

VALIDATION REPORT FOR SELVA PARANAENSE VIDA NATIVA - GS1



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Summary:

AENOR CONFÍA S.A.U (AENOR) has performed the validation of the project “SELVA PARANAENSE VIDA NATIVA - GS1” in Argentina on the basis of Voluntary Carbon Standard (VCS) and Climate, Community & Biodiversity standard (CCB), as well as the host country criteria.

The project area is located in the extreme east of Misiones, in the department of San Pedro, Argentina, bordering Brazil. It has 22,878.5 hectares of native forest and a sawmill operating in the Green Corridor. Controlled logging has been carried out since the 1960s and harvesting is completed.

The project aims to improve forest management by planting 430,000 native trees in the first 5 years and other activities to increase forest productivity. The project is developing in a private area; although, there are no communities, it has been subjected to invasion and illegal occupations, with burning for planting or deforestation for rudimentary construction. Land has also been colonized or exploited for agriculture or livestock, leaving it with high levels of degradation and contamination.

The project objectives include installing monitoring technology to reduce biodiversity threats and recover biodiversity affected by anthropic activities. The woody strata affected by enrichment activities will be actively intervened by planting 696 seedlings per hectare, while the remaining area will be restored through passive natural regeneration. Reforestation will be used in the most affected strata.

The project expects to reduce GHG emissions by 10,178,342 tCO₂e in a period of 30 years, averaging 339,278tCO₂e per year (ex-ante), and provide adaptation to climate change. The "community benefits" of the project are defined as improvements in the well-being of communities resulting from the project activities in place. The "biodiversity benefits" of the project are defined as the enhancement of the biodiversity elements resulting in increments of endangered populations.

The purpose validation is to have an independent, third party assess the project design. In particular, the project's baseline, the monitoring plan (MP), and the project's compliance with relevant VCS and CCB requirements.

In order to confirm that the project design as documented is sound and reasonable and meets the stated requirements and identified criteria, the validation consisted of the following three phases: i) a desk review of the project design and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders; iii) the resolution of outstanding issues and internal technical review followed by the issuance of the final validation report and opinion. In the course of the validation process 12 corrective actions and 10 clarifications were raised, all have been successfully closed.

The purpose of the visit assessment was to determine the conformance of the project with respect to the VCS Version 4 Standard and the Third Edition of the CCB Standard and information provided in the joint project description. The field visit took place on 18 and 19 January 2023 in which the lead auditor (Richard Gonzáles) and the auditor (Daniel Bermejo) visited the project area, interviewed key stakeholders, staff and other related experts, and also reviewed the CCB-VCS-PD and supporting documents. In addition to the site visit, on 23 and 24 January 2023, the validation team conducted (remote assessment) the reviewing of baseline calculation; the processing data from satellite images; and additionality. The scope of the validation was to assess the conformance of information in the project design document with the VCS and CCB standards.

This validation report has been submitted to the PP in which 12 CARs and 10 CLs were reported (see validation protocol in appendix II) for VCS and CCB. However, all these issues raised during the

validation process where appropriately closed by means of corrections, clear explanations and providing other supported documents.

Hence, once all issued detected were appropriately solved, AENOR carried out a final validation report and deems with reasonable level of assurance that the project complies with all of the validation criteria for VCS and CCB. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the validation criteria, hence, the audit team concludes that the net GHG emissions reductions or removals, for the lands included in the project boundary at validation stage has been quantified in accordance with VCS rules. AENOR assessed the calculations and can confirm estimated GHG emission reductions are correct, the project expects to avoid annual average net emissions of 186,557.90 tCO₂e (without discounting buffer emissions and in a period of 30 years) for the whole crediting period (ex-ante).

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1 INTRODUCTION

1.1 Objective

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

1.2 Scope and Criteria

Validation Scope: The scope of the validation audit is to validate the emissions reductions of the proposed project activity against the Verified Carbon Standard, the identified methodology and associated tools as well as to validate the Climate Community and Biodiversity requirements of the CCB Standard.

