections 2.3.7, 2.3.8, and 2.3.9, PD Section 2.3.8, site visit interviews

Findings:	Site visit interviews with Village Government representatives and community members substantiated that consultations and participatory processes have been carried out with the communities and their legitimate representatives. The project is reported to consult primarily through the Village Governments. Site visit interviews substantiated the general structure of the Village Governments, the composition of these bodies and of advisory committees, the democratic process of electing members to these bodies, and the eligibility for any community member to be elected to these bodies, which substantiates these bodies are legitimate representatives of the communities. Site visit interviews substantiated sharing of information through the Village Governments and through Carbon Champions. Item closed.
Date Closed:	13 October 2021

Indicator G3.6 - Describe the measures needed and <i>taken</i> to enable effective participation, as appropriate, of all Communities, including all the Community Groups, that want and need to be involved in project design, implementation, monitoring and evaluation throughout the project lifetime, and describe how they have been implemented in a culturally appropriate and gender sensitive manner.	For reference, Appendix 1 of the PD identifies the following stakeholders, communities, and community groups with rights, interest, and overall relevance to the project: Tanganyika District Government Mpanda District Government Bujombe Village (+5 sub-villages) Kagunga Village (+4 sub-villages) Kapanga Village (+3 sub-villages) Katuma Village (+4 sub-villages) Lugonesi Village (+7 sub-villages) Lwega Village (+6 sub-villages) Mpembe Village (+6 sub-villages) Mwese Village (+5 sub-villages) Village Women & Women's Groups The MR states that the Project Proponent has organized face-to-face meetings with community members to present opportunities to participate in the project. Additionally, Project Proponent has suggested women be allowed to be VGS to Villages governments.
Evidence Used to Assess Conformance:	MR Section 2.3.1 through 2.3.10, PD Section 2.3.10 and Appendix 1, Community Monitoring Plan for the

	Ntakata Mountains REDD Project, site visit interviews and observations
Findings:	Documentation in the MR and supplementary documents, supported by site visit interviews, substantiate the Village communities, including women, have been involved in project implementation activities, monitoring, and evaluation. Evidence reviewed and interviews substantiate the Project Proponent has drawn on the democratic practices and governance structure in place in the communities as a basis for efforts to ensure community participation for determining and safeguarding the forest reserve boundaries, determining how the REDD project funds would be distributed among the communities, and determining funding priorities established within each Village. Site visit observations and interviews within the Villages visited substantiate implementation of project activities, including development of VLUPs, has been undertaken through involvement of the local communities. Site visit interviews substantiate VGS are recruited from local communities. Site visit interviews substantiates the Project Proponent is making progress on encouraging the communities to overcome a cultural gender bias against women's employment in the VGS, and the audit team met with one of the two women who are now in the VGS. Site visit interviews substantiate widespread interest and involvement in project activities and implementation, and widespread understanding of the ways in which community members can provide feedback on the project activities. Item closed.
Date Closed:	13 October 2021
Indicator G3.7 - Describe the measures needed and <i>taken</i> to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination or sexual harassment with respect to the project.	The MR states that there are company and human resource policies in place to prevent and define discrimination relating to gender, religion or sex. There is a grievance policy, and all employees and partners sign a code of conduct which includes anti-discrimination.

Evidence Used to Assess Conformance:	MR Section 2.3.11, PD Section 2.3.11
Findings:	The language regarding discrimination in the MR is consistent with the language in the validated PD, which was determined to be adequate, but there is no specific reference to sexual harassment policy. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.11 include the requirement to describe the activities and/or processes implemented to ensure that all entities involved in project design and implementation are not involved in or complicit in any form of sexual harassment with respect to the project.
Clarification Request (CL):	Please provide documentation detailing sexual harassment policy, and measures taken to ensure compliance with this policy.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Company policies provided. Sexual harassment physical or verbal considered gross misconduct (level A) and requires immediate dismissal. All staff and sign the code of conduct (included in the company policies) including a commitment to avoid any sexual harassment. Structures for reporting complaints or grievances are clear. (8 February 2022)
Evidence Used to Close CL:	The VVB has reviewed the CT Company Policies provided in response to this request for clarification. CT Company Policies clearly identify sexual harassment as an action resulting in dismissal at first occurrence. Sexual harassment is addressed in the company's Code of Conduct and measures identified within the Company Policies for ensuring compliance with this policy include the requirement for all staff, interns, volunteers, and freelancers to acknowledge they have read, understand, and will adhere to the Code of Conduct. Item closed.
Date Closed:	24 February 2022
Indicator G3.8 - Demonstrate that a clear grievance redress procedure has been formalized to address disputes with Communities and Other Stakeholders that may arise during project planning, implementation and	MR Section 2.3.12 states that no grievances were raised during this monitoring period.

evaluation with respect but not limited to, Free, Prior and Informed Consent, rights to lands, territories and resources, benefit sharing, and participation. The project shall include a process for receiving, hearing, responding to and attempting to resolve Grievances within a reasonable time period. The Feedback and Grievance Redress Procedure shall take into account traditional methods that Communities and Other Stakeholders use to resolve conflicts. The Feedback and Grievance Redress Procedure shall have three stages with reasonable time limits for each of the following stages.

First, the Project Proponent shall attempt to amicably resolve all Grievances, and provide a written response to the Grievances in a manner that is culturally appropriate.

Second, any Grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.

Third, any Grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the Grievance to a competent supranational adjudicatory body, if any.

The Feedback and Grievance Redress Procedure must be publicized and accessible to Communities and Other Stakeholders. Grievances and project responses, including any redress,

must be documented and made publicly available.	
Evidence Used to Assess Conformance:	MR Section 2.3.12, PD Section 2.3.12, site visit interviews
Findings:	Site visit interviews with individuals employed by the project or otherwise involved with the project or engaged in interactions with project staff determined that these individuals may not be familiar with the formal grievance process, but were generally aware of who they could bring grievances to if they arose. The MR states there were no grievances logged during this reporting period. In response to direct questioning, none of the interviewees during the site visits identified any grievances they had raised about the project or project staff or knew of anyone who had raised any grievances during this reporting period. The validated PD identifies the grievance redress procedure. In the apparent absence of any grievances raised during the reporting period, and the auditor not identifying any individuals who had raised or knew of any grievances raised, the auditor is relying on Project Proponent's anticipated adherence to the grievance redress policy outlined in the validated PD to determine that the grievance redress procedure will be implemented when or if a grievance is raised. Item closed.
Date Closed:	13 October 2021

Indicator G3.9 - Describe measures needed and <i>taken</i> to provide orientation and training for the project's workers and relevant people from the Communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the Communities, with special attention to women and vulnerable and/or marginalized people. Identify how training is passed on to new workers when there is staff turnover, so that local capacity will not be lost.	The MR states that several meetings occurred where project related training was provided to Village Government members and there were opportunities for community members to gain more knowledge of the project. The MR also references several specific instances of training that occurred during this verification period including the training of carbon champions, Village Game Scouts, and project leadership.
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Evidence Used to Assess Conformance:	MR Sections 2.3.13 and 2.3.14, PD Section 2.3.14; supplemental documentation including agendas and attendee lists for trainings; site visit interviews
Findings:	The MR describes measures taken to provide training to project employees as well as community leaders and members and documents specific activities that contribute towards building community capacity completed during this monitoring period. Site visit interviews substantiate progress towards building capacity within the communities through employment and job training, building capacity through training on good governance, and building capacity through raising awareness of the carbon project. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.13 include the requirement to identify how, once it is built, local capacity is not lost. The MR is not clear on how local capacity will not be lost.
Clarification Request (CL):	Please clarify actions taken to ensure that local capacity will not be lost once it is built.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	As substantiated during the site visit capacity was built through employment and job training, training on good governance, and increased project awareness. As these capacity increasing are skill and knowledge transfers, they are permanent. This is bolstered by the fact that project engages in these capacity increases with existing, official and project- independent structures. Meaning that the structures that gained capacity like the village and district governments will continue to exist regardless of the project and will benefit from the increased capacity while dispatching various project and non-project duties. Lastly the young age of many of the community members with increased capacity ensures the longevity of the local capacity built, including that most of the carbon champions and VGS are youth. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.3.13 has been revised to provide an appropriate summary of actions taken to ensure that local capacity will not be lost once the capacity is built.
Date Closed:	24 February 2022

Indicator G3.10 - <i>Demonstrate</i> that people from the Communities are given an equal opportunity to fill all work positions (including management) if the job requirements are met. Explain how workers are selected for positions and where relevant, describe the measures needed and <i>taken</i> to ensure Community members, including women and vulnerable and/or marginalized people, are given a fair chance to fill positions for which they can be trained.	MR states that all members can apply and will be assessed fairly and without bias. The MR states that Village governments are requested to ensure women and other marginalized groups are informed of jobs and encouraged to apply.
Evidence Used to Assess Conformance:	MR Section 2.3.14 and 1.2, PD Section 2.3.15; site visit interviews
Findings:	MR Section 2.3.14 states that all employees of the project were employed from this project area during this monitoring period and that all members of the community were eligible and encouraged to apply for open positions with bias, and that efforts were made to encourage applications from women and other marginalized groups. Site visit interviews supported the existing employees' general belief that the process involved for project employment was fair and unbiased. Site visit interviews substantiated that project employees who were interviewed were hired from the local communities. MR Section 1.2 indicates that only 5 of the 48 full-time equivalent project employees were female. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.14 include the requirement to describe the activities and/or processes implemented to ensure women are given a fair chance to fill positions for which they can be trained.
Clarification Request (CL):	Please clarify and provide documentation for the actions taken during this reporting period to ensure that women were given a fair chance to fill project positions that were available during this reporting period.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The limited number of females employed is a result of the nature of the cultural preferences and desires for certain positions and not a result of the unfair nature of the process used by the villages to fill

	positions. The village governments are democratically elected and participate. Much of the discrepancy is based on 39 of the positions being for VGS, 2 of those 39 are female and in the Tanzanian context this is an accomplishment as female VGS are very rare. Across Tanzania and Africa, rangers are often male due to the perceived nature of the job and personal and cultural preference for women to not apply for those roles. The remaining 9 jobs (8 carbon champions and 1 project manager) contain 3 females, these are the roles that CT pays directly. Women were given a fair chance and encouraged to fill project positions and have made inroads compared to the baseline. Furthermore, as seen during the site visit a significant amount of the official village leadership, especially chairpersons and village executive officers are female. Females have also gotten most of the available positions in the community cocobas. Lastly as noted during the project visit CT's most recent direct hire (the second one in the project) is a female community member in the position of community finance officer. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.3.14 has been revised to provide clarification documenting actions taken during this reporting period to ensure that women were given a fair chance to fill project positions that were available during this reporting period. Item closed.
Date Closed:	24 February 2022
Indicator G3.11 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe measures needed and <i>taken</i> to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	MR states that Project Proponent is organizationally committed through internal policy to follow the Employment Act and Labor Institutions Act of 2004, and the Code of Good Practice Rules of 2007. MR states all employees received a briefing on laws and working rights as well as copies of company policy documents.
Evidence Used to Assess Conformance:	MR Section 2.3.15, PD Section 2.3.16. site visit interviews

Findings:	MR Section 2.3.15 states the Project Proponent adheres to applicable labor laws and regulations and that employees are informed of their rights during employee orientation. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.16 include the requirement to demonstrate how compliance was achieved for these relevant labor laws and regulations.
Clarification Request (CL):	Please clarify and provide documentation for the actions taken during this reporting period to ensure compliance with the cited labor laws and regulations.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	In TZ CT is required by law to: 1. Contribute to employees' pension 2. Pay for workers compensation fund in case of injury 3. File annual returns for non-citizens employees Total compliance with labor and business laws allows a company to receive 1. tax clearance 2. renewed business license Evidence provided in the form of a receipt for payment to the national pension, a receipt from the workers compensation fund, signed employee pay slip showing these deductions and following the regulations, and the labor registration for non-citizen employees. Furthermore, provided is tax clearance certificate and business license from this reporting period, which can also be attained through compliance with Tanzanian labor laws and regulations. (8 February 2022)
Evidence Used to Close CL:	The clarification provided by the Project Proponent identifies how compliance is achieved for relevant laws and regulations covering worker rights in Tanzania. Item closed.
Date Closed:	24 February 2022
Indicator G3.12 - Comprehensively assess situations and occupations that might arise through the implementation of the project and pose a substantial risk to worker	The MR state that risks associated with the project are well within a normal range and workers are informed of possible risks and how to minimize them.

safety. Describe measures needed and <i>taken</i> to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks are minimized using best work practices in line with the culture and customary practices of the communities.	Possible risks identified by the MR and PD include vehicle accidents, insect/snake bites, and conflict related violence.
Evidence Used to Assess Conformance:	MR Section 2.3.16, PD Section 2.3.17, support documentation for VGS training, site visit interviews
Findings:	MR Section 2.3.16 and PD Section 2.3.17 state that risks “are well within a normal range” and that employees are informed of risks during orientation. Several risks are identified in the MR and measures taken to mitigate these risks are described, focusing mainly on training and providing proper equipment for fieldwork and for the VGS. The risks identified in the MR are consistent with the risks identified in the validated PD. Review of VGS training information provided to the auditor and site visit interviews substantiates the professional training provided to the VGS included law enforcement and anti-poaching techniques which are key measures for minimizing occupational safety risks for the VGS. The MR states that no occupational safety incidents were reported during this monitoring period. Instructions for the CCB/VCS Monitoring Report Template for Section 2.3.16 are to provide an assessment of substantial risks to worker safety that have arisen due to project implementation, describe activities and/or processes implemented to inform workers of risks and how to minimize such risks, and to show how risks have been minimized. The MR, site interviews, and documentation provided for VGS training substantiate these criteria have been met. Item closed.
Date Closed:	13 October 2021

