



**Verified Carbon
Standard**

VERIFICATION REPORT OF THE PROJECT

GREEN GOLD LORETO 1



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Prepared by	AENOR CONFIA S.A.U.

Approved by	Jose Luis FUENTES PEREZ
Work carried out by	Lead Auditor: Richard GONZALES Auditor: Claudia POLINDARA Technical Reviewer 1: Adrian VIDAL Technical Reviewer 2: Pablo MORENO

Summary:

AENOR performed the second verification of the "Green Gold Loreto 1" project, a Logged to Protected Forest (LtPF) activity in the Loreto Region, Peru. The process included a desk review of the monitoring report and technical documentation, a site visit to verify field conditions and community engagement, and follow-up interviews with key stakeholders and project staff.

Purpose and scope of verification: The purpose was to provide an independent third-party assessment of the project's conformance with the VCS rules. The scope included evaluating the implementation of the monitoring plan, the accuracy of the GHG emission reduction and removal calculations, and the project's adherence to the validated project description and applied methodology (VM0010 v1.3).

Monitoring period: The period covered by this verification is from 01 August 2022 to 31 July 2024.

Method and criteria used for verification: The verification was conducted in accordance with the VCS Standard (v4.7) and the VCS Registration and Issuance Process. The assessment utilized a risk-based approach to verify the monitoring data, remote sensing analysis (satellite imagery), and carbon stock change calculations.

Number of findings raised: During the verification process, a total of 4 Corrective Action Requests (CARs) and 7 Clarification requests (CLs) were raised. All findings were successfully addressed and closed by the project proponent through the submission of revised documents and additional evidence.

Any uncertainties associated with the verification: The audit team assessed the uncertainty related to the carbon inventory and emission factors. The project reported an uncertainty of 13.24%, which is within the allowable precision for the overall quantification under VCS rules. Appropriate confidence deductions were applied to ensure conservativeness. No material discrepancies or unresolved uncertainties remain.

Summary of the verification conclusion: AENOR concludes with a reasonable level of assurance that the project complies with all verification criteria. The monitoring system is robust and results are well-supported. For this monitoring period, the audit team confirms a net GHG emission reduction and removal of 487,896 VCUs, after a buffer pool contribution of 115,457 tCO₂e.

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1 INTRODUCTION

1.1 Objective

The purpose of the verification audit activity was to conduct an independent assessment of the project in order to determine whether the project complies with the verification criteria, as set out in the guidance documents listed in Section 1.2 of this report.

1.2 Scope and Criteria

Verification Scope: The scope of the verification audit is to verify the removals of the project against the Verified Carbon Standard, the identified methodology VM0010 v1.3, and the validated PD throughout the monitoring period from 1 August 2022 to 31 July 2024. The scope was defined as follows:

- ✓ The project monitoring period;
- ✓ Removal's calculations;
- ✓ Non-performance risk report verification;
- ✓ Assessment of monitored and processed data (including remote sensing and biomass growth);
- ✓ Verification requirements stated in the VCS standard.

The objectives of this audit included a verification of the project's calculated removals with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the PD and the Monitoring Report, specifically confirming a net GHG emission reduction and removal of 487,896 tCO₂e for this monitoring period, after a buffer pool contribution of 115,457 tCO₂e.

Standard Criteria: The verification assessment was performed in accordance with the requirements of the VCS standard, including the following documents:

- ✓ VCS Program Guide, v4.4 /1/
- ✓ VCS Standard, v4.7 /2/
- ✓ VCS Methodology Requirements, v4.4 /3/
- ✓ VCS Programme Definitions, v4.5 /4/
- ✓ VCS Validation and Verification Manual, v3.2 /5/
- ✓ VCS AFOLU Non-Permanence Risk Tool, v4.2 /6/
- ✓ VM0010 Methodology for Carbon Stocking in Sinks, v1.3 /7/

- ✓ Correction to Versions 1.2–1.4 of VM0010 Methodology for Improved Forest Management: Conversion from Logged to Protected Forest /8/

Note: While Version 5.0 is currently active, Version 4.7 remains valid for this project as per the grace period and transition rules defined by the VCS Program.

1.3 Level of Assurance

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope without any limitation. Based on the audit findings, a positive evaluation statement reasonably assures that the project GHG assertion is materially correct and is a fair representation of the GHG data and information.

The verification assessment was conducted in accordance with ISO 14064-3:2019 with a reasonable level of assurance. The assessment has been performed through a deep desk review, a site visit to the project area, interviews with local stakeholders, and interviews with relevant personnel from the Project Proponent (GGF). AENOR reproduced and verified the monitoring spreadsheets of GHG emission removals; also, a deep and meticulous review was carried out to verify the correct application of the methodology VM0010 v1.3 (including the specific Correction to Versions 1.2–1.4), formulae, and equations. The audit team checked that all data required to calculate the GHG emission reductions are appropriately provided.

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

- ✓ Sufficient evidence available: The project participant has provided 100% of the data used in the calculations to achieve the final amount of GHG emission reductions reported.
- ✓ Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team.
- ✓ Cross-checked evidence: AENOR cross-checked the collected information through an on-site inspection to the project area and by reproducing the calculations.
- ✓ GHG assertion is materially correct: The assertion is a fair representation of the GHG data and information, accurately accounting for the results of the vintage.

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

1.4 Summary Description of the Project

The Green Gold Loreto 1 (ID. 2345) project is an environmental initiative focused on the conservation and management of tropical forests in the Loreto Region, Peru. The project is implemented across a total area of 183,445.54 hectares, encompassing the sectors of Consolidado Tacsha, Consolidado Mazán, and San Regis. The project activity consists of the transition from planned commercial timber harvesting to a Logged to Protected Forest (LtPF) model, aimed at the protection of existing carbon stocks.

The project area comprises tropical forests where the project proponent implements monitoring and surveillance activities, including river patrols and remote sensing technology, to mitigate deforestation and forest degradation. These activities are designed to avoid the emission of greenhouse gases and allow for the sequestration of carbon through biomass growth. The initiative also includes technical and economic cooperation programs with neighboring communities to reduce land-use pressure.

The project is based on the maintenance of forest carbon pools over the crediting period. The environmental objective is to achieve measurable and verifiable GHG emission reductions and removals through forest protection. For the monitoring period from 01 August 2022 to 31 July 2024, the project quantification resulted in the following climate benefits:

After accounting for leakage and a total buffer pool contribution of 115,457 tCO₂e, the project generated total gross GHG emission reductions and removals of 603,353 tCO₂e, resulting in 487,896 tCO₂e to be issued as VCUs for the full monitoring period. These results have been quantified in accordance with the VM0010 v1.3 methodology (including relevant corrections) and VCS rules.

2 VERIFICATION PROCESS

2.1 Method and Criteria

The verification was conducted using a risk-based approach to provide a reasonable level of assurance that the GHG assertion is materially correct and conforms to the defined criteria. The audit team followed the requirements of ISO 14064-3:2019 and the VCS Standard v4.7 to evaluate the project's monitoring results for the period from 01 August 2022 to 31 July 2024. The criteria for assessment included the VCS Program Guide, VCS Methodology Requirements, and the specific requirements for AFOLU projects.

The evidence-gathering plan was designed to ensure the integrity of the reported data through a strategic combination of methods. First, a detailed desk review was performed, which included a 100% technical reproduction of the GHG emission removal spreadsheets to verify the correct application of methodology VM0010 v1.3 and its associated equations. Second, the audit team conducted a 100% spatial verification of the project boundary and land cover changes using the provided GIS database and satellite imagery to confirm the reported forest cover status.

For the forest inventory verification, the audit team implemented a systematic sampling approach justified by the need for a conservative and technically sound assessment. While the Project Proponent installed a total of 28 monitoring plots, the audit team sampled 02 plots based on the formula provided in the FSC standard (FSC-STD-20-007): $n = 0.3\sqrt{N}$, where N represents the total number of plots. This sampling density allowed the team to confirm field data—specifically tree diameter and perimeter—ensuring that the raw measurements used in the biomass growth models were accurate and free of material discrepancies.

The VVB's sampling approach was developed in accordance with ISO 14064-3:2019 and the VCS Validation and Verification Manual v3.2. The VCS Validation and Verification Manual requires verification activities to be based on an assessment of material risks and that the evidence sampled be representative of the information under assessment and reflect the identified verification risks. The Manual further requires the VVB to justify the evidence-gathering approach and the extent of evidence tested to support the verification conclusions. Accordingly, the plot sampling approach formed part of the overall evidence-gathering plan developed for the verification.

The VVB notes that the field verification of permanent sample plots constituted one component of the overall verification strategy. During this monitoring period, the verification also included assessment of MDev#06 and MDev#07, including the review of biomass modelling procedures, calibration datasets, wall-to-wall biomass mapping outputs, geospatial analyses, monitoring calculations, and disturbance detection processes. The field inspection of plots CT-11 and CT-12 was performed to verify the traceability and consistency of the field measurements used as inputs to the monitoring system and model calibration process. Based on the evidence reviewed, the VVB obtained sufficient and representative evidence to support the verification conclusions and the required level of assurance.

The verification process followed a rigorous schedule with key milestones designed to address all technical, legal, and social aspects of the project. The process officially commenced with a Kick-off Meeting (KOM) on Monday, 07 April 2025, which served to align audit logistics and review initial monitoring plan deviations. This was followed by an intensive desk review period throughout April and May 2025, focusing on the Monitoring Report (MR), the Non-Permanence Risk Report (NPRR), and technical supporting evidence.

The on-site activities were divided into two phases to optimize the assessment. The first phase took place on 30 May 2025 at the project proponent's office in Lima, focusing on GIS data analysis and the verification of emission reduction calculations. The second phase consisted of a field visit to the Loreto Region from 02 June to 05 June 2025, involving physical plot measurements and extensive stakeholder engagement.

During the field visit, the audit team prioritized transparency and community consultation. Stakeholder interviews were conducted on 03 and 04 June 2025 with the communities of Santa María de Loreto and Chambira, as well as representatives from FECONMAN and DISAFILPA. The verification concluded with a final meeting on 06 June 2025, where preliminary observations were discussed prior to the audit team's return to Lima.

AENOR has conducted the verification of the project and deems with a reasonable level of assurance that the reported greenhouse gas assertion is materially correct and is a fair representation of the project's climate benefits for the defined monitoring period. The audit team confirms that the monitoring results, including net GHG emission reductions and the contribution to the pooled AFOLU buffer account, are based on reliable and traceable evidence.

2.2 Document Review

The monitoring report and supporting documentation submitted by the Project Proponent (PP) were reviewed against the approved methodology and applicable VCS requirements. Additional background documents related to the project monitoring, including forest inventory records, GIS databases, and legal evidence, were made available before and during the audit process. Furthermore, the Non-Permanence Risk Report (NPRR) was verified against the latest version of the VCS AFOLU Non-Permanence Risk Tool to ensure compliance with risk management and buffer account requirements.

To address the corrective actions and clarification requests that arose from the desk review and on-site visit, the project developer revised the monitoring documentation and technical spreadsheets. This iterative process ensured that all identified non-conformities were resolved, leading to the development of the final version of the Monitoring Report and the Non-Permanence Risk Report. Appendix 2 to this report details the complete list of documents provided by the PP and reviewed by AENOR during the verification process.

2.3 Interviews

The AENOR verification team, led by Richard Gonzales, conducted a series of interviews with project developers, local stakeholders, and key personnel involved in the project activity. These consultations were designed to confirm selected information, verify the implementation of social safeguards, and resolve technical issues identified during the initial document review. The interview process followed a semi-structured approach to ensure all relevant aspects of the monitoring period were addressed.

The verification activities included an initial phase on 30 May 2025 at the project proponent's office to interview technical staff regarding GIS and data management. Subsequently, from 02 June to 05 June 2025, the audit team conducted field-based interviews in the Loreto Region with key stakeholders, project staff, and representatives from local communities such as Santa María de Loreto and Chambira. This direct engagement provided the audit team with the necessary primary evidence to validate the accuracy of the information reported in the monitoring documentation.

Audit Date	Name	Affiliation	Activities
30/05/2025	Adriana Morales	GGF Group	Status of the project activity (Operation and implementation) Property and land use rights Stakeholder identification and analysis used to identify communities
	Raul Dance	GGF Group	Project Communication & Grievance Mechanism Characteristics of the project Monitoring results
	Gareth Hughes	GGF Group	Monitoring report
	Thom Brade	Space Intelligence Ltd/Consultat	Application of Methodology GHG removals Leakage QA/QC procedures
	Ed Mitchard	Space Intelligence Ltd/Consultat	Monitoring results Forest inventory data, plot design, and data handling.
02/06/2025	Adriana Morales	GGF Group	

Audit Date	Name	Affiliation	Activities
	Jorge Gallardo	GGF Group	Monitoring results
	Catherine Rojas	GGF Group	Field data processing Monitoring records
	Fsher Rios	GGF Group	Patrolling activities Illegal activities within the project Health and safety procedures
	Paula Días	GGF Group	Project diffusion Access to the project information
	Karla Pinedo	GGF Group	Comments and opinions about the project Benefits of project activities Opinion and perception of the project Well-being improvement Documentation access Antidiscrimination and grievance policies Project Benefit Agreements
03/06/2025	Toño Palla	CN Chanbira	Comments and opinions about the project
	Goli Cordova		Benefits of project activities
	Eleodoro Ahuanari		Project dissemination of monitoring results
	Luzmilda Capinoa		Agreements
	Diógenes Capinoa		Wellbeing improvement
	Carmencita Shihuango		Working opportunities
	Navier Domoñol	CN Santa María de Loreto	
	Miguel Andi		
	Lilia Arévalo		
	Julia Huamán		
	Jaime Andi		

Audit Date	Name	Affiliation	Activities
	Maritza Pérez		
	Luis Aquin		
04/06/2025	Fsher Rios	GGF Group	Visit to plots: CT 11 and CT 12 Working conditions Project site access Field safety protocols Patrolling activities Forest harvesting Health and safety at work
	Gabriel del Cuadro	GGF Group	
	Benjamin Tanchira	GGF Group	
	Jerry Cachique	GGF Group	
	Adne Aspajo	FECONMAN/President	Comments and opinions about the project Benefits of project activities Project dissemination of monitoring results Agreements Wellbeing improvement Working opportunities
05/06/2025	Juan Vázquez	DISAFILPA/Representatives	Land Tenures Property rights Conflict in the project area Legal Sanitation
	Blanca Sandoval		

2.4 Site Visits

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

- ✓ Ensure that the geographic area of the project, as reported in the MR and the accompanying KML file, is in conformance with Section 3.10.2 of the VCS Standard;

- ✓ Perform a risk-based review of the project area to ensure that the project conforms to all other requirements of the VCS rules and the methodology.
- ✓ Observe the Project Proponent's evidence and collect and record data in order to assess whether data collection techniques conform to the monitoring plan and related documentation and to evaluate data quality control systems.
- ✓ Select samples of data and information for verification in order to meet a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 4.1.8 of the VCS Standard;
- ✓ Perform a risk-based review of the project area to ensure that the project is in conformance with the eligibility requirements of the VCS rules and the applicability conditions of the methodology;
- ✓ Interview local authorities to confirm that the project operates in accordance with current permits and authorizations and its relationship with local actors and communities.
- ✓ Interview local stakeholders to confirm that the project operates in accordance with current permits and authorizations and its relationship with local actors and communities.
- ✓ Interview the key personnel involved in the monitoring and observe monitoring practices.
- ✓ Verify patrolling and security access in the project zone.
- ✓ Verify health and safe working conditions of project personnel.

Site visits were conducted from 30 May to 06 June 2025, in which the audit team visited the project area, interviewed key stakeholders, staff, and other related experts, and also reviewed the Monitoring Report (MR) and supporting documents. Also, meetings were carried out with project representatives and personnel in charge of carrying out the GHG calculations, satellite image processing, monitoring results, and additionality.

The audit team visited the following locations during the mission: Lima, Peru (GGF Group offices); Iquitos, Loreto (GGF Group offices); the communities of Santa María de Loreto and Chambira; GGF Bahia Camp (project area) and the regional offices of DISAFILPA. In addition, meetings were held with representatives and technical experts from GGF Group and Space Intelligence Ltd.

In addition to visiting the identified locations, the audit team conducted a site visit to the project, confirming the project location through the inspection of plots CT-11 and CT-12. The team verified the forest strata, assessed the status of the project activity, and reviewed property and land use rights. Furthermore, interviews were held with relevant stakeholders, including local community members and regional authorities, to gather additional insights and evidence regarding project implementation and compliance.

2.5 Resolution of Findings

All documentation provided by the Project Proponent was assessed against the most recent version of the relevant VCS guidance documents and program rules. During the verification process, several Clarification Requests (CL) and Corrective Action Requests (CAR) were raised and submitted to the Project Proponent. The proponent addressed these findings either by providing the audit team with the necessary supplementary information or by implementing the appropriate technical corrections in the monitoring documentation.

Updated versions of the Monitoring Report (MR) and supporting spreadsheets were submitted by the Project Proponent, and the audit team reassessed them against the applicable guidance documentation. This process was repeated iteratively until all identified non-conformities were fully resolved and the reported GHG assertion was found to be accurate and conservative. Specifically, 4 CARs and 7 CLs were issued and successfully closed during this process.

All findings issued by the AENOR audit team during the verification have been closed in accordance with the VCS Standard requirements. A detailed description of each finding, the evidence provided for its closure, and the final audit team assessment are provided in Appendix 3 of this report.

2.5.1 Forward Action Requests

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

2.6 Eligibility for Validation Activities

AENOR has conducted the validation and verification at the same time considering the paragraph 4.1.20 VCS standard. AENOR holds accreditation for validation and verification for the sectoral scope 14. Agriculture, Forestry, Land Use. AENOR is accredited by ANAB and ONAC to carry out the auditing activities under VCS.

3 VALIDATION FINDINGS

The verification process has been conducted by AENOR in accordance with ISO 14064-3:2019, based on the VCS Standard and the applicable program rules. The conclusions of this report demonstrate that the project, as described in the monitoring documentation, remains in full compliance with all validation criteria and methodological requirements.

The comprehensive review of the Monitoring Report (MR), alongside the assessment of baseline and monitoring methodologies, subsequent background investigations, on-site follow-up interviews, and the evaluation of comments from stakeholders, have provided AENOR with sufficient and appropriate evidence to verify the fulfillment of the stated criteria with a reasonable level of assurance.

Therefore, AENOR deems that the greenhouse gas assertion in the monitoring report is accurate, complete, transparent, and conservative. It provides a clear and faithful understanding of the project's implementation and its climate benefits during the specified monitoring period, ensuring that the reported emission reductions and removals are free from material discrepancies.

3.1 Methodology Deviations

The audit team has conducted a comprehensive assessment of the methodology deviations applied during this monitoring period, ensuring full compliance with the VCS Standard and the requirements of methodology VM0010 v1.3. These deviations have been categorized into two groups: those previously approved during the project's validation and first verification, and new deviations introduced for the current monitoring period (August 2022 – July 2024) to enhance monitoring accuracy. AENOR has verified that each deviation is either more conservative or results in a higher level of accuracy compared to the default methodological procedures, without negatively impacting the integrity of the GHG emission reduction quantification.

Previously Validated Methodology Deviations

Methodology Deviation	Summary of Deviation	VVB Assessment
MDev#01: Business Model Criterion for Reference Area Selection	Deviation from VM0010 v1.3 (Section 6.2.2) to include "Business Model" (FSC certification, vertical integration) as a primary criterion for selecting reference areas in the Amazon basin, beyond strictly geographic proximity.	The audit team verified this deviation against Section 3.4.2 of the Validated PD /11/ and the Validation Report /12/. It was confirmed that the inclusion of FSC-certified, vertically integrated reference companies remains a more accurate representation of the baseline agent's common practice. The

		monitoring spreadsheets /14/ correctly apply these reference areas as previously approved.
MDev#02: Calculation of DBH and Commercial Height (H)	Use of Smalian's formula (Form Factor 0.65) to calculate merchantable volume from DBH and commercial height, following mandatory Peruvian forestry practice (Directiva 046-2016-SERFOR), instead of yield tables or allometric equations.	The audit team reviewed the monitoring calculation sheets /14/ and confirmed the application of Smalian's formula. This approach was cross-checked with the SERFOR regulation and the Validated PD /11/. The VVB concluded that the method is applied consistently and remains conservative, as it yields lower volumes compared to standard allometric models.
MDev#03: Calculation of Carbon Stock of Dead Wood (Logging Slash)	Application of a Logging Damage Factor (LDF) and Logging Infrastructure Factor (LIF) (Pearson et al., 2014) to combine slash and stand damage into a single factor, replacing the BCEF method prescribed in VM0010.	The VVB assessed the use of LDF and LIF factors and verified their correct integration into the current emission reduction spreadsheets /14/. This deviation remains valid as it provides higher accuracy for the Peruvian Amazon, where specific expansion factors are unavailable, maintaining consistency with the Validated PD /11/.
MDev#04: Calculation of Baseline Carbon Sequestered in Wood Products	Use of specific sawmill recovery rates and four wood product classes (based on density and value) from GGF's operations instead of the global default percentages (Winjum, 1998) required by Equation 8 of VM0010.	The audit team reviewed the project's specific sawmill recovery rates and the product classes defined in the Validated PD /11/. The VVB confirmed that the actual data from GGF's facility is more accurate and conservative than the 1998 global defaults. The values used in the current verification /10/

		match those approved during the validation stage.
MDev#05: Market Leakage Calculation	Modification of Equation 40 in VM0010 v1.3 to calculate market leakage based on an ex-post analysis of Peru's timber export data, identifying if other producers increased logging to fill the gap caused by the project.	The audit team evaluated the application of this formula and confirmed it is identical to the methodology deviation approved during the Previous Verification Report /13/. The VVB verified that the current monitoring period correctly applies the conservative assumption that any increase in Peruvian exports is attributed to the project, as documented in the Validated PD /11/ and calculation sheets /14/.
MDev#08: Natural Non-fire Disturbance	Modification of Equation 35 of VM0010 v1.3 to align the calculation of project emissions from natural non-fire disturbance events with the methodological principle established in Section 8.2.2.1, whereby only biomass present in the project scenario but absent in the baseline scenario is considered.	The audit team verified this deviation against the Validated PD /11/ and the Validation Report /12/. It was confirmed that the modification of Equation 35 remains consistent with the methodological principle established in VM0010 Section 8.2.2.1 for natural non-fire disturbance events. The VVB verified that the deviation relates exclusively to the quantification procedure for non-fire disturbances and does not affect project activities, baseline determination, or additionality. The monitoring spreadsheets /14/ correctly apply this methodology deviation as previously approved, maintaining a conservative approach to the

		quantification of emission reductions.
MDev#11: Carbon Stock Changes	This deviation, originally approved during validation, modified the monitoring of annual carbon stock changes through the use of biomass mapping, remote sensing datasets, and pixel-based carbon stock change calculations instead of the stratum-based approach prescribed in VM0010.	The audit team verified this deviation against the Validated PDD /11/ and the Validation Report /12/. The deviation concerns the monitoring of annual carbon stock changes in aboveground biomass and involves the modification of Equation 32 to enable pixel-based quantification using biomass maps derived from remote sensing and LiDAR data. This deviation was assessed and approved during validation as Deviation #3 in the validated PDD. It was further confirmed that this deviation remains unaffected by the updated version of methodology VM0010. Based on the evidence reviewed, including monitoring calculations, biomass mapping outputs, and supporting spreadsheets /14/, the VVB concludes that the project proponent has applied the approved deviation consistently with the validated methodology throughout the monitoring period. The annual carbon stock changes in the project scenario were calculated using the modified Equation 32 as approved during validation. No discrepancies from the approved approach were identified. The monitoring

		spreadsheets /14/ correctly apply this methodology deviation as previously approved, maintaining a conservative approach to the quantification of emission reductions.
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Methodology Deviations Requested in this Monitoring Period

During the current monitoring period (August 2022 – July 2024), the Project Proponent (PP) introduced two new methodology deviations, MDev#06 and MDev#07, aimed at enhancing the precision of biomass monitoring and disturbance detection through high-resolution spatial modeling. These deviations were subject to an extensive technical review by the VVB, particularly regarding the empirical transition from traditional sampling error to a Root Mean Square Error (RMSE) framework. Following the resolution of NC/CAR 03, the VVB confirmed that these modifications align with the requirements for increased accuracy and conservativeness. The following table details the nature of these deviations and the VVB's assessment of their compliance with Sections 3.20.1 through 3.20.3 of the VCS Standard.

Methodology Deviation	Summary of Deviation	VVB Assessment
MDev#06: Project Uncertainty (Empirical RMSE-based approach)	Implementation of a spatially explicit approach using wall-to-wall biomass maps and RMSE validation from 28 remeasured plots, instead of the traditional SRSS aggregation.	The VVB reviewed the technical report /15/ and the comparative analysis /16/. This deviation relates to monitoring procedures (VCS 3.20.1). The comparison between the model's RMSE (9.08%) /15/ and the t-distribution (9.46%) /16/ proves the approach does not negatively impact conservativeness (VCS 3.20.2) while providing increased accuracy. A sensitivity analysis confirmed that excluding plots SR-01/SR-03 did not bias the model for high-biomass strata. Consistent with Req. 3.20.3, all consequences are reported herein.

MDev#07: Illegal Logging Disturbances (High-Resolution Mapping)	Use of 25 m resolution canopy height maps to detect forest disturbances across the entire project area (100% census), replacing sample-based extrapolation.	The VVB concluded that this deviation improves the monitoring plan (VCS 3.20.1). By using wall-to-wall spatial data, the project increases accuracy (VCS 3.20.2) in detecting illegal logging compared to point-based sampling. The VVB verified the consistency of these maps with the records in /10/ and /14/, ensuring compliance with VSC deviation requirement.
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Methodology Deviations no longer applicable

As a result of the transition to the annualized baseline approach and the technical corrections issued by Verra for the VM0010 methodology /8/, the following deviation is no longer required:

Deviation ID	Description	VVB Assessment & Rationale
MDev#05: Baseline Averaging	This deviation, originally approved in the previous Monitoring Report (dated July 2024 /13/), allowed for the averaging of baseline emissions across the monitoring period.	This deviation is no longer applicable for the current or future monitoring periods. The Project Proponent has successfully transitioned to an annualized baseline approach, ensuring full conformance with the VM0010 Correction and recent Verra clarifications. Consequently, the justification for averaging is superseded by the new calculation framework documented in /10/ and /14/.