The objectives of this audit included a validation of the projects calculated emission reductions with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects, besides the assessment of the additionality and the risk assessment report. For the CCB Standard also were validated the benefit on Climate Community and Biodiversity generated by the project activities.

The scope was defined as follows:

- The project and its baseline scenarios;
- The physical infrastructure, activities, technologies and processes of the project;
- The GHG sources, sinks and/or reservoirs those are applicable to the project;
- The types of GHGs that are applicable to the project; and
- The project crediting period, as discussed in Section 3.2.11 of this report

Standard Criteria: Even though, the version in force is version 4.4 of VCS standard; project developer is applying templates form from version 3, since they are the ones that are available jointly for VCS and CCB programs. The validation assessment was performed in accordance the reequipments detailed in section 4 of the VCS standard; including the following documents:

- VCS Program Guide v4.3 /1/
- VCS Standard v4.4 /2/
- VCS Methodology requirements v4.3 /3/
- VCS Programme definition v4.3 /4/
- VCS Validation and verification manual v3.2 /5/
- VCS AFOLU Non-Permanence Risk Tool, v4.0 /6/
- Climate, Community & Biodiversity Standards, v3.1 /7/
- CCB Program Rules, v3.1 /8/

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

1.3 Summary Description of the Project

The project area is located in the extreme east of Misiones, in the department of San Pedro, Argentina, bordering Brazil. It has 22,878.5 hectares of native forest and a sawmill operating in the Green Corridor. Controlled logging has been carried out since the 1960s and harvesting is completed.

The project aims to improve forest management by planting 430,000 native trees in the first 5 years and other activities to increase forest productivity. The project is developing in a private area; although, there are no communities, it has been subjected to invasion and illegal occupations, with burning for planting or deforestation for rudimentary construction. Land has also been colonized or exploited for agriculture or livestock, leaving it with high levels of degradation and contamination.

Through the implementation of initiatives like "Mujeres Cultivadoras" and "Óga" in partnership with local communities, the SPVN GS1 project focuses on community needs and agreements. These programs benefit from Nideport's financial and technical support, which enables them to manage resources independently and sustainably. Through a Free, Prior, and Informed Consultation, the indigenous Alecrín community devised these projects, resulting in the building of community gardens and homes. Nideport has made investments in these projects since the project's beginning, tackling climate change issues and boosting community resilience via cooperation, resources, and training.

The project objectives include installing monitoring technology to reduce biodiversity threats and recover biodiversity affected by anthropic activities. The woody strata affected by enrichment activities will be actively intervened by planting 696 seedlings per hectare, while the remaining area will be restored through passive natural regeneration. Reforestation will be used in the most affected strata.

- The climate benefits of the project are defined as the reductions or removals of GHG emissions resulting from forest regeneration, these are expected to reach 10,178,342 tCO₂e in a period of 30 years, averaging 339,278 tCO₂e per year and adaptation to climate change.
- The community benefits of the project are defined as improvements in the well-being of communities resulting from the project activities in place with the implementation of productive projects.
- The biodiversity benefits of the project are defined as the enhancement of the biodiversity elements resulting in increments of endangered populations.

Therefore, the project will contribute to the mitigation of climate change, conserving biodiversity and generating benefits for the population of the community. The project goals include the conservation and reduction of deforestation; contribute to improve the quality of life of neighbourhood and local stakeholders; and the conservation of biodiversity.

2 VALIDATION PROCESS

2.1 Audit Team Composition (*Rules 4.3.1*)

AENOR is accredited by ANAB and ONAC to carry out the auditing activities under different standards such as VCS or CCB.