Indicator G4.1 - Describe the project’s governance structures, and roles and responsibilities of all the entities involved in project design	MR Section 2.4.1 presents a diagram of the project governance structure consistent with the governance structure described and governance structure diagram depicted in PD Section 2.4.2.
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and implementation. For projects using a programmatic approach, identify any new entities included in the project since the last validation or verification against the CCB Standards.	
Evidence Used to Assess Conformance:	PD Section 2.4.1, MR Sections 2.4.1 and 2.2.5
Findings:	Review of the MR and supporting documents substantiate this project is not a grouped project and no new project areas or communities were added to the project during this reporting period. The project governance structure continues as described in the validated PD. Item closed.
Date Closed:	14 October 2021

Indicator G4.2 - Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations are partnered with to support the project or have a recruitment strategy to fill the gaps.	The MR states that the key skills needed are project management, marketing, community engagement, natural resource conservation, biodiversity assessment, provision of health services, rural development, and carbon measure and monitoring. The MR states the key management team staff have experience developing and implementing two other REDD projects in Tanzania. TerraCarbon LLC was contracted to provide services for the project.
Evidence Used to Assess Conformance:	MR Sections 2.4.1, 2.4.2, and 2.4.3; PD Sections 2.4.1, 2.4.2 and 2.4.3; MR Sections 2.1.3 and 2.1.4; PD Sections 2.1.3 and 2.1.4; discussions with Project Proponent and key project staff, site visit interviews with community stakeholders
Findings:	Review of MR Sections 2.1.3 and 2.1.4 and site visit observations and interviews confirms the key project personnel from CT, TerraCarbon, Tuungane, and The Greater Mahale Ecosystem Research and Conservation, as identified in the validated PD continued their involvement in the project, and that the key Government organizations also continued in their support and involvement. Based on previous validated project experience and credentials of the project

	development team, it appears likely that all the skills needed to implement a project of this nature can be supplied by the Project Proponent and associates. Discussions with Project Proponent and key project demonstrated the project utilizes personnel with key technical and management skills believed to be required to successfully implement the project. Interviews with community stakeholders identified widespread belief that the project is being managed competently Item closed.
Date Closed:	14 October 2021
Indicator G4.3 - Document the financial health of the implementing organization(s). Provide assurance that the Project Proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion, and describe any measures needed <i>and taken</i> to be able to provide this assurance.	MR Section 2.4.4 states CT is an established company with a sound financial basis for operations over the project lifetime and that the annual audit reports and financial statements are available upon request. MR Section 2.4.5 contains the assurance stating CT and its partners are not complicit in any form of corruption.
Evidence Used to Assess Conformance:	MR Sections 2.4.4 and 2.4.5, discussions and interviews with Project Proponent, project management staff, Village Government representatives, District Government representatives, community members; supplemental documents Financial data Ntakata_2021_Risk_Report_2021-06-30 and Ntakata_Financial_Viability_JA070721
Findings:	Interviews and discussions with Project Proponent, project management staff, Village Government representatives, District Government representatives, and community members did not identify any concerns the project or project staff are complicit in any form of corruption. Community members interviewed confirmed that projects they have requested and prioritized to be funded through the REDD revenues are being delivered as anticipated, and that the Villages receive postings about the project

	governance and what has been done with the money received. The financial health of the implementing organization(s) is being assessed as part of the VCS verification of the Financial Viability Analysis for the Non-Permanence Risk Analysis. Resolution for CCB Indicator G4.3 was pending completion of the VCS assessment. The VVB reviewed financial information provided by the Project Proponent and confirmed the information provided satisfactorily demonstrated the financial health of the implementing organization is adequate to support project implementation. Item closed
Date Closed:	24 February 2022

Indicator G5.1 - Describe and map statutory and customary tenure/use/access/management rights to lands, territories and resources in the Project Zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and <i>taken</i> by the project to help to secure statutory rights. <i>Demonstrate</i> that all Property Rights are recognized, respected, and supported.	PD Sections 2.5.1 and 2.5.2 identify the statutory and customary property rights applicable to the project zone. PD Appendix 3 presents maps for the Village Use Plans (VLUPs). Under the Village Land Act, the VLUPs are legally enforceable. MR Section 2.5.1 states that most villagers do not have certificates of customary rights to occupancy (CCROs) due to the slowness of the registration process, leading to unclear property boundaries and potential for land disputes. The MR states that the disputes generally involve small plots of agricultural land and are sometimes linked to grazing.
Evidence Used to Assess Conformance:	MR Sections 2.5.1 and 2.3.7, PD Sections 2.5.1 and 2.5.2, PD Appendix 3, site visit interviews
Findings:	Site visit observations confirmed the posting of VLUPs in villages visited and interviews with community members substantiated the general agreement that community members knew about the VLUPs. Site visit interviews substantiated there were no concerns over the VLUPs because they were developed for the communities by the communities. Site visit interviews substantiated community members identified protection of religious areas, protection of wildlife, and protection of areas for grazing as benefits of the project. Site visit interviews determined that community members identified outsiders (not village community members) as the source for conflicts over land use. MR Section 2.3.7

	states that the Ntakata REDD project adopted the VLUPs as part of the overall project scheme, which integrates community views and priorities into the project design. Site visit interviews with Village Government representatives and community members substantiates the project recognizes, respects, and supports all property rights. Instructions for the CCB/VCS Monitoring Report Template for Section 2.5.1 include the requirement to describe, if applicable, activities and/or processes implemented by the project to help to secure statutory rights. The last paragraph of MR Section 2.5.1 appears to begin to summarize these activities, but also ends with an incomplete sentence indicating that some text intended to complete this sentence and paragraph are missing. Information presented elsewhere in the MR identifies the support provided by the project in completing the VLUPs.
Clarification Request (CL):	Please provide the clarification in Section 2.5.1 for the efforts the project has made in supporting the Villages in completing VLUPs and in helping secure statutory rights.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Clarification provided in Section 2.5.1 for the efforts the project has made in supporting the Villages in completing VLUPs and in helping secure statutory rights. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.5.1 has been revised to provide clarification for the efforts the project has made in supporting the Villages in completing VLUPs and in helping secure statutory rights.
Date Closed:	24 February 2022
Indicator G5.2 - Demonstrate with documented consultations and agreements that a. the project will not encroach uninvited on private property, community property, or government property,	MR Section 2.5.2 states that the project area was based on the VLUPs that were developed under a participatory process in consultation with multiple stakeholders. The MR states that communities gave FPIC for the project to be implemented in the village forest reserves through multiple consultations in each village and the subsequent negotiation and signing of project contracts with each participating village.

b. the Free, Prior, and Informed Consent⁵ has been obtained of those whose property rights are affected by the project through a transparent, agreed process.

Free, Prior and Informed Consent is defined as:

- **‘Free’** means no coercion, intimidation, manipulation, threat and bribery;
- **‘Prior’** means sufficiently in advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes;
- **‘Informed’** means that information is provided that covers (at least) the following aspects
 - a. the nature, size, pace, reversibility and scope of any proposed project or activity;
 - b. the reason/s or purpose of the project and/or activity;
 - c. the duration of the above;
 - d. the locality of areas that will be affected;
 - e. a preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle;
 - f. personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees, and others); and
 - g. procedures that the project may entail; and
- **‘Consent’** means that there is the option of withholding consent and that the parties have reasonably understood it.
- Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined.

c. appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project.	
Evidence Used to Assess Conformance:	MR Section 2.5.2, PD Section 2.5.3, site visit interviews with District and Village Government representatives and community members; supplemental documentation for contractual requirements and compensation provided
Findings:	MR Section 2.5.2 outlines meetings held with District and Village stakeholders from June 2016 through September 2018, prior to and leading up to the signing of contracts. The listed consultation meeting summaries are generally consistent with the list of meetings identified in Section 2.5.3 of the validated PD, with apparent correction of one date and addition of one set of meetings not included in the PD. s FPIC was established by the validated PD through signing of project contracts by Village Governments as representatives of villagers. Site visit interviews in September 2021 substantiate the willing participation of the Village Governments in the project, and the widespread consensus among the community members interviewed. The project area was substantiated as occurring on forest reserve lands identified by the villages as part of their development and implementation of their VLUPs. No uninvited encroachment by the project on private, community, or government land was identified by the auditors. Instructions for the CCB/VCS Monitoring Report Template for Section 2.5.2 include the requirement to demonstrate appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project. Site visit interviews with District and Village Government representatives and community members substantiate that compensation generally believed to be fair is being provided for use of the project area for the REDD project. Information provided by the Project Proponent in supplemental documentation identifies the funds that have been distributed to the District and

	Villages through May 2021. The MR does not state nor do supplemental materials provided to date to the auditor demonstrate the compensation being provided or provided to date meets the contractual obligations of the project with the Village and District Governments.
Non-conformance Request (NCR):	Please provide appropriate documentation demonstrating the project is providing appropriate compensation to the affected parties and please provide appropriate clarification or statement of attestation within MR Section 2.5.2.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The MR now states, and materials have been provided to demonstrate the compensation provided to date meets the contractual obligations of the project with the Village and District Governments. (8 February 2022)
Evidence Used to Close NCR:	The VVB has reviewed supplemental documentation provided by the Project Proponent, including the contract between CT and the Villages, and evidence for payments made to the villages. The contract clearly outlines the compensation to be provided in return for the Villages' participation and for following their village land use plans and laws to reduce deforestation. The VVB has concluded appropriate restitution or compensation has been allocated to the Villages whose lands have been or will be affected by the project. Item closed.
Date Closed:	24 February 2022
Indicator G5.3 - Demonstrate that project activities do not lead to involuntary removal or relocation of Property Rights Holders from their lands or territories, and does not force them to relocate activities important to their culture or livelihood. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must <i>demonstrate</i> that the agreement was made with the Free, Prior, and Informed Consent of those concerned and includes	The MR states the project does not require the involuntary removal or relocation of communities or important activities to livelihood and culture.

provisions for just and fair compensation.	
Evidence Used to Assess Conformance:	MR Section 2.5.3, PD Section 2.5.4, site visit interviews
Findings:	MR Section 2.5.3 is consistent with PD Section 2.5.4 in stating that project activities did not involve any involuntary removal or relocation of property rights holders from their lands. Site visit interviews with Village Government representatives and community members substantiated the participatory nature used in developing and implementing the VLUPs and that the project does not force them to relocate activities important to their culture or livelihood. Item closed.
Date Closed:	14 October 2021

Indicator G5.4 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., illegal logging) taking place in the Project Zone and describe measures needed and <i>taken</i> to reduce these activities so that project benefits are not derived from illegal activities.	The MR identifies logging and clearing of forest and illegal hunting of wildlife as illegal activities that could affect the project's impacts. The MR identifies increased enforcement through employing and training VSGs and unpredictable patrol schedules as measures taken to reduce illegal activities.
Evidence Used to Assess Conformance:	MR Section 2.5.4, PD Section 2.5.5, site visit interviews
Findings:	MR Section 2.5.4 identifies illegal activities that could have negative effects on the project that are the same as those identified in PD Section 2.5.5. The MR states these issues were addressed through the employment and training of VGS, which was identified as the project's core activity. The MR further identifies complementary village development activities supported by the project which help reduce pressure on the forests. Site visit interviews with VGS staff and District Government representatives providing law enforcement support to the villages substantiate the hiring, training, and deployment of VGS personnel and support from the District Government. VGS personnel also reported using informant networks within the community to assist in their efforts. Site visit observations substantiated the posting of VLUPs in communities, widespread knowledge of the forest reserve areas by community members, and the

	presence of boundary markers for a forest reserve area. Site visit interviews with community members identified the belief that the threat of illegal activities would generally be from individuals from outside the community. The activities of the VGS are believed to be effective in reducing the threat of illegal activities that could affect the project's impacts. Item closed.
Date Closed:	14 October 2021

Indicator G5.5 - Identify any ongoing or unresolved conflicts or disputes over rights to lands, territories and resources and also any disputes that were resolved during the last twenty years where such records exist, or at least during the last ten years. If applicable, describe measures needed and <i>taken</i> to resolve conflicts or disputes. <i>Demonstrate</i> that no activity is undertaken by the project that could prejudice the outcome of an unresolved dispute relevant to the project over lands, territories and resources in the Project Zone.	MR Section 2.5.4 states the VLUP process has resolved previous land disputes involving the village forest reserves through participatory planning and mapping with stakeholders and that the plans are now widely recognized and legally enforceable. PD Section 2.5.6 states that there were no ongoing or historical disputes between stakeholders over land ownership or resource use within the project area, and further states that stakeholders were engaged in the planning of all land and resource ownership.
Evidence Used to Assess Conformance:	MR Section 2.5.5, PD Section 2.5.6, site visit interviews
Findings:	The project's support in the development of the VLUP's is identified as a key component for helping prevent disputes relevant to the project over the forest reserves. In response to direct questioning regarding the forest reserves, Village Government representatives and community members did not identify any disputes on an individual level or awareness of any disputes at a village level over land ownership or use. Site visit interviews with Village Government representatives substantiated the Project Proponent does not exert undue influence on the local community decisions. Item closed.
Date Closed:	21 September 2021

Indicator G5.6 - Submit a list of all national and local laws and regulations in the host country that	The MR provides a list of laws relevant to project activities including, for reference: Land Acquisitions Act (1967)
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are relevant to the project activities. Provide assurance that the project is complying with these and, where relevant, demonstrate how compliance is achieved.	• Land Act, number 4 (1999) • Village Land Act, number 5 (1999) • Forest Act (2002) • Contract Act (2002) • Employment and Labor Relations Act (2004) • Prevention and Combatting Corruption (2004) • Wildlife Conservation Act (2009) • Employment and Labor Relations (General) Regulations (2017)
Evidence Used to Assess Conformance:	MR Section 2.5.6, PD Section 2.5.7
Findings:	MR Section 2.5.6 lists laws and regulations considered relevant to project activities that is the same as the list provided in PD Section 2.5.7. The MR and PD provide a summary for the relevance of each of these laws and regulations to the project, and several identify the applicable law or regulation as setting standards or basis for actions undertaken or followed by the project. Instructions for the CCB/VCS Monitoring Report Template for Section 2.5.6 are to: List any national and local laws and regulations in the host country that have gone into effect, changed, or been eliminated since the project's last validation or verification that are relevant to the project activities. Provide assurance that the project is in compliance with all national and local laws and regulations in the host country that are relevant to the project activities and, where relevant, demonstrate how compliance is achieved.
Clarification Request (CL):	Three items were identified as requiring clarification to address Indicator G5.6: • Please provide clarification in Section 2.5.6 on whether there have been any changes in national or local laws and regulations since the last verification that are relevant to the project activities. • Please provide clarification in Section 2.5.6 on how compliance is determined and achieved. • Please provide a definitive statement of assurance in Section 2.5.6 that the project is in compliance with all national and local laws

	and regulations in the host country that are relevant to the project activities.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Clarification provided in Section 2.5.6 on whether there have been any changes in national or local laws and regulations since the last verification that are relevant to the project activities. Clarification provided in Section 2.5.6 on how compliance is determined and achieved. Definitive statement provided in Section 2.5.6 of assurance that the project is in compliance with all national and local laws and regulations that are relevant to the project activities. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 2.5.6 has been revised to include clarification that there have been no changes in national or local laws relevant to project activities and includes appropriate clarification describing how compliance is determined and achieved with relevant laws and regulations. MR Section 2.5.6 contains a definitive statement that the project continues to be in compliance with all national and local laws and regulations that are relevant to the project activities. Item closed.
Date Closed:	24 February 2022