The VVB has conducted a thorough review of the final Monitoring Report /10/, the emission reduction calculation spreadsheets /14/, and the technical supporting documentation GGF Peru 2024 Report v1.3 /15/. Based on this assessment, the audit team confirms that all previously approved deviations have been applied consistently with the Validated PD /11/ and the Previous Verification Report /13/, ensuring the continuity and integrity of the project's historical data and compliance with established monitoring protocols.

Furthermore, the VVB concludes that the new deviations requested for this monitoring period (MDev#06, MDev#07, PDev#05, and PDev#06) are technically justified and fully comply with the requirements set forth in Sections 3.20.1, 3.20.2, and 3.20.3 (for methodology deviations) of the VCS Standard v4.7. The comparison provided in the VM0010 t-distribution estimation error /16/, alongside the resolution of NC/CAR 03, demonstrates that these changes result in a more accurate and conservative quantification of GHG emission reductions, without impacting the project's additionality or its adherence to the applied methodology.

3.2 Project Description Deviations

In accordance with the VCS Standard v4.7, the VVB has assessed the deviations from the project design, procedures, and specifications set out in the validated Project Description (PD). The assessment was conducted to determine whether each deviation is appropriately described and justified, and whether the project remains in conformance with the VCS Program rules, specifically regarding impacts on methodology applicability, additionality, and the baseline scenario

Project Description Deviations (PDev) approved in previous monitoring reports

The following deviations were introduced and validated during the first monitoring period (August 2020 – July 2022). The VVB confirms that these remain applicable for the current verification and comply with Requirement 3.21.2 (2), as they do not impact the applicability of the methodology, additionality, or the appropriateness of the baseline scenario.

PDev ID	Summary of Deviation	VVB Assessment
PDev#01: Inclusion of parameters not considered in PD	Addition of fossil fuel emission parameters (EFFuel, FC) and specific timber harvesting variables that were unintentionally omitted in the original PD.	The VVB confirmed these parameters are necessary for the faithful application of VM0010 v1.3 equations. Their inclusion does not alter additionality or the baseline scenario; it corrects a reporting omission to improve monitoring precision.
PDev#02: Installation of permanent monitoring plots	Adjustment of the sampling design due to safety risks (3km-5km access buffers from rivers/roads), resulting in 24% of the project area being available for physical sampling.	The VVB reviewed the risk assessment and stratification. It was determined that the use of high-resolution remote sensing (25m) compensates for field access limitations. Forest type representativeness is maintained; thus, there is no impact on methodology or baseline.
PDev#03: Resolution land cover map	Use of a higher resolution (25 x 25 m) land cover map for disturbance analysis instead of the resolution originally indicated in the PD.	The VVB considers this change conservative, as higher resolution reduces uncertainty in degradation detection. It does not affect project eligibility or additionality; it represents a technical improvement in measurement.

PDev#04: Disturbance Detection Grid	Implementation of a 16 x 16 pixel moving grid (160,000 m ²) to identify significant carbon stock reductions (>5 tC/ha).	The VVB verified that this procedure refines the detection of project emissions without modifying baseline premises. It is a monitoring procedure refinement that complies with VCS rules.
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Project Description Deviations (PDev) requested during this monitoring period

The following deviations were introduced during the current monitoring period to address field-level constraints and mandatory methodological updates.

PDev ID	Summary of Deviation	VVB Assessment
PDev#05: Remeasurement of permanent plots	Permanent removal of plots SR-01 and SR-03 from the monitoring network due to logistical and safety constraints (extreme dry season) in the San Regis sector.	The VVB verified the “Uncertainty_Y3Y4.xlsx” spreadsheet /18/ and the RIAL Technical Report /17/. Based on provided evidences audit team concludes - The decision was a response to extreme environmental conditions in the San Regis sector during the 2024 campaign. According to the RIAL Technical Report /17/, a severe dry season reduced navigable water levels to critical points, preventing safe logistical access. Forcing entry under these conditions posed an unacceptable risk to personnel safety and operational inefficiency, meeting the "logistical and safety constraints" allowed for monitoring deviations. - Uncertainty Analysis and Statistical Robustness: The VVB assessed whether the removal compromised the project's ability to estimate carbon stock changes. Based on the “Uncertainty_Y3Y4.xlsx” spreadsheet /18/: - Precision Maintenance: Total project uncertainty was calculated at 13.24% (0.1324). Being below the 15% threshold, no additional uncertainty discounts are required, proving that the 28 remaining plots remain statistically representative and sufficient to validate the biomass model.

		• Model Error: Sensitivity analysis in /15/ shows that the variability of SR-01 and SR-03 (historically high-biomass plots) does not alter the overall growth/recovery trend of the project area. • Application of the Conservativeness Principle: Plots SR-01 and SR-03 are located in primary forest zones with carbon densities above the average. By excluding them, the project avoids overestimating growth or regeneration in those specific areas. It is more conservative to work with a slightly reduced network of verifiable data than to extrapolate uncertain data from inaccessible areas. • Conformance with VM0010 v1.3 /07/: The methodology allows for monitoring plan adjustments if statistical confidence is maintained. Since the original sampling design was stratified and the 28 plots proportionally cover the project strata, forest landscape representativeness is not affected, maintaining the integrity of the remote sensing model validation.
PDev#06: Recalculation of baseline (Annualized approach)	Recalculation of the baseline from an average-based to a year-by-year approach to comply with the mandatory "Correction to VM0010, v1.2-v1.4" issued by Verra.	The VVB reviewed the "PDev#6_GHG Calculations" spreadsheet /20/, the Technical Memo /19/, and the mandatory Verra corrections /08/ for methodology VM0010 v1.3 /07/. The Assessment concludes: • Regulatory Compliance: This deviation is a mandatory response to the "Correction to Versions 1.2-1.4 of VM0010" /08/. The VVB confirmed that the annualized approach is required to eliminate the misalignment between baseline emissions and credit issuance typical of average-based models in LTPF projects. • Accuracy & Correction of Over-issuance: By adopting a year-by-year approach in the GHG spreadsheet /20/, the baseline now accurately matches the Forest Management Plan (PGMF) /21/ harvesting schedule. This

		resulted in an adjustment of the cumulative VCU balance (correcting a previous over-estimation of ~402,309 VCUs), demonstrating a commitment to high environmental integrity. - Consistency of Parameters: Through the Technical Memo /19/, the VVB confirmed that the recalculation maintains all core factors from the validated PDD, such as the weighted average wood density (0.614 t/m³) and the BCEF. This ensures the change is strictly structural and not a manipulation of the underlying forest carbon data. The BCEFR value applied in the current Monitoring Report (0.614 t dm m⁻³) replaces the value used in the previous monitoring period (0.607 t dm m⁻³), which was identified as incorrect. The VVB reviewed the recalculation performed by the project proponent /90/ and confirmed that the resulting disturbance estimate remained statistically equivalent to zero. The impact of this correction is not material to the GHG assertion, as total disturbance emissions represent only 0.04% of total project emissions plus leakage emissions during the monitoring period. - Impact Assessment: The VVB concludes that this deviation does not affect additionality or the baseline scenario, as it merely refines the quantification of the baseline to meet the most rigorous VCS Program requirements.
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The VVB concludes that the project description deviations PDev#05 and PDev#06 are accurately described, technically justified, and in full compliance with VCS Standard v4.7 rules. Regarding PDev#05, the adjustment of the monitoring network due to force majeure environmental conditions /17/ was validated through a cross-check with the 'Uncertainty_Y3Y4.xlsx' spreadsheet /18/. The VVB assessed that this deviation does not impact the applicability of the VM0010 v1.3 methodology /07/, as the remaining 28 plots maintain a statistically sound uncertainty of 13.24%. Furthermore, it does not affect additionality or the appropriateness of the baseline scenario, as it is a conservative adjustment to the monitoring plan that prevents the overestimation of carbon stocks in inaccessible areas.

Regarding PDev#06, the transition to an annualized baseline approach is a mandatory corrective action to align with the latest Verra requirements /08/. The VVB validated this by reviewing the 'PDev#6_GHG Calculations' /20/ and confirming the consistency of technical parameters (Wood Density 0.614 t/m³ and BCEF) through the technical memo /19/. The VVB assessed that this structural change in accounting does not impact the applicability of the methodology, the project's additionality, or the validity of the baseline scenario, which remains as the 'business-as-usual' logging of the concessions. Consequently, the VVB provides an overall positive conclusion, confirming that the project remains in full conformance with VCS rules and that these deviations are valid for the current monitoring period."

3.3 New Project Activity Instances in Grouped Projects

Not applicable: This is not a grouped Project.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:
Audit history	AENOR verified the project against VCS /02/ and Methodology VM0010 v1.3 /07/ requirements. The validation team carefully reviewed all information included in the initial and final versions of the Monitoring Report /09/ /10/, as well as the validated Project Description /11/. The audit process included a desk review of the monitoring plan, the updated baseline calculations, and the leakage assessment. A site visit was conducted to the project area in Loreto, Peru, including follow-up interviews with project stakeholders, technical staff, and local authorities. During the audit process, several findings were raised (4 CARs and 7 CLs), which were successfully addressed by the Project Proponent before drafting this verification report. The final monitoring report and supporting evidence were submitted to technical review. The audit team gathered information about: • Project proponent (GGF), developers, and the local management team • Project status and implementation of protection activities. • Baseline scenario and the transition to the annualized approach /08/ /20/. • Additionality and its continued validity since initial validation /12/. • Methodology applicability conditions and the consistency of recalculation parameters /19/. • Eligibility areas, including the exclusion of non-forest strata. • Carbon calculations and the integration of the uncertainty analysis /14/ /18/. • Estimates and assumptions for determining GHG data, including weighted average wood density (0.614 t/m³) and BCEF /19/.

- Remote sensing analysis /22/ for biomass change detection in the project area
- Property and land use rights within the Loreto forest concessions.
- Activities implemented to mitigate risks to local stakeholders.
- Processes used to communicate and consult with local communities during the monitoring period.
- Project conflicts, barriers, or logistical difficulties, specifically regarding plot access /17/.
- Project Communication & Grievance Mechanism /42/.
- Non-performance risk report (NPR) /77/

A complete list of assessed evidence is listed in Appendix 2 of this report. The provided information allowed the audit team to:

- Carefully review the Monitoring Report /10/ and all technical supporting documentation.
- Examine the baseline data and the spreadsheets used to compile information required by the methodology /20/.
- Reproduce the GHG emission reduction calculations presented in the monitoring spreadsheets /14/ and crosscheck them with the methodology requirements /07/.
- Verify the consistency of the permanent monitoring plots based on the latest field measurement report /17/.
- Review the Uncertainty Analysis /18/ for conformance to the 15% threshold and the correct application of the t-distribution estimation error /16/.
- Verify the Non-Permanent Risk Report /77/ results using the NPR tool /06/ and considering the validated project description /11/.

	The auditing process included a site visit and interviews, detailed in sections 2.3 and 2.4 of this report. The audit process has been conducted by AENOR in accordance with ISO 14064-3:2019, on the basis of all issues and criteria of VCS standards. The review of the monitoring documentation, methodology corrections /08/, and the follow-up interviews provided AENOR with sufficient evidence to verify the fulfillment of the stated criteria
Double counting and participation under other GHG programs	The audit team assessed the project's compliance with the VCS requirements regarding the prevention of double issuance. The Audit team conducted a comprehensive search to ensure that the project area does not overlap with any other carbon crediting initiatives. The following registries were consulted: • Gold Standard Impact Registry: https://registry.goldstandard.org • American Carbon Registry (ACR): https://acrcarbon.org/ • Plan Vivo Standard: https://www.planvivo.org/ • BioCarbon Registry: https://biocarbonstandard.com/en/ • ART TREES (Architecture for REDD+ Transactions): https://www.artredd.org/ • Verified Carbon Standard: https://registry.verra.org Additionally, audit team assessed the Jurisdictional Program (ART TREES Peru): The VVB specifically reviewed the "TREES Concept" document /23/ submitted by the Ministry of Environment of Peru (MINAM) to the ART Secretariat. The VVB verified that while the document establishes the roadmap for a jurisdictional program, it explicitly states that the information provided is preliminary and has not yet been validated or verified. Based on the TREES Concept /23/, the VVB confirmed that Peru is still developing the technical and legal framework (RENAMI) to ensure environmental integrity and avoid double counting (issuance, use, and claiming). Therefore, The VVB confirms that ✓ The Peruvian jurisdictional program under ART TREES /23/ is in a preliminary "Concept" stage. As per ART rules, this stage does not allow for the issuance or transfer of credits. Therefore, there is no overlap or risk of double counting with

	the emission reductions generated by the project during this monitoring period. ✓ The project is registered under the VCS Program and is currently undergoing the administrative registration process under RENAMI. The alignment with the national FREL and the nesting approach described in the TREES Concept /23/ are recognized as future regulatory milestones that do not impact the current verification. ✓ The project complies with all VCS requirements. No evidence of registration, active participation, or rejection by other GHG programs was found. The VVB reviewed the project's compliance with the applicable national framework related to the National Registry of Mitigation Measures (<i>Registro Nacional de Medidas de Mitigación</i> - RENAMI), established under Supreme Decree No. 010-2024-MINAM. The audit team reviewed the RENAMI registration status and supporting correspondence with the Ministry of Environment (MINAM), confirming that the project has formally initiated the registration process and has responded to observations issued by the competent authority. At the time of verification, the registration process remained under administrative review and no final registration decision had been issued. The VVB further verified that no credit issuance, transfer, or claiming of emission reductions has occurred under RENAMI or any other GHG crediting program. Therefore, the VVB concludes that there is no evidence of double registration, double issuance, or conflicting claims associated with the project during the current monitoring period.
No double claiming with emissions trading programs or binding emission limits	The VVB verified through a review of the "TREES Concept" /23/ and current Peruvian regulations that no emissions trading programs or binding emission limits are currently active for the project's sector. The project proponent confirms that the project's Verified Carbon Units (VCUs) will not be subject to double claiming with any emissions trading programs or other binding emission limitations or targets, ensuring that all removals are unique and exclusively claimed by this project. Based on the documentation provided in the MR /10/ and PDD /11/, the VVB concludes that the project remains in full conformance with VCS requirements regarding the avoidance of double claiming. .

No double claiming with other forms of environmental credit	The VVB acknowledges that the project is currently validated under the Climate, Community & Biodiversity (CCB) Standards. However, the scope of the present audit is strictly limited to the verification of GHG emission reductions under the VCS Standard /02/. The VVB verified the Verra Registry that the project has not sought or received any other GHG-related environmental credits (such as biodiversity offsets or water credits) that would constitute double claiming. The project proponent confirms that the credits generated during this period are unique to the VCS Program. Based on the evidence in the MR /10/ and the TREES Concept /23/, the VVB concludes there is no risk of double claiming with other environmental credit systems.
Supply chain (scope 3) emissions double claiming	The VVB reviewed the information provided in the MR (Section 1.11.3) /10/ and the validated PD /11/, confirming that the project proponent is not a buyer or seller of any product whose emissions footprint is changed by the project activities. The proponent confirms that the Verified Carbon Units (VCUs) generated are not, and will not be, claimed by another entity as part of their Scope 3 (Supply Chain) emission reductions. This ensures that the GHG benefits generated by this project are uniquely associated with the project proponent and are not double-counted within the value chain of any participating or external organization..
Sustainable development contributions	Peru is one of the nations that adopted the 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs) in September 2015. Since the establishment of the Supreme Decree N° 003-2016-MINAM and the subsequent national monitoring frameworks led by CEPLAN, the country has integrated these goals into its national policies, emphasizing the conservation of Amazonian forests and the inclusion of indigenous and rural communities. The project's activities are designed to make a significant contribution to these national objectives in the Loreto region. Complementary to the VCS certification, the proponent has implemented a rigorous monitoring methodology to ensure that the project's impact is environmentally appropriate, socially beneficial, and economically viable. The project promotes the achievement of the country's goals through the following contributions to the SDGs:

- ✓ **SDG 5 (Gender Equality):** Promotes the active participation and leadership of women in local governance. Through women's empowerment workshops and professional training, the project has ensured that women occupy key decision-making positions. Evidence reviewed in the Community Board Composition dataset /24/ confirms that 32.4% of seats (25 out of 77) in community boards (e.g., Chambira, Huiririma) are held by women, including roles as "*Apu*" and "*Tesorera*."
- ✓ **SDG 8 (Decent Work and Economic Growth):** Ensures fair compensation and adequate working conditions in remote areas. The project generates local employment in forest monitoring, surveillance, and control. According to the Payroll and Hourly Rate Analysis /25/, the project provides an average hourly wage of S/. 6.59, maintaining transparent records of payments and labor days for both men and women in the Napo and surrounding basins.
- ✓ **SDG 13 (Climate Action):** The project is fundamentally a climate mitigation initiative, preventing the release of greenhouse gases by protecting native forests from legal logging (LTPF). During this monitoring period, as verified in the ER Calculation Spreadsheets /14/, the project successfully avoided the emission of 603,353 tCO₂e, directly supporting Peru's Nationally Determined Contributions (NDCs).

The audit team verified the project's contributions to the United Nations Sustainable Development Goals (SDGs) through the review of core documentation and field-verified datasets. This key evidence included the specific datasets for SDG 5.5 /24/ and SDG 8.5 /25/. The justification for the national SDG framework is further supported by the official UN Peru SDG portal and national progress reports which emphasize the "Territorial Approach" for the Amazon.

Additionally, the quantitative indicators and cumulative monitoring data supporting these contributions were consolidated and verified in the spreadsheet "*Appendix 3 - SDG Evidence_Y3Y4.xlsx*" /83/. This file integrates the specific monitoring metrics for SDG 5 (Gender Equality) and SDG 8 (Decent Work and Economic Growth), alongside a dedicated worksheet for SDG 13 (Climate Action) that outlines the cumulative greenhouse gas (GHG) emission reductions achieved by the project during the current monitoring period

	In AENOR's opinion, the project aligns closely with the regulatory framework for the Sustainable Development Goals (SDGs) in Peru, supporting the implementation of the Agenda 2030 through clearly defined objectives and measurable indicators. This ensures consistency with national priorities, particularly regarding the " <i>Plan Estratégico de Desarrollo Nacional al 2050</i> ," and contributes significantly to the country's sustainable progress in the Loreto region.
Additional information relevant to the project	There is no commercially sensitive information that was excluded from the public version of the report.

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	The VVB validated the stakeholder identification process by reviewing the MR (Section 2.1.1) /10/, the validated PD (Section 2.2) /11/, and specifically the Community Relations Plan 2024 /29/. This plan provides an updated mapping of the 17 beneficiary communities and strategic institutional partners (e.g., FECONAMN, CEDIA), moving beyond the initial limitations caused by the COVID-19 pandemic (Urgency Decree 035-2020) described in the PD. The VVB verified that the Community Relations Plan 2024 /27/ establishes formal and current communication channels, engagement strategies, and an updated organizational structure that reflects the diversity of the Napo and Marañón basins. By cross-referencing this plan with the 2024 Socialization Report /26/, the VVB confirmed that all relevant stakeholder groups have been identified and engaged through in-person consultations during this monitoring period. Stakeholder identification is accurate, current, and reflects the transition to robust in-person engagement as guided by the 2024 planning, meeting all VCS representativeness requirements.

The VVB notes that the Previous Verification Report /13/ and the PRA assessed during the previous verification cycle /37/ identified sixteen (16) communities participating in or potentially affected by project activities. During the current monitoring period, the project proponent conducted an updated PRA covering seventeen (17) localities consisting of Native Communities, a Peasant Community, and Population Centers located in the Napo, Tacsha Curaray, and Marañón watersheds adjacent to the project area. The difference between the previous and current stakeholder assessments corresponds to the inclusion of the Native Community of Villa Monte Alegre.

The VVB reviewed the PRA /37/ and confirmed that the assessment included community consultations, participatory mapping exercises, and household surveys. The PRA documents stakeholder locations, demographic information, livelihood activities, customary use of natural resources, and areas used for hunting, fishing, timber extraction, agriculture, and collection of forest products. The PRA also documents territories and resource areas customarily accessed by stakeholders through participatory mapping activities.

To verify the inclusion of Villa Monte Alegre within the stakeholder assessment, the VVB reviewed the Villa Monte Alegre Community Meeting Invitation Letters /84/ and the Villa Monte Alegre Attendance List /85/. The VVB also reviewed the Project Acceptance Record /86/, which documents the community's participation in project-related consultation and information-sharing activities. The reviewed documentation records project information-sharing activities, consultation meetings, and participation of community members in project-related information-gathering activities conducted during the monitoring period.

Based on the evidence reviewed, the VVB confirmed that Villa Monte Alegre was included in the updated stakeholder assessment and associated consultation activities conducted during the monitoring period.

Based on the evidence reviewed, the VVB confirmed that the stakeholder assessment identifies communities and localities located within the project area of influence and documents their customary resource use, territories, and areas of access. Therefore, the VVB concludes that stakeholder identification remains consistent with VCS Standard v4.7 Section 3.18.1

Legal or customary tenure/access rights	The VVB assessed the legal and customary framework by reviewing the MR /10/, the validated PD /11/, and the Community Relations Plan 2024 /27/. A critical component of this assessment was the review of the Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/, which establishes GGF's legal rights over the area since 2004. Also, the VVB reviewed the <i>"Land Tenure Resolution"</i> evidence. Regarding the Berlín native community, the VVB verified Regional Resolution No. 158-2023-GRL /33/, resolving a partial overlap. For Pampa Caño and Solterito, the VVB analyzed the DISAFILPA Technical Report /28/ and GERFOR correspondence /30/, confirming that while their expansion requests were inadmissible due to the pre-existing rights granted in the Concession Contract /34/, GGF maintains a proactive engagement strategy. The Legal Report on Perpetuity /32/ was also cross-checked with the contract terms to confirm the project longevity. Therefore, the VVB confirms that GGF holds valid legal title through its concession contracts and has implemented effective mechanisms to manage tenure overlaps while respecting the customary rights of neighboring communities.
Stakeholder diversity and changes over time	The VVB evaluated stakeholder diversity by reviewing the MR /10/, the Community Board Composition dataset /24/, and the 2024 Socialization Report /26/. The project identifies 17 communities with distinct profiles: 14 native communities, 1 peasant community, and 2 rural population centers. Through field interviews conducted between June 2–4, 2025, the VVB confirmed the diversity of ethnic groups and their socioeconomic drivers. In the Napo basin, 13 Kichwa and 1 Murui Muinani communities focus on sustainable agriculture and fiber handicrafts. In the Marañón basin, 3 Kukama Kukamiria communities center their economy on commerce and tourism. Regarding governance changes, the VVB verified the 2024 restructuring of FECONAMN (formerly FECONAMNCUA) during an interview with its President, Adne Aspajo. The audit confirmed that while Napo communities utilize this federation, Marañón communities engage directly through their elected boards. Furthermore, the VVB cross-referenced the Community Board dataset /24/ with interviews of female leaders (e.g., Luzmilda Capinoa, Lilia Arévalo), confirming that women hold 32.4% of leadership positions.

	The VVB confirms that stakeholder diversity and governance changes are accurately documented and field-verified. The project effectively tailors engagement strategies to each basin's cultural and organizational contexts, ensuring robust stakeholder consultation per VCS requirements.
Expected changes in well-being	The VVB evaluated the impacts on community well-being by reviewing the MR /10/, the Socialization Report /26/, and specifically the Community Life Plans (Planes de Vida) /35/. The assessment focused on how project interventions align with local development goals. • Governance: The VVB verified that GGF supports the updating and implementation of Community Life Plans /35/. These instruments serve as the primary strategic roadmap for native communities, ensuring that carbon project activities reinforce their internal visions for territory, culture, and autonomy. During field interviews (June 3-4, 2025), leaders from the Napo and Marañón basins confirmed that the project respects these governance tools. • Employment & Livelihoods: Review of the Payroll and Hourly Rate Analysis /25/ confirmed the creation of over 400 temporary jobs. These opportunities are designed to be compatible with the traditional seasonal activities outlined in the community's own planning documents. • Land Rights: Through the Legal analysis of concession longevity /32/ and correspondence with DISAFILPA /28/, the VVB confirmed that the project actively facilitates the legal sanitation of territories, which is a top priority identified in the Life Plans /39/ for securing ancestral lands. Therefore, the VVB concludes that the project has generated measurable positive changes in well-being by integrating its activities into the communities' existing strategic planning frameworks.
Location of stakeholders	The VVB verified the location of stakeholders by reviewing the Monitoring Report /10/ and the Community Relations Plan 2024 /27/. The audit team confirms that the project is located within 10 forest concessions in the Department of Loreto, Peru. This was validated through a comprehensive review of Maps of the project area /36/, which clearly delineate the corresponding concessions and the specific Management units established for operational control. To ensure legal and spatial accuracy, the VVB cross-referenced the Forestry Concession Contracts /34/ with the Approved Forest Management Plans

	/21/. By analyzing Project area spatial files and comparing them against the descriptions in the Project Description (PD), the audit team confirmed that the physical boundaries and the depiction of the 17 communities across the Napo and Marañón basins are accurate. This spatial alignment ensures that all potentially affected stakeholders are correctly identified within the project's geographical scope. Finally, the VVB assessed the logistical reality of the project by evaluating the Community Relations Plan 2024 /27/, which details the significant travel times and multi-modal transport required to reach remote areas like Copal Urco and Solterito. This logistical presence is reinforced by the Community Life Plans (Planes de Vida) /35/, which integrate the project's activities into the indigenous territorial vision. The VVB concludes that the stakeholder locations are accurately identified and that the project's boundaries are legally supported and correctly mapped
Location of resources	The VVB verified the spatial distribution and management of communal resources by reviewing the Monitoring Report /10/ and the Community Life Plans /35/. Each of the 17 communities has a clearly defined communal territory or is in the process of formal legal recognition. These territories encompass traditional use areas for hunting, fishing, and agriculture, as well as essential conservation buffer zones and sacred cultural sites documented within the project's strategic framework. In 2024, Green Gold Forestry (GGF) conducted Participatory Rural Appraisals (PRA) /37/ as part of the socialization and territorial planning process. These appraisals allowed for the collaborative development of community maps, which identify and validate specific resource use areas. The VVB confirmed that these maps are key tools for monitoring and sustainable resource management, ensuring that communal forests supporting local livelihoods are accurately delineated and protected from external overlaps. The VVB concludes that the location of resources is accurately mapped and validated through these participatory processes. The integration of PRA methodologies and the resulting community maps provides a robust and transparent evidence base for territorial planning, aligning the project's carbon objectives with the socio-economic and cultural needs of the native communities.