ANAB is the ANSI National Accreditation Board (ANAB) is the largest multi-disciplinary accreditation body in the western hemisphere, with more than 2,500 organizations accredited in approximately 80 countries. ANAB is a recognized global leader in accreditation and prides itself on world-class service while maintaining the highest level of quality. ANAB accredited certificates, inspections, reports, and persons drive confidence in the marketplace. ANAB-accredited laboratories and ANAB-accredited certification bodies (personnel, management systems, validation and verification, and products, processes and services) working in the industry can be trusted when certifying, testing, and/or inspecting those working in the industry.

ONAC is the Colombia's National Accreditation Body. ONAC's main purpose is to provide accreditation services to conformity assessment bodies in order to accredit their competence, to act as the monitoring authority for good laboratory practices of the Organization for Economic Cooperation and Development (OECD), and to perform the functions of the National Accreditation Body of Colombia. The accreditation service opens opportunities for CABs and the producers they certify to demonstrate the quality of their products and services and even compete in international markets.

AENOR passes the accreditation exams and audits every year to still maintaining the required skills and assurance that its certifications are competent. The team involved in this verification is summarized below:

Name	Position	Experience and expertise
Richard GONZALES	Lead auditor	He is mechanical an electrical engineer and has a Master in energy. He has more than 10 years of experience in auditing, consulting and training activities related to environmental and carbon management projects. Actively participated in the audit of international sustainable development projects in several carbon schemes, such as the Clean Development Mechanisms (CDM), Verified Carbon Standard (VCS), Climate, Community and Biodiversity Standards (CCB), Gold Standard (GS) and carbon footprints (ISO 14067 and ISO 14064). Richard Gonzales, lead auditor, is a Peruvian (speak Spanish) auditor who knows relevant regulation, social al cultural situation of the region (Latam). He audited many project in the region (VCS and CCB standard) Biodiversity and ecological expertise were obtained by accompanied other expert and following AENOR's internal competence requirements.

Daniel BERMEJO	Auditor	Daniel Bermejo is a Forest Engineer with a master's degree in sustainable finance. He began his career in private consulting, working on topics such as climate risk analysis and TCFD risks, forestry development, agriculture and forestry banking standards, environmental footprint projects and sustainability reporting. He has worked at AENOR since 2022 and has already participated as an auditor in several AFOLU projects in different carbon schemes, such as VCS, CCB, FCPF, Cercarbono and BCR. He is an expert in Climate, Community and Biodiversity aspects and has worked in LATAM, North America, Africa and Europe countries. He speaks Spanish and English fluently.
Javier CÓCERA	Technical reviewer	He is a forest engineer with a master in forest management. He has developed his career focused to the forest management. Mainly he has been working through sustainability in two ways: in forestry consultancy, developing forest management plans, working with GIS and LiDAR both in the field and the office and getting experience of the forest resources; and in developing environmental footprint projects and sustainability reports. Currently, Javier is working in AENOR as auditor focused in AFOLU projects.

2.2 Method and Criteria

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

Sampling plan

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

The audit team conducted a strategic and risk analysis following the guidance of ISO 14064-3: 2019 standards, evaluating issues, and conducting sampling based on the GHG program requirements. The number of sampled plots (04) were obtained following the formula provided FCS standard (FSC-STD-20-007): $n = 0.3 \times \sqrt{N}$

As per sampling plot design, 98 plots were installed. Based on the FSC Standard formula:

$$n = 0.3 \times \sqrt{98} = 2.96$$

Then, 4 plot were assessed. In these plots field data (diameter and/or perimeter) were confirmed. No discrepancies were identified during the field inspection.

Therefore, due audit team is following international recognized forest standard for sampling; moreover, additional review were conducted to validate used data; then, the representativeness and quality is guaranteed.

2.3 Document Review

The Project Description submitted by the PP was reviewed against the approved methodology and against VCS and CCB requirements. Additional background documents related to the project design, baseline, additionality, community and biodiversity objectives, Non-Permanence Risk Reports, were made available before and during the on-site visit and during the validation process (complete list of evidence is find in appendix I).