Indicator G5.7 - Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the Communities.	N/A-Validation Item
Evidence Used to Assess Conformance:	PD Section 2.5.8
Findings:	This indicator was addressed in the validated Project Description document and does not need to be re-evaluated during verification. Item closed.
Date Closed:	14 October 2021

Indicator G5.8 - Demonstrate that the Project Proponent(s) has the unconditional, undisputed and unencumbered ability to claim that the project will or did generate or	N/A-Validation Item
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cause the project's climate, community and biodiversity benefits.	
Evidence Used to Assess Conformance:	PD Section 2.5.9
Findings:	This indicator was addressed in the validated Project Description document and does not need to be re-evaluated during verification. Item closed.
Date Closed:	14 October 2021

Indicator G5.9 - Identify the tradable climate, community and biodiversity benefits of the project and specify how double counting is avoided, particularly for offsets sold on the voluntary market and generated in a country participating in a compliance mechanism.	The project is registered under VCS and CCB and is also undergoing validation under SD Vista. Only VCS supplies tradeable benefits. Tanzania is not currently participating in a compliance mechanism.
Evidence Used to Assess Conformance:	MR 2.1.9, PD Sections 2.5.10 through 2.5.15
Findings:	MR Section 2.1.9 provides definitive statements that: - During this verification period GHG emission reductions or removals generated by the project have not been included in an emissions trading program or any other mechanism that includes GHG allowance trading. - During this verification period and since validation the project has not received or sought any other form of environmental credit or become eligible to do so. - During this verification period and since validation the project has not participated or been rejected under any other GHG programs. These statements are consistent with the statements made in the validated PD that: - The Ntakata Mountains REDD project does not seek to generate any other form of environmental or social credit, nor does it intend to do so. - The Ntakata Mountains REDD project is not subject to binding emissions limits or emission trading programs. - The Ntakata Mountains REDD project has not, nor does it intend to create non-

	VCS/CCBGHG emissions reductions or any another form of environmental credit. This includes, but is not limited to, biodiversity credits, species banking, water certificates, and nutrient certificates. • The Ntakata Mountains REDD project has not been registered, nor is it seeking registration under any other GHG programs other than VCS and CCB. • The Ntakata Mountains REDD project has not been rejected by any other GHG programs. • Tanzania is not currently participating in any national REDD+ markets where a compliance mechanism, or formal jurisdictional reporting framework in operation, could lead to double counting. Double counting would therefore be limited to the voluntary markets. The Ntakata Mountains REDD project has not been registered, nor is seeking registration, under any other GHG programs hence double counting is not an issue for this project. Item closed.
Date Closed:	14 October 21

Indicator GL1.1 - Identify likely regional or sub-national climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land use scenario due to these climate change scenarios in the absence of the project.	This indicator was successfully closed during project validation. Section 3.4.1 of the validated PD identifies likely climate change scenarios reported as developed specifically for Tanzania.
Evidence Used to Assess Conformance:	PD Section 3.4.1
Findings:	This indicator was addressed in the validated Project Description document and does not need to be re-evaluated during verification. Item closed.
Date Closed:	14 October 2021

Indicator GL1.2 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of Communities and/or the conservation status of biodiversity in the Project Zone and surrounding regions.	This indicator was successfully closed during project validation. Section 3.4.2 of the validated PD describes current or anticipated impacts to community well-being and biodiversity conservation status within the Project Zone as a result of anticipated climate changes.
Evidence Used to Assess Conformance:	PD Section 3.4.2
Findings:	This indicator was addressed in the validated Project Description document and does not need to be re-evaluated during verification. Item closed.
Date Closed:	14 October 2021

Indicator GL1.3 - Describe measures needed and <i>taken</i> to assist Communities and/or biodiversity to adapt to the probable impacts of climate change based on the causal model that explains how the project activities will achieve the project's predicted adaptation benefits.	PD Section 3.4.3 identified the following measures as needed and designed for adaptation: • Land tenure and planning to provide the most basic and useful adaptations to climate change. • Diverse livelihoods, especially attained through education, which are not reliant on exploiting the local natural resource base. • Investment in health facilities and interventions to protect communities against future health issues compounded by climate change. • Climate smart and adaptive agriculture and grazing regimes. • Investment and training in good governance and institutions. • The PD notes that project activities addressing these measures will reduce effects on the communities and pressure on the biodiverse habitat and natural resource base.
Evidence Used to Assess Conformance:	MR Section 3.3.1, PD Section 3.4.3, site visit observations and site visit interviews
Findings:	Site visit observations and interviews substantiate the completion of VLUPs that account for forest protection as well as community uses needed for livelihood. Site visit observations and interviews were conducted with COCOBA groups in two communities, and interviews with beneficiaries substantiated the small loan program through REDD project proceeds is helping diversify livelihoods.

	Site visit observations and interviews substantiated progress on helping bring health facilities and education to the communities. Site visit observations and interviews substantiated the VLUPs have dedicated land reserved for agricultural and grazing purposes. Site visit interviews substantiated that climate smart agriculture training has been initiated. Site visit interviews substantiated training has been provided on good governance and community members acknowledged the guidance provided. Site visit observations and remote sensing data indicate forest loss is still occurring, though far less than what was forecasted as would be occurring in the absence of the project. The activities identified and substantiated as having been implemented or initiated during the period covered by the verification have been determined to be delivering the intended results. Item closed.
Date Closed:	14 October 2021

Indicator GL1.4 - Include indicators for adaptation benefits for Communities and/or biodiversity in the monitoring plan. <i>Demonstrate</i> that the project activities assist Communities and/or biodiversity to adapt to the probable impacts of climate change. Assessment of impacts of project activities on Communities must include an evaluation of the impacts by the affected Communities.	PD Section 3.4.3 identified the following measures as needed and designed for adaptation: • Land tenure and planning to provide the most basic and useful adaptations to climate change. • Diverse livelihoods, especially attained through education, which are not reliant on exploiting the local natural resource base, • Investment in health facilities and interventions to protect communities against future health issues compounded by climate change. • Climate smart and adaptive agriculture and grazing regimes. • Investment and training in good governance and institutions. • The PD notes that project activities addressing these measures will reduce effects on the communities and pressure on the biodiverse habitat and natural resource base.
Evidence Used to Assess Conformance:	MR Section 3.3.1, PD Section 3.4.3, site visit observations and site visit interviews
Findings:	The findings for Indicator GL1.3 identify the steps taken to verify the results of actions taken by the

	project to assist communities and biodiversity to adapt to the probable impacts of climate change. For Indicator GL1.4 the verifier is required to include documentation assessed including the evaluations of the impacts by the affected communities. Site visit interviews with community members determined that community members are generally very familiar with the VLUPs, and the auditors received positive feedback from community members that the project is helping ensure the protection of farming and grazing rights as well as forest protection. Community members interviewed acknowledged the additional benefits provided by forest protection. Site visit interviews with beneficiaries of livelihood improvement efforts confirmed the beneficiaries believe the project has had positive benefits on improving their livelihood opportunities. Site visit interviews confirmed affected communities view the construction of health facilities as having a positive effect on the communities. Site visit interviews confirmed community members either had participated in or knew someone who had participated in health education programs funded through project proceeds. Site visit interviews substantiated widespread community belief that the project has helped protect farming and grazing activities for the communities. Site visit interviews substantiated Village Government representatives' beliefs that good governance training has had positive effects, particularly in understanding Western concepts of fairness. Site visit interviews identified the positive evaluation from a District stakeholder that the project is having spillover benefits to other villages because of the additional project proceeds available to the District. Site interviews with community members about their evaluation of the project impacts substantiated widespread community belief that the project is delivering the intended results. Item closed.
Date Closed:	14 October 2021

Community Section

Indicator CM1.1 - Describe the Communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics. Describe the social, economic and cultural diversity within the Communities and the differences and interactions between the Community Groups.	The monitoring report does not address this item, because it was established at validation and cannot change.
Evidence Used to Assess Conformance:	Sections 4.1.1 and 4.1.2 of the validated PD
Findings:	This item was successfully closed during project validation and does not require re-examination during verification.
Date Closed:	21 September 2021

Indicator CM1.2 - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to community well-being and describe the qualifying attributes for any identified HCVs: a. Areas that provide critical ecosystem services; b. Areas that are fundamental for the livelihoods of Communities; and c. Areas that are critical for the traditional cultural identity of Communities. Identify the areas that need to be managed to maintain or enhance the identified HCVs.	Like the previous item, this is a validation item on the state of the project area at the start of the project and will not be re-examined here. However, the HCVs are recited here for reference for other HCV-related items. • Village water sources • “Matambiko” spiritual sites • Beekeeping / honey hunting areas
Evidence Used to Assess Conformance:	PD Section 4.1.3
Findings:	The three listed community well-being HCVs were identified in the validated PD. The MR does not identify any changes in the HCVs and so this indicator is not being re-examined for verification. Item closed.
Date Closed:	21 September 2021

Indicator CM1.3 - Describe the expected changes in the well-being conditions and other characteristics of Communities under the without-project land use scenario, including the impact of likely changes on all ecosystem services in the Project Zone identified as important to Communities.	This item was established at validation and cannot change, since the without project scenario is no longer an option.
Evidence Used to Assess Conformance:	PD Section 4.1.4
Findings:	This validation item does not need to be re-examined for verification.
Date Closed:	21 September 2021

Indicator CM2.1 - Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified Community Groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected Community Groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being of the Community Groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the Communities (including water and soil resources), over the project lifetime.	For reference, PD Section 4.2.1 lists the following expected community impacts for three identified community groups: Villages (all 8 project villages) 1. Improved livelihoods (e.g., income, employment, production) 2. Improved reproductive health 3. Increased access to education 4. Reduced conflict over land and resources 5. Increased resilience Women and Women's groups 1. Improved livelihoods 2. Greater control over reproductive health Village Game Scouts (VGS) 1. Improved livelihoods (e.g., income, employment, production) 2. Improved capacities (enforcement, negotiation, coordination)
Evidence Used to Assess Conformance:	MR Section 4.1.1, PD Section 4.2.1, site visit interviews
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 4.1.1 are to complete the table

	provided in the template. The template table includes four rows (Community Group, Impact, Type of Benefit/Cost/Risk, and Change in Well-being) to be completed for each community group. The MR identifies Community Group and Impacts consistent with those listed in the PD and consistent with template instructions. The MR describes Type of Benefit/Cost/Risk for the Villages Community Group in accordance with template instructions for the impacts identified, but does not consistently provide the required description for the other two Community Groups. The MR is missing the row “Change in Well-being” for two of the community group tables and does not present type or magnitude of impact for any of the three Community Groups. Instructions for “Type of Benefit/Cost/Risk” are: Describe whether the impact is predicted or actual, direct or indirect, and whether it is a benefit, cost or risk Instructions for “Change in Well-being” are: Describe type and magnitude of impact Site visit interviews and observations substantiates the general improvement in well-being for the community groups identified, but this assessment is preliminary pending review of the Proponent’s fully completed assessment of impacts.
Non-conformance Request (NCR):	Please complete Section 4.1.1 in accordance with template instructions.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Section 4.1.1 completed in accordance with template instructions. (8 February 2022)
Evidence Used to Close NCR:	The VVB confirmed MR Section 4.1.1 has been revised to include information required regarding type and magnitude of impacts for community groups and provides information for changes in well-being. The additional information provided in Section 4.1.1 is consistent with information substantiated by the VVB during site visit interviews and observations. Item closed.
Date Closed:	24 February 2022

Indicator CM2.2 - Describe measures needed and <i>taken</i> to mitigate any negative well-being impacts on Community Groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.	MR Section 4.1.2 states that restrictions on encroachment of remaining forest land for agricultural land could be perceived negatively by families who do not have enough land to divide among all their children. The MR indicates this potential problem is mitigated by the project through introducing climate smart agricultural techniques to increase productivity. Additionally, the project claims to have created a more vibrant economy, allowing for alternative livelihoods such as small businesses, and through direct employment as VGS.
Evidence Used to Assess Conformance:	MR Section 4.1.2, PD Section 4.2.2, site visit observations and site visit interviews
Findings:	Measures identified in the MR as having been taken are consistent with the measures identified as needed in the PD. Site visit interviews substantiate the initiation of climate smart agricultural training by the project. Site visit observations and interviews substantiate the increased opportunities for alternative livelihoods through the COCOBA program for small businesses. Specific COCOBA beneficiaries interviewed during the site visit included community members now involved in livelihoods including restaurants, tailors, palm oil reselling, vegetable selling, and grain selling. Site visit observations and interviews confirmed the employment of members from the community as VGS. Site visit observations and interviews substantiate mitigation actions identified as needed have been implemented in accordance with the validated PD. Item closed.
Date Closed:	15 October 2021