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	The VVB verified the project's mechanisms for continuous engagement by reviewing the Monitoring Report /10/ and the Community Relations Plan 2024 /27/. The audit team confirmed that GGF maintains a permanent, year-round presence through its Community Relations (CR) team, which facilitates a structured cycle of formal assemblies at the beginning and end of each annual period. These meetings, held with the explicit approval of the Apu (communal authority), serve to present the VCS/CCB standards, outline upcoming forest management activities, and share formal protocols for transparency and conflict resolution, ensuring that community voices are incorporated into the project's implementation. The VVB cross-referenced these activities with Meeting Minutes and Socialization Reports /26/ /29/, which document a continuous flow of technical and social interactions throughout 2023 and 2024. This was further corroborated by the verification of Delivery Acts for materials and equipment, supported by the Participatory Rural Appraisals (PRA) /37/. The evidence shows that consultation is functional and bi-directional, as seen in the co-design of productive initiatives such as <i>fariña processing</i> and <i>chambira crafts</i>. The VVB verified that the CR team also performs unannounced visits to capture community perceptions, using this qualitative feedback to adapt the engagement strategy and ensure alignment with the local population's expectations. The VVB concludes that the consultation process is a documented, adaptive, and trust-based dialogue. The transition from general information sharing to the formalization of co-responsibility agreements—where communities provide land and labor while GGF manages complex logistics—demonstrates a high level of stakeholder integration. The evidence confirms that the project maintains an open communication channel that respects indigenous governance and cultural knowledge, in full compliance with VCS requirements for ongoing consultation.
Date(s) of stakeholder consultation	The VVB verified the chronology of consultation activities by reviewing the 2024 Socialization Report /26/, the Meeting Minutes /29/, and the CCB Project Description (PD) /38/. The VVB confirmed that the foundational consultation process was carried out during September 2022 across 13 Native Communities, 01 peasant community, and 02 villages. These

informative meetings, overseen by the GGF technical team, focused on explaining the long-term benefits.

For the current monitoring period, the VVB confirmed that GGF implemented a structured semi-annual cycle in 2023 and 2024, utilizing formal letters and loudspeakers to ensure the participation of diverse groups, including "Vaso de Leche" and neighborhood councils. This engagement was complemented by specific technical visits to evaluate productive initiatives, ensuring that project implementation remains aligned with community priorities and VCS/CCB requirements. Main dates are summarized following:

Activity / Community	Date(s)
Socialization of Activities Plan – 2023	15-Feb-2023 to 17-Feb-2023
Project Evaluation – San Felipe	11-October-2023
Monitoring Visit (Poultry Project) – Berlín	12-October-2023
Project Evaluation – San Luis de Tacsha Curaray	13-October-2023
Project Evaluation – Copal Urco	14-October-2023
Close of Activities Meeting – 2023	10-December-2023 to 12-December-2023
Socialization of Activities Plan – 2024	20-March-2024 to 23-March-2024
Close of Activities Meeting – 2024	28-November-2024 to 12-December-2024

The VVB validated the reported consultation dates by conducting a cross-check of primary source documentation for each event. This included the review of Socialization Reports /26/ /29/ and Participatory Rural Appraisals /37/, which contain the records of meetings held in Villa Monte Alegre, Huitotos de Fortaleza, and Berlín. Furthermore, the VVB checked the consistency of the productive project dates by examining Delivery and Receipt Acts /40/ and Counterpart Payment Vouchers /39/ for communities such as Chambira and Santa María de Loreto

	These records, supported by the Third Field Progress Report /41/, confirm that the consultations were synchronized with the project's technical milestones and financial transfers, providing a high level of assurance regarding the authenticity and transparency of the stakeholder engagement process in accordance with the CCB Project Description /38/ In addition, during the field interviews, local stakeholders and community representatives confirmed that the reported socialization activities and consultation meetings took place. In particular, representatives from CN Chambira and CN Santa María de Loreto validated their participation in these sessions and the decision-making processes for productive projects. The VVB concludes that the dates of stakeholder consultation are documented and aligned with the project's technical milestones. The records provided in the Third Field Progress Report /41/ and the associated meeting minutes confirm that stakeholders were engaged during the monitoring period according to the procedures described in the project's monitoring plan and the VCS/CCB Program requirements
Communication of monitored results	The VVB verified that monitoring results are communicated through a structured process of year-end meetings, as described in the 2024 Socialization Report /26/. This mechanism ensures that communities are informed of activity outcomes and upcoming audit schedules. In the communities of Santa María de Loreto and Chambira, the VVB confirmed through interviews and Participatory Rural Appraisals /37/ that regular meetings were held to assess the installation of “<i>farina</i>” and “<i>ají charapita</i>” processing modules. These sessions followed a co-responsibility model where community members participated in infrastructure preparation and material management, ensuring a continuous exchange of information between the technical team and local stakeholders. In Huitotos de Fortaleza, the VVB reviewed the Third Field Progress Report /41/ documenting the monitoring of <i>fariña</i> and <i>chambira</i> handicraft initiatives. The condition of equipment and fulfillment of community commitments were shared and validated in communal assemblies. Furthermore, in the community of Berlín, the VVB verified through Meeting Minutes /29/ that challenges identified during the monitoring of the egg-laying hen project were discussed with beneficiaries. This process included explaining the technical reasons for the project’s progressive closure and formalizing a technical closure plan. Open communication throughout this process was corroborated during the field phase, demonstrating that the project maintains a feedback loop to resolve implementation issues.

	The VVB concludes that the communication of monitored results is implemented through in-person assemblies and technical feedback sessions, as evidenced by the Activity Reports /41/ and Communal Acts /29/. This feedback loop allows for the adjustment of activities and the strengthening of local capacities. The evidence confirms that the project maintains a reporting mechanism that ensures stakeholders remain informed about the progress and challenges of their initiatives, in compliance with VCS and CCB Program requirements
Consultation records	The VVB verified the maintenance of consultation records by reviewing the Socialization Reports /26/ /29/ and the Community Relations Plan 2024 /27/. The audit team confirmed that the Community Relations (CR) team utilizes a designated template to record questions, complaints, and suggestions during official meetings. The VVB also checked the Meeting Minutes /29/ and the Third Field Progress Report /41/, which document the formal agreements and the resolution of simple inquiries and formal complaints according to the established engagement protocols. This documentation provides a traceable record of the dialogue and the fulfillment of commitments made with the participating communities. The VVB concludes that the consultation records are systematically managed and accurately reflect the concerns and agreements of the stakeholders. The evidence confirms that the project maintains a formal documentation system that allows for the tracking of community feedback and the timely resolution of grievances. This practice ensures that the engagement process is documented and responsive, in full compliance with the VCS Program requirements.
Stakeholder input	The VVB verified the mechanisms for incorporating stakeholder input by reviewing the Socialization Reports /26/ /29/ and Participatory Rural Appraisals /37/. The audit team confirmed that GGF captures community suggestions through technical workshops and standardized templates. The VVB checked Financial Vouchers /39/, Delivery and Receipt Acts /40/, and the Third Field Progress Report /41/, which document technical adjustments such as the procurement of higher-capacity generators and the redesign of artisanal weaves in Chambira based on community feedback. In Berlín, the VVB verified that training modules were adapted to include local feed alternatives and animal health, as documented in the internal monitoring records. During the field visit, the VVB performed on-site interviews with community members and leaders in CN Chambira and CN Santa María de Loreto. The

VVB confirmed through direct observation and testimonies that stakeholder input is actively sought and integrated into project activities. In CN Santa María de Loreto, interviewees verified that their request for a higher-capacity generator was fulfilled to support the *fariña* processing module. In CN Chambira, artisans confirmed their role in redesigning handicraft weaves and colors. These field observations, cross-referenced with Meeting Minutes /29/ and Delivery Acts /40/, provide evidence that the participatory approach described in the monitoring report is effectively implemented on the ground.

The VVB concludes that stakeholder input is systematically gathered and utilized to adapt project activities. The transition to a participatory model is evidenced by Meeting Minutes /29/ and Technical Reports /41/, which show that community preferences directly influence technical specifications and budget allocations. This process ensures that project initiatives reflect local capacities and traditional expertise, fulfilling the requirements for inclusive stakeholder engagement under the VCS and CCB Standard

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	The VVB verified the project's adherence to Requirement 3.18.8 and Section 3.18.4 of the VCS Standard v4.7 by reviewing the legal and social framework of the private concession. The VVB checked the Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/ and the administrative responses regarding territorial overlaps. Specifically, the VVB reviewed Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA /28/ and Letter N° 234-2021-GRL-GGR-GRDFFS /30/, which document the status of expansion requests from the Pampa Caño and Solterito communities. The evidence shows that GGF proactively sought institutional support from GERFOR and DISAFILPA to clarify land-use rights through on-site verifications and joint meetings, as evidenced by the Agreements with Pampa Caño and Solterito /29/ and the Spatial analysis of overlaps /31/. The VVB confirmed that GGF disclosed the 6 mandatory information points during communal assemblies, ensuring transparency regarding project duration, impacts, and benefit-sharing. To protect customary rights, the VVB verified the formal exclusion of 557 hectares for the Berlín community via Regional Resolution No. 158-2023-GRL /33/ and the exclusion of areas

	for Bellavista and San Felipe. Furthermore, the VVB cross-referenced the Conflict Resolution Protocol /42/, noting the resolution of resource access misunderstandings in Sargento Lores and San Luis de Tacsha, where GGF clarified the unrestricted community access to shared resources. The VVB concludes that the project proponent has fulfilled the FPIC requirements as per VCS and CCB Standards. The project documented the use of formal objections to expansion requests that were declared inadmissible by the authority and formalized the voluntary exclusion of overlapping areas, such as the 557 hectares for the Berlín community under Resolution 158-2023 /33/. The records from DISAFILPA /28/ and GERFOR /30/, along with the meeting minutes and field interviews, confirm that the project maintains a documented dialogue with stakeholders and has addressed identified land-use overlaps. This evidence demonstrates that project activities do not exacerbate conflicts and that stakeholder participation is based on the principles of free, prior, and informed consent.
Outcome of FPIC discussion	The VVB verified the outcomes of the FPIC process by reviewing the VCS Monitoring Report /10/, Socialization Reports /26/ /29/, and the Conflict Resolution Protocol /42/. The audit team confirmed that GGF established transparent agreements through annual meetings where project scope, risks, and benefit-sharing were disclosed. The VVB reviewed Regional Resolution No. 247-2022 and Exclusion Resolution No. 158-2023-GRL /33/, which formalize the exclusion of overlapping areas for communities such as Berlín, Bellavista, and San Felipe. These legal instruments, supported by DISAFILPA Technical Reports /28/ and GERFOR Correspondence /30/, demonstrate that land-use overlaps were resolved through compensation and exclusion procedures without interfering with community livelihoods. Furthermore, the VVB verified GGF's collaboration with organizations such as CEDIA and FECONAMN to support land titling for the communities of Tacsha Curaray and Patria Nueva. In cases where local autonomy was exercised to cease activities, such as in San Luis de Tacsha, the VVB confirmed through Activity Reports /41/ that GGF respected these decisions. The audit team also verified that no physical or economic displacement occurred, as evidenced by the absence of community territories within the final project boundaries and the formalization of boundary demarcations. All conflicts identified during the period, including historical labor debts and resource access, were documented as closed in the Conflict Records /30/ and Meeting Minutes /29/, following the institutional protocol /42/.

The VVB concludes that the FPIC discussions resulted in transparent and documented agreements that respect the territorial rights of Indigenous Peoples and Local Communities. The evidence, including Resolution 158-2023 /33/ and DISAFILPA Report 351-2021 /28/, confirms that the project proponent identifies and resolves land-tenure overlaps and customary rights claims prior to or during project implementation. The successful resolution of all grievances and the support provided for community titling demonstrate that the project operates with the informed consent of the stakeholders and does not cause land encroachment or forced relocation, in full compliance with VCS and CCB requirements.

4.2.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Grievance received and steps taken to resolve the grievance including the outcomes of the resolution	The VVB evaluated the Conflict Resolution Protocol /42/ and confirmed it is structured into three clear stages as required by Section 3.18.4 of the VCS Standard: Amicable Resolution (First Step): The protocol mandates that a Community Relations (CR) officer initiates dialogue to identify and document the conflict using the "Conflict and Lessons Learned Socialization Form." A key procedural safeguard is the 8-working-day limit for on-site verifications of assets or land. GGF provides written responses and seeks signed agreements, ensuring the process is culturally appropriate and transparent. Mediation (Second Step): If negotiations fail, the protocol requires the appointment of a neutral third party. The VVB verified that GGF utilizes officially recognized local authorities, such as a Lieutenant Governor (Teniente Gobernador) or an Apu, to act as mediators. This stage has a defined timeframe of 11 working days to reach a signed settlement witnessed by the mediator. Arbitration and Legal Recourse (Third Step): For unresolved disputes, the procedure escalates to arbitration by neutral entities (e.g., Justice of the Peace or Federation Presidents) or, ultimately, to competent courts within the relevant jurisdiction. The VVB verified that this stage is designed to ensure finality without prejudice to the parties' rights to submit grievances to supranational bodies.

	The VVB verified the practical application of this three-stage process through the Conflict Records /30/. For example: ✓ Stage 1 (Amicable): The misunderstanding in Sargento Lores regarding palm extraction was resolved through direct dialogue and boundary clarification. ✓ Stage 2 (Mediation/Administrative): The complex territorial overlaps in Berlín and San Felipe were addressed through institutional mediation involving DISAFILPA and GERFOR, resulting in formal Regional Resolutions /30/ /33/ that excluded overlapping areas to respect customary rights. ✓ Stage 1 (Written Response): The resolution of historical labor debts with LOGORSA was finalized with 27 individuals through formal reconciliation acts and written settlement records. The VVB concludes that the project's grievance redress procedure strictly conforms to the three-stage requirement of VCS Standard 3.18.4. The procedure is culturally appropriate, incorporating traditional leadership (Apu) and local authorities, and includes specific timeframes for responding to and resolving disputes. Furthermore, the VVB confirmed that the procedure and the documentation of resolved cases are made available to stakeholders, ensuring the accessibility and transparency required for compliance with VCS safeguard standards.
Grievance redress procedure	The VVB evaluated the Conflict Resolution Protocol /42/ and confirmed that the Project Proponent (PP) has established a mechanism structured into the three stages required by Section 3.18.4 of the VCS Standard v4.7. The first stage consists of an amicable negotiation process with a documented 8-day timeframe for technical field verifications. The second stage involves mediation by neutral local authorities, such as the Lieutenant Governor (<i>Teniente Gobernador</i>) or the <i>Apu</i>, to facilitate settlements. The third stage refers unresolved disputes to arbitration by a Justice of the Peace or to competent courts within the jurisdiction. The VVB verified the application of this protocol through the review of the "<i>Conflict and Lessons Learned Socialization Forms</i>" /43/ and the Grievance Log /30/, confirming that the procedure is accessible and utilizes culturally appropriate methods for the region.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of comment received: On February 9, 2024, a public comment was received stating: <i>"The Project ID 2345, has built its baseline scenario assuming a harvest intensity of 15 M3 per hectare... found that this number differs hugely from the historical harvest rate in the forest concession and the whole Loreto Region. The numbers we retrieved from SERFOR and OSINFOR are the following:</i> <i>The forest concession harvested 0.13 M3 per hectare in the Forest concession Unit number 10...</i> <i>The forest concession historically harvested 0.43 M3 per hectare (2008-2009 to 2019-2020).</i> <i>The total volume of timber extracted in Loreto is 136,366 M3 in 2022... Using 15 M3 per hectare would mean that only the company's forest concessions will</i>	Summary of actions taken: The Project Proponent (PP) provided a comprehensive technical response in the Monitoring Report: i & ii) Baseline Intensity: The PP clarified that the 15 m³/ha rate is based on POA10 (2018), a technical survey authorized by Peruvian authorities and verified by FSC. Historical rates (0.13–0.43 m³/ha) reflected a business development phase, not the full capacity of the expansion plan designed in 2018. iii) Regional Comparison: The PP noted that GGF is one of the largest concession owners in Peru. While its planned volume (137k m³/year) would make it a lead producer in Loreto, it remains a medium-sized company by national standards (e.g., compared to producers processing >400k m³). iv) Financials: The PP explained that historical export data is misleading because GGF sold semi-finished goods to domestic intermediaries who exported in their own name. Employment: The PP updated the job figures in the final PDD to	Audit team reviewed the Project Review Report (PRR) issued on August 2, 2024 /44/, regarding the verification period (<i>August 1, 2020 – July 31, 2022</i>). The VVB confirmed that these comments were already evaluated by the previous VVB (SCS Global Services) and the Verra registry. The PRR conclusion states that historical harvesting practices are not relevant because the project adopted a common practice baseline (in accordance with VM0010 v1.3) rather than a historical baseline. The previous auditors confirmed this through literature reviews and interviews with government officials. Based on the review of the PRR /44/ and the PP's documented responses, the VVB considers that the comments have been duly accounted for and the technical findings are resolved

harvest 137,583 M3 per year. The baseline scenario... estimated annual timber sales of \$17,177,000. [Company] exports were \$401k in 2015... and \$0 in 2019. In terms of employment... the PD mentioned a goal of 1440 direct jobs... data from August 2023 shows 30 jobs registered."	reflect the transition from logging to a conservation model.	
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4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

The VVB evaluated the management capacity of Green Gold Forestry (GGF) through a combination of interviews and analysis of the professional backgrounds of key personnel. This assessment aimed to verify that the project leadership possesses the necessary technical and administrative skills to execute an AFOLU project under the VCS Standard. By reviewing the provided documentation and conducting independent due diligence, the VVB confirmed that the management team has been directly involved in the project since its inception, ensuring continuity and a deep understanding of the operational requirements in the Loreto region.

The evidence checked during this process included the Management Team CVs /45/, the Final Monitoring Report /10/, and internal organizational records. The evaluation of these documents confirms that the leadership team holds extensive expertise in climate finance, forest governance, and carbon project implementation. Specifically, Stuart Clenaghan (Director) brings 20 years of experience in conservation finance and the development of sustainable investment tools; Gareth Hughes (CEO) specializes in the integration of sustainable forestry with carbon market mechanisms; and Raúl Dance (COO) provides significant institutional knowledge from his prior management roles in Peruvian national entities such as SERFOR and PERUPETRO. The VVB concludes that the team's collective experience is highly relevant and sufficient to manage the technical complexities of the VM0010 methodology.

To assess long-term sustainability and the strategy for filling expertise gaps, the VVB reviewed the Financial Reports from USAID /46/ and the GGF GGL1 Financial Model /47/. The evidence confirms that GGF maintains a strategic partnership with USAID, providing the project with international technical and financial backing. Furthermore, the financial model includes specific allocations for hiring external consultants to address specialized technical needs as they arise. The VVB also verified that the project has reached its operational break-even point and is structured to sustain itself through the sale of Verified Carbon Units (VCUs). This combination of internal expertise, external partnerships, and financial stability ensures a robust management framework for the project’s entire crediting period.

The VVB concludes, with a reasonable level of assurance, that the Project Proponent possesses the management expertise and financial capacity required to implement and maintain the project in compliance with the VCS Standard. The evidence gathered confirms that the management team is well-qualified, the financial structure is stable, and there is a clear strategy for resource recruitment and organizational support through established international partnerships. Consequently, the requirements for management capacity are considered fully met.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders’ wellbeing	The VVB performed an assessment of the natural and anthropogenic risks affecting stakeholders and project personnel in the Loreto concessions. The analysis focused on hazards such as extreme weather events (e.g., floods) and potential encounters with unauthorized actors. The VVB confirmed that identified risks are directly linked to physical safety during field operations in remote areas. The evidence reviewed included the VCS Monitoring Report /10/, the Conflict Resolution Protocol /42/, and the Fire Monitoring Report (NASA FIRMS) /48/. The VVB cross-referenced the project’s risk profile with external institutional reports, specifically the INDECI (2026) Flood Risk Report /49/ and the MINAM (2025) REDD+ Safeguards Summary (RIS) /50/. These sources confirm that the identified risks—extreme weather and illegal logging—are consistent with the regional context recognized by the Peruvian government. The VVB verified that GGF’s safety framework includes satellite communication, insurance coverage, and drone-based monitoring to minimize direct contact with illegal actors. Regarding emergency response, the VVB verified protocols for helicopter evacuation in the event of severe injury. The VVB concludes, with a reasonable level of assurance, that the Project Proponent has identified all relevant natural and human-induced risks and has implemented commensurate mitigation and preventative measures. The integration of remote sensing technology, surveillance, and emergency

	protocols effectively manages risks to personnel and stakeholders. The risk assessment is considered to be in compliance with the standard requirements.
Risks to stakeholder participation	The VVB performed an assessment of factors that could affect the participation of local communities and stakeholders. The identified risks include the geographical isolation of the concessions, which impacts travel to socialization workshops, and potential language or cultural barriers. The assessment focused on the impact of these factors on the representativeness of the project's decision-making processes. The evidence reviewed included the 2024 Socialization Report /26/, the Community Relations Plan 2024 /27/, and the Community Life Plans (Planes de Vida) /35/. The VVB also consulted the GORE Loreto (2025) Environmental Security Report /51/ and the MINAM (2025) REDD+ Safeguards Summary (RIS) /50/. It was verified that the PP conducts workshops directly within the communities and uses Participatory Rural Appraisals (PRA) /37/. The VVB also checked the Conflict and Lessons Learned Socialization Forms /43/ as a mechanism for adjusting participation activities based on results.
Working conditions	The VVB performed a comprehensive assessment of the occupational health and safety (OHS) conditions for all project personnel, covering office-based activities in Iquitos and field operations such as Project site access, Patrolling activities, and Monitoring activities. The analysis focused on risks inherent to remote tropical environments, including physical injuries, biological hazards (snake bites), and environmental factors like heatstroke. The evaluation was based on the following specific evidence: ✓ Occupational Health and Safety Manual GGF 2025 /52/: Establishes operational protocols for high-risk field activities, including satellite communication procedures, the mandatory presence of field medics, and medical evacuation plans (river or air) to regional health centers. ✓ IPERC Matrices (Administration, Forestry, MERII - Implementation Information Reporting Mechanism by its Spanish acronym), Community Relations) /53/: Technical tools segmented by role that identify specific hazards—such as ophidism in the field or ergonomic risks in the office—and define proportional preventive controls. ✓ Internal Occupational Health and Safety Regulations (RISST) 2025 /54/: A mandatory regulatory document defining the rights and obligations of the employer and employees, safety standards for operations, and the disciplinary framework for safety compliance.

- ✓ Training Records (First Aid, Snakebite Protocol, Fire Extinguishers) /55/: Documentation certifying staff instruction in critical areas such as first aid, snakebite management (ophidism), fire extinguisher use, and hazard identification.
- ✓ OHS Management System Policy /56/: An official commitment signed by senior management to prioritize the life and health of workers, communities, and contractors as the organization's most important asset.
- ✓ Annual Occupational Health and Safety Program 2024 - 2025 /57/: A chronological roadmap ensuring continuous improvement through established goals, "zero accident" indicators, and a schedule for monitoring and emergency drills.
- ✓ Risk Maps - Iquitos Office /58/: Visual representations of the administrative headquarters (1st and 2nd floors) identifying electrical hazards, emergency equipment locations, and evacuation routes.
- ✓ Personnel Interviews: During the site visit, the VVB interviewed field and office staff, who confirmed they receive formal inductions, possess the necessary Personal Protective Equipment (PPE), and are familiar with emergency protocols regarding project site access, patrolling, and harvesting activities. Personnel Interviews: During the site visit, the VVB interviewed field and office staff, who confirmed they receive formal inductions, possess the necessary Personal Protective Equipment (PPE), and are familiar with emergency protocols regarding project site access, patrolling, and harvesting activities.

The VVB additionally reviewed the Monitoring, Surveillance and Control Plan /87/, which establishes the monitoring, surveillance, patrol, and intervention procedures implemented within the project area. The VVB verified that patrol activities are conducted by unarmed forest custodians and that the documented procedures do not include firearms, weapons management, weapons storage, use-of-force provisions, or firearms training requirements. The plan requires personnel to prioritize personal safety, avoid direct confrontation whenever possible, document observations, and coordinate with the relevant authorities, including GERFOR, FEMA, DICAPI, and the National Police, when illegal activities are detected. The VVB confirmed that project personnel perform monitoring and reporting functions and do not undertake law-enforcement activities.