To address the corrective actions and clarification requests that arose from the desk review and on-site visit, the project developer revised the project description document version 1 /9/, dated 31 October 2022 and developed a final version 6 /10/ dated on 13 August 2024.

2.4 Interviews

The AENOR validation team composed of Richard Gonzales and Daniel Bermejo conducted interviews with project developers; local stakeholders; and key personnel involved in the project activity, in order to confirm selected information and to resolve issues identified in the document review.

The field visit took place from 18 to 19 January 2023 in which the lead auditor visited the project area, interviewed key stakeholders, staff and other related experts, and also reviewed the PD and supporting documents. The people interviewed were those directly affected or involved in the project activity and in some cases were just indirectly affected.

Additional to site visit, meetings via teleconferences were carried on 23 and 24 January 2023 to validated additionality; emission reduction calculation and verify the processing GIS data from satellite images.

The people interviewed were those directly affected or involved in the project activity and in some cases were just indirectly affected are summarized following:

Audit Date	Name	Organization	Activities
18/01/2023	Marcelo Taboada	NIDEPORT (President)	
	Pablo Gallardo	NIDEPORT	
	Mariano Iturbe	NIDEPORT	

Audit Date	Name	Organization	Activities
	Claudio Estaban	NIDEPORT	Status of the project activity (Operation and implementation)
	Guillermo Colella	NIDEPORT	Property and land use rights
	Hugo Barreto	NIDEPORT	Stakeholder identification and analysis used to identify communities
	Tomas Gonzalez	NIDEPORT	Project Communication & Grievance Mechanism Characteristics of the project Communities involved with the project and benefits to the communities Productive economic activities implementation Project zone inspection
	Guillermo Videla	FORESTAL BELGA	Illegal activities within the project Surveillance and control activities Supporting from project developer
	Gustavo Alvarez	FORESTAL BELGA	Joint activities with the project developer Working conditions Health and safety at work Project zone inspection
	Rodrigo Fariña	Consultant/Aves Argentinas	Biodiversity within the project area. Before and after project implementation. HCV values
	Josefina Uijt den Bogaard	Consultan/Prosustentia	Forestry management plan
	Federico Russo	Consultant/Fotosintesis	Forestry baseline
	Juan Carlos Russel	Consultan/Fotosintesis	Forestry inventory
	Heinrich Burschel	Consultan/Fotosintesis	Measurement methods of Sampling plot Sampling plot and subplots design
	Azul Popper	Consultant/Ecosecurities	Project description information (VCS-CCB-PD content)
	Stella Gama	Consultant/Ecosecurities	Characteristics of the project

Audit Date	Name	Organization	Activities
19/11/2022	Lorena Mielnichuk	Nueva Esperanza Cooperative	Activities implemented by the project proponent to mitigate risks local stakeholders
	Emilia Campo		
	Angelica Fereyra		The processes used by the project proponent to communicate and consult with local stakeholders during validation and verification
	Raquel Barboza		Project design results dissemination
	Nilda Rivas		Training activities
	Nelida Accuña		Satisfaction and perception of the project
	Estefani Chacon		
	Isabel Barreto	Civil institutions (EPET 31 – Elementary and middle school)	Local employment opportunities
	Gustavo Pedrozo		Improving of livelihood
	Jonas Schneider		Antidiscrimination and grievance policies
	Daniel Secaluk		Project benefits
	Maicon Villalba		Comments and opinions about the project
	Sebastian Benitez	Tekoa Alecrín (Guaraní community)	Implementation of economic activities
	Arturo Benitez		Activities implemented by the project proponent to mitigate risks local stakeholders
	Victoriano Benitez		Project design results dissemination
	Javier Aquino		Satisfaction and perception of the project
	Silvia Benitez		Improving of livelihood
	Jonathan Velazquez		Antidiscrimination and grievance policies
	Carlos Velazquez		Project benefits
	Rosalina Dasilva		Comments and opinions about the project
	Maria Rosa Alba		Implementation of economic activities
			HCV identification workshops
	Miguel Dossantos	Mayor of San Pedro Intendency	Permits Project conflicts