Indicator CM2.3 - <i>Demonstrate</i> that the net well-being impacts of the project are positive for all identified Community Groups compared with their anticipated well-being conditions under the without-project land use scenario (described in CM1).	MR Section 4.1.3 states the net well-being impacts of the project are positive for all community groups with positive impacts including improved livelihoods through improved agriculture, employment, income, increased access to and quality of education, improved reproductive health services, reduced land conflict, and increased resilience in response to environmental shocks.
Evidence Used to Assess Conformance:	MR Sections 4.1.1 through 4.1.3, PD Sections 4.2.1 through 4.2.3, site visit observations and site visit interviews
Findings:	Site visit observations and interviews substantiate the positive impacts from the project reported for the

	community groups identified by the PD: Villages, Women and Women's Groups, and VGS. Site visit observations and interviews substantiate mitigation actions identified as needed have been implemented in accordance with the validated PD. With the positive impacts substantiated for the community groups and mitigation implemented for potential negative impacts, the overall net impact of project activities on community groups is positive. Item closed.
Date Closed:	15 October 2021
Indicator CM2.4 - <i>Demonstrate</i> that no High Conservation Values (identified in CM1.4) are negatively affected by the project.	For reference, PD Section 4.1.3 identifies three HCVs related to community well-being: Village water sources, "Matambiko" spiritual sites, and beekeeping/honey hunting areas. MR Section 4.1.4 appears to have a typo based on the contradictory statement: "The HCVs related to community well-being were negatively affected by the project; furthermore, on the contrary, only positive impacts have been seen and are expected for water sources, spiritual sites, and beekeeping areas."
Evidence Used to Assess Conformance:	MR Section 4.1.4, PD Sections 4.1.3 and 4.2.4, site visit observations and interviews
Findings:	The MR makes a typographical error in stating that the HCVs related to community well-being were negatively affected by the project. Evidence presented in the MR and substantiated through site visit observations and site interviews justifies the conclusion that none of the three community well-being HCVs (Village water sources, "Matambiko" spiritual sites, and beekeeping/honey hunting areas) have been negatively affected by the project. The MR states there were 27 incidents of illegal activity recorded within the forest area and refers to Section 4.3.1 for details. Information reviewed in MR Section 4.3.1 does not appear to clearly support this statement. The MR makes a statement regarding "PRAs conducted indicate no significant impacts", which is not clear in the type of impacts referenced, whether the

	impacts are positive or negative, or the magnitude of impact intended by the term “significant”.
Clarification Request (CL):	Three items were identified for clarification: • Please correct the typographical error in Section 4.1.4 regarding HCVs being negatively affected by the project. • Please confirm and clarify the number and type of illegal activity incidents referenced in this section and in MR Section 4.3.1 • Please clarify the statement regarding PRAs and relevance to the HCVs.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Typographical error in Section 4.1.4 regarding HCVs being negatively affected by the project corrected. The number and type of illegal activity incidents referenced clarified in this section (63) and now matching MR Section 4.3.1 Statement regarding PRAs and relevance to the HCVs clarified. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 4.1.3 has been revised to correct the typographical error regarding HCVs, to reconcile the number of incidents of illegal activities, and to clarify the statement regarding PRAs and relevance to HCVs. Item closed.
Date Closed:	24 February 2022

Indicator CM3.1 - Identify any potential positive and negative impacts that the project activities are likely to cause on the well-being of Other Stakeholders.	PD Section 4.3.1 identifies Other Stakeholders as the Tanganyika and Mpanda District Governments, and identifies potential impacts from project activities as positive, and states there are no anticipated negative impacts.
Evidence Used to Assess Conformance:	PD Section 4.3.1
Findings:	The validated PD established the identification of potential positive and negative impacts project activities are likely to cause on the well-being of Other Stakeholders. The MR does not identify any new or additional impacts the project is likely to cause on the well-being of Other Stakeholders. This Indicator does not need to be reassessed. Item closed.
Date Closed:	15 October 2021

Indicator CM3.2 - Describe the measures needed <i>and taken</i> to mitigate the negative well-being impacts on Other Stakeholders.	MR Section 4.2.1 identifies the Tanganyika and Mpanda district governments as other stakeholders and states there are no anticipated negative impacts, and therefore no mitigation measures are needed.
Evidence Used to Assess Conformance:	PD Section 4.3.1 and 4.3.2, MR Section 4.2.1, site visit interviews with District Government representatives
Findings:	District Government interviewees did not identify any negative impacts the project is having on the District Governments. Site visit interviews substantiate the project is not having negative impacts on the District Governments which are the “Other Stakeholders” identified in the PD, and no mitigation is warranted. Item closed.
Date Closed:	15 October 2021

Indicator CM3.3 - Demonstrate that the project activities do not result in net negative impacts on the well-being of Other Stakeholders.	MR Section 4.2.2 states that the district authorities identified as “other stakeholders” have benefited from additional financial resources and additional training and capacity building opportunities. The MR states there were no observed negative impacts and only positive impacts on the well-being of other stakeholders, with the net impact of the project positive.
Evidence Used to Assess Conformance:	MR Sections 4.2.1 and 4.2.2, PD Sections 4.3.1 through 4.3.3, site visit interviews
Findings:	Site visit interviews with District Government representatives determined District Government interviewees view the project as having delivered positive impacts on the District Government through the provision of REDD project proceeds which is alleviating the financial pressure at the District level. District Government interviewees did not identify any negative impacts the project is having on the District Governments. The positive benefits to these district authorities and the absence of negative impacts from the project result in a net positive impact. Item closed.
Date Closed:	15 October 2021

Indicator CM4.1 - Develop and implement a monitoring plan that identifies community variables to be monitored, Communities, Community Groups and Other	MR Section 4.3.1 provides a table listing monitored activities and provides a summary of results. PD Section 4.4.1 states that a separate Community Monitoring Plan (CMP) was developed, and PD
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Stakeholders to be monitored, the types of measurements, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project's objectives for Communities and Community Groups and to predicted outputs, outcomes and impacts identified in the project's causal model related to the well-being of Communities (described in G1.8). Monitoring must assess differentiated impacts, including and benefits, costs and risks, for each of the Community Groups and must include an evaluation by the affected Community Groups.	Appendix 5 provides the Community Monitoring Framework. A copy of the CMP was provided to the auditors.
Evidence Used to Assess Conformance:	MR Section 4.3.1, PD Section 4.4.1 and Appendix 5, Community Monitoring Plan for the Ntakata Mountains REDD Project (20th May 2017), site visit interviews and observations, review of supplementary support documents
Findings:	The monitoring plan results presented in the MR cover each of the activities identified by the Community Monitoring Framework presented in the validated PD and in the Community Monitoring Plan (CMP). Monitoring frequency for each activity is identified in the PD and CMP as annual or bi-annual depending on the specific activity, and data collection method/tools are specifically identified. The CMP states that CT prepares an annual project report that is based on the data compiled throughout the year. Supplementary documents provided to the auditor included attendance lists from training and meetings for various activities, summaries of expenditures for various activities, and summaries of population statistics tracking. Site visit interviews and review of supplementary materials substantiates monitoring has been conducted in general accordance with the data collection methods/tools specified by the Community Monitoring Plan. The monitoring results provides separate reporting for women as a community group, for activities identified for separate evaluation consistent with the activities identified for separate

	evaluation in the PD and CMP. Supplementary documents substantiate tracking results of activities by Village or Ward (collection of Villages). MR Section 4.3.1 is not clear on the dates covered by the monitoring results and is not clear on whether the results presented cover the reporting period or results to date over the project lifetime. Results reported for Activity 3.1 are not clearly aligned with the information in the support document provided, specifically for the time period being monitored/reported, or for how the number of women were tracked. The PD and CMP do not clearly define the specific indicator/output metric required to be monitored or reported. Instructions for the CCB/VCS Monitoring Report Template for Section 4.3.1 state what the community monitoring plan impact monitoring results “should” include, but the auditor is required in the Verification Report to describe the steps taken to verify that the community impact monitoring has been carried out in accordance with the project’s validated design. Additional information is required for the auditor to be able to verify this compliance.
Clarification Request (CL):	Three items were identified as requiring clarification: • Please provide clarification on the monitoring dates corresponding to the monitoring results presented. • Please provide supporting documentation for auditor review that provides the summary of monitoring data results in annual or bi-annual format, as applicable, to demonstrate consistency with monitoring frequency for each activity as specified in the PD and CMP. • Please provide clarification for the indicator/output metric for Activity 3.1.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	• The monitoring dates corresponding to the monitoring results presented are 19 May 2019 – 18 May 2021. Results only represent that period and not project lifetime. • Supporting documentation provided that provides the summary of monitoring data

	results in annual or bi-annual format, as applicable, demonstrating consistency with monitoring frequency for each activity as specified in the PD and CMP. Activity 3.1. Indicators are # couples and # of women receiving support and # women with improved reproductive health. The Activity only occurred between April 2020- March 2021 the results are valid for the entire period of 19 May 2019 – 19 May 2021. Results were collected based on initials “client interactions” with professionals at Pathfinder International a recognized leader in the space who provided the data. MR 4.3.1 and the sections that reference it have been updated to included clearer and desegregated data for Activity 3.1. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed the information provided by the Project Proponent provides the appropriate clarification requested. Supporting documentation and clarifications provided by the Project Proponent substantiate the community monitoring plan has been appropriately implemented, including types of measurements, sampling methods, and the frequency of monitoring and reporting. Item closed.
Date Closed:	24 February 2022
Indicator CM4.2 - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to community well-being.	As stated for Indicator CM2.4, HCVs related to community well-being were identified in the PD as Village water sources, “Matambiko” spiritual sites, and beekeeping / honey hunting areas. These HCVs are not specifically identified in the Community Monitoring Plan. MR Section 4.1.4 states that these HCVs are related to the maintenance of forest areas that have been better protected under the project and to which community rights have been better protected through the VLUPs. MR Section 4.1.4 further states that “indicators associated with these HCVs include the tracking of illegal activity in the forest area.”
Evidence Used to Assess Conformance:	MR Sections 4.3.1 and 4.1.4; PD Sections 4.4.1, 4.1.3, and Appendix 5; Community Monitoring Plan for the Ntakata Mountains REDD Project (20th May 2017); site visit interviews and observations

Findings:	Specific monitoring of the three HCVs related to community well-being does not appear to be addressed in the PD or Community Monitoring Plan. MR Section 4.1.4 states that “indicators associated with these HCVs include the tracking of illegal activity in the forest area.” Tracking of illegal activity in the forest area is reported on in MR Section 4.3.1. Site visit observations and site visit interviews substantiate effective forest management should protect these community well-being HCVs; it is unclear how the effectiveness of this measure is being quantified.
Clarification Request (CL):	See findings, please clarify the effectiveness of measures taken to maintain or enhance the three identified community well-being HCVs.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The Three HCVs are Village water sources, “Matambiko” spiritual sites, and beekeeping / honey hunting areas. Village water sources are in or depend directly on the forest for function, the connection between forests and hydrology and water security is well documented. The spiritual sites, as evidenced during the site’s visits are located within the forests and the site itself is usually a tree. Honey hunting involves finding wild honey within trees in the forest and thus is directly dependent on the forest/trees. Therefore, all data from forest monitoring, including deforestation analysis, forest by-law enforcement, patrol data, and reporting of illegal activity serve as direct indicators on the effectiveness of the improved forest management measures are having on maintaining or enhancing community well-being HCVs. The climate section analysis shows the enhanced effectiveness of the forest measures against the baseline, and the continued patrolling would at a granular level show any failure to maintain spiritual sites or beekeeping areas, this has not been the case at all. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 4.3.1 has been revised to provide clarification on the effectiveness of measures taken to maintain or enhance the three HCVs identified for community well-being. The VVB’s review determined the Project Proponent has provided a clear summary describing the effectiveness of appropriate measures.

	Item closed.
Date Closed:	24 February 2022
Indicator CM4.3 - Disseminate the monitoring plan, and any results of monitoring undertaken in accordance with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities and Other Stakeholders through appropriate means.	The Community Monitoring Plan states that CT prepares an annual project report that is based on the data compiled throughout the year, and that CT produces a bulletin in Swahili to share project information and data with the community. PD Section 4.4.2 states: Monitoring results will be communicated through meetings with the Village Governments in each of the eight villages on an annual basis. A copy of the monitoring results will also be presented to the Tanganyika and Mpanda districts. All of these meetings (with Village Governments and districts) will be an opportunity to analyse and discuss the project strategy and activities to assess effectiveness and possibly adjust. MR Section 4.3.2 states: Monitoring results are communicated through meetings with the Village Governments in each of the eight villages on a bi-annual basis. A copy of the monitoring results will also be shared with the Tanganyika and Mpanda districts. All of these meetings (with Village Governments and districts) provide an opportunity to analyze and discuss the project strategy and activities to assess effectiveness and consider adjustments.
Evidence Used to Assess Conformance:	MR Section 4.3.2, PD Section 4.4.2, Community Monitoring Plan, supplemental documents provided to auditor, site visit interviews and observations, Verra Website
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 4.3.2 are: Describe how any results of monitoring undertaken in accordance with the monitoring plan have been disseminated and made publicly available on the internet. Describe the means by which summaries (at least) of the monitoring results have been communicated to the communities and other stakeholders.

	Site visit interviews and review of supplemental documents substantiate that the monitoring plan and previous monitoring results have been posted and distributed to the communities. Site visit interviews indicated that in general community members were not aware of the monitoring results for the period under verification. Review of the online Verra project page confirmed that a project summary, in Swahili, is available on the internet and was posted on 4 August 2021: https://registry.verra.org/app/projectDetail/CCB/1897 Similar to the Findings for Indicator G3.1, it is not clear what efforts were made prior to the verification site visit to disseminate the results or a summary of the community monitoring results for this verification period to community stakeholders.
Clarification Request (CL):	Please clarify and provide documentation for the efforts made prior to the verification site visit to disseminate the results or a summary of the community monitoring results for this verification period to community stakeholders.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The dissemination of results/results summary was done through the following channels. Along with the monitoring report a local language summary was uploaded to the registry before the verification. A notice letter was sent informing stakeholders of such and its surrounding procedures. The district, the overseeing authority of all governance and representative processes in the area confirmed during site visit their knowledge and use of the registry. The summary was also sent to the district directly. The summary was also sent to the project manager who shared it and informed community members and leaders. Any community leaders who are digitally available also received the digital copy. Carbon Champions also received copies and shared it and discussions in their daily interactions with community members, it was noted during site visit that even when Carbon Champions are not on an explicit deployment the community view and come to them as a source of project information.