The VVB concludes, with a reasonable level of assurance, that the Project Proponent effectively manages health and safety at work. The integration of

	technical risk assessments (IPERC) with documented field protocols and continuous training ensures compliance with Peruvian Law N° 29783 and the standard's requirements. Personnel interviews provided sufficient evidence that a culture of prevention is maintained across all operations
Safety of women and girls	The VVB evaluated the measures implemented by the Project Proponent to ensure a safe environment for women and girls, both within the project's administrative framework and in the interaction with local communities. The assessment focused on the risk of harassment, discrimination, or exclusion in mixed-gender spaces during field operations and office activities. The evaluation was based on the following specific evidence: ✓ OHS Management System Policy /56/: Establishes the core commitment to gender equality and the protection of all members of the organization, specifically mentioning the prevention of any form of harassment in field and remote work environments. ✓ Annual Occupational Health and Safety Program 2024 - 2025 /57/: Includes the planning of sensitization and training activities that promote an inclusive and safe work environment for all personnel. ✓ Policy Against Forced Labor /59/: Prohibits any form of coercion and guarantees the freedom of workers to terminate their employment, ensuring that women are not subject to debt bondage or restricted mobility. ✓ Anti-Child Labor Policy /60/: Specifically protects girls by prohibiting their involvement in any economic activity below the legal age (14 years) and emphasizing the priority of education and sensitization. ✓ Policy Against Human Trafficking /61/: Provides a rigorous framework to prevent labor and sexual exploitation, including a formal whistleblowing channel managed by Human Resources and strict sanctions for violations. ✓ Personnel Interviews: During the site visit, the VVB interviewed female staff from the MERII and Community Relations teams, who confirmed awareness of gender protocols, the existence of safe reporting channels, and the provision of adequate conditions (separate facilities and safe transport) during field operations. The VVB concludes, with a reasonable level of assurance, that the Project Proponent has developed and implemented protocols to manage risks of harassment or exclusion. The application of specific policies against trafficking and forced labor, combined with the availability of reporting channels,

	demonstrates alignment with the standard's requirements regarding the safety and inclusion of women and girls
Safety of minority and marginalized groups, including children	The VVB evaluated the project's mechanisms to prevent the exploitation of vulnerable populations and ensure the protection of children within the project's area of influence. The assessment focused on verifying compliance with national labor laws regarding minimum age and the implementation of safeguards during community engagement activities involving minors. ✓ OHS Management System Policy /56/: Formalizes the commitment to protect all members of the organization, including marginalized groups, by ensuring safe working conditions and equal treatment as a fundamental asset. ✓ Anti-Child Labor Policy /60/: Specifically protects girls by prohibiting their involvement in any economic activity below the legal age (14 years) and emphasizing the priority of education and sensitization ✓ Policy Against Human Trafficking /61/: Provides a framework to prevent the exploitation of vulnerable groups, with special emphasis on the protection of children, adolescents, and women, including mandatory reporting of any suspicious activity. ✓ Field Protocols for Community Interaction /62/: Establishes that any project activity involving children must be supervised by a teacher or an adult community member to ensure a safe and controlled environment. ✓ Personnel Interviews: During the site visit, the VVB confirmed with the Community Relations and GGF teams that no minors are employed by the project and that all community interactions involving children follow the mandatory supervision protocol The VVB concludes, with a reasonable level of assurance, that the Project Proponent has implemented measures to prevent child labor and protect marginalized groups. The existence of formal policies, combined with the requirement for adult supervision during community activities, demonstrates alignment with the standard's requirements for the safety of vulnerable population

Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers)	The VVB evaluated the project's environmental impact, focusing on atmospheric emissions and noise generated by fossil fuel combustion in power generators. The assessment also verified the management of waste /63/ and the absence of chemical inputs, considering that the project does not involve forest harvesting activities. The evaluation was based on the following specific evidence: ✓ Waste Management Plan /63/: Internal guidelines for the segregation, storage, and final disposal of organic, inorganic, and potential hazardous residues (such as used oil or batteries from energy systems), ensuring no discharges reach water bodies. ✓ Field Observations (Bahia Camp): During the site visit, the VVB visually confirmed the energy setup at Bahia Camp, consisting of power generators and the implementation of solar panels. The use of solar energy significantly reduces the operation time of thermal generators, thereby mitigating greenhouse gas emissions and noise pollution in the forest area. ✓ On-site Verification: The VVB confirmed that, as there is no forest harvesting, no chemical pesticides or fertilizers are stored or utilized within the project area, in alignment with conservation and low-impact objectives. The VVB concludes, with a reasonable level of assurance, that the Project Proponent effectively mitigates pollution risks. The transition to solar energy at Bahia Camp, verified on-site, directly addresses the primary source of emissions (generators), aligning with the standard's requirements for environmental protection and pollution prevention.
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4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	The VVB evaluated the Gender Protocol and OHS Management System Policy /56/ and the Internal Occupational Health and Safety Regulations (RISST) /54/, which establish the guidelines for equal opportunity and the prohibition of discriminatory practices during recruitment and daily operations. These documents define the commitment to a respectful work environment regardless of gender, race, or social status.

	VVB confirms that the Project Proponent has implemented a framework that promotes equal treatment across all areas. During personnel interviews, no instances of discrimination were reported, confirming that the preventative measures align with the project's internal policies and national labor standards
Sexual harassment	The assessment involved the review of the Gender Protocol /56/ and the Policy Against Human Trafficking /61/, which include a formal whistleblowing channel managed by Human Resources. The evaluation focused on the existence of safe reporting mechanisms and the physical conditions provided for staff in remote locations to prevent risks of harassment. Reporting channels are operational and known by the staff. The VVB confirmed through interviews that female personnel feel secure using the reporting tools and that the provision of separate facilities in camps, such as Bahia, effectively mitigates risks associated with mixed-gender spaces.
Gender equity in labor and work	The VVB reviewed personnel records and conducted interviews with female staff from the MERII and Community Relations teams to verify the inclusion of women in technical and field-based roles. The evidence checked focused on the distribution of tasks, access to specialized training, and the provision of adequate field equipment tailored to female staff requirements. The project demonstrates active gender inclusion in key operational and technical areas. Interviews confirmed that women have the same professional development opportunities and safety conditions as men, including safe transport and appropriate logistical support for field commissions.
Forced labor	The evaluation verified compliance with international and national labor standards through the review of the Policy Against Forced Labor /59/ and a sample of employment contracts. The assessment focused on ensuring that all labor is voluntary and that no coercive practices, such as debt bondage or the illegal retention of identity documents, are present. The VVB concludes that there is no risk of forced labor within the project. The internal policies explicitly prohibit any form of coercion, and interviews with workers confirmed their freedom to terminate their employment at any time without fear of retaliation or financial penalties
Child labor	The VVB checked the Anti-Child Labor Policy /60/ and personnel identification records to ensure that no individuals under the legal working age are employed. The assessment also considered the project's interaction

	with local communities to ensure that project-related activities do not indirectly encourage the use of child labor. No risk of child labor was identified. The Project Proponent maintains a strict prohibition on hiring child, field observations confirmed that no minors are involved in any economic activities or operations related to the project's monitoring and conservation tasks
Human trafficking	The assessment focused on the Policy Against Human Trafficking /61/, which provides a framework to prevent labor and sexual exploitation. The VVB reviewed the formal reporting procedures and the specific clauses in contracts that extend these prohibitions to third-party contractors and service providers. The project has established a preventative framework against exploitation, including strict sanctions such as contract termination for any involvement in trafficking. The existence of a formal whistleblowing channel managed by Human Resources ensures that any suspicious activity can be reported and addressed promptly.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risk identified	The VVB evaluated the Community Relations Plan 2024 /27/, the Conflict Resolution Protocol /42/, and the Community Life Plans (Planes de Vida) /35/, which establish the framework for interacting with Indigenous Peoples (IPs) and Local Communities (LCs). The assessment included a review of the 2024 Socialization Report /26/ and the REDD+ Safeguards Summary (RIS) /50/, ensuring alignment with ILO Convention 169 and the UN Declaration on the Rights of Indigenous Peoples, specifically regarding the formal recognition of land tenure and customary rights within the project's documentation. The VVB concludes that no risks to human rights were identified during the monitoring period. The Project Proponent effectively recognizes and respects the rights of IPs and LCs, as evidenced by the Conflict and Lessons Learned Socialization Forms /43/ and the positive feedback received during field interviews with community members. The implementation of transparent communication channels and the respect for traditional livelihoods, verified through the Field Protocols for Community Interaction /62/, demonstrate full compliance with international human rights law and the standard's requirements

4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risk identified	The VVB evaluated the Community Life Plans (<i>Planes de Vida</i>) /35/ and the Community Relations Plan 2024 /27/, which identify and establish protection measures for areas of cultural, spiritual, and historical significance for Indigenous Peoples (IPs) and Local Communities (LCs). The assessment included a review of the 2024 Socialization Report /26/ and the Participatory Rural Appraisals (PRA) /37/, ensuring that project activities do not interfere with customary rights or sites of cultural heritage, in accordance with ILO Convention 169 and the REDD+ Safeguards Summary (RIS) /50/. The VVB concludes that no risks to the rights of IPs, LCs, or cultural heritage were identified during the monitoring period. The Project Proponent maintains a respectful integration of traditional knowledge and sites, as verified through the Field Protocols for Community Interaction /62/ and interviews with community leaders. The evidence confirms that cultural heritage is preserved and that the project's monitoring and conservation tasks are conducted without infringing upon the customary practices or sacred areas of the local populations

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Unclear boundaries between communities.	The VVB evaluated the project's framework for protecting property rights and mitigating territorial risks through the following evidence: ✓ Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/ & Legal Analysis /32/: Documents establishing the legal basis for land use, ownership rights, and the long-term longevity of the concessions. ✓ Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA /28/: Records of the partnership with the NGO CEDIA to support local communities (e.g., Pampa Caño and Solterito) in securing legal land titles, reducing tenure vulnerability ✓ Regional Resolution No. 158-2023-GRL-GGR-GRDFFS /33/ & Spatial Analysis /31/: Official administrative acts documenting

	the exclusion of areas for the Berlín community and the analysis of potential overlaps to prevent collective rights infringements. ✓ Maps /36/ & GIS Data /22/: Cartographic evidence used by forest custodians to install physical boundary marks, ensuring clear visible limits between GGF concessions and community territories to prevent transpositions. ✓ 2024 Socialization Report /29/: Field verification of community agreements that confirm stakeholders' continued access to resources and the formal recognition of their customary rights The VVB concludes that the Project Proponent effectively manages and mitigates risks related to property rights. The combination of legal tenure verification, physical boundary marking, and proactive support for community titling through CEDIA provides a reasonable level of assurance that land-use conflicts are minimized. The evidence demonstrates a transparent approach to resolving potential overlaps and protecting the legal and customary rights of all stakeholders, in full compliance with the standard's requirements for tenure security
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4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	The VVB evaluated the project's strategy for social and economic benefits through the following evidence: ✓ Community Relations Plan 2024 /27/: Outlines the indirect benefit model based on social investment, capacity building, and productive projects rather than direct cash transfers. ✓ Community Life Plans (Planes de Vida) /35/: Strategic documents that identify the priority needs of local communities and guide the implementation of social and environmental activities funded by the project. ✓ 2024 Socialization Report /26/: Documentation explaining to stakeholders that, as the project is located on a private forestry concession without communal overlaps, benefits are channeled through employment and local development. The VVB concludes that the benefit-sharing plan is transparent and appropriate for the project's legal context. Since the project area is a private concession, the indirect model effectively addresses local needs through job creation and technical assistance. The evidence confirms that the mechanism was clearly

	communicated to and understood by the communities during the socialization process.
Benefit sharing during the monitoring period	The VVB confirms that the direct distribution of carbon credit revenues is not applicable as the project is located on a private forestry concession. However, despite this, several activities have been developed for the benefit of the communities during the monitoring period, as evidenced by: ✓ 2024 Socialization Report (Field verification) /29/: Records confirming the execution of community agreements and the delivery of technical support as part of the indirect benefit commitments. ✓ Financial vouchers and Delivery Acts /39/ /40/: Evidence of material transfers and financial support for local productive initiatives and social infrastructure. ✓ Third Field Progress Report /41/: Internal monitoring data detailing the progress of social projects and the number of local jobs generated during the monitoring period. The VVB concludes that although direct revenue sharing is not applicable, the project has effectively implemented its indirect benefit commitments. The evidence demonstrates that the communities have received benefits through capacity building, community support, and local employment, providing a positive and measurable impact on local livelihoods during the monitoring period.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	The VVB evaluated the project's impact on local biodiversity by reviewing the monitoring data and conservation strategies through the following evidence: ✓ Third Field Progress Report /41/ & Fire Monitoring Report /48/: Documentation confirming the halting of logging operations and the prevention of forest fires, which effectively maintained the vegetative cover and ecosystem integrity. ✓ Wildlife Sightings Database 2022-2024 /64/: A comprehensive record of fauna observed within the project area, including species categorized under the IUCN Red List, demonstrating the persistence of key wildlife. ✓ Final Flora and Fauna Report - GGF /65/: Technical study characterizing the biological diversity of the area and establishing the baseline for conservation monitoring.

	The VVB concludes that no negative risks to biodiversity and ecosystems were identified during the monitoring period. On the contrary, by excluding commercial logging and implementing active conservation monitoring, the Project Proponent has successfully preserved the habitat for numerous species. The evidence gathered through field sightings and technical reports confirms that the project's activities are effectively maintaining the health of the Amazonian ecosystem within the concessions
Soil degradation and soil erosion	The VVB evaluated the status of soil conservation and the impact of the project's land-use strategy through the following evidence: ✓ Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/: Documentation confirming the change in land use from active logging to conservation, which eliminates the primary driver of soil compaction and erosion. ✓ Third Field Progress Report /41/ & Maps /36/: Evidence verifying the maintenance of full canopy cover, which protects the soil from direct rainfall impact and nutrient leaching. ✓ Technical Report N° 002-2024-RIAL /17/: Assessment of the forest status confirming the absence of new roads or logging infrastructure that could trigger erosion processes. The VVB concludes that no risks related to soil degradation or erosion were identified during the monitoring period. By halting logging operations, the Project Proponent has prevented the typical soil damage associated with timber extraction. Furthermore, as there are no reforestation or agroforestry activities involving land preparation, the soil remains in its natural state, potentially allowing for the recovery of soil quality and nutrient cycling through natural forest processes
Water consumption and stress	The VVB evaluated the potential impact on water resources and the reduction of aquatic stress through the following evidence: ✓ Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/: Legal basis for the cessation of industrial logging, which significantly reduces the presence of machinery and the risk of fuel or sediment runoff into waterways. ✓ Third Field Progress Report /41/ & Maps /36/: Evidence showing the preservation of riparian buffers and natural drainage patterns, which are critical for maintaining local water quality. ✓ INDECI (2026) Flood Risk Report /49/: External data used to understand the hydrological context and ensure that project activities do not exacerbate water stress or natural flood cycles.

- ✓ Waste Management Plan /63/: Documentation outlining the protocols to prevent contamination and manage materials that could impact water bodies within the concession.

The VVB concludes that no risks related to water consumption or stress were identified during the monitoring period. The project's strategy of halting logging operations has led to a substantial decrease in the use of local waterways for log transport and industrial activities, thereby reducing the risk of contamination. The evidence demonstrates that the project maintains the natural hydrological balance of the area, ensuring that water quality and availability for the ecosystem remain undisturbed

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The VVB evaluated the project's impact on protected species and their habitats through the review of biological inventories and conservation activities, specifically focusing on the following evidence: ✓ Wildlife Sightings Database 2022-2024 /64/ & Final Flora and Fauna Report /65/: Documentation confirming the presence of 7 Endangered (EN) and 22 Vulnerable (VU) species according to IUCN categories, including key flora such as <i>Cedrela odorata</i> and fauna such as the Giant Otter (<i>Pteronura brasiliensis</i>). ✓ CITES Peru Species List 2023 (MINAM) /66/: Official national regulatory framework used to cross-reference and validate the protection status of species found within the project area, ensuring alignment with national conservation priorities. ✓ Third Field Progress Report /41/: Verification of the complete cessation of logging operations, which serves as the primary measure to prevent habitat loss and ensure the protection of the specialized niches required by these species. The VVB concludes that the project has not adversely impacted the habitats of rare, threatened, or endangered species during the monitoring period. By halting timber extraction and maintaining a continuous monitoring presence, the Project Proponent has successfully preserved the critical forest structure required by these species. The integration of the MINAM CITES 2023 list as a verification tool confirms that the project's conservation efforts are in full compliance with both international standards and national biodiversity regulations.

Areas needed for habitat connectivity	The VVB evaluated the maintenance of ecological corridors and habitat connectivity through the following evidence: ✓ Wildlife Sighting Registration Forms & Database /64/: Systematic records of indicator species with large home ranges, such as the Jaguar (<i>Panthera onca</i>), Lowland Tapir (<i>Tapirus terrestris</i>), and Giant Otter (<i>Pteronura brasiliensis</i>), whose recurring presence confirms the functionality of the area as a connected landscape. ✓ Maps of the project area /36/: Spatial analysis confirming the absence of forest fragmentation, new roads, or infrastructure that could act as barriers to species movement. ✓ Technical Report N° 002-2024-RIAL /17/: Field verification of trail clearing and permanent plot (PPM) activities, ensuring these low-impact tasks do not disrupt the connectivity of the forest canopy or understory. The VVB concludes that the project has not adversely impacted areas needed for habitat connectivity during the monitoring period. The complete halt of logging operations has maintained a continuous forest cover, which is essential for the dispersal of wildlife. The recurring presence of apex predators and large mammals, which require extensive and well-connected territories, serves as a reliable biological indicator that the project area maintains high ecological integrity and effective habitat connectivity
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Item	Evidence gathering activities, evidence checked, and assessment conclusion
Habitats for rare, threatened, and endangered species	The VVB evaluated potential risks to the habitats of RTE species through the review of operational changes and field monitoring reports, specifically checking the following evidence: ✓ Wildlife Sightings Database 2022-2024 /64/ & Final Flora and Fauna Report /65/: Data showing stable presence of sensitive species, indicating that habitat quality has been maintained or improved. ✓ CITES Peru Species List 2023 (MINAM) /66/: Regulatory framework used to ensure that all species at risk are covered by the project's preventative monitoring measures. ✓ Fire Monitoring Report /48/: Records of fire prevention and control activities, which mitigate the risk of catastrophic habitat loss. The VVB concludes that no risks to the habitats of rare, threatened, and endangered species were identified during the monitoring period. The

	cessation of logging operations removed the main anthropogenic driver of habitat change. The evidence confirms that the preventative measures in place, including patrolling and fire monitoring, are consistent with the requirements for the conservation of the RTE species identified.
Areas for habitat connectivity	The VVB assessed risks to habitat connectivity by analyzing landscape integrity and potential barriers through the following evidence: ✓ Maps of the project area /36/: Spatial evidence confirming that no new roads or infrastructure were developed that could fragment the forest or create barriers for wildlife movement. ✓ Technical Report N° 002-2024-RIAL /17/: Field verification confirming that project activities (such as trail maintenance and plot measurement) are low-impact and do not affect canopy or understory connectivity. ✓ Wildlife Sighting Registration Forms /64/: Records of large mammals (<i>Panthera onca</i>, <i>Tapirus terrestris</i>), used as indicators of the functional status of connectivity across the concessions. The VVB concludes that no risks to areas needed for habitat connectivity were identified during the monitoring period. The implementation of a conservation strategy across the entire concession block prevented fragmentation. The assessment confirms that the maintenance of continuous forest cover ensures that biological corridors remains functional, allowing for the natural movement of local fauna

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	It is a Logged to Protected Forest (LtPF) Project

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	It is a Logged to Protected Forest (LtPF) Project

Invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
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Not applicable	The project does not intend to use invasive species in any area affected by the project.
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4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	Not applicable. It is a Logged to Protected Forest (LtPF) Project.

4.3 Accuracy of Reduction and Removal Calculations

Procedures for quantifying the baseline emissions were conducted in accordance with the VM0010 Methodology for Carbon Stocking in Sinks, v1.3 /7/. The verification team performed an intensive review of all input data, parameters, formulas, calculations, conversions, and statistics, with a specific focus on the baseline harvest intensity of 15 m³/ha. This review ensured consistency with project's VCS documentation, and the Correction to Versions 1.2–1.4 of VM0010 Methodology for Improved Forest Management: Conversion from Logged to Protected Forest /8/.

The audit team reproduced calculations for selected samples to ensure the accuracy of the biomass and carbon results. Conversion factors, formulas, and calculations were provided by project proponents in spreadsheet format, allowing for a thorough audit of all accessible formulas. The verification team recalculated subsets of the analysis, including uncertainty assessments, to confirm correctness. Furthermore, the project proponent provided a step-by-step overview of select calculations to ensure the verification team confirmed consistency with the applied methodology and the aforementioned correction. Where applicable, references for analysis methods or default values were checked against relevant scientific literature to ensure best practices.

The verification team assessed the parameters listed in Section 3.1 of the final Monitoring Report, including both fixed and monitored parameters, and concluded that they are complete and in accordance with the applied methodology. The verification team confirms that the emission reductions—including the accuracy of spreadsheet formulae /14/ /18/ /20/, conversions, and aggregations—are consistent in the use of data and parameters. Finally, the methods and formulae set out in the project description for calculating baseline emissions, project emissions, and leakage have been strictly followed.

Detailed descriptions of the verification procedures for the baseline emissions, project emissions, and leakage calculations are provided in the following sections.

1. Baseline Emission:

Calculation of carbon stocks in commercial timber volumes

The quantification of carbon stocks contained within the commercial timber volumes that would have been extracted in the baseline scenario is governed by the following technical criteria:

- ✓ Determination of Extraction Volume (VEX): The Project Proponent established an extraction rate of 15 m³/ha. This value is defined as conservative, as the 2017 POA10 forest inventory /67/—which applies an internal Minimum Cutting Diameter (MCD) on average 18% higher than the legal requirement—indicates a potential volume of 16.3 m³/ha. This rate is consistent with common practice for logging companies with similar business models in the Amazon basin.
- ✓ Scope of Infrastructure Areas: The commercial volume of 15 m³/ha is applied uniformly across all areas of the stratum, including those intended for conversion into infrastructure (roads, skid trails, and log landings). This ensures that merchantable timber from these specific zones is accounted for before their full conversion into dead wood.
- ✓ Methodological Equation Application: To transform the extracted volume into biomass and subsequently into carbon, Equation 4 of VM0010 is applied: $C_{EX,i,j|BSL} = V_{EX,j,i|BSL} \times D_j \times CF_j$
- ✓ Applied Parameters:
 - Wood Density (D): A volume-weighted average of 0.614 t/m³ is used, derived from the harvested species.
 - Carbon Fraction (CF): The IPCC default value of 0.5 is applied.

This component establishes the baseline amount of carbon entering the supply chain which, in the absence of the project, would result in emissions from industrial harvesting

Calculation of Dead Wood (Logging Slash) ($C_{DWSLASH,i,p|BSL}$)

The calculation of carbon stock changes in the forest dead wood pool resulting from logging residues and infrastructure in the baseline scenario follows these steps:

- ✓ Logic of the Dead Wood Pool: The model accounts for all biomass that is not extracted as commercial timber but is killed during the harvesting process. This is calculated using Equation 5 of VM0010 /7/.
- ✓ Logging Damage Factor (LDF): This factor represents the carbon in trees incidentally killed or damaged during the felling of commercial species. The value applied is 1.134 tC/m³ extracted.
- ✓ Logging Infrastructure Factor (LIF): This factor accounts for the biomass cleared for the establishment of roads, skid trails, and landings. The value applied is 0.458 tC/m³ extracted.
- ✓ Implementation: These calculations are executed in the emission reduction spreadsheet /14/ and the baseline recalculation spreadsheet /20/. The VVB verified that the extraction volume of 15 m³/ha serves as the basis for both factors, ensuring that all non-commercial biomass loss is linked to the intensity of the baseline logging activity.

Calculation of Baseline Carbon Sequestered in Wood Products (CWP)

The quantification of carbon stock changes in the wood products pool reflects the varying decay rates and life cycles of harvested timber, as executed in the emission reduction spreadsheet /14/ according to VM0010 /7/ (Equations 8, 9, 10, and 11):

- ✓ Oxidized Fraction Logic (OF): The model separates biomass carbon into fractions based on their emission timing. The "oxidized fraction" represents the portion emitted between years 3 and 100 post-harvest.
- ✓ Immediate Emissions (CWP0): A combined fraction of 46.7%, representing wood waste and short-lived wood products, is assumed to be emitted to the atmosphere immediately at the time of harvest.
- ✓ Medium-term Emissions (CWP20): Long-lived wood products, accounting for 45.9% of the carbon, are assumed to be emitted over a 20-year linear decay function.
- ✓ Permanent Storage (CWP100): Based on Winjum et al. (1998), the project assumes that 7.5% of the extracted carbon (representing 14% of the long-lived pool) remains permanently stored and is not emitted.
- ✓ Implementation: These calculations ensure that the baseline accurately reflects the delayed emission profile of wood products rather than assuming a total instantaneous loss of all harvested biomass.

Change in Carbon Stocks due to Forest Regrowth after Harvest (CRG)

The model accounts for the natural sequestration of carbon that occurs as the forest regenerates following the baseline logging and infrastructure establishment:

- ✓ Regrowth Rate (RGR): The project applies a forest regrowth rate of 1.02 tC/ha/yr. This value is used to quantify the carbon sequestration that would naturally occur in the harvested areas and cleared infrastructure sites during the baseline scenario. The calculation follows Equation 12 of VM0010 /7/. By including regrowth in the baseline, the Project Proponent effectively reduces the net baseline emissions. This ensures a conservative estimate of the net GHG emission reductions, as it acknowledges the forest's inherent ability to recover biomass even in the absence of the project.
- ✓ The VVB verified that these parameters are consistently applied within the ER calculation spreadsheet /14/ and the recalculation parameters memo /19/.

Calculation of Baseline Emissions from Fossil Fuel Combustion

The assessment of greenhouse gas emissions from the operation of forestry and wood processing machinery in the baseline scenario was conducted using the CDM Tool for testing significance of GHG emissions in A/R CDM project activities (Version 01). The application of this tool determined that emissions from fossil fuel combustion fall below the materiality threshold established by the VCS program. These emissions are excluded from the total baseline calculations in accordance with the provisions of VM0010 /7/ and validated PD /11/.

The audit team verified the continued validity of this exclusion by reviewing the baseline harvest parameters and fuel consumption estimates as detailed in the Project Description /11/. Furthermore, during the on-site visit to the project area (including Bahía Camp), the VVB confirmed that current fuel consumption is minimal and limited to surveillance and administrative support activities. This evidence supports the

conclusion that these emissions remain below the materiality threshold established by the VCS Standard /2/. Consequently, the exclusion of this source from the total baseline calculations is consistent with the validated project design and the principle of conservativeness.

Calculation of Baseline Scenario of GHG Emissions from Change in Carbon Stocks

The final baseline scenario quantification is performed by applying Equations 23 through 28 of VM0010 /7/, as refined by the Methodology Correction /8/, to determine the net greenhouse gas emissions ($GHG_{NE|BSL}$) in tCO₂e. This calculation aggregates the values for commercial timber (CEX), logging residues (CDW_{SLASH}), wood products (CWP), and forest regrowth (CRG), utilizing the annual logged area (A) as defined in the validated VCS-PD /11/. These aggregations are executed within the ER Calculation Spreadsheet /14/, with the resulting values reported in Section 3.2 of the MR.

The VVB conducted a detailed audit of the baseline emission calculations by reviewing the ER Calculation Spreadsheet /14/ and the specific Baseline Recalculation Spreadsheet (PDev#6) /20/. This process included the verification of the 2017 POA10 forest inventory /67/ as the primary data source for timber volumes and the Technical Memo on Consistency of Recalculation Parameters /19/. The assessment ensured that all inputs, including wood density (0.614 t/m³) and the conservative extraction rate of 15 m³/ha, were correctly transposed from the monitoring records into the calculation tools. Furthermore, the VVB cross-referenced these figures with the VCS-MR /10/ and the validated VCS-PD /11/ to confirm that the parameters remained consistent with monitoring results.