Audit Date	Name	Organization	Activities
23/01/2023	Stella Gama	Consultant/Ecosecurities	Additionally assessment Project scenarios Financial model
24/01/2023	Stella Gama	Consultant/Ecosecurities	Satellite images processing Emission reduction calculation

2.5 Site Inspections

The objectives of the on-site inspections performed were mainly to cross check the description provided in the project description related to the environmental conditions of the project area, including:

- Ensure that the geographic area of the project, as reported in the PD and the accompanying KML file, is in conformance with Section 3.10.3 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 validation 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 the eligibility requirements of the VCS rules and the applicability conditions of the methodology; and
- Interview local authorities to confirm that the project operates in accordance with current permits and authorizations and its relationship with local actors and communities.
- Confirm the Standard Operating Procedures for forest inventory and QA/QC procedure

Additional to the site inspection, meetings via teleconferences were carried with project representants and consultants in charge of carrying out the calculations, image processing, monitoring, additionality and unique metrics report.

2.6 Public Comments (*Rules 4.6*)

The Joint project description (CCB-VCS-PD) was submitted to the VCS website for a 30-day public comment period from 06/12/2022 to 05/01/2023. No public comments were received during the validation process. Validation team confirmed this issue against public information in VERRA database platform.

2.7 Resolution of Findings

All findings issued by the AENOR audit team during the validation process have been closed for both VCS and CCB Standards. It was reported 12 CARs and 10 CLs (see validation protocol in appendix II). In

accordance with VCS and CCB requirements, all findings issued during the validation process, and the inputs for their closure, are described in Appendix II of this report

2.7.1 Forward Action Requests

No Forward Action Requests were raised to the PP during this process.

3 VALIDATION FINDINGS

3.1 Summary of Project Benefits

Section 1.2 of CCB-VCS-PD summarize the standardized benefit metrics, including: GHG emission reductions or removals; Forest cover; Improved land management; Training; Employment; Livelihoods; Health; Education; Water; Well-being and Biodiversity conservation. The audit team reviewed information reported in this section against supporting evidence listed in appendix I; also, AENOR validation team has verified that all achievements reported are substantiated with information provided in the body of the CCB-VCS-PD.

3.2 General

3.2.1 Summary Description of the Project (G1.2)

The project area is located in the extreme east of the province of Misiones, in the department of San Pedro, bordering Brazil. The project activity aims to improve the forest management in a 22,878.5 hectare native forest field in the Green Corridor. Controlled logging has been ongoing since 1960s, but the project aims to decrease it. Over 430,000 native trees will be planted within five years, and other activities will increase forest productivity. The Forest Regeneration Plan defines seedling distribution based on stratum and field conditions, collaborating with a professional team. The project aims to work with communities in poverty-stricken areas to identify risks, HCV areas, and needs, implementing projects for housing improvement and healthcare.

The project area faces invasion, illegal occupations, burning, deforestation, and colonization, resulting in high degradation and contamination of land without communities or groups. Then, project objectives involve using advanced monitoring technology and a biodiversity monitoring plan to reduce threats and recover biodiversity affected by anthropic activities. Woody strata will be planted with 696 seedlings per hectare, while remaining areas will be restored through passive natural regeneration. Reforestation actions will be implemented in the most affected strata. The project objectives are:

- The climate benefits of the project are defined as the reductions or removals of GHG emissions resulting from forest regeneration, these are expected to reach 10,178,342 tCO₂e in a period of 30 years, averaging 339,278 tCO₂e per year and adaptation to climate change.
- The community benefits of the project are defined as improvements in the well-being of communities resulting from the project activities in place.
- The biodiversity benefits of the project are defined as the enhancement of the biodiversity elements resulting in increments of endangered populations.