	Though some community members were unable to recall specific monitoring results or documentation community members were largely knowledgeable and confirmatory on positive climate, community, and biodiversity benefits achieved during this monitoring period. In the case of the community results the majority were generated directly by the communities themselves and collated through the official and representative governance structures the project works with. It should be noted that Katavi region has one of the lowest literacy rates in a country in one of the lowest literacy regions of the world and this informs the project in its practical commitment to ensuring multi-directional information flow and results sharing with the participating community. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed clarification has been added to MR Section 4.3.2. Based on the clarification provided, along with review of supporting supplemental documents provided by the Project Proponent, the VVB concludes the community monitoring results have been disseminated in accordance with the Community Monitoring Plan for the Ntakata Mountains REDD Project. Item closed.
Date Closed:	24 February 2022

Indicator GL2.1 - a. Demonstrate that Smallholders/Community Members or Communities either own or have management rights, statutory or customary, individually or collectively, to land in the Project Area. The Smallholders/Community Members or Communities have rights to claim that their activities will or did generate or cause the project's climate, community and biodiversity benefits. OR b. Demonstrate that the Project Zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the households within	PD Section 4.5.1 was validated as demonstrating this project met both criteria for exceptional community benefits. MR Section 4.4 provides information, with citations to demonstrate the project continues to meet both criteria.
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the Communities are below the national poverty line.	
Evidence Used to Assess Conformance:	MR Section 4.4, PD Section 4.5.1
Findings:	This indicator was successfully demonstrated as having been met during project validation. Information provided in the MR substantiates the project continues to meet both criteria. Item closed.
Date Closed:	21 September 2021

Indicator GL2.2 - <i>Demonstrate</i> that the project generates short-term and long-term net positive well-being benefits for Smallholders/Community Members. Include indicators of well-being impacts on Smallholder/Community Members in the monitoring plan. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected Smallholders/Community Members.	MR Section 4.4.1 reports short term benefits provided by the project during this monitoring period include increased knowledge through training and education on REDD+ (679 people), project governance (298 people), forest management (54 VGS), and reproductive health (6,191 women/couples). The MR reports 63 community members were employed by the project and received income. The MR reports natural resources were protected by 272 forest patrols conducted. The MR states that increasing capacity and knowledge of community members in the short term will create long term benefits. Additionally, revenues from the sale of verified emissions reductions will provide funds for continued community development.
Evidence Used to Assess Conformance:	MR Section 4.4.1, site visit observations and interviews
Findings:	MR Section 4.4.1 describes the short- and long-term benefits accomplished during this monitoring period, giving quantifiable results for each indicator. These results demonstrate the project is successful in providing short- and long-term community benefits. Findings for Indicator GL1.3 and GL1.4 document the evaluation undertaken to verify the project's net positive benefits for smallholder/community members. Site visit interviews substantiates the short-term net positive well-being benefits the project has had and is having on the project zone communities. Review of project documentation coupled with site visit interviews and observations substantiates an overall conclusion the project is on track to generate long-term, net positive well-being benefits for smallholders/community members.

	Item closed.
Date Closed:	16 October 2021

Indicator GL2.3 - Identify, through a participatory process, risks for the Smallholders/Community Members to participate in the project, including those related to tradeoffs with food security, land loss, loss of yields and short-term and long-term climate change adaptation. Explain how the project is designed to avoid such tradeoffs and the measures taken to manage the identified risks. Include indicators of risks for Smallholders/Community Members in the monitoring plan.	MR Section 2.3.4 states costs, risks (including not being able to sell carbon credits), and benefits were communicated to Village Governments of all target villages in face-to-face meetings. The MR states CT also prepared a leaflet on the project and its background and distributed it to the Village Governments. MR Section also describes the strategy of employing “carbon champions” in which a champion from each village is provided additional training about the project and is responsible for spreading key messages throughout the villages and relaying information from the communities back to the project team. MR Section 4.1.2 identifies potential negative community impacts along with mitigation measures identified and implemented.
Evidence Used to Assess Conformance:	MR Sections 4.3.1, 4.1.2 and 2.3.4, site visit interviews
Findings:	As noted in Findings for Indicator G3.2, interviews conducted during the site visit determined that community members were largely aware of the project and potential risks and benefits. Site visit interviews with community leaders and community members substantiated that village meetings were held to democratically vote on whether to join the project and that community members were informed about potential risks as well as benefits. MR Section 4.1.2 identifies several potential risks that were identified as part of the participatory process along with measures taken to manage these risks. As noted in findings for Indicator CM2.2, site visit observations and interviews substantiate mitigation actions identified as needed have been implemented in accordance with the validated PD. Review of supplemental project documents, site visit observations, and site visit interviews substantiate that the project continues to utilize the participatory process, that community members are kept informed of the potential risks, and that the project has implemented or initiated appropriate measures to manage the identified risks.

	Item closed.
Date Closed:	16 October 2021
Indicator GL2.4 - Identify Community Groups that are marginalized and/or vulnerable. <i>Demonstrate</i> that the project generates net positive impacts on the well-being of all identified marginalized and/or vulnerable Community Groups. <i>Demonstrate</i> that any barriers or risks that might prevent benefits going to marginalized and/or vulnerable Smallholder/Community Members have been identified and addressed. <i>Demonstrate</i> that measures are taken to identify any marginalized and/or vulnerable Smallholders/Community Members, whose well-being may be negatively affected by the project, and that measures are taken to avoid, or when unavoidable to mitigate, any such impacts.	PD Section 4.5.4 identifies two marginalized and/or vulnerable community groups within the project zone: poor households, and women in the villages. MR Section 4.4.2 also identifies poor households and women in the villages as the two community groups of concern for being marginalized and/or vulnerable. MR Section 4.4.2 summarizes net positive impacts and the measures taken to ensure access to these benefits by the affected groups.
Evidence Used to Assess Conformance:	MR Section 4.4.2, PD Section 4.5.4, supplemental documentation, site visit observations and interviews
Findings:	The MR provides positive impacts for two identified potentially marginalized or vulnerable community groups. The MR states there are no negative impacts anticipated for either community group, implying a net positive impact. The MR also identifies potential risks to the groups but offers a solution to mitigate risks. Site visit observations and interviews noted that the training and loans provided through the COCOBA program is acknowledged by community members as having positive impacts for poor households and women. An opportunity for improvement was noted for including the project's support of the COCOBA program as part of the demonstration that the project is generating net positive impacts on the impacts of these marginalized and/or vulnerable community groups.

	Review of project documentation, site visit observations, and site visit interviews substantiate the project is generating net positive benefits on the well-being of poor households and women, has identified and has taken steps to address risks that might prevent benefits from going to these groups. Appropriate mitigation measures outlined to address project risks in MR 4.1.2 were substantiated as providing benefits to poorer households and women. Item closed.
Date Closed:	16 October 2021
Indicator GL2.5 - Demonstrate that the project generates net positive impacts on the well-being of women and that women participate in or influence decision-making and include indicators of impacts on women in the monitoring plan.	MR Section 4.4.3 states that while women do not hold the same status as men in the project area due to the traditionally patriarchal culture in the villages, the Project Proponent is taking steps to influence change and encourage more women to participate in decision making. The MR states that during the verification period, 4 out of 8 new carbon champions were women and 8 of 48 members of village governments are women. Additionally, women were reported as having benefited from improved reproductive health, and income generated from women-owned businesses supported by project funds.
Evidence Used to Assess Conformance:	MR Sections 4.4.3 and 4.3.1, site visit observations and interviews
Findings:	MR Section 4.4.3 provides multiple examples of how women are reported as benefiting from the project. MR Section 4.3.1 provides summaries from monitoring of the some of the reported benefits to women from the project. Site visit observations and interviews substantiate the involvement of women as carbon champions, village government members, and in the COCOBA program. Site visit observations and interviews confirmed the active participation and decision-making role by women in village government and committees. Site visit interviews substantiate the health support being provided to women in the communities. Site visit observation and interviews indicate the project is making some progress on overcoming gender bias in the VGS and in providing women an equal opportunity for employment in the VGS.

	The project has been substantiated as generating net positive impacts on the well-being of women and that women participate in or influence decision making. Item closed.
Date Closed:	16 October 2021

Indicator GL2.6 - Describe the design and implementation of a benefit sharing mechanism, demonstrating that Smallholders/Community Members have fully and effectively participated in defining the decision-making process and the distribution mechanism for benefit sharing; and demonstrating transparency, including on project funding and costs as well as on benefit distribution.	PD Section 4.5.6 outlines a benefit sharing mechanism that states net revenues from carbon sales are to be split evenly between CT (50%) and Village governments (50%). The PD notes this was communicated to the Village Governments as part of the contract with CT. PD Section 4.5.6 further states that conceptually revenue division among villages for the village share of the carbon payments was to be based on a base payment (50%) and the size of the village (50%). MR Section 4.5.6 further states that the steering committee would in turn apply payments received to priorities already established in the existing village development plans. PD Section 4.5.6 states that CT will publicly post the amount of the bi-annual payment in an accessible and visible way so that the wider community is aware of the amount received. MR Section 4.4.4 also outlines a benefit sharing mechanism that the eight villages receive 50% of the net revenue sales with 50% remaining with CT to cover operating expenses and invest in new projects. MR Section 4.4.4 states that the eight villages received a base payment amounting to 30% of the bi-annual allocation, with 40% of the biannual allocation based on size of the forest area protected divided proportionally, and the remaining 30% allocated based on performance and results. The MR states that the committees applied payments received to priorities already established in the existing village development plans. Several steps were reported in the MR for this verification period to ensure that community members participated in decision making regarding benefit distribution. The MR identifies the formation of the steering committee in 2019, composed of leaders from each village, to serve as representatives for community members in administering and reporting on distribution of funds. The MR also identifies the
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	involvement by CT in providing presentations to the general community assemblies, including highlighting forthcoming carbon revenue and discussing the mechanisms for it to be used fairly by the community. Additionally, the Carbon Champions were reported as spreading information at a grassroots level regarding the steering committee mechanism.
Evidence Used to Assess Conformance:	MR Section 4.4.4, PD Section 4.5.6, review of supplemental financial documentation and contract between CT and Villages; site visit interviews
Findings:	Review of the MR notes that the project appears to have implemented a participatory mechanism for sharing benefits within the community generally in accordance with the validated PD. However, there is a discrepancy between the MR and validated PD regarding the reported allocation of payments to communities. In the validated PD, allocations were identified as conceptually to be based on base payment and village size, whereas in the MR allocations are reported as based on participation (base payment), size of forest managed, and performance. While this seems like an adequate benefit sharing mechanism, the MR does not address why the allocation criteria were changed. MR Section 4.4.4 does not address the allocation made to the District Government, which was also not described in PD Section 4.5.6.
Clarification Request (CL):	See findings. Please clarify the decision-making process in the change of allocation criteria reported in the MR compared to the conceptual allocation identified in the PD. Please also clarify how the allocation to the District Government factors into the benefit sharing mechanism outlined by the PD and implemented during this reporting period.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Decision making around benefit sharing is a community led process and centered around the steering committee which is legally recognized and representative. All changes come from consultations with the community. In the PD the commitment was to have the 50% of community revenue split by villages based on village size and an equal base payment. Though the projects continued development the committee expressed desire to include a division based on performance to keep the incentive structures clear and this was mentioned in the MR. However, during this monitoring period the committee agreed to

	consider all villages as performing up to their own standards and no changes were made to any village's allocations. The only factors that were considered were equal distribution, and size of forest, however this was not done at a 50/50 distribution but at each meeting the members divided what percent should be divided evenly and what percent on forest size. The key is the entire body, which signed the contract and is responsible must agree with all villages' leadership individually agreeing to the allocations. This allows the villages to be adaptive and learn from previous benefit sharing allocations while ensuring all stakeholders are satisfied. The district always receives 10% of the total revenue, this is in the contract and reflected in the steering committee minutes. The steering committee minutes also reflect the agreement of all parties and the decision making around allocation for each meeting, which match with the eventual disbursement of funds. This is all done to allow more control of the process to project communities, increasing transparency, adaptation, buy-in and true benefit sharing in the process. (8 February 2022)
Evidence Used to Close CL:	Site visit interviews and review of materials provided substantiate community members have fully and effectively participated in defining the decision-making process and the distribution mechanism for benefit sharing; and the Project Proponent and Villages have implemented a benefit sharing mechanism demonstrating transparency, including on project funding and costs as well as on benefit distribution. Review of the contract between CT and the Villages substantiates the contractual agreement to pay the villages 50% of the revenue from the sale of carbon if the villages follow their village land use plans and laws thus reducing deforestation, and that from the Villages' share, the Villages agree to provide 10% to the District. Based on the clarification provided, review of supporting documentation, and review of the mechanism presented in the validated PD, the VVB concludes the benefit distribution of the benefit

	sharing mechanism has been implemented in accordance with the project's validated design.
Date Closed:	24 February 2022

Indicator GL2.7 - Explain how relevant and adequate information about predicted and actual benefits, costs and risks has been communicated to Smallholders/Community Members and provide evidence that the information is understood.	PD Section 4.5.7 identifies specific risks, costs, and benefits reported to have been presented to the communities during the introductory meetings held in all eight villages.
Evidence Used to Assess Conformance:	PD Section 4.5.7, site visit interviews
Findings:	This item was addressed by the validated PD and is not identified as an item for continued verification by instructions in the Monitoring Report template or the Verification Report template. Item closed.
Date Closed:	16 October 2021