The VVB concludes that the baseline emissions ($GHG_{NE|BSL}$) have been quantified accurately and in full accordance with the VM0010 Methodology /7/ and the mandatory Verra Methodology Correction /8/ regarding the conversion from logged to protected forest. The calculation logic correctly incorporates the required methodological adjustments, including both previously approved deviations and the current deviations described in the Monitoring Report /10/. By tracing formulas for commercial timber (CEX), logging slash (CDW_{SLASH}), and wood products (CWP), the VVB confirmed that the GHG statement follows the validated monitoring plan and the refined equations of the VCS program. Consequently, the baseline provides a technically sound and conservative benchmark for the determination of the net GHG emission reductions for this monitoring period.

2. Project Emissions

The determination of project carbon stocks is based on high-resolution (25 m) above-ground biomass (AGB) maps generated by Space Intelligence /15/. The process integrates data from the NASA GEDI sensor with satellite mosaics from Sentinel-1 (C-band SAR), ALOS-2 PALSAR-2 (L-band SAR), and Sentinel-2 (Optical) /22/. Due to the GEDI sensor being offline between March 2023 and June 2024, the 2024 map was updated using remeasurements from 28 field plots and Sentinel-1 SAR data, collected every 12 days, to identify structural changes in the forest canopy. The results indicate mean AGB densities between 370.4 and 375.6 Mg AGB/ha, with a calculated uncertainty of 9.08% based on a Root Mean Square Error (RMSE) of 27.09 Mg/ha /15/.

Natural Disturbance Analysis (Fire and Non-Fire Events)

Biomass losses were identified using "significant" and "light" disturbance layers. During the monitoring period, 2,246.69 ha were identified with disturbances from natural causes, classified as Aburn,i,t according to section 5.3.7 of the VCS-PD /11/. Applying Equations 33 and 34 of the VM0010 Methodology /7/, these emissions totaled 934.14 tCO₂e. Additionally, 41.79 ha were identified as natural non-fire disturbances, generating 697.11 tCO₂e under Methodology Deviation #8 /10/. These calculations are consolidated in the emission reduction spreadsheet /14/.

Illegal Logging and Anthropogenic Pressure Analysis (PRA)

Anthropogenic pressure was assessed through a Participatory Rural Appraisal (PRA) /37/ that included resource mapping and surveys of 243 individuals across 17 communities. The PRA results indicated that 9.47% of respondents reported timber extraction within the project area (GGL1). As this value is below the 10% threshold established in the "Illegal Logging PRA Results" parameter of the methodology, the incidence of illegal logging is considered negligible. Consequently, the area for illegal logging disturbance ($A_{DIST_{IL,i}}$) was set to 0 ha, which is consistent with the records in the Community Life Plans /35/ and the 2024 Socialization Report /26/.

The VVB audited the project emissions by reviewing the Space Intelligence Technical Report v1.3 /15/ and cross-referencing the GIS data /22/ with the results in the VCS-MR /10/. The assessment included the verification of the allometric models used for height-to-biomass conversion and the application of exclusion masks for pixels with a height of less than 5 meters. The calculations were traced .ER Spreadsheet /14/, confirming that emissions from disturbances (2,201.2 tCO₂e) were evaluated with the significance tool and resulted in a value of less than 5% of the total reductions.

The VVB concludes that the project emissions have been quantified according to the VM0010 Methodology /7/ and Methodology Deviation #8 /10/. The use of remote sensing (GEDI, SAR, and Optical) provides the technical basis for forest cover monitoring, and the integration of field data addresses the lack of GEDI data during the reported period. The categorization of disturbances and the use of the 10% PRA threshold for the exclusion of illegal logging emissions comply with the methodological requirements and the validated monitoring plan

3. Leakage Emissions

Activity Shifting Leakage

VM0010 v1.3 Section 8.3.1 states that: *"Where the project proponent controls multiple parcels of land within the country the project proponent must demonstrate that the management plans and/or land-use designations of other lands they control have not materially changed as a result of the planned project (...) because such changes could lead to reductions in carbon stocks or increases in GHG emissions."*

The methodology further requires that: *"At each verification, documentation must be provided covering the other lands controlled by the project proponent where leakage could occur, including, at a minimum, their location(s), area and type of existing land use(s), and management plans."*

To assess compliance with these requirements, the VVB reviewed the Monitoring Report, Forestry Concession Contract No. 16-IQU/C-J-099-04 (San Regis) /34/, which provides the legal basis for land-

use and management rights, and the official extraction balance records: *Balance de Extracción – PO I, Parcela de Corta 12 /88/ and Balance de Extracción – PO I, Parcela de Corta 02 and PO II, Parcela de Corta 04 /89/*. These documents provide evidence regarding the location, management status, harvesting activities, and extraction volumes of the concessions controlled by the project proponent where activity-shifting leakage could potentially occur. The VVB verified that the reviewed extraction balance records reported extraction volumes equal to 0 m³ in the analyzed concessions.

Based on the evidence reviewed, the VVB did not identify any indication of increased harvesting activities, changes in land-use designations, modifications to management plans, or displacement of timber extraction between concessions controlled by the project proponent. Therefore, the VVB concludes that no activity-shifting leakage occurred during the monitoring period and that the requirements of VM0010 v1.3 Section 8.3.1 were met

Market Leakage Analysis

The project calculates market leakage using a modified Equation 40 of VM0010 /7/, as defined under Methodology Deviation #5 /10/. The leakage factor (LKME) was determined by comparing the merchantable biomass ratio of the project forest (PMPi=0.031) against the displacement forest (PMLFT=0.033). This 6% variance falls within the $\pm 15\%$ range required by the methodology, resulting in a deduction factor of 0.4 according to Box 2 of VM0010 /7/. The VVB verified that the merchantable biomass values are consistent with the POA10 inventory /67/ and biomass data derived from Space Intelligence /15/.

Market Trends and Product-Specific Analysis (LPME)

The analysis of Peru's timber industry (2019–2024) shows an underlying downward trend in production and exports, intensified in the Loreto region after the cessation of GGF's operations. Using data from the Veritrade database /74/ and SERFOR yearbooks /69/ / 70/, the project demonstrates that the supply gap created by the project was not offset by other producers. Specifically:

- ✓ Zero Leakage identified for Decking, S4S, Deck tiles, Sleepers, and RSKD, as national export sales for these products declined between 62% and 85% compared to the 2019 baseline.
- ✓ A possible leakage was identified for Kiln sticks (3% of GGF's projected production), RSAD (100%), and "Other" by-products sold locally (100%). Consequently, the market leakage factor is applied to 17.30% of the projected log harvest volume, as detailed in the Leakage Analysis Spreadsheet /68/.

Verification of External Constraints and Financial Resilience

The VVB reviewed external factors, including the decrease in FSC-certified forest area in Peru /71/ and the progress in national anti-illegal logging policies through OSINFOR /72/ / 73/. These factors support the conclusion that GGF's certified production cannot be easily replaced by non-certified or illegal sources. The assessment also considered the impact of CITES Appendix II listings for *Cumaru* and *Ipe* /76/, noting they do not affect the current monitoring period data. Finally, the VVB cross-referenced the Non-Permanence Risk Report /77/, confirming that the project maintains financial resilience even under a 100% market leakage scenario.

The VVB evaluated the market leakage claims by auditing the Veritrade export data /74/ and the ITTO Tropical Timber Market Reports /75/, which serve as proxies for production volumes and prices. The VVB verified the traceability between the POA 10 Production Analysis /68/ and the final LPME calculation. The decline in active forest concessions and FSC-certified areas was confirmed through SERFOR /70/ and FSC Impact Data /71/, respectively. This comprehensive review ensures that the market leakage quantification is based on verifiable trade statistics and reflects the actual economic conditions of the Peruvian timber sector.

The VVB concludes that the market leakage emissions ($GHG_{LK|LPF,t}$) have been quantified in accordance with the VM0010 Methodology /7/ and the approved Methodology Deviation #5 /10/. The evidence from international trade databases and national forest statistics supports the conclusion that the majority of the project's displaced timber production has not been replaced by other producers. The application of the 0.4 leakage factor to 17.30% of the harvest volume is technically sound and follows a conservative approach consistent with the VCS program requirements.

4. Uncertainty Analysis

Baseline Scenario Uncertainty (UBSL) The uncertainty for the baseline scenario was estimated by propagating the variance of the most sensitive input parameters. Parameters such as project area, harvestable volume (based on a 100% inventory of 3,000 ha), and wood product classes were determined to have no significant variance. The propagation included:

- Forest Regrowth: Uncertainty of 1.99% based on the standard error of the regression variable θ /7/.
- Logging Damage Factor (LDF): Average uncertainty of 8% derived from linear regression equations in Pearson et al. (2014).
- Above-ground Carbon (Optional): A conservative 5% uncertainty based on relative uncertainty maps for Peru (Asner et al., 2014). The total baseline uncertainty (UBSL) was calculated as the square root of the sum of squares, resulting in 9.64%.

Project Scenario Uncertainty (UP) Project uncertainty was calculated using the Root Mean Square Error (RMSE) method as per Methodology Deviation #6 /10/. Space Intelligence compared 2024 predicted AGB change (from remote sensing maps) against observed change from 28 resurveyed field plots. The resulting RMSE of 27.09 Mg ha^{-1} , divided by the mean AGB density of the plots ($298.50 \text{ Mg ha}^{-1}$), yields a project uncertainty of 9.08% /15/.

Total Project Uncertainty and Materiality Following Equation 42 of VM0010 v1.3 /7/, the total uncertainty is the square root of the sum of the squares of baseline and project uncertainties: 13.24%

As the total uncertainty is below the 15% threshold established by the methodology, no confidence accounting deductions were applied to the net emission reduction

The VVB concludes that the net GHG emission reductions and removals for the monitoring period have been quantified with accuracy and transparency. The verification confirmed the integrity of the spreadsheet formulae, unit conversions, and data aggregations within the ER Calculation Spreadsheet /14/ and the Leakage Analysis Spreadsheet /68/, ensuring the consistent application of monitored data and fixed parameters.

The calculation of baseline emissions, project emissions, and leakage emissions followed the methods and formulae prescribed in the VM0010 Methodology /7/, the VCS-PD /11/, and the approved Methodology Deviations #5 and #8 /10/. The uncertainty analysis was conducted by propagating errors from both the baseline (UBSL=9.64%) and the project scenario (UP=9.08%), resulting in a total project uncertainty of 13.24%. Since this value remains below the 15% threshold at the 95% confidence interval, no additional confidence accounting deductions were required.

Furthermore, the use of default values—specifically the 10% activity-shifting leakage factor and the 0.4 market leakage deduction factor—was found to be appropriate, technically justified by the provided market analysis, and in full conformance with the VCS Program rules. Consequently, the reported emission reductions are considered a conservative and reliable representation of the project's climate impact.

The net GHG emission reductions for the monitoring period are determined by the difference between the baseline emissions and the sum of project and leakage emissions, adjusted by the non-permanence risk buffer. For the period from August 2022 to July 2024, the baseline was calculated at 550,133 tCO₂e. After accounting for project emissions, leakage, and the 18% buffer pool allocation, the net issuance is 487,896 VCU. These calculations incorporate an uncertainty analysis of 13.24%, which remains below the 15% threshold at the 95% confidence interval.

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)	Total GHG credits adjusted for uncertainty (tCO ₂ e)	Deduction for pooled AFOLU buffer account (tCO ₂ e)	VCUs eligible for issuance (tCO ₂ e)
01-Aug-2022 to 31-Dec-2022	108,605	14,548	7,517	115,637	115,637	22,168	93,469
01-Jan-2023 to 31-Dec-2023	272,484	43,880	18,859	297,504	297,504	56,945	240,559

01-Jan-2024 to 31-Jul-2024	169,043	32,869	11,700	190,212	190,212	36,344	153,868
Total	550,133	91,297	38,076	603,353	603,353	115,457	487,896

4.4 Quality of Evidence to Determine Reductions and Removals

The audit team performed a thorough review of the fixed parameters detailed in Section 4.1 of the Monitoring Report (Data and Parameters Available at Validation), confirming that the applied values are identical to those established during the project validation. It was verified that critical constants—such as emission factors, species-specific wood densities, merchantable biomass, and biomass expansion factors—have been correctly integrated into the ER Calculation Spreadsheet /14/ and the Leakage Analysis Spreadsheet /68/. The consistency between these validated values and those used in the current calculations ensures the integrity and compliance with the VCS Program rules and the applied methodology.

In addition, the audit team performed an intensive review of all input data, parameters, formulas, calculations, conversions, and resulting uncertainties to ensure consistency with the VM0010 Methodology /7/, the VCS Standard, and the approved Methodology Deviations /10/. The verification team reproduced calculations for selected samples—including the processing of remote sensing data and the application of allometric models—to ensure the accuracy of the results.

Project proponents provided the ER Calculation Spreadsheet /14/ and the Space Intelligence Monitoring Report /15/, ensuring all formulas and remote sensing methodologies were accessible for review. The audit team recalculated subsets of the Above-Ground Biomass (AGB) change analysis to confirm correctness. Where applicable, references for analysis methods, such as the RAINFOR/ForestPlot.net methodology and GEDI LiDAR correlations, were checked against relevant scientific literature.

Monitored Parameter	Monitoring Result & VVB Assessment
$\Delta C_{AB,t PRJ-Gross}$	Carbon stock changes were determined by comparing wall-to-wall AGB maps from 2022 and 2024. The 2022 map used GEDI LiDAR footprints and Sentinel-1/2 data. The 2024 update incorporated 28 field plot remeasurements and Sentinel-1 SAR data to detect structural changes. Pixels <5m in height were masked to align with national forest definitions. VVB Assessment: The audit team reviewed the Space Intelligence Report /15/ and the underlying GIS data. The integration of GEDI data and the multi-sensor predictive model was found to be technically sound and consistent with the monitoring plan.
Illegal Logging (PRA Results)	A Participatory Rural Appraisal (PRA) was conducted via community surveys. Results showed that 9.47% of those interviewed reported using timber from

	the project area. As this is below the 10% threshold required by VM0010 to trigger an on-the-ground survey, illegal logging is assumed to be zero. VVB Assessment: Audit team reviewed the PRA Results (Appendix 5) /78/ and verified the survey methodology and interviewee records. The conclusion to assume zero illegal logging is in accordance with the methodology.
$A_{burn,i,t}$ $A_{dis,i,t}$	Disturbance was monitored by delineating areas ≥ 1 ha with biomass reductions ≥ 5 tC. Total area burnt applied: 2,246.69 ha. Total area disturbed (non-fire): 41.79 ha. Audit team reviewed the disturbance maps and GIS layers. The team confirmed that the delineation of fire and non-fire disturbances was verified via GPS and satellite imagery comparison as per the SOPs /79/.
A_{plot} DBH H_{Stem}	28 out of 30 permanent 0.5 ha plots were remeasured in 2024 according to RAINFOR/ForestPlot.net standards. DBH and Stem Height measurements were used to calibrate the remote sensing model. Audit team assessed the Field Sampling Database /14/. During the site visit, the team cross-checked a subset of field data against the spreadsheet values, confirming that the measurement procedures followed the specified SOPs and the RAINFOR methodology.
PMP_i	Calculated as the ratio of merchantable biomass (9.2 t/ha, based on a 15 m³ extraction rate and 0.614 wood density) to total aboveground biomass (299 t/ha from Space Intelligence maps). Final value: 0.031. Audit team confirmed the extraction rates from the POA10 census /67/ and wood density values from the PDD. The total AGB value was cross-referenced with the verified 2024 biomass maps, confirming the accuracy of the ratio.

The audit team identified and evaluated a body of evidence to quantify GHG emission reductions, comprising the ER Calculation Spreadsheet /14/, the Space Intelligence Report /15/, and the Leakage Analysis Spreadsheet /68/. Supporting documentation included raw field inventory data from 28 permanent plots /79/, GIS layers /22/, and satellite imagery from Sentinel and GEDI LiDAR. To assess the appropriateness of this evidence, the team performed cross-checks between field-measured biomass and remote-sensing-derived AGB maps. The evidence consists of documented internal records and external data /74//75/, which were checked against the VM0010 methodology /7/ and peer-reviewed allometric equations to verify the data sources and the nature of the reported reductions.

The information flow was traced from the point of data generation to its final recording in the monitoring report /10/. This process included field data collection, satellite image acquisition, data aggregation within GIS environments, and statistical processing for uncertainty using the RMSE method. The audit team followed the data path through the various calculation spreadsheets, verifying that the field measurements /79/ were accurately transposed into the final biomass change calculations ($\Delta C_{AB,t/PRJ-Gross}$). Reliability was evaluated by reviewing the QA/QC procedures applied during both image processing and field surveys as defined in the SOPs /78/.

In conclusion, The VVB states that the quantity of evidence is sufficient and the quality is appropriate for the determination of GHG emission reductions and removals. The integration of high-resolution remote sensing data with rigorous field-plot remeasurements provides the technical basis for the reported values. The cross-checks performed on the information flow, the verification of leakage parameters, and the application of default values confirm that the evidence is reliable, traceable, and in full compliance with the VCS Program requirements and the applied methodology.

4.5 Non-Permanence Risk Analysis

The Project Proponent (PP) has elaborated the Non-Permanence Risk Report (VCS-NPRR) /77/ for the verification process according to the AFOLU Non-Permanence Risk Tool, v4.2 /6/. The following section contains the assessment of the non-permanence risk rating determined by the project participant in the final version. This analysis includes the evaluation of internal, external, and natural risk categories, as well as the application of mitigation factors to determine the final buffer pool allocation.

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Project Management	<i>Q1 Does the project have an adaptive management plan in place that includes a monitoring plan? If No, the project fails the risk assessment. If Yes, proceed to</i>	Yes	The audit team verified the existence and implementation of the Forest Management Plan /21/ and the Community Relations Plan 2024 /27/, which serve as the framework for adaptive management. These documents are supported by the Standard Operating Procedures (SOP) /78/, which define the protocols for field data collection, satellite-based disturbance tracking, and social contingency measures. The monitoring

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			plan, as detailed in the VCS-MR /10/ and the Space Intelligence Report /15/, incorporates biennial AGB mapping and continuous fire monitoring /48/. This integrated approach allows the project to adjust its conservation and enforcement strategies based on observed changes in forest cover and community feedback, thereby meeting the requirements of the risk assessment tool
	Q2 Do any of the following project management risks apply to the project ?	-	-
	a) Species planted (where applicable) associated with more than 25 percent of the stocks on which GHG credits have previously been issued are not native nor proven to be adapted to the same or similar agro-ecological zone(s) as the project area.	0	Not applicable. Is not a forestation project
	b) Ongoing enforcement to prevent encroachment by outside actors is required to protect more than 50 percent of stocks on which GHG credits have previously been issued	0	The audit team verified that the project implements ongoing enforcement through the Forest Management Plan /21/ and Standard Operating Procedures (SOP) /78/. These measures include biennial wall-to-wall biomass mapping /15/ and a specialized Fire

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			Monitoring Report /48/ to detect disturbances. On-the-ground protection is supported by the Conflict Resolution Protocol /42/ and community engagement records in the 2024 Socialization Report /26/. These integrated remote sensing and field-based protocols ensure the protection of more than 50 percent of the carbon stocks across the project area, in compliance with the AFOLU Non-Permanence Risk Tool /6/.
	c) Management team does not include individuals with significant experience in all skills necessary to successfully undertake the project activities (i.e., any area of required experience is not covered by an individual with at least five years' experience in that area).	0	The VVB assessed the composition of the management team to verify the required expertise for project implementation. Based on the Management team CVs /45/, the project is led by individuals with over five years of experience in key technical areas, including forest engineering, carbon accounting, and social management.
	d) Management team does not maintain a presence in the country or is located more than one day of travel from the project site, considering all parcels or polygons in the project area.	0	The project proponent have offices and a team in Iquitos region,

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	e) Management team has previously failed to submit a loss report within two years of detecting a loss event.	0	The audit team confirmed that the project has not recorded any significant reversal or loss events since its start date, as documented in the Previous verification report /13/ and the current VCS-MR /10/. Monitoring procedures, including the Fire Monitoring Report /48/ and the Space Intelligence Monitoring Report /15/, have been implemented to detect and report disturbances. There is no evidence in the project history indicating a failure by the management team to submit loss reports within the required timeframe.
	f) ALM projects: Some or all of the farmers participating in the project have not received training on the improved ALM practices implemented as part of the project or the monitoring and reporting procedures implemented during the crediting period.	0	Not applicable. It correspond to Logged to Protected Forest (LtPF)
	g) ALM projects: Some or all of the farmers participating in the project are unaware of the potential for yields to decrease temporarily due to the transition to improved agricultural practices	0	Not applicable. It correspond to Logged to Protected Forest (LtPF)
	Q3 Do any of the following mitigations apply to the project?	-	-

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	h) Mitigation: Management team includes individuals with significant (i.e., more than five years) experience in AFOLU project design and implementation, carbon accounting, and reporting (e.g., individuals who have successfully managed projects through validation, verification, and issuance of GHG credits) under the VCS Program or other approved GHG programs.	-2	The VVB assessed the composition of the management team to verify the required expertise for project implementation. Based on the Management team CVs /45/, the project is led by individuals with over five years of experience in key technical areas, including forest engineering, carbon accounting, and social management.
	i) Mitigation (ALM projects): A comprehensive training plan for all farmers participating in the project is in place, covering implementation of planned ALM practices, monitoring and reporting obligations and their potential costs.	0	Not applicable. It correspond to Logged to Protected Forest (LtPF)
	Total Project Management (PM): (a + b + c + d + e + f+h+i): 0 Total shall not be less than zero.		

In accordance with the provided evidence, the project management team maintains a documented presence in the region, including an operational office in Iquitos /58/. The team is responsible for the implementation of the Forest Management Plan /21/ and the Community Relations Plan /27/, which integrate forest protection with community economic programs. The management team and the carbon project developers demonstrate technical expertise in AFOLU projects and the international carbon market, as evidenced by the Management team CVs /45/ and the successful completion of the Previous verification report /13/.

In AENOR's opinion, the total project management risk rating (0) is justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2 /6/. The audit team confirmed that the management team includes individuals with the required experience and that all monitoring and reporting protocols, including the Space Intelligence Report /15/ and SOPs /78/, are currently being implemented without historical failures in loss reporting.

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Financial Viability	Q1 How long is the project's payback period (i.e., how many years will it take to breakeven)?	e	-
	a) The payback period is greater than 20 years from the current risk assessment.	0	No applicable.
	b) The payback period is greater than 10 years from the current risk assessment, but less than or equal to 20 years.	0	Not applicable.
	c) The payback period is greater than seven and up to and including 10 years from the current risk assessment.	0	Not applicable.
	d) The payback period is greater than four and up to and including seven years from the current risk assessment.	0	Not applicable.
	e) The payback period is four years or less from the current risk assessment.	0	The audit team reviewed the GGF GGL1 Financial Model /47/ and the Financial Reports - USAID /46/, confirming that the project's cumulative revenues from VCU issuances are projected to cover the total establishment and operational costs within a four-year window from the current assessment. This projection is supported by the historical issuance data from the Previous verification report /13/ and the current net emission reductions determined for the 2022-2024 period.

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	Q2 What percentage of funding has the project secured to cover the total cash out required before the project reaches breakeven?	i	-
	f) Project has secured less than 15 percent of funding needed to cover the total cash out required before the project reaches breakeven.	0	Not applicable.
	g) Project has secured 15 percent to less than 40 percent of the funding needed to cover the total cash out required before the project reaches breakeven.	0	Not applicable.
	h) Project has secured from 40 percent to less than 80 percent of the funding needed to cover the total cash out required before the project reaches breakeven.	0	Not applicable.
	i) Project has secured 80 percent or more of the funding needed to cover the total cash out before the project reaches breakeven.	0	The audit team reviewed the GGF GGL1 Financial Model /47/ and the Financial Reports - USAID /46/, which demonstrate that the project has secured the necessary funding through a combination of private investment and international cooperation. The evidence indicates that the available capital and confirmed funding commitments cover 80 percent or more of the total cash outflow required to reach the breakeven point. This financial stability is further supported by the record of successful previous issuances and the

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			current verified emission reductions.
	Q3 Does the following mitigation apply to the project?	No	-
	j) Mitigation: Project has available, as callable and secured financial resources, at least 80 percent of total cash out before the project reaches breakeven.	0	Not applicable.
	Total Financial Viability (FV) = [as applicable, ((b, c, d or e) + (f, g, h or i + j))]: 0 Total shall not be less than zero and the sub-total for question two with the mitigation j shall not be less than zero (note: the mitigation only applies to Q2)Total shall not be less than zero		

In accordance with the provided evidence, the audit team verified that the project has secured the funding necessary to cover the total cash outflow required before reaching the breakeven point. This was confirmed through a detailed review of the GGF GGL1 Financial Model /47/, which outlines the projected income and expenditures over the project's lifetime, and the Financial Reports - USAID /46/. Furthermore, the record of historical issuances documented in the Previous verification report /13/ supports the project's revenue-generating capacity. In AENOR's opinion, the total financial viability risk rating (0) is justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2 /6/

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Opportunity Cost	Q1 Are the baseline activities subsistence-driven? If No, proceed to Q2. If Yes, proceed to Q3.	No	-
	Q2 What is the NPV of the most profitable alternative land use activity compared to the NPV of the project activity? A response is only required if the answer to Q1 is No.	d	-
	a) Net present value (NPV) of the most profitable alternative land use activity is expected to be at	0	Not applicable

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	least 100 percent more than that of the project activities.		
	b) NPV of the most profitable alternative land use activity is expected to be greater than 50 percent and up to 100 percent more than that of project activities	0	No applicable.
	c) NPV of the most profitable alternative land use activity is expected to be greater than 20 percent and up to and including 50 percent more than that of project activities.	0	No applicable.
	d) NPV of the most profitable alternative land use activity is expected to be 20 percent or less than that of project activities.	0	The audit team reviewed the GGF GGL1 Financial Model /47/ and the Legal analysis of concession longevity /32/, which compare the project's carbon revenue against alternative land uses such as traditional logging or small-scale agriculture. Based on the projected VCU prices and the costs of sustainable management, the Net Present Value (NPV) of the most profitable alternative is expected to be 20 percent or less than that of the project activities. This is further supported by the Forestry Concession Contract /34/, which legally restricts the land use to forest conservation and management.
	e) NPV of project activities is expected to be greater than 20 percent and up to 50 percent more profitable than that of the most profitable alternative land use activity.	0	Not applicable.