The scenario prior to the project implementation is the continuation of Forest degradation with relogging. Over 50 years of harvesting activities in the project area have led to forest degradation, with only a small portion harvested. As a result of these practices, the forest area is mostly degraded and only parts of it could be harvested. Then, lack of forest quality improvement activities contributes to continued degradation.

The project start date is 15 December 2021, when stopped logging started. Validation team confirming that it is the date when forestry were stopped; then is the date on which activities led to the generation of GHG emission reductions or removals.

The project activity is being developed by NIDEPOR S.A. and expects to remove and reduce the emission of 10,178,342 tCO₂e in a period of 30 years, averaging 339,278 tCO₂e per year and improve local adaptation to climate change.

Therefore, in AENOR's opinion the project will contribute to the mitigation of climate change, conserving biodiversity and generating benefits for the population of the community. The project goals include the conservation and reduction of deforestation; contribute to improve the quality of life of neighbourhoods and local stakeholders; and the conservation of biodiversity.

AENOR deems that the description in the project description is accurate, complete, and provides an understanding of the nature of the project

3.2.2 Physical Parameters (G1.3)

In section 2.1.5 of the CCB-VCS-PD, there is a complete description of the basic physical parameters of the area where the project is carried out. These parameters include the climate, hydrology, soil, types of vegetation and biological diversity, following is summarized these physical parameters.

The validation team confirmed that the PD sufficiently describes the physical parameters of the project area and zone. Validation team confirmed the physical parameters against climate data from project area reported in official information provided by the Argentinian government on Statistics of Argentina 2020 Yearbook /11/; Management Report 2022 of National Parks Administration /12/; and public information on Weatherspark.com web site.

In addition, validation team, during the on-site visit, confirmed by observing the main characteristics that they are in accordance to the provided information in the CCB-VCS-PD.

3.2.3 Social Parameters (G1.3)

The social parameters were contrasted against Argentina Census report 2010 /13/ and census report 2021 /14/; including information regarding current socioeconomic conditions of the inhabitants living in a given territory, their cultural characteristics, organizational system and exercise of collective governance. Also, provided information was assessed this during the site visit and with the documented evidence from Appendix I.

Also, the information about groups present in the project, were confirmed during the meeting with local stakeholders contrasting the information of social baseline report.

3.2.4 Project Zone Map (G1.4-7, G1.13, CM1.2, B1.2)

Section 2.1.7 of the VCS-CCB-PD describes the project zone map of the project, including: Reference Region /15/, Project Area /16/; Leakage Belt /17/ and HCV maps /18/.

AENOR assessed this during the site visit by visiting project zone; also, it was reviewed KML files /19/ and processed GIS data /20/.

3.2.5 Stakeholder Identification (G1.5)

The stakeholder identification and analysis process involved brainstorming with key informants, identifying relevant stakeholders by gender, ethnicity, wealth, livelihoods, community-based organizations, local government influencers, and public organizations. After that, field research utilized a mixed-stage design, involving interviews, censuses, random sample selection, and directed sample selection for rural households and community groups.

Project proponent conducted a series of participatory workshops /21/, survey of rural household's report /22/; also, PP has conducted a census /23/ to identify community groups, women, indigenous peoples, and people with greater economic and social vulnerability, livelihoods and/or cultural values. In addition, the community relations team utilized a mixed territorial approach strategy to identify rural residents outside project boundaries, based on their rural lifestyle, occupation, income, cultural patterns, and access to public education and health systems.

Validation team confirmed that the process of identifying actors was carried out through workshops and mixed strategy, which involved stakeholder meetings, ethnographic interviews, semi-structured interviews, and thematic focus groups on agriculture, indigenous habitat issues, and local problems in Cruce Caballero. It also involved a SWOT matrix for community organization self-diagnosis.