Indicator GL2.8 - Describe the project's governance and implementation structures, and any relevant self-governance or other structures used for aggregation of Smallholders/Community members, and demonstrate that they enable full and effective participation of Smallholders/Community Members in project decision-making and implementation.	The project's governance and implementation structures outlined in MR Section 4.4.5 are identical to those described in Section 4.5.8 of the validated PD.
Evidence Used to Assess Conformance:	MR Section 4.4.5, PD Section 4.5.8, site visit interviews
Findings:	MR Section 4.4.5 identifies the involvement of CT, its partners, District Governments, and Village Governments in the project governance and implementation. Site visit interviews substantiate the effective participation of community members in committees and participatory meetings for developing the VLUPs and for other community involvement in the project. Site visit interviews substantiate the project has used the existing democratic institutions in place within the communities to ensure smallholders/community members are represented by elected representatives for project decision making

	and implementation. The steering committee formed for the project was substantiated as including elected village leaders from each of the eight villages. Site visit interviews determined the prevalent belief in the communities that community members were able to actively participate politically with the governance structures that decide how to allocate the project funds. Item closed.
Date Closed:	16 October 2021

Indicator GL2.9 - Demonstrate how the project is developing the capacity of Smallholders/Community Members, and relevant local organizations or institutions, to participate effectively and actively in project design, implementation and management.	MR Section 4.4.6 summarizes the approach reported as taken by CT for developing the capacity of community members and local government institutions.
Evidence Used to Assess Conformance:	MR Section 4.4.6, supplemental support documents, site observations and site interviews
Findings:	Site visit interviews substantiate, as also demonstrated by meeting attendee rosters and agendas, that the project has implemented and held training on good governance for the villages. Site visit observations and interviews substantiate, as also demonstrated by training logs and other supplemental documentation, the project has provided for professional training and certification of the VGS. Site visit interviews substantiate the project has hired staff who interact with the communities to assist them with financial accounting and understanding related to the project and for the beneficiaries of the COCOBA program. Site visit interviews, site observations, and review of supplemental documentation substantiate the project is developing the capacity of community members, relevant local organizations, and local government institutions to participate effectively and actively in project design, implementation, and management. Item closed.
Date Closed:	16 October 2021

Biodiversity Section

Indicator B1.1 - Describe biodiversity within the Project Zone at the start of the project and threats to that biodiversity, using appropriate methodologies.	This is a validation indicator that cannot change once the project has been initiated.
Evidence Used to Assess Conformance:	PD Section 5.1.1
Findings:	This indicator was addressed in the validated PD and does not need to be re-evaluated during verification. Item closed.
Date Closed:	27 September 2021

Indicator B1.2 - Evaluate whether the Project Zone includes any of the following High Conservation Values (HCVs) related to biodiversity and describe the qualifying attributes for any identified HCVs: a. Globally, regionally or nationally significant concentrations of biodiversity values; i. protected areas¹⁰⁸ ii. threatened species¹⁰⁹ iii. endemic species¹¹⁰ iv. areas that support significant concentrations of a species during any time in their lifecycle. b. Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; c. Threatened or rare ecosystems. Identify the areas that need to be managed to maintain or enhance the identified HCVs.	PD Section 5.1.2 identifies the biodiversity HCV species identified for the project zone at the start of the project.
Evidence Used to Assess Conformance:	PD Section 5.1.2, MR Section 5.1.4
Findings:	This indicator was addressed in the validated PD. The MR does not provide any additional information

	regarding new biodiversity HCVs within the project zone not addressed in the PD. Item closed.
Date Closed:	16 October 2021

Indicator B1.3 - Describe how the without-project land use scenario would affect biodiversity conditions in the Project Zone.	PD Section 5.1.3 describes the “without-project scenario”.
Evidence Used to Assess Conformance:	PD Section 5.1.3
Findings:	This is a Validation indicator. The without-project land use scenario does not need to be re-examined during verification
Date Closed:	16 October 2021

Indicator B2.1 - Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the Project Zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.	MR Section 5.1.1 presents information for four biodiversity parameters: maintenance of forest cover, maintenance of offsite forest cover, maintenance of native tree diversity, and eastern chimpanzee habitat suitability. PD Section 5.2.1 provides a summary of biodiversity indicators identified for monitoring along with monitoring and estimation procedures, and states that details are provided in the Biodiversity Monitoring Plan that accompanied the PD.
Evidence Used to Assess Conformance:	MR Section 5.1.1, PD Section 5.2.1, Ntakata Mountains REDD Biodiversity Monitoring Plan (20 th May 2017), supplemental documentation for forest cover analysis and chimpanzee habitat data
Findings:	Findings for accuracy of forest cover and offsite forest cover are pending VCS verification of GIS data for these parameters. Findings for accuracy of chimpanzee habitat model are pending review of these data in conjunction with VCS verification of these data. The auditor does not appear to have been provided with the chimpanzee habitat model to verify accuracy of results. MR Section 5.1.1 states that native tree diversity was maintained during the monitoring period based on the data on diversity documented in the 2016 inventory. MR Section 5.1.1 further states that native tree

	diversity exceeds conditions in the “without project scenario” based on less area converted to non-forested condition than forecasted. The MR does not provide the documentation used to support the relationship between the area of forest not converted to non-forest and reported effect on native tree biodiversity.
Clarification Request (CL):	Please provide the documentation used to support the claims regarding changes in native tree biodiversity for this verification period. Please provide the chimpanzee model for use by the auditor in verifying the accuracy of reported results.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	After discussion with the auditor, it was determined that the actual chimpanzee model did not need to be provided. However, the document “ChimpanzeeSuitability_Method” has been provided to the auditor for review. The remote sensing analysis shows that forest cover maintained well-above the baseline in the project area during this monitoring period. It is assumed that deforested areas have less tree diversity than forested areas as described in section 5.1.3 of the MR, citing Banda et al 2006, where smaller areas or fragmented areas of forest cover have lower diversity than larger forested areas. Deforested areas are converted to agriculture and lead to total loss of forest cover. Banda et al has been shared with the auditor in the Dropbox folder. (8 February 2022)
Clarification Request (CL):	The VVB reviewed the study (Banda et al 2006) cited and provided by the Project Proponent in support of assumptions presented in the MR regarding native tree diversity. Because the Ntakata Mountains REDD Biodiversity Monitoring Plan did not require re-inventory of forest trees during this monitoring period, the VVB concludes the assessment of areal coverage of forest is a reasonable surrogate for estimating predicted change in native tree diversity. Findings for accuracy of forest cover and offsite forest cover are pending VCS verification of GIS data for these parameters.

	The VVB has reviewed the information provided for the chimpanzee model and final concurrence is pending resolution of findings related to deforestation mapping as part of the VCS verification.
Date Issued:	24 February 2022
Evidence Used to Close CL:	The VVB has closed the VCS finding upon which this item was pending. Item closed.
Date Closed:	16 May 2022

Indicator B2.2 - <i>Demonstrate</i> that the project's net impacts on biodiversity in the Project Zone are positive, compared with the biodiversity conditions under the without-project land use scenario (described in B1).	MR Section 5.1.3 states that net impacts on biodiversity resulting from the project activity are positive through the current monitoring period compared to the baseline scenario. PD Section 5.2.3 states that net impacts on biodiversity resulting from the project were expected to be positive as outlined in the baseline scenario.
Evidence Used to Assess Conformance:	MR Section 5.1.3, PD Section 5.2.3, site visit observations and interviews with VGS
Findings:	Site visit observations of recently deforested areas and interviews with VGS substantiate that some deforestation has occurred within the project area. MR Section 5.1.3 states that net biodiversity benefits are demonstrated, in part, through remotely sensed data on deforestation as compared to the baseline scenario and references details provided in Section 2.1. Information demonstrating the net positive claim does not appear to be presented in Section 2.1. MR Section 5.1.3 states that net biodiversity benefits are demonstrated, in part, through monitoring of chimpanzee habitat data using the habitat suitability model described in Section 5.3.1. Information demonstrating the net positive claim does not appear to be presented in Section 5.3.1. Instructions for the CCB/VCS Monitoring Report Template for Section are to demonstrate that the project's net impacts on biodiversity in the project zone are positive compared with conditions under the without-project land use scenario. Information supporting the assertion of net positive biodiversity impacts resulting from project activities appears to be provided in other sections of the MR and in supplemental support documents but is not clearly presented or demonstrated in MR Section 5.1.3.

Clarification Request (CL):	Please clarify information presented in Section 5.1.3 to clearly demonstrate how with the deforestation observed in the project area, there is still a net positive biodiversity impact for project area forest cover and chimpanzee habitat suitability.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The reference to remotely sensed data on deforestation analysis demonstrating a net positive impact on biodiversity as a result of the project activity was meant to be Section 3.1. It is demonstrated that deforestation occurring during this monitoring period was well below expected rates of deforestation in the baseline scenario and thus there is a net-positive impact on biodiversity. Information demonstrating net positive impacts of the project activity was added to section 5.3.1 of the MR. (8 February 2022)
Clarification Request (CL):	The VVB concurs the Project Proponent has demonstrated through data reported and based on site visit observations and interviews that net impacts in the Project Zone are likely positive, compared with the biodiversity conditions under the without-project land use scenario. However, closure of this finding is pending resolution of findings for accuracy of forest cover and offsite forest cover and deforestation mapping through the VCS verification of GIS data for these parameters.
Date Issued:	24 February 2022
Evidence Used to Close CL:	The VVB has closed the VCS finding upon which this item was pending. Item closed.
Date Closed:	16 May 2022

Indicator B2.3 - Describe measures needed and <i>taken</i> to mitigate negative impacts on biodiversity and any measures needed and <i>taken</i> for maintenance or enhancement of the High Conservation Value attributes (identified in B1.2) consistent with the precautionary principle.	PD Section 5.2.2 states that the main threats to megafauna are habitat fragmentation and loss of landscape connectivity. The PD does not identify negative impacts on biodiversity anticipated to result from project activities. PD Section 5.2.2 identifies the governance, management, and implementation of VLUPs as an action taken for enhancement of habitat for chimpanzee populations and other megafauna.
Evidence Used to Assess Conformance:	PD Section 5.2.2, MR Section 5.1.2, site visit observations and interviews

Findings:	Site visit observations and interviews substantiated the project is not expected to result in negative biodiversity impacts that would require mitigation. Site visit observations and interviews substantiated the development and implementation of VLUPs that clearly delineate the forest conservation areas from other land uses within the project zone. Implementation of the VLUPs is an action taken in accordance with the actions identified in the validated PD. Item closed.
Date Closed:	17 October 2021

Indicator B2.4 - <i>Demonstrate</i> that no High Conservation Values (identified in B1.2) are negatively affected by the project.	PD Section 5.2.4 states that it is not anticipated that HCVs related to biodiversity will be negatively affected by the project activity. MR Section 5.1.4 states that HCVs related to biodiversity were not negatively affected by the project activity.
Evidence Used to Assess Conformance:	MR Section 5.1.4, PD Section 5.2.4
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 5.1.4 are: Demonstrate that no HCVs related to biodiversity in the project zone have been negatively affected by the project. The MR states that the demonstration for absence of negative impacts is through periodic monitoring and reporting of biodiversity indicators. Site visit observations and interviews substantiate the implementation of VLUPs to set aside the forest reserves which contain the biodiversity HCVs. Item closed.
Date Closed:	17 October 2021

Indicator B2.5 - Identify all species used by the project and <i>show</i> that no known invasive species are introduced into any area affected by the project and that the population of any invasive species does not increase as a result of the project.	PD Section 5.2.5 and MR Section 5.1.5 state no species are grown or introduced as part of the forest conservation activities.
Evidence Used to Assess Conformance:	MR Section 5.1.5, PD Section 5.2.5, site visit observations and interviews

Findings:	Site visit observations and interviews substantiate the project is focused on forest conservation activities and no plant species are grown for introduction or planned to be introduced in the project area. Therefore, no known invasive species have been introduced by the project or expected to have increased as a result of the project. Item closed.
Date Closed:	17 October 2021

Indicator B2.6 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Justify any use of non-native species over native species.	MR Section 5.1.6 states no species will be introduced as part of project forest conservation activities. MR Section 5.1.6 also identifies several non-native plant species that have been used in ongoing agricultural activities.
Evidence Used to Assess Conformance:	MR Section 5.1.6, PD Section 5.2.6 and 5.2.7, site visit observations and interviews
Findings:	Site visit observations and interviews substantiate the development and implementation of the VLUPs which dictate the legally enforceable land uses within the project zone. The verifiers have concluded that non-native crop and livestock species used for agriculture and grazing within areas designated and previously used for those purposes will not pose harm to the region's environment. Item closed.
Date Closed:	17 October 2021

Indicator B2.7 - <i>Guarantee</i> that no GMOs are used to generate GHG emissions reductions or removals.	MR Section 5.1.7 and PD Section 5.2.8 state that the project uses no GMOs to generate GHG emissions reductions or removals and that GMOs are currently illegal in Tanzania.
Evidence Used to Assess Conformance:	MR Section 5.1.7, PD Section 5.2.8, site visit observations and interviews
Findings:	Site visit observations and interviews substantiate GHG emissions reductions and removals are planned to be generated through conservation and protection of existing forests. Conservation and protection of natural forests and forest species would not involve or use GMOs. Item closed.
Date Closed:	17 October 2021

Indicator B2.8 - Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.	MR Section 5.1.8 describes fertilizers, chemical pesticides, and herbicides reported as legally used by farmers within the designated farming area following the VLUPs and describes possible adverse effects. The MR does not identify use of these inputs for the project and states that use of these inputs by farmers is not part of the project's monitoring activities.
Evidence Used to Assess Conformance:	MR Section 5.1.8, PD Section 5.2.9
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 5.1.8 are to describe the use of any fertilizers, chemical pesticides, biological control agents and other inputs used for the project, and to describe the potential and realized adverse effects by each input on the region's environment and/or communities. MR Section 5.1.8 does not identify how the listed fertilizers, chemical pesticides, biological control agents and other inputs are used for the project.
Clarification Request (CL):	Please clarify how the project uses fertilizers, chemical pesticides, and herbicides identified in MR Section 5.1.8.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	These fertilizers, chemical pesticides, and herbicides identified in MR Section 5.1.8 are not used by the project or in project activities in any way. They are included only as examples of some of the inputs that are potentially used by community members in agricultural communities and for agricultural livelihood in Tanzania. The project or any project activities in no way use any of these fertilizers, chemical pesticides, and herbicides nor encourages or supports their use. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed MR Section 5.1.8 has been revised to provide clarification that the fertilizers, chemical pesticides, and herbicides identified in MR Section 5.1.8 are not used by the project or in project activities. Site observations and interviews substantiated the project does not use fertilizers, chemical pesticides, or herbicides. Item closed.
Date Closed:	22 February 2022
Indicator B2.9 - Describe the process for identifying, classifying	PD Section 5.2.10 states that no waste products are generated through project activities.