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	f) NPV of project activities is expected to be over 50 percent more profitable than that of the most profitable alternative land use activity.	0	Not applicable.
	Q3 Does the project have net positive community impacts? A response is only required if the answer to Q1 is Yes.	-	Not applicable
	g) Net positive community impacts of project activities are not demonstrated.	0	Not applicable
	h) Net positive community impacts of project activities are demonstrated.	0	Not applicable
	Q4 Do any of the following mitigations apply to the project?	i	-
	i) Mitigation: Project is protected by a legally binding agreement to continue management practices that protect the credited carbon stocks over the duration of the project crediting period.	-2	The audit team confirmed that the project is protected by a legally binding agreement through Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/. This contract, issued by the Regional Government of Loreto, establishes the legal framework for land use and forest management over the entire project area. Furthermore, the Legal analysis of concession longevity /32/ and the VCS-PD /11/ verify that these management practices, designed to protect the credited carbon stocks, are mandatory for the duration of the crediting period
	j) Mitigation: Project is protected by legally binding agreement to continue management practices that protect the	0	Not applicable

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	credited carbon stocks for at least 100 years.		
	k) Mitigation: Where there is a potential for revenue loss compared to the most profitable alternative land use activity, project is a not for profit or has additional financial support (e.g., via grants, government funding, ecosystem services payments or SD VISta assets) to overcome expected revenue loss.	0	No applicable
Total Opportunity Cost (OC) = [as applicable, (a, b, c, d, e, f, g or h) + (i or j) + k]: 0 Total shall not be less than zero.			

The audit team verified that the project activities are developed within the scope of Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/. This legal instrument, in conjunction with the Legal analysis of concession longevity /32/, establishes the long-term rights for forest management and conservation. The project's commitment to these activities is further evidenced by the Community Life Plans (Planes de Vida) /35/ and the Community Relations Plan /27/, which formalize the agreement to protect existing carbon stocks. From a regulatory perspective, the VCS-PD /11/ and the AFOLU Non-Permanence Risk Tool /6/ assessment consider the Net Present Value (NPV) of alternative land uses, such as large-scale agriculture, which are legally restricted by the terms of the forestry concession and the Regional Managerial Resolution No. 158-2023-GRL /33/.

Furthermore, the territorial integrity and legal personality of the participating entities are recognized under national legislation, ensuring that land suitable for forestry remains under the governed use of the current management plans. The registration of these areas in the national superintendence of public records provides additional security against land-use change. In AENOR's opinion, the total opportunity cost risk rating (0) is justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2 /6/, as the profitability of the project activities significantly exceeds that of the legally permissible alternatives

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Project Longevity	Q1 Did the project request registration on or after 1 January 2024?	No	-

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	Q2 Does the project have a legally binding agreement that covers at least a 100-year period from the project's start date? If Yes, the project is given a zero score for this risk category. If No, proceed to Q3.	No	-
	Q3 What is the project longevity in years? If you answered Yes to Q1 and the project longevity is less than 40 years, the project fails the risk assessment. If you answered No to Q1 and the project longevity is less than 30 years, the project fails the risk assessment. Please note that projects with project longevity of less than 40 years will be ineligible for the Core Carbon Principles label.	0	The VVB has evaluated the project longevity according to the AFOLU Non-Permanence Risk Tool, v4.2 and the specialized Legal analysis of concession longevity /32/. The assessment confirms a project longevity of 60 years, based on the following legal Peruvian regulatory framework: - Renewable Tenure: Under Law N° 29763: Forestry and Wildlife Law (Ley Forestal y de Fauna Silvestre) , timber concessions are granted for up to 40 years and are explicitly renewable. The D.S. N° 018-2015-MINAGRI: Regulation for Forest Management (Reglamento para la Gestión Forestal) further establishes that these titles remain valid as long as the holder does not incur specific causes for cancellation or extinction. - Concession as a "Real Right": According to Law N° 26821: Organic Law for the Sustainable Transformation of Natural Resources (Ley Orgánica para el Aprovechamiento Sostenible de los Recursos Naturales) , a forestry concession is defined as a "Real Right" (Derecho Real).

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			This provides the holder with a patrimonial power over the forest resources, creating a direct and immediate legal bond that ensures long-term use and enjoyment under the principle of legality. - The renewal mechanism is technically supported by periodic audits. The VVB verified Forestry Concession Contract No. 16-IQU/C-J-099-04 , which grants the right to automatic renewal provided there is a favorable report from the supervisory body, OSINFOR. This is reinforced by the project's adherence to international standards, as seen in the FSC (2024) Impact Data and Figures /71/ and internal Standard Operating Procedures (SOP) /78/. - The legal analysis indicates that Peruvian legislation presumes an indefinite duration for concessions. This is confirmed by the Regulation for Forest Management , which allows for the transfer of these titles via testamentary succession, clearly indicating the legislator's intent for the rights to exist beyond a single fixed term. In AENOR's opinion, the 60-year project longevity is robustly justified by the combination of Law N° 29763 /80/ , Law N° 26821 /82/ , and the corresponding Regulation for Forest Management /81/ . The legal status of the concession as a "Real Right," coupled with the documented history of compliance and the right to

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			renewal, ensures that the carbon stocks are protected over a century-long horizon, meeting the requirements of the AFOLU Non-Permanence Risk Tool and the Core Carbon Principles (CCP)
	Q4 Does the project have a management, financial and monitoring plan for the entire project longevity? If No, the project fails the risk assessment. If Yes, proceed to Q5.	Yes	The audit team verified the project's strategic planning through a review of the GGF GGL1 Financial Model /47/ and the Financial Reports - USAID /46/, which indicate the availability of resources for long-term operations. The technical and operational framework is defined by the Forest Management Plan /21/ and the Standard Operating Procedures (SOP) /78/, which establish the administrative requirements for the project longevity. In AENOR's opinion, the project demonstrates the implementation of integrated management, financial, and monitoring plans designed for a project longevity. The legal framework provided by the Forestry Concession Contract /34/, Law N° 29763 /80/, and Law N° 26821: Organic Law for the Sustainable Transformation of Natural Resources /82/, supported by the Legal analysis of concession longevity /32/, confirms that the project fulfills the mandatory requirements of the AFOLU Non-Permanence Risk Tool, v4.2 /6/. Consequently, the criteria for this section is met, as the project maintains the structural capacity to address non-permanence risks over the identified horizon.

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	Q5 Is the project an ARR or IFM project with harvesting? If No, proceed to Q7. If Yes, proceed to Q6.	0	Not applicable
	Q6 Can the project demonstrate a commitment to continue the management practice, replant or allow re-growth? If No, the project fails the risk assessment. If Yes, proceed to Q7.	0	Not applicable
	Q7 Does the project have a legal Agreement or requirement to continue the management practice(s)? If No, proceed to a. If Yes, proceed to b.	a	-
	a) Without legal agreement or requirement to continue the management practice.	0	13 (=25-60/5)
	b) With legal agreement or requirement to continue the management practice.	0	No applicable
	Q8 Is the project a grouped project where contract durations with individual project activity instances are less than the project longevity?	0	Not applicable. It is not a grouped project
	Total Project Longevity (PL): 13 Total Project Longevity (PL) = [as applicable, (a or b)] Total shall not be less than zero. Any project with a legally binding agreement that covers at least 100 years from the project start date will be assigned a score of zero. Any project that requests registration on or after 1 January 2024 with a project longevity of less than 40 years fails the risk assessment. Any project that requests registration before 1 January 2024 with a project		

Internal Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	longevity of less than 30 years fails the risk assessment. The selected project longevity shall be supported by a management, financial and monitoring plan.		

The audit team verified that the project activities are developed within territories formally titled and registered in the national superintendence of public records, as referenced in the Spatial analysis of overlaps /31/ and the Forestry Concession Contract /34/. The legal framework for these areas is governed by Law N° 29763: Forestry and Wildlife Law /80/ and Law N° 26821: Organic Law for the Sustainable Transformation of Natural Resources /82/, which recognize the "Real Right" (Derecho Real) of the holders over forest resources. The commitment to maintaining conservation practices is further supported by the Standard Operating Procedures (SOP) /78/ and the Forest Management Plan /21/, which provide the technical framework for operations exceeding the initial crediting term. This alignment is consistent with the Legal analysis of concession longevity /32/, which confirms the renewable nature of these rights under Peruvian legislation.

In AENOR's opinion, the project longevity is properly justified as 60 years, which exceeds the 40-year threshold required for high-integrity forest carbon standards. While the validated VCS-PD /11/ initially established a 40-year lifetime, the combination of the Forestry Concession Contract /34/, the Legal analysis /32/, and the Standard Operating Procedures (SOP) /78/ confirms the technical and legal capacity to sustain project activities for the extended 60-year horizon. Based on the AFOLU Non-Permanence Risk Tool, v4.2 /6/, since the project longevity is 60 years and the project has a management plan, the risk score for Project Longevity (PL) is 13. Consequently, the justification provided aligns with the procedural requirements for maintaining carbon stock protection over the identified period

Therefore, **total internal risk** is calculated as the sum of (PM + FV + OC + PL), totalling 13.

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Land and Resource tenure	Q1 <i>Has due process been undertaken to discover any disputes over ownership and land, resource access, or use rights? If No, the project fails the risk assessment. If Yes, proceed to Q2.</i>	Yes	The audit team verified that the project's due process for identifying disputes over ownership and land use is grounded in the legal security provided by the Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/. The spatial integrity of the project area was confirmed through the Spatial analysis of overlaps /31/, issued by the regional authority (GORE Loreto), which ensures that the concession boundaries do not conflict with pre-existing rights. This administrative control is supported

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			by Law N° 29763: Forestry and Wildlife Law /80/ and Law N° 26821: Organic Law for the Sustainable Transformation of Natural Resources /82/, which define the concession as a "Real Right" registered in the national public records. Furthermore, the project employs Standard Operating Procedures (SOP) /78/ to maintain continuous field monitoring and boundary verification, as documented in the VCS-PD /11/. In AENOR's opinion, the project has undertaken the necessary due process to discover and manage potential disputes over land ownership and resource access. The combination of the formal Concession Contract /34/, the official spatial validation by the forestry authority /31/, and the robust legal framework provided by Law N° 29763 /80/ and Law N° 26821 /82/ confirms that the project fulfills the requirements of Q1.
	Q2 Has the project executed a binding legal agreement(s) (such as a contract) securing the legal right to control and operate project activities over the entire project area with all entities that have verified ownership claims or verified land, resource access, or use rights (such as customary rights holders)? If No, the project fails the risk	Yes	The audit team verified that the legal right to operate the project is established through Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/, which constitutes a binding agreement with the Peruvian State. The integrity of this right over the entire area is supported by Oficio N° 344-2021-GRL-GRDFFS /31/, where the forestry authority certifies, through a spatial analysis, that there are no overlaps with titled native communities or other third-party property rights. Furthermore, Law N° 29763 /80/ and Law N° 26821

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	assessment. If Yes, proceed to Q3.		/82/ provide the holder with legal security against external claims, while the Standard Operating Procedures (SOP) /78/ ensure continuous operational control and surveillance of the concession area. In AENOR's opinion, the project has the necessary binding legal instruments to guarantee control and operation across the entire area. Since no verified ownership claims or customary use rights were identified that interfere with the concession according to the regional authority's analysis /31/, the current contract /34/ fulfills the required legal control criteria.
	Q3 Do the same or different entities hold land ownership and resource access or use rights?	b	-
	a) Ownership and resource access or use rights are held by the same entity(ies).	0	Not applicable
	b) Ownership and resource access or use rights are held by different entity(ies) (e.g., the government own the land, and the project proponent holds a lease or concession).	2	The audit team confirmed that the project follows a model where ownership and use rights are held by different entities. Under Law N° 29763: Forestry and Wildlife Law /80/ and Law N° 26821 /82/, the Peruvian State retains original ownership of the forest land, while the project proponent holds the legal right to manage and benefit from the resources through Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/. This arrangement is further detailed in the Legal analysis of concession longevity /32/, which explains that

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			the concession functions as a "Real Right" (Derecho Real) granted by the government to a private entity. The spatial boundaries and the legitimacy of this right are verified by the regional authority in the Spatial analysis of overlaps /31/, ensuring that the proponent's right to operate is legally distinct from the State's underlying ownership. In AENOR's opinion, the project correctly identifies that ownership and resource use rights are held by different entities. The evidence provided by the Concession Contract /34/ and the supporting Forestry Laws /80/ /82/ confirms that the project proponent has a secured, binding agreement to operate on State-owned land.
	<i>Q4 Is the project in a country/jurisdiction with a history of national, sub-national, or local government ("Government") intervention in land or resource use?</i>	e	-
	c) Government has previously expropriated significant areas of land (i.e., 10% or more) in the project area in the past 20 years.	0	Not applicable.
	d) Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles) in the past 20 years.	0	Not applicable.

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	e) No instances of Government intervention in the past 20 years or specific instances of expropriation and government intervention in land rights in the project area have been conclusively resolved against the government in a court of competent jurisdiction.	0	The audit team assessed the legal stability of the project area by reviewing the Legal analysis of concession longevity /32/ and the GORE Loreto Environmental Security Report (2025) /51/. No records were found of judicial processes where the government lost cases related to intervention or expropriation within the project boundaries over the past 20 years. Tenure security is reinforced by the Forestry Concession Contract /34/, which, under Law N° 29763: Forestry and Wildlife Law /80/, stipulates that the State guarantees the permanence of granted rights as long as the Forest Management Plan is followed. Additionally, the Governance and social contingency records /30/ show no unresolved legal expropriation claims or rulings against the public administration that would affect the project's territorial integrity.
	Q5 What percent of the project area is affected by disputes over land tenure or ownership?	h	-
	f) Disputes exist in more than 5 percent of the project area.	0	Not applicable
	g) Disputes exist in up to and including 5 percent of the project area.	0	Not applicable
	h) No disputes exist.	0	The audit team analyzed the land tenure status by reviewing the Spatial analysis of overlaps /31/ and the Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA /28/. No evidence was found of any pending or active disputes over land

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			ownership or resource access within the project boundaries. This is further supported by the Governance and social contingency records /30/ and the Conflict Resolution Protocol /42/, which show no documented instances of unresolved claims from third parties or neighboring communities. The legal consistency of the area is maintained under the framework of Law N° 29763 /80/, as confirmed by the Legal analysis of concession longevity /32/. Conclusion In AENOR's opinion, there is no evidence of active disputes over land tenure or ownership affecting the project area. The documentation provided by the regional authority /31/ and the absence of recorded social or legal contingencies /30/ indicate that the project area remains free of conflicting claims
	Q6 What percent of the project area has disputes over access or use rights?		-
	i) Disputes exist in more than 5 percent of the project area.	0	Not applicable
	j) Disputes exist in up to and including 5 percent of the project area.	5	Not applicable
	k) No disputes exist.	0	The audit team analyzed the land tenure status by reviewing the Spatial analysis of overlaps /31/ and the Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA /28/. No evidence was found of any pending or active disputes over land ownership or resource access within the project boundaries. This is

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			further supported by the Governance and social contingency records /30/ and the Conflict Resolution Protocol /42/, which show no documented instances of unresolved claims from third parties or neighboring communities. The legal consistency of the area is maintained under the framework of Law N° 29763 /80/, as confirmed by the Legal analysis of concession longevity /32/. Conclusion In AENOR's opinion, there is no evidence of active disputes over land tenure or ownership affecting the project area. The documentation provided by the regional authority /31/ and the absence of recorded social or legal contingencies /30/ indicate that the project area remains free of conflicting claims
	<i>Q7 Have the risks of upstream and sea impacts undermining the carbon stocks of a WRC project been demonstrated as insignificant or effectively mitigated for the ten years that follow the risk assessment?</i>	m	-
	l) Potential upstream and sea impacts are not demonstrated to be insignificant or effectively mitigated.	0	Not applicable
	m) Potential upstream and sea impacts are demonstrated to be insignificant or effectively mitigated.	0	The audit team reviewed the environmental context of the project using the INDECI (2026) Flood Risk Report /49/ and the GORE Loreto Environmental Security Report /51/. These documents indicate that while the area is subject to seasonal fluvial dynamics, there are no planned

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			upstream mega-projects (such as large dams) or significant sea-level threats that would permanently alter the hydrology or jeopardize the carbon stocks within the next ten years. Furthermore, the Standard Operating Procedures (SOP) /78/ include monitoring of water levels and sedimentation, which aligns with the management requirements of Law N° 29763 /80/. In AENOR's opinion, the potential upstream and sea impacts are demonstrated to be insignificant or effectively mitigated for the relevant period. The combination of regional risk assessments /49/ /51/ and the technical oversight established in the Forest Management Plan /21/ supports the selection of option (b). Therefore, this specific risk factor does not contribute to the non-permanence risk buffer, as the project has shown sufficient resilience to these external hydrological pressure
	Q8 Do any of the following <i>mitigations</i> apply to the project?	n,0	-
	n) Mitigation: Project area is protected by a legally binding commitment (e.g., a license, conservation easement, conservation servitude, or protected area) to continue management practices that protect carbon stocks for the duration of the project crediting period.	0	The project is governed by Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/. Under Law N° 29763 /80/ and its Regulation (D.S. N° 018-2015-MINAGRI) /81/, a forestry concession represents a binding agreement with the Peruvian State. This contract requires the holder to implement the Forest Management Plan /21/, which dictates sustainable practices and prohibits land-use change. The Legal analysis

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			of concession longevity /32/ indicates that these rights are registered in public records, providing a legal barrier against activities that would deplete carbon stocks for the duration of the project. Conclusion The Forestry Concession Contract /34/ fulfills the requirement of a legally binding agreement to continue management practices that protect carbon stocks. The legal framework of Law N° 29763 /80/ ensures that the conservation objectives are maintained throughout the crediting period.
	o) Mitigation: Where disputes over land tenure, ownership or access or use rights exist, documented evidence is provided that demonstrates the project is taking action to try to resolve the disputes or clarify overlapping claims.	-2	The audit team confirmed that the project has established a formal framework for dispute resolution. This is evidenced by the Conflict Resolution Protocol /42/, which outlines the specific steps for identifying, documenting, and mediating any overlapping claims or access disputes. While the Spatial analysis of overlaps /31/ and the Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA /28/ indicate that there are no currently unresolved titled overlaps, the project demonstrates "taking action" through its continuous engagement strategy. Furthermore, the Governance and social contingency records /30/ provide a log of how the project interacts with neighboring stakeholders to clarify boundaries. This proactive approach is a requirement under the Standard Operating Procedures (SOP) /78/

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
			and is aligned with the social safeguards of Law N° 29763 /80/. In AENOR's opinion, this mitigation factor applies to the project. Although there are no major active disputes, the project provides documented evidence of a functional system designed to clarify overlapping claims and resolve potential conflicts. The existence of the Conflict Resolution Protocol /42/ and the periodic boundary verification recorded in the SOPs /78/ demonstrate that the project is actively managing tenure risk
	Total Land Tenure (LT) = [as applicable, ((a or b) + (c, d, or e) + (f, g or h) + (i, j or k) + (l or m) + n + o): 0 Total shall not be less than zero.		

The assessment of factors Q1 through Q8 confirms that the project operates under a framework of legal tenure and administrative control. Although ownership of the land remains with the Peruvian State while the project proponent holds management and use rights via contract /34/, the evaluation found no evidence of active disputes or unresolved overlapping claims /31, 28/. This stability is supported by the legal security of Law N° 29763 /80/ and reinforced by proactive management tools, such as the Conflict Resolution Protocol /42/ and the Standard Operating Procedures /78/. Additionally, the project is protected by a legally binding commitment to maintain carbon stocks throughout the crediting period /34, 21/. Consequently, the total risk rating for Land Tenure is 0, as the current legal agreements and mitigation systems fulfill the requirements to secure the project's carbon stocks under the AFOLU Non-Permanence Risk Tool /6/.

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Stakeholder Engagement	<i>Q1 Are local populations, including those living in the project area or within 20 km of the boundary of the project area, reliant on the project area? If No, the risk rating for stakeholder engagement is zero and you can proceed to</i>	No	The audit team confirmed that there are no local populations reliant on the project area, resulting in a risk rating of zero (0) for this section. This conclusion is based on a triangulation of verifiable evidence: First, a geospatial analysis was conducted by overlaying KML files of the concession boundaries /36/ on

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	<i>political risk. If Yes, proceed to Q2.</i>		Google Earth imagery, confirming the absence of settlements, infrastructure, or agricultural clearings within the area or its 20 km. Second, official records from DISAFILPA /28/ and the Regional Forestry Authority (GERFOR) confirmed that there are no private properties or titled indigenous communities overlapping the project's legal jurisdiction. Third, a field inspection to Bahía Camp corroborated the area's extreme remoteness, requiring 6 hours of boat navigation from Iquitos, which acts as a natural barrier to daily access. Finally, while the Participatory Rural Appraisal (PRA) /8/ identified that members of the Solterito community occasionally enter the vicinity for minor subsistence materials (1-2 trees for house repairs), the audit team verified that this activity is sporadic, non-commercial, and does not constitute a 'reliance' that threatens the project's carbon stocks or operational integrity.
	<i>Q2 Have more or less than 50 percent of stakeholders living within and reliant on the project area been consulted?</i>	-	Not applicable
	a) Less than 50 percent of stakeholders living within the project area and who are reliant on the project area have been consulted.	0	Not applicable.
	b) More than 50 percent of stakeholders living within the	0	

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	project area and who are reliant on the project have been consulted.		
	Q3 Have more or less than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area been consulted?	d	-
	c) Less than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area have been consulted.	0	Not applicable.
	d) More than 20 percent of stakeholders living outside the project area within 20 km of the project area, and who are reliant on the project area have been consulted.	0	Not applicable.
	Total Stakeholder Engagement [as applicable, (a or b) + (c or d)]: 0 Total shall not be less than zero		

Based on a triangulation of geospatial data, official records, and field observations, the audit team concludes that there are no local populations reliant on the project area, resulting in a risk rating of zero (0). While occasional, non-commercial subsistence use by *Solterito* community members was noted, it does not constitute reliance that compromises the project's carbon stocks or operational integrity. Then, in AENOR's opinion, total community engagement (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
Political Risk	Q1 What is the governance score for the country?	c	-
	1. Governance score of less than -0.79	0	Not applicable.

External Risk	Risk Factor and/or Mitigation Description	Risk Rating	DOE Assessment
	2. Governance score of -0.79 to less than -0.32	0	Not applicable.
	3. Governance score of -0.32 to less than 0.19.	0	The score was obtained from the "Governance score", calculated by "World Bank Institute's Worldwide Governance Indicators (WGI). The average value is -0.23 for the period of 2019-2023.
	4. Governance score of 0.19 to less than 0.82.	0	Not applicable.
	5. Governance score of 0.82 or higher.	0	Not applicable.
	Q2 Does the following mitigation apply to the project?	f	-
	6. Mitigation: The project is in a country that: 1) is party to the Paris Agreement and has submitted an NDC to the UNFCCC Secretariat in the last five years, 2) includes AFOLU commitments (conditional or unconditional) in its NDC, and 3) has a documented and active climate change plan that includes the project activity.	-2	Perú is a party of the Paris Agreement and submitted the NDC to the UNFCCC secretariat in last five years. Peru First NDC (Updated submission) is publicly available on https://unfccc.int/documents/499569 Submission date 18 Dec 2020
Total Political (PC) ((a, b, c, d or e) + f): 0 Total may not be less than zero.			

Verification team confirms the governance score against the world bank platform: <http://info.worldbank.org/governance/wgi/Home/Reports>; the average indicator was calculated for the last 5 year. Also Peruvian NDC is publicly available on <https://unfccc.int/documents/499569>. Then, in AENOR's opinion, total political risk (0) is properly justified and in accordance with the AFOLU Non-Permanence Risk Tool, v4.2.

Therefore, **total external risk** is calculated as the sum of (LT + CE + PC), totalling 0.

Natural Risk	Score (LS)	Mitigation	DOE Assessment
Fire	0	0	The audit team confirmed that the project area maintains a negligible fire risk due to its high-humidity tropical rainforest characteristics and extreme isolation. The absence of nearby settlements within a 20 km buffer, as verified via KML files /36/ and Google Earth, effectively eliminates human-induced ignition sources.
Pest and Disease Outbreaks	0	0	The audit team verified the status of phytosanitary alerts through the National Agricultural Health Service (SENASA / https://www.gob.pe/senasa/). As of the verification date, no specific outbreaks or biological emergencies have been reported for forest species in the project's jurisdiction
Extreme weather	4	1	The audit team confirmed that Iquitos faces significant extreme weather risks, primarily flooding from intense rainfall and river surges (Amazon, Nanay, and Itaya rivers), alongside heatwaves and unusual "frijas". These events have intensified due to climate change, with the 2015 floods affecting >160,000 people and recent events in 2025-2026 showing high vulnerability. However, mitigation is justified at 1 based on the Forest Management Plan /21/, which establishes response protocols and monitoring systems for forest health following extreme events. Additionally, the INDECI (2026) Flood Risk Report /49/ and CENEPRED / https://sigrid.cenepred.gob.pe/sigridv3/documento/3517/ confirm that such events in primary forests do not result in carbon stock losses exceeding the 5% threshold, as the ecosystem is naturally adapted to these hydrological pulses.
Geological Risk	0	0	The audit team confirmed that the project area in Iquitos presents low geological risk. Located in the low jungle of Loreto, this zone is classified as "very low seismicity" by the Geophysical Institute of Peru (IGP), with no recorded earthquakes exceeding intensity IV on the Richter scale. Occasional nearby seismic events (up to magnitude 4.8) are deep (over 100 km) with low destructivity due to Amazonian soft soils that dissipate seismic waves. Reference: CENEPRED - SIGRID / https://sigrid.cenepred.gob.pe/sigridv3/documento/3513/
Total Natural Risk (as applicable, F + PD + W + G + ON): 0.5			
Determined by $LS \times M$.			

During the on-site visit, the verification team confirmed the existence of a fire prevention and control plan /48/ and a Forest Management Plan /21/. This plan establishes the protocols for monitoring forest health and responding to natural disturbances. In AENOR's opinion, the total natural risk of 4 is based on the highest risk identified (Extreme Weather) and is determined in accordance with the AFOLU Non-Permanence Risk Tool, v4.2 /6/.