AENOR assessed the identification of stakeholder by reviewing workshop presentation /24/, flyers of project diffusion /25/, stakeholders meeting reports /26/; project diffusion reports /27/; presentation project diffusion /28/; Citizen Consultation Project Control Board /29/ and by direct interview with stakeholder, during the on-site visit. Complete list of evidence is listed in appendix I.

3.2.6 Stakeholder Descriptions (G1.6, G1.13)

The stakeholders identified are mentioned in section 2.1.9 of the CCB-VCS-PD and also briefly explained above in section 3.2.5 of this report. The identification of stakeholders were carried out through meetings, workshops, surveys and census conducted by PP. The project zone's population could lead to believe to be a single community due to its proximity, income and economy regularities, public services access, evangelical Christian religions, and common linguistic patterns, including Spanish and Portuguese, "Portuñol, and Mbya Guaraní. On the other hand, PP has identified three groups: women, native people, and those with greater economic and social vulnerability, affecting livelihoods, education, and food sovereignty.

Validation team in order to confirm that all communities, community groups and other stakeholders, were correctly identified in the project description reviewed Citizen participation workshop report /21/; Survey of rural household's report /22/; NIDEPOR Census report /23/; and Project Control Board Citizen Consultation /29/. Also, this information was constated against official information included in the Census report /13/ /14/. Then, based on reviewed documents and interviews the relevant stakeholders mentioned in the CCB-VCS-PD, in AENOR's opinion stakeholder description were correctly identified and in line with the audit observation.

3.2.7 Sectoral Scope and Project Type

Sectoral scope: 14 Agriculture, forestry and other land use (AFOLU)

Project category: Conversion of low-productive forests to high-productive forests (LtHP).

As described in Section A1.4 – 4) of VCS Methodology Requirements, v4.3., the project activity fall under Low-Productive to High-Productive Forest (LtHP). This category includes practices that increase carbon sequestration by converting low-productivity forests to high-productivity forests. In this sense, the project activity stopped logging; it will adopt enrichment planting to increase the density of trees; and Implement forest management activities as cutting bamboos/vines that prevent forest regrowth. Then, validation team concludes that sectoral scope and project type are properly defined by PP.

3.2.8 Project Activities and Theory of Change (G1.8)

Project proponent included in the CCB-VCS-PD a complete description of activities to be taken in order to achieve the climate, biodiversity and community objectives. Section 2.1.11 includes the activities description, outputs, outcomes and impacts.

The overall objective of the project is the restoration of the biosphere, regenerating the native forest structure, reinserting native species, and restoring the biodiversity of the different ecosystems. The project aims to restore a 22,878.5 hectare forest mass over 5 years, focusing on species interaction and reintroduction. It includes a monitoring system, training for protected groups, and development programs for housing, water, and food production. Participatory Carbon Budgeting financing is used to finance these programs.

Project proponent developed the conservation plan for native forests /30/, which was designed to maintenance the potential of conservation; restore of original ecosystems; identity ecosystem functions and their services. Since illegal hunting and logging activities are the main threats to the area, the project includes the installation of a monitoring system, training and provision of equipment for the different protected area protection groups (rangers, firemen, local police, etc.).

Moreover, this is made possible by using only the saracua, a hand tool made to have as little influence on the soil as possible. It avoids deep disturbances, compaction, or erosion that are usually associated with automated procedures by just penetrating the top 10–12 cm of soil. This method successfully maintains the stability and natural structure of the soil.

We can efficiently prepare planting areas while protecting the project's environmental goals by maintaining the integrity of the soil and avoiding the negative effects of mechanical operations. This age-old technique is a wonderful example of how sustainable land management may benefit greatly from tried-and-true, low-tech technologies.

In order to confirm that project activity would be able to meet its objectives, validation team reviewed conservation plan for native forests /30/ and community monitoring plan /31/. Moreover, during the on-site assessment, interviewed local stakeholders confirmed all activities carried out by the project developer. Therefore, AENOR deems that the theory of change in the project description is accurate, complete, and provides an understanding of the nature of the project and how it will achieve its climate, community, and biodiversity objectives.