and managing all waste products resulting from project activities.	
Evidence Used to Assess Conformance:	PD Section 5.2.10
Findings:	This indicator was addressed in the validated PD. The MR does not identify any changes to the information presented in the PD. Item closed.
Date Closed:	17 October 2021

Indicator B3.1 - Identify potential negative impacts on biodiversity that the project activities are likely to cause outside the Project Zone.	MR Section 5.2.1 identifies deforestation due to leakage outside the project area as a potential negative offsite biodiversity impact.
Evidence Used to Assess Conformance:	PD Section 5.3.1, MR Section 5.2.1, visit observations and interviews
Findings:	The potential negative offsite impact identified in MR Section 5.2.1 is the same as the potential negative offsite impact identified in the validated PD. No additional potential negative offsite impacts were identified by site visit observations or site visit interviews. Site visit observations and interviews substantiate the project has adequately identified all potential offsite biodiversity impacts as presented in the validated PD. Item closed.
Date Closed:	17 October 2021

Indicator B3.2 - Describe the measures needed and <i>taken</i> to mitigate these negative impacts on biodiversity outside the Project Zone.	MR Section 5.2.1. states that VLUPs contain efforts to mitigate the effects of deforestation due to leakage by designating areas of agricultural activity.
Evidence Used to Assess Conformance:	PD Section 5.3.1, MR Section 5.2.1, site visit observations and interviews
Findings:	The mitigation measure described for the potential negative offsite impact identified in MR Section 5.2.1 is the same as the mitigation measure described for the potential negative offsite impact identified in the validated PD. The mitigation measure identifies VLUPs which are described as mitigating the effects of deforestation due to leakage by designating areas for agricultural activity. Site visit observations and interviews and review of supplemental documents substantiates the implementation of VLUPs and

	protection efforts for the areas designated as forest reserves. Instructions for the CCB/VCS Monitoring Report Template for Section 5.2.1 are to describe any negative impacts on biodiversity outside of the project zone resulting from project activities and for Mitigation Measure(s), to describe the actions taken to mitigate negative impact. MR Section 5.2.1 identifies actions taken to mitigate negative impact within the project zone but does not describe actions taken to mitigate negative impact outside the project zone. Project plans to assist villages outside the project zone to develop VLUPs is identified as an action conducted to mitigate the risk to the project in MR Section 2.2.6.
Clarification Request (CL):	Please clarify in Section 5.2.1 the status of the project's support in development of VLUPs in villages outside the project zone.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	While the development of VLUP is a government process that CT cannot force, the Ntakata project has supported neighboring regions/villages in developing VLUPs during the monitoring period. The district is the primary party responsible for coordinating village land use planning and during this period the carbon project was one of the largest revenue sources for the district providing 38,000,000 Tsh of unrestricted revenue. The success of the carbon project has led to many villages requesting to partake, and CT always states that an independent participatory land use plan is a prerequisite. This has encouraged land-use planning in the nearby areas. One example is Bugwe village neighboring Mpembe to the north, which passed a Land Use Plan in 2020 and will potentially be incorporated in future carbon projects. Attached is Bugwe Village Land Use Plan Map

Indicator B3.3 - Evaluate unmitigated negative impacts on biodiversity outside the Project Zone and compare them with the project's biodiversity benefits within the Project Zone. Justify and demonstrate that the net effect of the project on biodiversity is positive.	MR Section 5.2.2 states that biodiversity related to forest cover were tracked within the Ntakata REDD project area and leakage belt as part of climate impact monitoring activities. MR Section 5.2.2 states that net impacts on biodiversity indicators are quantified and reported in Section 5.1.1.
Evidence Used to Assess Conformance:	MR Sections 5.2.2 and 5.1.1
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 5.2.2 are: Describe the evaluation of unmitigated negative impacts on biodiversity outside the project zone and compare them with the project's biodiversity benefits within the project zone. Justify and demonstrate that the net effect of the project on biodiversity is positive. MR Section 5.2.2 states that net impacts on biodiversity indicators are quantified and reported in Section 5.1.1, but a review of Section 5.1.1 did not identify an evaluation presented for negative impacts, mitigated or unmitigated, on biodiversity outside the project zone. MR Section 5.2.2 does not justify and demonstrate that the net effect of the project on biodiversity is positive based on the required criteria for Indicator B2.3 within MR Section 5.2.2
Non-conformance Request (NCR):	Please provide the required evaluation using the required criteria within Section 5.2.2 to demonstrate the net positive effect on biodiversity.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Forest cover is an indicator for biodiversity outside of the project area as described in Section 5.2.1 of the PD. Forest cover is a direct predictor of habitat suitability for key species in and around the project area such as chimpanzees (see "ChimpanzeeSuitability_Method.docx"). As described in the PD, the project activity is the prevention of forest loss at the levels expected in the without project scenario. Net positive biodiversity impacts are quantified as the difference between forest cover in the without-project scenario and the with-project scenario both inside and outside the

	project area. While some deforestation was expected to occur, the amount of deforestation that took place during the reporting period is well below the predicted forest loss in the without-project scenario. Therefore, maintenance of forest cover, as measured with analysis of aerial imagery collected in 2021, in the leakage belt is a net positive outcome for offsite biodiversity. (8 February 2022)
Clarification Request (CL):	The VVB concurs the Project Proponent has demonstrated through data reported and based on site visit observations and interviews that net impacts outside the Project Zone are likely positive, compared with the biodiversity conditions under the without-project land use scenario. However, closure of this finding is pending resolution of findings for accuracy of forest cover and offsite forest cover and deforestation mapping through the VCS verification of GIS data for these parameters.
Date Issued:	24 February 2022
Evidence Used to Close CL:	The VVB has closed the VCS finding upon which this item was pending. Item closed.
Date Closed:	16 May 2022

Indicator B4.1 - Develop and implement a monitoring plan that identifies biodiversity variables to be monitored, the areas to be monitored, the sampling methods, and the frequency of monitoring and reporting. Monitoring variables must be directly linked to the project's biodiversity objectives and to predicted activities, outcomes and impacts identified in the project's causal model related to biodiversity (described in G1.8).	PD Section 5.4.1 states: All biodiversity indicators are identified and addressed in the Biodiversity Monitoring Plan that accompanies this document [=PD]. The Biodiversity Monitoring Plan will be implemented periodically and results reported to CCBA and disseminated to Communities and Other Stakeholders identified in this document [=PD]. Biodiversity Monitoring Plan Section 6 states: Reporting to the CCBA will be conducted every five years or less from 2019 to 2047. Carbon Tanzania will compile all monitoring reports for verification. Biodiversity Monitoring Plan Section 7 identifies four indicators to be monitored, with a frequency of monitoring for each identified as every 5 years or less (for three), or every 10 years or less (for one). This section of the BMP also identifies the sampling method and the area to be monitored for each of the four indicators.
Evidence Used to Assess Conformance:	MR Section 5.3.1, PD Section 5.4.1, Ntakata Mountains REDD Biodiversity Monitoring Plan (20 th May 2017), supplemental documents/data

Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 5.3.1 relevant to Indicator B4.1 are: Present the results of the biodiversity impact monitoring, which should include: All biodiversity variables identified in the monitoring plan. Dates, frequency, locations, sampling methods used, and other information concerning the monitoring process. Results and evaluation of monitoring MR Section 5.3.1 identifies the four biodiversity variables identified in the monitoring plan. MR Section 5.3.1 does not identify the dates of monitoring or results, but for results refers to Section 5.1.1 for results for three variables, and to “ChimpanzeeSuitability_Method.docx” for the fourth variable. MR Section 5.1.1 refers to Appendix 1 for results of the chimpanzee habitat suitability model for this verification period. The map provided in Appendix 1 appears to refer to the entire project zone as the project area. No forest inventory data for native tree diversity was provided for review, but the BMP identifies this as having been conducted initially in 2017 with required re-inventory identified as every 10 years or less. Supporting documentation has been reviewed for the assessment of forest cover change within the carbon project area (project area forest reserves), forest cover change within the leakage belt, and for the chimpanzee habitat suitability model. Review of the supplemental monitoring data substantiates the biodiversity impact monitoring was carried out in accordance with the project’s validated design in terms of dates, and frequency, but the MR and supplemental documentation do not clearly substantiate whether appropriate sampling methods were met or whether the appropriate results are presented.
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	Sampling methods identified in the PD and MR for monitoring forest cover reference methods presented for the VCD carbon stock monitoring and methodologies. Findings regarding whether methods are applied correctly and results are calculated correctly are pending the positive findings for these parameters by the VCS verification.
Clarification Request (CL):	Please provide information supporting the monitoring that is reported reflects the correct project area and distinguishes project area from project zone results, and these results are in turn distinguished from results presented for offsite leakage areas identified outside the project zone. Please provide a copy of the referenced document: “ChimpanzeeSuitability_Method.docx”
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Dates of monitoring were added to the table in Section 5.3.1 of the MR. The “ChimpanzeeSuitability_Method.docx” has been provided to the auditor for review. While the map in Appendix 1 of the MR displays chimpanzee habitat suitability for the project zone, it is clearly overlaid by the project area and leakage belt boundaries. The new non-forest displayed in the map is clearly labeled as “new non-forest in suitable habitat” and is only accounted for within the project area. An explanation of the habitat suitability change was added to Appendix 1 in the MR. (8 February 2022)
Clarification Request (CL):	Based on the clarification provided, the VVB concurs the Project Proponent conducted monitoring during this monitoring period in accordance with the validated monitoring plan that identified biodiversity variables to be monitored, the areas to be monitored, the sampling methods, and the frequency of monitoring and reporting. However, closure of this finding is pending resolution of findings for accuracy of forest cover and offsite forest cover and deforestation mapping through the VCS verification of GIS data for these parameters.
Date Issued:	24 February 2022

Evidence Used to Close CL:	The VVB has closed the VCS finding upon which this item was pending. Item closed.
Date Closed:	16 May 2022
Indicator B4.2 - Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to globally, regionally or nationally significant Biodiversity (identified in B1.2) present in the Project Zone.	PD Section 5.4.1 states: All biodiversity indicators are identified and addressed in the Biodiversity Monitoring Plan that accompanies this document [=PD]. The Biodiversity Monitoring Plan will be implemented periodically and results reported to CCBA and disseminated to Communities and Other Stakeholders identified in this document [=PD]. Biodiversity Monitoring Plan Section 4 states that HCV Species tracked in the monitoring plan include: • Southern Ground-hornbill • White-backed Vulture • Rüppell's Vulture • Martial Eagle • Secretarybird • Red Colobus • Robust Chimpanzee • Giraffe • African Elephant • African Wild Dog • African Lion • Leopard • Temminck's Ground Pangolin • West African Ebony Biodiversity Monitoring Plan Section 6 states: Reporting to the CCBA will be conducted every five years or less from 2019 to 2047. Carbon Tanzania will compile all monitoring reports for verification. Biodiversity Monitoring Plan Section 7 identifies four indicators to be monitored, with a frequency of monitoring for each identified as every 5 years or less (for three), or every 10 years or less (for one). This section of the BMP also identifies the sampling method and the area to be monitored for each of the four indicators.
Evidence Used to Assess Conformance:	MR Section 5.3.1, PD Section 5.2.1, Ntakata Mountains REDD Biodiversity Monitoring Plan (20th May 2017), supplemental documents/data.
Findings:	MR Section 5.3.1 reports monitoring results for one HCV species, eastern chimpanzee, are presented in a separate document: "ChimpanzeeSuitability_Method.docx".