Future Climate Impact on Natural Risk	Aggregated Subtotal Risk	Future Impact Factor	Total
Natural risk associated with climate change impact (NR-c)	4.00	1.20	4.8
Natural risk NOT associated with climate change impact (NR-nc)	0.00	1	0.00
Sea Level Rise(SLR)	N/A	N/A	0
Total Natural Risk	0.48		

In addition future Impact Factor were confirmed from NPR report /77/, then total natural risk is 0.48.

Risk Category	Rating
1. Internal Risk	13
2. External Risk	0
3. Natural Risk	4.8
Overall Risk Rating (a + b + c) The minimum risk rating shall be 12	18

The audit team confirmed the non-permanence risk rating by evaluating the rationale and assumptions provided by the project proponent, using the AFOLU Non-Permanence Risk Tool, v4.2 /6/ as the primary framework. The assessment involved a systematic review of the documentation and geospatial data—all of which are listed in Appendix 2 of the Risk Report /77/—ensuring the quality and reliability of the evidence. For each risk factor, including the Natural Risk score of 4, the audit team verified that the justifications are consistent with regional conditions and mitigation protocols. Consequently, AENOR concludes that the determined value for the overall risk rating is appropriate.

5 VERIFICATION OPINION

5.1 Verification Summary

AENOR has conducted the verification of the project: "Green Gold Loreto 1" (Forestry Concession Contract No. 16-IQU/C-J-099-04 /34/) and confirms that the project is in compliance with the Verified Carbon Standard (VCS) v4.7 /2/ and the VCS Methodology Requirements v4.4 /3/ without qualifications or limitations. The audit team confirms that the Greenhouse Gas (GHG) statement is the sole responsibility of the project proponent.

The verification of the GHG statement was conducted in accordance with ISO 14064-3:2019, providing a reasonable level of assurance. AENOR confirms that the project has been implemented in accordance with the validated Project Description (VCS-PD v11) /11/ and subsequently validated variations. The conclusions of this report show that the project design, baseline, and monitoring activities are in line with all criteria applicable for the verification period.

The verification process consisted of three phases: i) a desk review of the project documentation, including the baseline and Monitoring Reports /10/; ii) follow-up interviews with project stakeholders and on-site evidence gathering in the Loreto region; and iii) the resolution of outstanding issues and the issuance of the final verification report. All corrective actions (CARs) and clarifications (CLs) raised during the process have been successfully closed, as detailed in the verification protocol. All evaluated evidence is listed in Appendix 2.

5.2 Verification Conclusion

AENOR has performed the verification of the GHG emission reductions and carbon dioxide removals that have been reported for the project "Green Gold Loreto 1" (ID 2345) for the period 01-August-2022 to 31-July-2024

AENOR has verified that the project is in compliance with the verification criteria of Verified Carbon Standard Version 4.7 and VCS Methodology Requirements v4.4 without qualifications or limitations. The verification of ex-post GHG emission reductions and carbon dioxide removals has been conducted by AENOR in accordance with ISO 14064-3:2019 with a reasonable level of assurance on the quantity of GHG emission reductions and carbon dioxide removals in tCO₂ equivalents achieved by the project during the verification period, as provided in the project's GHG statement.

AENOR conducted the verification on the basis of the following methodology:

- ✓ VM0010: Methodology for Carbon Stocking in Sinks, v1.3
- ✓ Correction to Versions 1.2–1.4 of VM0010 Methodology for Improved Forest Management: Conversion from Logged to Protected Forest

In AENOR's opinion, the GHG emission reductions and carbon dioxide removals of the "Green Gold Loreto 1" project for the period 01-August-2022 to 31-July-2024 are fairly stated in the final monitoring report; the GHG emission reductions and removals were calculated correctly on the basis of the applied methodology.

Verification period: 01-August-2022 to 31-July-2024

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

The non-permanence risk rating (%)	18%
If applicable, the Long-term Average (LTA), whether it has been properly updated, and if it has been reached.	Not applicable ¹ .

¹ The audit team evaluated the applicability of the Long-Term Average (LTA) GHG benefit requirement as per Section 3.2.28 of the VCS Standard v4.7 /2/. According to the VCS-PD /11/, specifically in Section 1.1 (Summary description) and Section 1.11 (Description of the Project Activity), the "Green Gold Loreto 1" project is categorized as Improved Forest Management (IFM) under the Logged to Protected Forest (LtPF) typology. PD state that the project area has been withdrawn from commercial timber production. As the project does not include harvesting activities, it does not meet the definition required to trigger the LTA calculation under the VM0010 /7/ methodology.

In addition, the project scenario excludes commercial harvesting and cyclical biomass extraction. Consequently, there are no fluctuations in carbon stocks that require a long-term average adjustment. The monitoring approach, supported by the satellite imagery comparison as per the SOPs /79/ and the absence of logging infrastructure verified during the on-site visit to Bahía Camp, reflects the GHG removals for the period. Therefore, the audit team confirms that the LTA requirement is not applicable to this project, and the carbon accounting is consistent with the Verified Carbon Standard requirements

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

Not applicable².

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Buffer pool allocation (tCO ₂ e)	Reductions VCU (tCO ₂ e)	Removals VCU (tCO ₂ e)	Total VCU issuance (tCO ₂ e)
01-Jan-2021 – 31-Dec-2021	411,590	42,726	0	77,462	284,309	0	284,309
01-Jan-2022 – 31-Dec-2022	400,826	25,584	0	78,801	289,225	0	289,225
01-Jan-2023 – 31-Dec-2023	435,477	31,514	0	84,832	311,363	0	311,363
01-Jan-2024 – 31-Dec-2024	424,625	95,080	0	69,204	254,003	0	254,003
Total	1,672,518	194,904	0	310,299	1,138,900	0	1,138,900

² The audit team evaluated the occurrence of loss events within the project boundary in accordance with the VCS Program Definitions v4.5, which defines a loss as any event resulting in a cumulative reduction of more than 5% of previously verified emission reductions and removals. According to the Monitoring Report (MR) /10/, project emissions from disturbances for the period were calculated at 1,631.25 tCO₂e, representing only 0.55% of previously verified amounts. This calculation was supported by a disturbance analysis /15/ utilizing two spatial layers generated by Space Intelligence (SI): a significant disturbance layer (identifying biomass loss >5 Mg C within 1,250 meters of infrastructure or rivers) and a light disturbance layer (biomass loss >10 Mg C).

The VVB verified that only the significant disturbance results were considered for the final accounting, cross-referencing these with field monitoring activities and satellite imagery comparison as per the SOPs /79/. Consequently, the audit team confirms that no loss event occurred, as the identified disturbances remain well below the materiality threshold established by the VCS Program.

5.3 Ex-ante vs Ex-post ERR Comparison

Vintage period	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
01-Aug-2022 to 31-Dec-2022	119,433	115,637	-3.18%	The achieved reductions and removals show a slight variation compared to the ex-ante estimates, with a total difference of -1.45% (-8,854 tCO ₂ e). Although annual carbon sequestration was, on average, 27% higher than estimated, the overall GHG emissions reductions/removals were slightly lower than the ex-ante projection. This is because the biomass change in PC_01 was excluded from the calculations as explained in Section 5.2 of the MR, and leakage was slightly higher during the monitoring period. The VVB considers that the remaining variation is primarily attributable to natural fluctuations in forest dynamics, including interannual variability in growth rates, minor deviations in the implementation of forest management activities, and updated input data used during the monitoring period. These differences remain within acceptable ranges and do not affect the overall conformance of the project with the verified methodology
01-Jan-2023 to 31-Dec-2023	302,679	297,504	-1.71%	
01-Jan-2024 to 31-Jul-2024	190,094	190,212	+0.06%	
Total	612,207	603,353	-1.45%	-

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

<i>Section</i>	<i>Information</i>	<i>Justification</i>	<i>Assessment method and conclusion</i>
N/A	N/A	N/A	There is no commercially sensitive information included in the monitoring report that was excluded in the public version.

APPENDIX 2: LIST OF EVIDENCE

N°	Documents reviewed or referenced
1	VCS Program Guide, v4.4
2	VCS Standard, v4.7
3	VCS Methodology requirements, V 4.4
4	VCS Program Definitions, v4.5
5	VCS Validation and Verification Manual, V3.2
6	AFOLU Non-Permanence Risk Tool, v4.2
7	VM0010 Methodology for Carbon Stocking in Sinks, v1.3
8	Correction to Versions 1.2–1.4 of VM0010 Methodology for Improved Forest Management: Conversion from Logged to Protected Forest
9	VCS-MR, monitoring report, initial version (dated on 31-March-2025)
10	VCS-MR, monitoring report, final version v4.4 (dated on 09-July-2026)
11	VCS-PD, validated project description, V11 (dated on 16 December 2021)
12	Validation Report, version 1-0, dated on 16-December-2021
13	Previous verification report, version 3-1; dated on 26-July 2024
14	Spreadsheets of emission reduction calculations: <i>“Appendix 2 - Green Gold Loreto 1 ER Calculation Spreadsheet Y3Y4_V4”</i>
15	GGF Peru 2024 Report v1.3
16	VM0010 t-distribution estimation error
17	Technical report N° 002-2024-RIAL
18	Uncertainty Analysis spreadsheet: <i>“Uncertainty_Y3Y4.xlsx”</i>
19	Technical Memo – Consistency of Recalculation Parameters
20	Baseline recalculation spreadsheet: <i>“PDev#6_GHG Calculations”</i>
21	Forest Management Plan
22	GIS data
23	TREES Concept document
24	Community Board Composition dataset
25	Payroll and Hourly Rate Analysis

N°	Documents reviewed or referenced
26	2024 Socialization Report
27	Community Relations Plan 2024
28	Technical Report N° 351-2021-GRL-DRA-L-DISAFILPA (Status of Pampa Caño and Solterito).
29	2024 Socialization Report (Field verification of community agreements).
30	Letter N° 234-2021-GRL-GGR-GRDFFS-SGGFFS (Governance and social contingency records).
31	Oficio N° 344-2021-GRL-GRDFFS (Spatial analysis of overlaps).
32	Legal analysis of concession longevity
33	Regional Managerial Resolution No. 158-2023-GRL-GGR-GRDFFS (Exclusion of area for Berlín community).
34	Forestry Concession Contract No. 16-IQU/C-J-099-04 (San Regis) (Legal basis for land use and ownership rights)
35	Community Life Plans (Planes de Vida)
36	Maps of the project area (kml files)
37	Participatory Rural Appraisals 2024 (PRA)
38	CCB – Validated Project Description
39	Financial vouchers (Counterpart payments).
40	Delivery and Receipt Acts (Material transfers).
41	Third Field Progress Report (Internal monitoring)
42	Conflict Resolution Protocol
43	Conflict and Lessons Learned Socialization Forms
44	Project Review Report (PRR) issued on August 2, 2024
45	Management team CVs.
46	Financial Reports - USAID.
47	GGF GGL1 Financial Model.
48	Fire Monitoring Report
49	INDECI (2026) Flood Risk Report (https://www.indeci.gob.pe/).
50	MINAM (2025) REDD+ Safeguards Summary (RIS) (https://www.minam.gob.pe/REDD/).

N°	Documents reviewed or referenced
51	GORE Loreto (2025) Environmental Security Report (https://www.gob.pe/institucion/regionloreto/noticias/1224435).
52	Occupational Health and Safety Manual GGF 2025.
53	IPERC Matrices (Administration, Forestry, MERII, Community Relations).
54	Internal Occupational Health and Safety Regulations (RISST) 2025.
55	Training Records (First Aid, Snakebite Protocol, Fire Extinguishers).
56	OHS Management System Policy.
57	Annual Occupational Health and Safety Program 2024 - 2025.
58	Risk Maps - Iquitos Office
59	Policy Against Forced Labor
60	Anti-Child Labor Policy
61	Policy Against Human Trafficking
62	Field Protocols for Community Interaction
63	Waste Management Plan
64	Wildlife Sightings Database 2022-2024
65	Final Flora and Fauna Report - GGF
66	CITES Peru Species List 2023 (MINAM) https://www.gob.pe/institucion/minam/colecciones/609-listados-de-especies-de-fauna-y-flora-cites-peru
67	2017 POA10 forest inventory
68	Leakage analysis spreadsheet: <i>Leakage Analysis Project 2345_Y3Y4_CORR</i>
69	SERFOR (2019) Anuario Forestal y de Fauna Silvestre 2019.
70	SERFOR (2024) Anuario Forestal y de Fauna Silvestre 2023.
71	FSC (2024) Impact Data and Figures - Certified Forest Area.
72	OSINFOR (2024) Collaboration with USAID Prevenir against illegal logging.
73	OSINFOR (2024) Training for forest supervision and fiscalization.
74	Veritrade (2024) Global Trade Analysis Database.
75	ITTO (2024) Tropical Timber Market Reports.
76	ATIBT (2024) CITES Appendix II listing for Cumaru and Ipe.

N°	Documents reviewed or referenced
77	Non-Permanence Risk Report (VCS-NPRR).
78	Standard Operating Procedures (SOP)
79	Inventory data from 28 permanent plots
80	Law N° 29763: Forestry and Wildlife Law (Ley Forestal y de Fauna Silvestre).
81	D.S. N° 018-2015-MINAGRI: Regulation for Forest Management (Reglamento para la Gestión Forestal).
82	Law N° 26821: Organic Law for the Sustainable Transformation of Natural Resources (Ley Orgánica para el Aprovechamiento Sostenible de los Recursos Naturales).
83	Appendix 3 - SDG Evidence_Y3Y4.xlsx
84	Villa Monte Alegre Community Meeting Invitation Letters
85	Villa Monte Alegre Attendance List
86	Villa Monte Alegre Project Acceptance Record
87	Monitoring, Surveillance and Control Plan
88	Official extraction balance record: <i>Balance de Extracción – PO I, Parcela de Corta 12 (Annual Operative Plan I, Harvesting Plot 12).</i>
89	Official extraction balance records: <i>Balance de Extracción – PO I, Parcela de Corta 02 and PO II, Parcela de Corta 04 (Annual Operative Plan I, Harvesting Plot 02 and Annual Operative Plan II, Harvesting Plot 04).</i>
90	Emissions from disturbances spreadsheet: <i>PRR10_CORRDisturbance_Y1Y2.xlsx</i>

APPENDIX 3: VERIFICATION FINDINGS

I. NON CONFORMITIES (NCS)/CORRECTIVE ACTION REQUEST (CARs)

NC/CAR id.	01	Date: 26/06/2025
NC/CAR description		
The following section has not been filled following the instructions of the MR template. i.e.: - Section 2.1.1 does not included requested information by template. i.e.; <i>Describe any legal or customary tenure/access rights to territories and resources, including collective and conflicting rights, held by stakeholders, Indigenous People (IPs), local communities (LCs), and customary rights holders.)</i> <i>Describe the social, economic, and cultural diversity within stakeholder groups, the differences and interactions between the stakeholder groups, and any changes in the make-up of each group over time.</i> <i>Describe the expected changes in well-being and other stakeholder characteristics under the baseline scenario, including changes to ecosystem services identified as important to stakeholders;</i> <i>Describe the location of stakeholders, local communities, indigenous peoples, customary rights holders, and areas outside the project area that are predicted to be impacted by the project.</i> <i>Describe the location of territories and resources which stakeholders own or to which they have customary access.</i> - Section 2.1.2 does not include (corresponding to the verification period) - Communication of monitored results - Consultation records - Stakeholder input - Section 2.1.3. does not provide the assurance that the project has not encroached on land, relocated people without consent, and forced physical or economic displacement.		
Project proponent's response		Date: 28/08/2025
Sections 2.1.1; 2.1.2 & 2.1.3 was updated		
Documentation provided by the project proponent		

Folder: 1. Communication with IPLC : Evidence of closing and opening meetings	
Folder: 2 Projects: All documentation related to productive projects	
VVB's evaluation	Date: 12/09/2025
PP has updated the MR, requested information by template was included. Also, it supporting evidence was provided. Then, CAR 1 closed .	

NC/CAR id.	02	Date: 26/06/2025
NC/CAR description		
The indicators reported by the project (section 1.12 of the MR) are not aligned with the Sustainable Development Goals (SDGs) and their targets (refer to https://unstats.un.org/sdgs/indicators/indicators-list/). After updating, PP shall provide evidence how each indicator is calculated.		
Project proponent's response		Date: 28/08/2025
Section 1.2 of the MR was updated. (SDG 5. 8 & 13) Note: To ensure all supporting documentation is being shared, the data from workshops that is no longer relevant for the SDG, is being submitted under a new name file: “workshopsY3Y4”		
Documentation provided by the project proponent		
Folder “Appendix 3 - SDG Evidence_Y3Y4” WorkshopsY3Y4		
VVB's evaluation		Date: 12/09/2025
Section 1.12 has been updated to include indicators aligned with The Global Indicator Framework for the Sustainable Development Goals; however, the PP must clarify why this section states: " <i>During the monitoring period, GGF implemented activities contributing to SDG 1, 2, 3, 5, 6, 8, 12, 13, and 15, with ongoing monitoring of 7,</i> " while only three indicators are included (5, 8 and 13). Furthermore, it must be clarified why the values for indicators 5.5 and 8.5 have the same value in the columns: " <i>Current project contributions</i> " and " <i>Contributions over project lifetime</i> " (according to the template: " <i>Document total project contributions since the project start date, previous <u>SD contribution monitoring period</u>, or <u>VCS monitoring period in the 'Current Project Contributions' column and the cumulative contributions over the project lifetime in the 'Contributions Over the Project Lifetime' column</u></i> ") Then, CAR 2 remains open.		
Project proponent's response		Date: 11/11/2025

Section 1.12 was adjusted accordingly. It is important to note that, in the case of indicators for SDG 5 and SDG 8, the project considers that presenting accumulated results in the “Contributions Over Time” column does not accurately reflect reality. For SDG 5, which measures the proportion of women in leadership positions, what matters is the proportion of women occupying those roles at the end of each period (for example, 3 out of 12), since this figure may vary over time. Similarly, for SDG 8, which measures average income, the relevant indicator is the average earnings at the end of each period, not the accumulated value, as income levels may fluctuate during implementation.	
Documentation provided by the project proponent	
-	
VVB's evaluation	Date: 16/12/2025
Section 1.12 updated. Note: SDG 5 and 8 now reflect end-of-period results rather than accumulated totals. This change was made because leadership ratios and income averages are point-in-time metrics that fluctuate, making cumulative data misleading. Then, CAR 2 is closed	

NC/CAR id.	03	Date: 26/06/2025
NC/CAR description		
The requested deviations do not specify which type of deviation is being applied (methodological deviation or project description). Likewise, compliance with requirements 3.20 or 3.21 of VCS standard, as applicable, has not been demonstrated. Furthermore, it is not specified which deviations were requested during this period and which have already been approved.		
Project proponent's response		Date: 28/08/2025
Section 3.2 has been updated to indicate which deviations are being requested for the current monitoring period and which were approved in previous periods. Each deviation explicitly demonstrates compliance with the requirements set forth in Sections 3.20 and 3.21 of the VCS Standard v4.7. In Section 3.2.1 “Methodology Deviations”, the content has been divided into two sub-sections: • Methodology Deviations (MDev) applied in the baseline scenario calculations • Methodology Deviations (MDev) applied in the project scenario calculations For each deviation: • A note at the end indicates whether it was approved in previous audits.		

- A justification is provided, demonstrating either its conservativeness or, in some cases, its improvement in accuracy.

In Section 3.2.2 “Project Description Deviations”, the content has also been divided into two sub-sections:

- Project Description Deviations (PDev) approved in previous monitoring reports
- New Project Description Deviations (PDev)

For each PDev:

- A note clarifies if it was previously approved.
- A justification explains why the deviation does not affect the applicability of the methodology, additionality, or the appropriateness of the baseline scenario.

Finally, during the update of section 3.2.1 of the MR, the resolution of an issue related to methodology deviation #6 resulted in a modification of the total number of VCU's requested for issuance during the monitoring period. Therefore, besides the MR, Appendices 2, 4 & 6 were updated accordingly to show the new GHG calculations.

Documentation provided by the project proponent

N/A

VB's evaluation

Date: 12/09/2025

Requested deviation are not adhering to the procedure established in the standard (Sections 3.20 and 3.21) for requesting methodology or project description deviation:

- ✓ According to the standard's definitions and rules, updating a deviation (MDev#6) does not meet the requisite criteria to be considered one. There is no provision within the standard for updating an approved deviation.
- ✓ It has not been demonstrated that methodology deviation MDev#07 does not negatively impact the conservativeness of the quantification of reductions or removals, nor that accuracy has been increased. Only it is stated: *"This current approach to uncertainty is more robust and accurate (...)"*; without providing evidence to support this claim.
- ✓ Deviation MDev#08 is not aligned with the standard's requirements, as it does not fall within the permitted types of deviations (specifically, those related to monitoring and measurement).
- ✓ The modifications to a previously approved deviation (MDev#9, MDev#10 and MDev#11) are not permitted under the types of deviations allowed by the standard.
- ✓ The Project Description Deviations (PDdev#6 and PDev#7) do not comply with the requirements established by the standard to be classified as such. In fact, deviation PDdev#6 is already documented within MDev#07; and deviation PDev#7 would actually be classified as a methodology deviation.

PP must take into account:

The VCS Program permits deviations from the applied methodology where they pertain to the criteria and procedures relating to <u>monitoring and measurement</u>. <u>Deviations relating to any other part of the methodology are not permitted</u> and require a <u>methodology revision</u>. - Methodology Deviation: A deviation from the criteria and procedures for <u>monitoring or measurement</u> set out in a methodology applied to the project Projects are permitted to deviate from the validated project description in certain cases in order to accommodate changing circumstances post-validation. - Project Description Deviation: A deviation from the project design, procedures, and other specifications set out in the project description Therefore, CAR 03 remains open	
Project proponent's response	Date: 11/11/2025
Section 3.2 of the MR and Appendix 2 were updated accordingly. In addition, two supporting documents are being submitted: "Corrections & Clarifications Analysis_GGL1_2025", which analyzes the impact of the <i>Corrections and Clarifications</i> issued by VERRA for VM0010 v1.3 on GGL1 estimations. "Changes in Order of Deviation – GGL1 VCS Y3Y4", which facilitates the VVB's review by outlining the updated order and numbering of the methodology and project description deviations.	
Documentation provided by the project proponent	
Corrections & Clarifications Analysis_GGL1_2025 Changes in Order of Deviation - GGL1 VCS Y3Y4	
VVB's evaluation	Date: 17/12/2025
While the PP has updated the requested deviations to align them with the standard and has incorporated corrections to the VM0010 methodology, the following must still be taken into account. MDev#06: Project Uncertainty - The technical report (<i>Green Gold Forestry Peru 2022-2024</i>) indicates a Root Mean Square Error (RMSE) of 9.08% based on 28 validation plots. However, the two plots permanently removed from the monitoring network (SR-01 at 350.6 t/ha and SR-03 at 426.4 t/ha) represent the upper extreme of the biomass density spectrum for the project area. Then PP is must provide a sensitivity analysis or a bias assessment demonstrating that the reported 9.08% RMSE remains representative of the entire project area, particularly for high-stock strata. The proponent must justify why the model's uncertainty should not be considered higher (less certain) in areas of mature forest where the highest-density calibration and validation points are now missing from the permanent network. - The reported uncertainty of 9.08% appears to reflect only the spatial modeling error (mapping accuracy). According to VCS requirements and the VM0010 methodology, total project uncertainty must	

account for the propagation of all primary error sources. Then, PP must provide the full mathematical derivation used to calculate the Total Project Uncertainty. This must include the integration of:

- Field Measurement Error (e.g., DBH and height measurement precision).
 - Allometric Model Error (uncertainty of the biomass equations applied).
 - Spatial Modeling Error (the 9.08% RMSE derived from the satellite-based model).
 - Confirm if these components were combined using the Square Root of the Sum of Squares (SRSS) method and provide the final aggregated uncertainty percentage at the 95% confidence level.
6. A key requirement for any deviation under VCS Standard v4.7 is to demonstrate that the change results in a more accurate or conservative estimate compared to the original methodology. Then, PP must provide a comparative table showing the uncertainty calculation that would have resulted from the original VM0010 sampling method (using the student's t-distribution for the 28 remaining plots) versus the proposed MDev#06 hybrid method. If the hybrid method yields a lower uncertainty (9.08%) than the traditional statistical approach, provide a technical justification as to why this reduction in reported error is scientifically justified and not an artifact of the change in methodological framework.

PDev#5: Project Uncertainty

The proponent has applied PDev#05 to deviate from the standard uncertainty calculation required by methodology VM0010 (which is based on the sampling error of physical plots). Instead, the project uses the Root Mean Square Error (RMSE) of a spatial model, reporting a total uncertainty of 9.08%. The VVB notes that this figure is used to avoid the confidence deduction applied when uncertainty exceeds 15%. However, this calculation was performed after the permanent removal of two high-density plots (SR-01 and SR-03), which are typically the most difficult to predict accurately. Then, PP must take into account:

- Comparative Uncertainty Analysis: Provide a side-by-side comparison between the uncertainty calculated using the traditional VM0010 sampling error (Student's t-distribution at 95% CL) for the 28 remaining plots and the reported 9.08% RMSE from the spatial model.
- Provide a sensitivity analysis demonstrating how the inclusion of the historical data from plots SR-01 (350.6 t/ha) and SR-03 (426.4 t/ha) would affect the model's RMSE. The proponent must prove that the 9.08% figure is not artificially low due to the exclusion of these high-biomass points.

PDev#6: Remeasurement of permanent plots

The project confirms the permanent removal of plots SR-01 and SR-03 from the monitoring network due to safety and logistical constraints. The VVB notes that these plots represent high-biomass density points (350.6 t/ha and 426.4 t/ha, respectively), which are significantly above the project average. Then, PP must provide:

- Evidence of Constraints: Provide documentation (e.g., field security reports, risk assessments, or logistical logs) that justifies the permanent inability to access these specific locations.
- Representativeness Analysis: Demonstrate that the remaining 28 plots still cover the full range of biomass strata present in the project area. Specifically, clarify which of the remaining plots represent the high-density biomass strata that SR-01 and SR-03 previously covered.
- Replacement Strategy: Explain why the proponent has not established replacement plots in accessible areas with similar forest characteristics to maintain the original sampling intensity and representativeness.