	The Biodiversity Monitoring Plan does not provide monitoring methodologies for the identified HCV species other than eastern chimpanzee. The Biodiversity Monitoring Plan references G1.8 in the PD (located in PD 2.1.11) as well as indicators for forest cover in the carbon project area, forest cover in the leakage belt defined in the PD, and tree species richness, composition, and relative basal area as the parameters to measure. MR Section 5.3.1 nor MR Section 5.1.1 present a clear connection between these monitored indicators and for how these monitor the effectiveness of measures taken to maintain or enhance all identified HCVs related to globally, regionally, or nationally significant biodiversity identified in B1.2 present in the project zone. Information presented in MR Section 5.3.1 on native tree diversity through lists of trees documented in the 2016 inventory does not list West African ebony (<i>Diospyros crassiflora</i>), one of the HCV species listed by the BMP as tracked by the monitoring plan.
Clarification Request (CL):	Please provide clarification within Section 5.3.1 for monitoring results related to HCVs, and please provide the auditor with any supporting documentation to substantiate the monitoring results.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	Section 5.4.1 of the PD explains that aside from chimpanzees, all HCV species population health will be inferred from forest cover because each of these species is reliant on intact forest cover in this region for habitat. Because forest cover is being maintained inside and outside of the project area well above levels in the without-project scenario, it can be inferred that habitat for these species is also being maintained. Additionally, the BMP states for each HCV that “Evidence that threats to the species are being addressed may be used to demonstrate that species population status is likely to be maintained or enhanced as a result of project activities”. Reports from VGS who are monitoring the project area for illegal harvesting and poaching are provided to the auditor for review. <i>Diospyros crassiflora</i> is listed in the BMP in error. There is a similar species of <i>Diospyros</i> that was documented in the 2017 forest inventory and the listing of <i>crassiflora</i> is likely a typo meant to indicate

	Diospyros mespilotrimis. A note has been added to PD minor changes in the MR. Either way, it can be assumed that maintenance of forest cover in the project area indicates that HCV species have been protected and maintained during the reporting period. (8 February 2022)
Clarification Request (CL):	The VVB confirmed the Project Proponent deleted West African Ebony (Diospyros crassiflora) as an HCV for the project in a statement added to MR section 2.2.3 covering minor changes to project description. The VVB has reviewed this change and concurs that deleting this species for this project constitutes a correction of a likely species misidentification and would not be considered a significant change in project activities or substantial change in the impacts of the project that are not described in a validated project description, so in accordance with CCB Program Rules v3.1, Section 3.5.6, the VVB has determined this change to represent a minor change that is allowed at verification. Based on the clarification provided, the VVB concurs the Project Proponent conducted monitoring during this monitoring period in accordance with the validated monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified High Conservation Values related to globally, regionally or nationally significant Biodiversity (identified in B1.2) present in the Project Zone. However, closure of this finding is pending resolution of findings for accuracy of forest cover and offsite forest cover and deforestation mapping through the VCS verification of GIS data for these parameters.
Date Issued:	24 February 2022
Evidence Used to Close CL:	The VVB has closed the VCS finding upon which this item was pending. Item closed.
Date Closed:	16 May 2022
Indicator B4.3 - Disseminate the monitoring plan and the results of monitoring, ensuring that they are made publicly available on the internet and summaries are communicated to the Communities	MR Section 5.3.2 states that monitoring results are communicated through meetings with the Village Governments in each of the eight villages on an annual basis and a copy of the monitoring results are presented to Tanganyika and Mpanda districts.

and Other Stakeholders through appropriate means.	
Evidence Used to Assess Conformance:	MR Section 5.3.2, PD Section 5.4.2, Biodiversity Monitoring Plan, supplemental documents provided to auditor, site visit interviews and observations
Findings:	Instructions for the CCB/VCS Monitoring Report Template for Section 5.3.2 are: “Describe how any results of monitoring undertaken in accordance with the monitoring plan have been disseminated and made publicly available on the internet. Describe the means by which summaries (at least) of the monitoring results have been communicated to the communities and other stakeholders.” Site visit interviews and review of supplemental documents substantiates that the monitoring plan and previous monitoring results have been posted and distributed to the communities. Site visit interviews indicated that community members were not aware of the monitoring results for the period under verification. The MR does not state explicitly that the monitoring plan is available online. Review of the online Verra project page confirmed that a project summary, in Swahili, is available on the internet and was posted on 4 August 2021: (https://registry.terra.org/app/projectDetail/CCB/1897) Similar to the Findings for Indicator G3.1, it is not clear what efforts were made prior to the verification site visit to disseminate the results or a summary of the biodiversity monitoring results for this verification period to community stakeholders.
Clarification Request (CL):	Please clarify and provide documentation for the efforts made prior to the verification site visit to disseminate the results or a summary of the biodiversity monitoring results for this verification period to community stakeholders.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The dissemination of biodiversity results/results summary was done through the following channels. Along with the monitoring report a local language summary was uploaded to the registry before the verification. A notice letter was sent informing stakeholders of such and its surrounding procedures. The district, the overseeing authority of all governance

	and representative processes in the area confirmed during site visit their knowledge and use of the registry. The summary was also sent to the district directly. The summary was also sent to the project manager who shared it and informed community members and leaders. Any community leaders who are digitally available also received the digital copy. Carbon Champions also received copies and shared it and discussions in their daily interactions with community members, it was noted during site visit that even when Carbon Champions are not on an explicit deployment the community view and come to them as a source of project information. Though some community members were unable to recall specific monitoring results or documentation community members were largely knowledgeable and confirmatory on positive biodiversity benefits achieved during this monitoring period. It should be noted that Katavi region has one of the lowest literacy rates in a country in one of the lowest literacy regions of the world and this informs the project in its practical commitment to ensuring multi-directional information flow and results sharing with the participating community. (8 February 2022)
Evidence Used to Close CL:	Based on the clarification provided, along with review of supporting supplemental documents provided by the Project Proponent, the VVB concludes the biodiversity monitoring results have been disseminated in accordance with the dissemination plan identified in PD Section 5.4.2 Item closed.
Date Closed:	24 February 2022

Indicator GL3.1 - Demonstrate that the Project Zone includes a site of high biodiversity conservation priority by meeting either the vulnerability <i>or</i> irreplaceability criteria defined below, identifying the ‘Trigger’ species that cause(s) the site to meet any of the following qualifying conditions and providing evidence that the qualifying conditions are met:	Information demonstrating compliance with requirements for Indicator GL3.1 was validated at the time of the PD validation. PD Section 5.5.1 makes the claim to demonstrate presence of at least a single individual of a species on the IUCN Red List that is critically endangered or endangered, or the presence of at least 30 individuals or 10 pairs of a vulnerable species, and lists one IUCN-designated Endangered species and three
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1.1 Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site: a. Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or b. Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs. OR 1.2 Irreplaceability A minimum proportion of a species' global population present at the site at any stage of the species' lifecycle according to the following thresholds: a. Restricted-range species - species with a global range less than 50,000 km² and 5% of global population at the site; or b. Species with large but clumped distributions - 5% of the global population at the site; or c. Globally significant congregations - 1% of the global population seasonally at the site; or d. Globally significant source populations - 1% of the global population at the site.	IUCN-designated Vulnerable species that meet these criteria. • PD Section 5.5.1 identifies Eastern Chimpanzee as the IUCN-designated Endangered species. • PD Section 5.5.1 identifies Leopard, Giant Ground Pangolin, and Martial Eagle as the IUCN-designated Vulnerable species that meet the required criteria.
Evidence Used to Assess Conformance:	PD Section 5.5.1
Findings:	Documentation used to substantiate these four species meet the required criteria was not provided to the auditor for the verification. However, this is a validation item addressed by, and at the time of, the validation of the PD. This information is included here for reference for other findings related to the Trigger Species established for the project. Giant Ground Pangolin is listed in PD Section 5.5.1 and MR Section 5.4.1 as IUCN-listed as Vulnerable, but review of the IUCN website indicates this species

	is listed by IUCN as Endangered. This information needs to be corrected if Giant Ground Pangolin is the species documented in the project zone and not Temminck's Ground Pangolin (see findings for GL3.2).
Clarification Request (CL):	Please clarify which pangolin is the correct Trigger species for this project, and if Giant Ground Pangolin is the correct species, please correct the IUCN status.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The correct Pangolin is the Temminck's Ground Pangolin. A PD minor change was added to the MR. (8 February 2022)
Clarification Request (CL):	The VVB confirmed the Project Proponent identified Temminck's Ground Pangolin as the correct trigger species in a statement added to MR section 2.2.3 covering minor changes to project description. The VVB has reviewed this change and concurs that correcting the pangolin species for this project would not be considered a significant change in project activities or substantial change in the impacts of the project that are not described in a validated project description, so in accordance with CCB Program Rules v3.1, Section 3.5.6, the VVB has determined this change to represent a minor change that is allowed at verification. Item closed
Date Closed:	24 February 2022
Indicator GL3.2 - Describe recent population trends of each of the Trigger species in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario.	Information demonstrating compliance with requirements for Indicator GL3.2 was validated at the time of the PD validation.
Evidence Used to Assess Conformance:	PD Sections 5.5.2 and 5.5.1
Findings:	Documentation used to substantiate the population trends for each of the four Tiger species was not provided to the auditor for the verification. However, this is a validation item addressed by, and at the time of, the validation of the PD. However, one of the Trigger species listed in PD Section 5.5.2 does not match the Trigger species listed in PD 5.5.1. PD Section 5.5.1 lists Giant Ground

	Pangolin (<i>Smutsia gigantea</i>) as one of the Trigger species but does not report on population trends at the start of the project for this species in PD Section 5.5.2 but instead reports on the population trends for Temminck's Ground Pangolin (<i>Smutsia temminckii</i>).
Clarification Request (CL):	Please provide clarification on which pangolin species is the correct Trigger species for this project. The spelling of the genus for both species should also be corrected to " <i>Smutsia</i> " rather than " <i>Smustia</i> " as presented in the PD and MR.
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	The correct trigger species is the Temminck's Ground Pangolin as listed in the MR. A correction has been added as a PD minor change in the MR. The genus has been corrected in the MR. (8 February 2022)
Evidence Used to Close CL:	The VVB confirmed the Project Proponent identified Temminck's Ground Pangolin as the correct trigger species in a statement added to MR section 2.2.3 covering minor changes to project description. The spelling for genus " <i>Smutsia</i> " has been corrected. Item closed
Date Closed:	24 February 2022

Indicator GL3.3 - Describe measures needed and <i>taken</i> to maintain or enhance the population status of each Trigger species in the Project Zone, and to reduce the threats to them based on the causal model that identifies threats to Trigger species and activities to address them.	MR Section 5.4.1 presents tables for five Trigger species along with actions reported as taken to maintain or enhance the population of each. Tables were created in the MR for three of the four trigger species identified in the validated PD. However, there are two discrepancies in the trigger species identified in the MR as compared to the validated PD: - The validated PD identifies Temminck's ground pangolin (<i>Smutsia temminckii</i>) as a trigger species while the trigger species listed in the MR is identified as giant ground pangolin (<i>Smutsia gigantea</i>) - The MR identifies Kungwe apalis (<i>Apalis argentea</i>) as a trigger species, but this species is not identified in the validated PD as a trigger species and is listed by IUCN as LC (Least Concern).
Evidence Used to Assess Conformance:	MR Section 5.4.1, PD Sections 5.5.1 and 5.5.2, site visit observations and interviews
Findings:	The "with-project scenario" presented in MR Section 5.4.1 for each of the trigger species identified in the

	MR were maintained, mainly through the implementation of the VLUPs and resultant reduced deforestation. Protection of the forest areas is identified in the PD as the general measure needed to maintain or enhance trigger species populations. Site visit observations and interviews substantiate the implementation of the VLUPs and patrolling by the VGS to help enforce the protection of the areas set aside as forest reserves from encroachment, tree-cutting, and poaching. However, there are two discrepancies identified between the trigger species treated in the MR and the trigger species identified in the validated PD.
Clarification Request (CL):	See findings for Indicator GL3.2. Please clarify the pangolin is the correct pangolin trigger species. Also please clarify why Kungwe apalis has been added as a trigger species in the MR and provide appropriate documentation to allow validation for this addition (documentation to demonstrate how it meets the criteria for inclusion).
Date Issued:	26 October 2021
Project Proponent Response/Actions and Date:	See finding GL3.2, the Pangolin species has been updated in the MR. The Kungwe apalis was added to the MR in error and has been removed as it is not a species that is monitored as a part of the Biodiversity Monitoring Plan. (8 February 2022)
Clarification Request (CL):	The VVB confirmed MR Section 5.4.1 has been revised to remove Kungwe apalis as a trigger species. The VVB notes Giant Ground Pangolin is listed in MR Section 5.4.1 as a trigger species. Based on resolution of findings for GL3.1 and GL3.2 identifying Temminck's Pangolin as the correct pangolin species to be considered a trigger species, please provide appropriate clarification for which pangolin species should be listed as is the trigger species in MR Section 5.4.1 and provide clarification for whether the with-project scenario described in MR Section 5.4.1 applies to Giant Ground Pangolin or Temminck's Pangolin.
Date Issued:	24 February 2022

Project Proponent Response/Actions and Date:	The trigger species in section 5.4.1 should actually be the Temminck's Pangolin. The MR has been corrected to reflect this change. (29 March 2022)
Evidence Used to Close CL:	The VVB confirmed the trigger species in question in MR section 5.4.1 has been corrected to Temminck's Ground Pangolin, which is now consistent with the validated PD. Item closed.
Date Closed:	8 April 2022

Indicator GL3.4 - Include indicators of the population trend of each Trigger species and/or the threats to them in the monitoring plan and demonstrate the effectiveness of measures needed and taken to maintain or enhance the population status of Trigger species.	PD Section 5.4.1 refers to the Biodiversity Monitoring Plan for all biodiversity indicators, which includes the HCV species as well as trigger species. identifies four indicators for the population trends for GL3.4. Biodiversity Monitoring Plan Section 7 identifies four indicators for monitoring focused on monitoring change in forest cover in the project area and inside the leakage belt, monitoring tree species richness, composition, and relative basal area, and monitoring habitat suitability modeled for chimpanzees. Biodiversity Monitoring Plan Section 3 provides justification for monitoring these indicators.
Evidence Used to Assess Conformance:	MR Section 5.3.1, 5.4.1, PD Sections 5.4.1 and 5.5.2, Biodiversity Monitoring Plan, site visit observations and interviews
Findings:	MR Section 5.4.1 justifies use of the forest cover indicators for inferring impacts on identified trigger species based on the CCBA v3 GL3. Review of criteria for GL3 in CCB Standards v3.1 confirms this is allowable under the CCB Standards. Site visit observations and interviews substantiate the implementation of the VLUPs and patrolling by the VGS to help enforce the protection of the areas set aside as forest reserves from encroachment, tree-cutting, and poaching. Based on the use of indicators focused on demonstrating reduction in rate of deforestation as the means for demonstrating the effectiveness of measures at maintaining or enhancing the population status of trigger species, it can be reasonably concluded that the actions taken by the project thus far are having the desired effect. Closure of this finding was pending resolution of the findings for Indicator GL3.2 and GL3.3. Findings

	related to Indicator GL3.2 were satisfactorily closed, but additional clarification is required for an item related to Indicator GL3.3.
Clarification Request (CL):	Please provide confirmation as appropriate that indicators of the population trend, and/or the threats identified in the monitoring plan apply to the appropriate pangolin species identified as the correct Trigger Species, and please confirm that information provided to demonstrate the effectiveness of measures needed and taken to maintain or enhance the population status of the correct pangolin species identified as the Trigger species.
Date Issued:	24 February 2022
Project Proponent Response/Actions and Date:	The trends in the MR do apply to the Temminck's pangolin and not the giant pangolin. We confirm that these same measures apply to the Temminck's pangolin. (29 March 2022)
Evidence Used to Close CL:	The VVB has reviewed the clarification provided and concurs the measures identified would apply to Temminck's ground pangolin. Item closed.
Date Closed:	8 April 2022