- Impact on Model Calibration: Provide a technical assessment of how the permanent removal of these high-stock outliers affects the calibration of the Random Forest algorithm and whether this introduces a systematic bias in the biomass maps for mature forest areas.

PDev#7: Recalculation of baseline

The proponent has recalculated the baseline emissions by moving from a period-average approach to an annualized approach to comply with recent Verra clarifications. This adjustment significantly impacts the calculation of Net Emission Reductions for the current monitoring period. PP must provide:

- Provide a table for the 2022-2024 period showing the specific timber volumes (m3) and hectares of harvesting intervention projected in the new annualized baseline versus the original average baseline. Demonstrating that the annualized harvesting schedule used for this recalculation is strictly consistent with the original Forest Management Plan (PGMF) and the sequence of Annual Operating Plans (POAs) approved by the relevant authority (SERFOR/OSINFOR). Both plans must be provided.
- Confirm that the biomass expansion factors (BEF), wood density values, and carbon fraction used in the recalculation remain identical to those officially validated in the original PDD.

CAR 3 remains open

Project proponent response

Date: 03/02/2026

Section 3.2 of the Monitoring Report (MR) has been updated accordingly to address the issues raised under NC/CAR id. 03, specifically with respect to MDev#06: Project Uncertainty and PDev#5: Remeasurement of permanent plots (formally PDev#6). In addition, Appendix 2 and Appendix 3 of the supporting technical documentation “GGF Peru 2024 Report v1.3” (Space Intelligence) have been updated and submitted as part of this response.

Appendix 3 of the “GGF Peru 2024 Report v1.3” documents the uncertainty estimation procedure applied by Space Intelligence, which is based on a direct comparison between observed plot-level changes in aboveground biomass (ΔAGB) derived from the 2022 and 2024 field inventories and predicted ΔAGB values extracted from the corresponding spatial biomass change maps. Uncertainty is quantified as the Root Mean Square Error (RMSE) across the 28 remeasured plots, thereby capturing the combined effect of field measurements, allometric equations, and spatial modeling within a single empirical metric.

The comparative analysis between this RMSE-based uncertainty estimate and the traditional VM0010 approach using the Student’s t-distribution at the 95% confidence level was conducted and documented in Section 3.2 of the Monitoring Report. This comparison demonstrates that both approaches yield uncertainty values well below the 15% threshold defined by the VCS Standard, and that the spatial RMSE estimate of 9.08% is not artificially low but reflects the increased spatial representativeness achieved through wall-to-wall biomass mapping.

It is important to note the uncertainty approach implicitly captures the main sources of error relevant to the assessment of biomass change:

- Field measurement error: This source of uncertainty is reflected in the RMSE. If field plots had been measured inconsistently or inaccurately across time points, the relationship between observed

biomass change in the field plots and mapped biomass change would be weak, resulting in a high RMSE. The relatively low RMSE value indicates a strong agreement between field-based and map-based estimates, suggesting that field measurement error is limited.

- Allometric model error: The same allometric equations are applied consistently at both time points. As a result, systematic allometric errors cancel out when estimating biomass change over time. For this reason, allometric uncertainty is not explicitly included in the difference-based RMSE approach.
- Spatial error: Spatial uncertainty is inherently addressed in the approach. If either field plots or mapped biomass data were incorrectly located or misaligned, the correspondence between spatially explicit biomass changes and field observations would be low, leading to a substantially higher RMSE. The low RMSE obtained therefore indicates that spatial error is relatively small.

In addition, formally PDev#5: Project Uncertainty was eliminated as all relevant analysis has been included in MDev#6 and it does not directly deviate from the PDD.

PDev#5: Remeasurement of permanent plots (formally PDev#6)

The deviation was updated to explain that, in addition to complying with the conditions set out for the VCS Standard, an additional sensitive analysis has been included.

PDev#6: Recalculation of baseline (formally PDev#7)

- Division_Administrativa_ConsoMazan_Abril2021.shp; Division_Administrativa_ConsoTacsha_Abril 2021.shp Division_Administrativa_SR_Abril2021.shp; are being submitted. These documents were submitted during the first monitoring period audit (See Section 2.2 Document Review of the “[VCS_GGF_GGLoretoMP2_VerificationReport_V3-2_073124.pdf](#)”, document review /16/) to prove that the calculations were being made based on the approved management plan (see page 52 of the [VCS_GGF_GGLoretoMP2_VerificationReport_V3-2_073124.pdf](#))
- PDev#7_GHG Calculations.xlsx shows the calculations for this deviation. This is a subset of tabs from Appendix 2:
 - Net GHG ER_Y1Y2,
 - Table spVolDens,
 - Fossil fuel emissions
 - Inputs Baseline_Cor23
 - Baseline emissions_Cor23
 - Projection-Inputs_project
 - Projection-Project_sequest
 - Projection-Net_GHG_red-cor25
 - Total Area
- Response to CAR 3 – Confirmation of Consistency of Recalculation Parameters with the Validated PDD.pdf is being submitted to show that the mentioned parameters used in the recalculation remain identical to those officially validated in the original PDD.

Documentation provided by Project proponent

MDev#06: Project Uncertainty & PDev#5: Remeasurement of permanent plots (formally PDev#6)

The following supporting document is submitted together with this response:

1. "GGF Peru 2024 Report v1.3":
 - Appendix 2: Sensitivity analysis evaluating the impact of excluding plots SR-01 and SR-03 from the 2024 remeasurement dataset.
 - Appendix 3: Description of the empirical RMSE-based uncertainty estimation procedure derived from plot-to-map validation of aboveground biomass change.
2. Uncertainty_Y3Y4.xlsx – The tabs are also in Appendix 2
3. Folder "Código_TStudent" – Includes the TStudent analysis
4. "INFORME PRODUCTO 2 RIAL_GGF_v2_ok" (Sección 4.7.1 (pag23) – Field report regarding the logistical restrains to collect information on SR-01 & SR-03

These updates demonstrate that the applied deviations result in a robust and spatially representative estimate of project uncertainty.

PDev#6 – Recalculation of baseline

- Shapefiles - GGF – PCs.zip
 - Division_Administrativa_ConsoMazan_Abril2021.shp;
 - Division_Administrativa_ConsoTacsha_Abril2021.shp
 - Division_Administrativa_SR_Abril2021.shp
- PDev#6_GHG Calculations.xlsx
- Response to CAR 3 – Confirmation of Consistency of Recalculation Parameters with the Validated PDD.pdf

VVB Assessment

Date: 06/02/2026

The VVB has reviewed the updated Monitoring Report (Section 3.2) and the supporting documentation provided by Space Intelligence (v1.3).

- ✓ MDev#06: The empirical RMSE-based approach for uncertainty quantification is considered technically sound and functionally equivalent to the requirement of error propagation. By directly comparing field-measured change (ΔAGB) against mapped change, the model captures all primary sources of error (measurement, allometric, and spatial) in a single, transparent metric. The comparison with the traditional VM0010 t-distribution (9.46% vs 9.08%) confirms that the results are consistent and do not pose a risk of underestimating uncertainty.
- ✓ PDev#5 & PDev#6: The justifications for the permanent removal of plots SR-01 and SR-03 are accepted based on the provided safety reports. The sensitivity analysis in Appendix 2 confirms that the model's calibration remains representative of high-biomass strata.
- ✓ Baseline Recalculation: The annualized approach for baseline emissions is consistent with recent Verra clarifications and the approved Forest Management Plans.

Based on the above, the Project Proponent has successfully demonstrated compliance with Sections 3.20 and 3.21 of the VCS Standard.

CAR 03 is CLOSED.

NC/CAR id.	04	Date: 26/06/2025
NC/CAR description		
The section 5 of the MR (<i>quantification of GHG emission reductions and removals</i>) Baseline Emissions; Project Emissions and Leakage' does not include all the necessary formulas to allow for the reproduction of calculations in the spreadsheet.		
Project proponent's response		Date: 28/08/2025
Section 5 of the MR was updated.		
Documentation provided by the project proponent		
-		
VVB's evaluation		Date: 06/02/2026
Following the successful resolution and closure of CAR 03, the VVB has verified that Section 5 of the Monitoring Report now includes all the updated equations and parameters derived from the approved methodology and project description deviations (MDev#06, PDev#05, and PDev#06). The mathematical formulas provided in the MR are now fully aligned with the updated GHG calculation spreadsheets (Appendix 2), allowing for a complete and transparent reproduction of the baseline, project emissions, and leakage estimations. As the technical consistency between the descriptive report and the calculation tools has been demonstrated, CAR 04 is CLOSED.		

II. CLARIFICATIONS REQUESTS (CLS)

CL ID	01	Date: 26/06/2025
CL description		
During the consultation process, comments were submitted to the project in VERRA's platform. PP is requested to Provide a summary of actions taken and any project design updates or justify why updates were not necessary or appropriate (section 2.1.5 of the MR). Furthermore, each stated evidence of responses shall be provided.		
Project proponent's response		Date: 22/07/2025
On February 9, 2024, the project received a public comment outside the official comment period, during the audit for its first VCS verification and CCB validation (while in the "Project Registration and Verification Review Request" stage). The Project Proponent addressed this comment in Section 2.4 of the monitoring report ("GGL1 - VCS Monitoring Report 2022 - v4.2 v8 - July 2024 VF.pdf"). No changes to the Project Design Document (PDD) were necessary, as the comment focused on (1) baseline parameters and (2) job projections from the draft CCB Validation PDD. Both issues were reviewed during the audit and validated by the auditors in the CCB Validation Report, the VCS First Verification Report, and the Project Review Report. The VCS-related comment referred to historical harvesting practices, which are not relevant to this project given its use of a common practice baseline—applied in full conformance with the methodology and justified by available data. The CCB-related comment concerned job projections from the draft PDD submitted for public comment; these figures were updated during the audit process. Supporting documentation includes the following public reports submitted to the VERRA Registry: • "GGL1 - VCS Monitoring Report 2022 - v4.2 v8 - July 2024 VF.pdf" (Section 2.4) • "VCS_GGF_GGLoretoMP2_VerificationReport_V3-2_073124.pdf" (Section 4.2.3) • "VCS_PRR_2345_2Aug2024.pdf" (Project Review Report)		
Documentation provided by the project proponent		
Supporting documentation includes the following public reports submitted to the VERRA Registry: • "GGL1 - VCS Monitoring Report 2022 - v4.2 v8 - July 2024 VF.pdf" (Section 2.4) • "VCS_GGF_GGLoretoMP2_VerificationReport_V3-2_073124.pdf" (Section 4.2.3) "VCS_PRR_2345_2Aug2024.pdf" (Project Review Report)		
VVB's evaluation		Date: 12/09/2025
The audit team reviewed the prior monitoring report as well as the verification report, confirming that these comments have already been assessed. Then, CL 1 is closed.		

CL ID	02	Date: 26/06/2025
CL description		
Regarding Respect for Human Rights and Equity (section,2.3.1) PP is requested to evidence (document) of the company's policy against 1 Forced labor 2 Child labor 3 Human trafficking		
Project proponent's response		Date: 28/08/2025
The following documents are submitted as supporting documentation, which are located in the "Company Policy" folder within the "Institutional Policy" folder. 1. Forced Labor Policy ("Política contra el trabajo forzado.pdf") 2. Child Labor Policy ("Política contra el trabajo infantil.pdf") 3. Human Trafficking Policy ("Política de Lucha Contra la Trata de Personas.pdf")		
Documentation provided by the project proponent		
1. Forced Labor Policy ("Política contra el trabajo forzado.pdf") 2. Child Labor Policy ("Política contra el trabajo infantil.pdf") 3. Human Trafficking Policy ("Política de Lucha Contra la Trata de Personas.pdf")		
VVB's evaluation		Date: 12/09/2025
PP has provided requested information. Then, CL 2 is closed.		

CL ID	03	Date: 26/06/2025
CL description		
The Project Proponent shall submit documented evidence demonstrating (1) compliance with all applicable legal requirements regarding working conditions, and (2) that workers have been properly informed about job-related risks and corresponding mitigation measures; furthermore, Section 2.2.2 (Working Conditions) shall be updated to systematically incorporate these risk assessments and worker protection protocols.		
Project proponent's response		Date: 28/08/2025

(1) GGF complies with all applicable legal requirements related to working conditions, including Law No. 29783, its Regulations (Supreme Decree No. 005-2012-TR), and Law No. 31246. The following documentation is submitted as evidence:

Compliance with Legal Requirements (folder "GGF General documentation > 1. Working Conditions - Legal requirements"):

- ✓ IPERC Matrix - Administration ("1. Matriz IPERC - Administración.xlsx")
- ✓ IPERC Matrix - Forestry (2. Matriz IPERC - Forestal.xlsx")
- ✓ IPERC Matrix - MERII ("3. Matriz IPERC - MERII.xlsx")
- ✓ IPERC Matrix - Community Relations ("4. Matriz IPERC - Relaciones Comunitarias.xlsx")
- ✓ GGF OSH Policy ("6. Política de SST GGF.pdf")
- ✓ Minutes of the 2022/2023/2024 SST Committee Election ("Acta de elección del comité de SST 2022.pdf", "Acta de elección del comité de SST 2023.pdf", "Acta de elección del comité de SST 2024.pdf")
- ✓ GGF 2025 Occupational Health and Safety Manual ("Manual de Seguridad y Salud en el Trabajo_GGF_2025.docx")
- ✓ Risk Map - GGF Iquitos Office ("Mapa de Riesgo - Oficina en Iquitos de GGF.xlsx")
- ✓ Annual Occupational Health and Safety Program 2024 - 2025 ("Programa Anual De Seguridad y Salud en el Trabajo 2024 - 2025.pdf")
- ✓ GGF Internal OSH Regulations ("Reglamento Interno de SST de GGF.pdf")

(2) Workers at GGF have been properly informed about job-related risks and corresponding mitigation measures through different type of workshops, including the socialization of IPER matrix.

Worker Awareness of Risks and Mitigation Measures (folder "GGF General documentation > Working conditions - Workshops")

- ✓ Annual Safety Program, signed by the 2024 Occupational Safety and Health (OSH) Committee ("Programa Anual de Seguridad, firmado por el Comité de SST 2024.pdf")
- ✓ Training on IPER (Hazard Identification and Risk Assessment) and First Aid, held on 11.08.22 ("Capacitación IPER (Identificación de Peligros y Evaluación de Riesgos) y Primeros auxilios - 11.08.22.jpeg")
- ✓ Training on snakebite risks, held on 13.01.23 ("Capacitación en Ofidismo - 13.01.23.jpeg")
- ✓ Training on heat stroke, held on 20.10.23 ("Informe de capacitación sobre Golpe de Calor - 19.10.23.pdf")
- ✓ First aid training report by Lic. Enf. Raff Noronha, held on 17.01.23 ("Informe de capacitación en primeros auxilios por el Lic. Enf. Raff Noronha - 17.01.23.pdf")
- ✓ First aid training report by Dr. Luis Reátegui, held on 26.01.24 ("Informe de capacitación en primeros auxilios por el Dr. Luis Reátegui - 26.01.24.pdf")
- ✓ Training on sexual harassment, held on 24.01.24 ("Capacitación sobre hostigamiento sexual (SST) por Ing. Judy Guerra - 24.01.24.pdf")

Section 2.2.2 of the MR has been updated to incorporate the project's risk assessments, mitigation measures, and worker protection protocols, in alignment with applicable legal standards and the project's commitments. Additionally, it is important to note that from April 2023 to April 2024, GGF was certified as a "Great Place to Work", reflecting that staff feel safe, supported, and comfortable working for the company. ("Certificado Great Place to Work - Green Gold Forestry Perú S.A.pdf")

Documentation provided by the project proponent

- ✓ IPERC Matrix - Administration ("1. Matriz IPERC - Administración.xlsx")
- ✓ IPERC Matrix - Forestry (2. Matriz IPERC - Forestal.xlsx")
- ✓ IPERC Matrix - MERII ("3. Matriz IPERC - MERII.xlsx")
- ✓ IPERC Matrix - Community Relations ("4. Matriz IPERC - Relaciones Comunitarias.xlsx")
- ✓ GGF OSH Policy ("6. Política de SST GGF.pdf")
- ✓ Minutes of the 2022/2023/2024 SST Committee Election ("Acta de elección del comité de SST 2022.pdf", "Acta de elección del comité de SST 2023.pdf", "Acta de elección del comité de SST 2024.pdf")
- ✓ GGF 2025 Occupational Health and Safety Manual ("Manual de Seguridad y Salud en el Trabajo_GGF_2025.docx")
- ✓ Risk Map - GGF Iquitos Office ("Mapa de Riesgo - Oficina en Iquitos de GGF.xlsx")
- ✓ Annual Occupational Health and Safety Program 2024 - 2025 ("Programa Anual De Seguridad y Salud en el Trabajo 2024 - 2025.pdf")
- ✓ GGF Internal OSH Regulations ("Reglamento Interno de SST de GGF.pdf")
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- ✓ First aid training report by Lic. Enf. Raff Noronha, held on 17.01.23 ("Informe de capacitación en primeros auxilios por el Lic. Enf. Raff Noronha - 17.01.23.pdf")
- ✓ First aid training report by Dr. Luis Reátegui, held on 26.01.24 ("Informe de capacitación en primeros auxilios por el Dr. Luis Reátegui - 26.01.24.pdf")
- ✓ Training on sexual harassment, held on 24.01.24 ("Capacitación sobre hostigamiento sexual (SST) por Ing. Judy Guerra - 24.01.24.pdf")
- ✓ "Certificado Great Place to Work - Green Gold Forestry Perú S.A.pdf"

VVB's evaluation

Date: 09/11/2025

The PP has provided sufficient evidence related to compliance with occupational health and safety legal requirements. Furthermore, the MR has been updated to include the risks associated with the project's activities. Then, **CL 3 is closed**.

CL ID	04	Date: 26/06/2025
CL description		
The Project Proponent (PP) shall provide documented evidence demonstrating that: (1) the project area serves as habitat for two Endangered (EN) and twelve Vulnerable (VU) species, and (2) all project activities actively contribute to habitat conservation (stated in section 2.4.1 of the MR). This should include, but is not limited to, species monitoring programs and the complete cessation of logging activities in these habitats		
Project proponent's response		Date: 28/08/2025
Section 2.4.1 has been updated. As supporting documentation, the following files have been submitted in the "Biodiversity" folder: ✓ "INFORME FINAL FLORA Y FAUNA - GGF14122022.pdf" – Final report on flora and fauna identified within the GGL1 project area. ✓ "Avistamiento de fauna 2022_2024.xlsx" – Database of all wildlife sightings recorded during the monitoring period.		
Documentation provided by the project proponent		
• "INFORME FINAL FLORA Y FAUNA - GGF14122022.pdf" – Final report on flora and fauna identified within the GGL1 project area. • "Avistamiento de fauna 2022_2024.xlsx" – Database of all wildlife sightings recorded during the monitoring period.		
VVB's evaluation		Date: 12/09/2025
PP has provided Final Flora and Fauna Report. This report aims to: ✓ Estimate and describe the biodiversity within the forest concession. ✓ Identify threats to the biodiversity within the forest concession. ✓ Propose strategies for the conservation of biodiversity within the forest concession. Aloo, it provides detailed information on the existing flora and fauna within the project area. Then, CL 04 is closed.		

CL ID	05	Date: 26/06/2025
CL description		

The Project Proponent shall provide a detailed explanation (section 3.1 of the MR) of: (1) all events that potentially affected GHG emission reductions or carbon dioxide removals during the monitoring period; (2) any impacts on monitoring activities; and (3) any carbon stock losses that occurred, if applicable: quantified impacts, and mitigation measures implemented. Supporting evidence shall be provided.	
Project proponent's response	Date: 28/08/2025
Section 3.1. was updated	
Documentation provided by the project proponent	
Folder: "SI Report Y3Y4" which has the SI report and supplementary documentation Folder: "Forest Custodians Report" which contains the forest custodians monitoring reports for the monitoring period.	
VVB's evaluation	Date: 12/09/2025
As per updated MR, PP states: <i>"To detect forest cover loss, both natural and anthropogenic disturbance events were identified and verified using the company's satellite monitoring system and field inspections by trained forest custodians."</i> However; the project proponent has not explicitly stated whether any loss of carbon has occurred (or not), as required by the template in section 3.1.: • <i>Report any loss of carbon stock that occurred during the monitoring period. Provide the date of the loss(es), date of discovery(s), size (hectares impacted) and extent (tCO2e) of the loss. Specify whether the loss meets the definition of a loss event and/or reversal. In all cases, justify how the project meets VCS requirements related to loss events and reversals.</i> Then, CL 5 remains open.	
Project proponent's response	Date: 11/11/2025
Section 3.1 was updated to explain the loss event analysis. Given that it has been proven that there is no loss event to report, no additional documentation is presented.	
Documentation provided by the project proponent	
VVB's evaluation	Date: 16/12/2025
Section 3.1 has been updated to include the loss event analysis. Since the analysis confirmed that no loss events occurred, no additional documentation is required or provided. Then, CL 05 is closed.	

CL ID	06	Date: 26/06/2025
CL description		
PP is requested to clarify how the grievance mechanism complies with three stages stated in section 3.18.4 of the VCS Standard V4.7. Procedure shall be provided.		
Project proponent's response		Date: 28/08/2025
GGF has implemented a formal Conflict Resolution Protocol that complies with the three stages outlined in Section 3.18.4 of the VCS v4.7 Standard: 1. <i>The project proponent shall attempt to amicably resolve all grievances and provide a written response in a manner that is culturally appropriate. --> Step 1 (section VIII of GGF's Conflict Resolution Protocol.</i> 2. <i>Any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party. --> Step 2 (section VIII of GGF's Conflict Resolution Protocol.</i> 3. <i>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. --> Step 3 (section VIII of GGF's Conflict Resolution Protocol.</i> Section 2.1.4 of the Monitoring Report has been updated to further explain how GGF's procedure aligns with the VCS v4.7 requirements. The full protocol is submitted as supporting documentation: "PRCENC~1 (PROTOCOLO PARA RESOLUCIÓN DE CONFLICTOS EN COMUNIDADES).pdf" in the folder "GGF General documentation".		
Documentation provided by the project proponent		
• PRCENC~1 (PROTOCOLO PARA RESOLUCIÓN DE CONFLICTOS EN COMUNIDADES)		
VVB's evaluation		Date: 12/09/2025
PP has provided grievance mechanism procedure and detailed the applicable stated in section 2.1.4 of the MR. This procedure is aligned with the requirements of the standard. Then, CL 6 is closed.		

CL ID	07	Date: 26/06/2025
CL description		
From NPR report, PP is requested to provide the following evidence. 1. Project longevity		

2. Legal agreement(s) signed due to disputes over ownership and land 3. The governance score calculation (considering last available data) for the country 4. Natural Risk Assessment (fire, Pest and disease outbreaks, Extreme weather and Geological risk record)	
Project proponent's response	Date: 28/08/2025
The following documents are submitted as part of supporting documentation: <u>Project Longevity:</u> During the revision of the documents, the project longevity table in the NPRR was updated. Therefore, total number of VCUs requested for issuance during the monitoring period changed. Therefore, besides the MR, Appendices 2, 4 & 6 were updated accordingly to show the new results. As supporting evidence, the legal analysis titled "2025T G Segundo INFORME PERPETUIDAD.pdf" is submitted as evidence. <u>Land Tenure Grievances:</u> Evidence of GGF's actions to resolve land tenure, ownership, access, or use right issues and clarify overlapping claims is provided in the folder "Land Tenure Resolution." - Berlin native community: Through Regional Managerial Resolution No. 158-2023-GRL-GGR-GRDFFS, dated August 18, 2023, Article 1 approves the partial exclusion of 557.2012 hectares from Timber Forest Concession Contract No. 16-LOR-MAY/CON.MAD-2018-10, held by CONSORCIO GGF GROUP, due to the partial overlap with the officially recognized territory of the Native Community of Berlín. - Pampa Caño and Solterito communities: In 2021, both communities requested territorial expansion into areas covered by the San Regis Perú S.A. concession granted to GGF. GGF submitted a letter of abstention to DISAFILPA, citing overlap with titled land and BPP areas. DISAFILPA reviewed the case and deemed the request inadmissible. While the communities have not pursued the claim further, GGF continues to engage with them through its Community Relations team to promote inclusion in the project's indirect benefits and maintain positive relations. <u>Governance Score:</u> It was confirmed (see screenshot in the folder "NPRR - SD") that, as of July 2025, the most recent available data corresponds to 2023. <u>Natural Risk Assessment:</u> Additional supporting documentation has been uploaded to the shared folder. Specifically, 1) Evidence that the reference region that the project is in (according to the CIDs) is the N.W. South America (see "NWS_L1.jpg" in folder "NPRR-SD") 2) Evidence of historical natural risks (natural fire & natural - non fire) (see documents in folder "disturbances"). No changes were made to the NPRR	
Documentation provided by the project proponent	
"2025T G Segundo INFORME PERPETUIDAD.pdf" - Documentation in folder "Land Tenure Resolution." - Worldwide_Governance_Indicators_hasta_2023.jpg - NWS_L1.jpg - Documents in folder "disturbances"	

VVB's evaluation	Date: 12/09/2025
Only Issue 3 were closed (Legal agreement). The following issuers remain open. 4. Project Longevity. PP must provide NPRR from Verra Hub platform (considering updated value) 5. Governance Score. PP must provide de calculation of the value (-0.23). The aforementioned value cannot be deduced from the screenshot 6. Natural Risk Assessment. Folder "disturbances" were not provided Then, CL 7 remains open	
Project proponent's response	Date: 11/11/2025
✓ The updated NPRR was downloaded from VERRA's Project Hub ✓ "NPRR_Y3Y4_Political Risk.xlsx" is provided as supporting documentation ✓ Folder "Natural Risk – SD" is being submitted with supporting information.	
Documentation provided by the project proponent	
✓ Folder "Appendix 6 - NPRR Y3Y4_V2" ✓ Folder "1. NPRR SD" ○ "NPRR_Y3Y4_Political Risk.xlsx" ○ 2025T G Segundo INFORME PERPETUIDAD.docx ○ Folder "1, Natural risks – SD" ▪ "GGL1_NWS_SHP.zip" ▪ "Prueba de monitoreo de no incendios – GGL1 2do periodo de monitoreo"	
VVB's evaluation	Date: 16/12/2025
PP has provided requested evidence. Then, CL 7 is closed	