3.2.9 Sustainable Development

As stated in section 2.1.12. of the CCB-VCS-PD, NIDEPOR aims to align projects with SDGs, including the UN Strategic Plan for Forests 2030, to combat deforestation and forest degradation. Global forestry goals and targets aim to contribute to sustainability, aligning with international agreements like the Aichi Goals and the Paris Agreement

Regarding national sustainable development priorities, the project contributes to goals; the project aims to reduce poverty, promote gender equality, generate decent work and economic growth, conserve natural forests, increase carbon sequestration, and promote sustainable land use. It also focuses on climate action, promoting sustainable land use, and controlling invasion. The project aims to address gender needs, create jobs, and promote sustainable land use.

The Validation Team reviewed the justification for the anticipated contribution to each SDG provided in the CCB-VCS-PD and determined that they are reasonable, and the description included in the project description are appropriate.

3.2.10 Implementation Schedule (G1.9)

The most important milestones are described in the in section 2.1.13 of the CCB-VCS-PD. In the following table is summarized the assessment carried out by the audit team:

Date	Milestone(s) in the project's development and implementation	VVB Assessment
2020	Project development	Validation team reviewed the reference period for determining the baseline. It is in line with crediting period
June 2020	Land irrevocable lease with option to purchase	Validation team reviewed the land lease acquisition contract /32/ and land title deed /33/ to confirming the leasing with the option to purchase de project area .
Sep 1 st – Oct 31 st 2021	Community assessment and census	Validation team reviewed the project proponent census report /23/ a feasibility study /34/ to confirm the activities carried out with communities.
Aug. 28 th 2021	Baseline fauna biodiversity inventory	Validation team reviewed the biodiversity baseline report /35/ and confirm the date.
Oct 26th 2021	Baseline forest inventory	Validation team reviewed the baseline forestry inventory /36/

Jun 3 th 2021	FIPC with Tekoa Alecrín community	Validation team reviewed the agreement between project proponent and Tekoa Alecrín community /37/
Nov. 26 th 2021	Public consultation with communities in project zone	Validation team reviewed the Invitation to public consultation /38/ to confirm the start of consultation process.
Dec 15 th 2021	Project start date with stopped logging	Validation team reviewed the stop logging report /39/ to confirm that logging activities have been stopped.
1 st Monitoring period	15 December 2021 – 31 July 2022	It correspond to the first monitoring period. Validation and 1 st verification are conducted simultaneously.
May 25-27 th 2022	First enrichment and regeneration practices	Validation team reviewed the enrichment and restoration report /40/ to confirm regeneration practices.
Jul 11-30 th 2022	Forest inventory	Validation team reviewed the /41/ to confirm these activities on the project area.
Jul. 13 th 2022	Biodiversity inventory	Validation team reviewed the biodiversity inventory report /42/ to confirm these activities on the project area.
March 2027	End of enrichment period activities	Validation team reviewed the enrichment and restoration report /40/ to confirm regeneration activities.
Dec. 14 th 2121	End of crediting period	In line with crediting period

3.2.11 Benefits Assessment and Crediting Period (G1.9)

The project start date is 15 December 2021 and the crediting period goes from 15 December 2021 to 14 December 2121. A total of 100 years. Validation team reviewed the evidence of project milestone (section 3.2.10 of this report) to confirm the start date and crediting period.

According to Section 3.9.3 of the VCS Standard, the crediting period of AFOLU projects will have a minimum of 20 years and a maximum of 100 years. Therefore, the project activity is in line with the length of the crediting period, and it has the option to renew more times.

Validation team confirmed that the project has a credible plan for managing and implementing the project over the project crediting period. Validation team confirmed the project ownership /32/ /33/, further supported through site interviews with both the landowner and the project proponent, the validation team substantiated the agreement between the project proponent and landowner regarding land management and carbon rights throughout the project lifetime. In addition, validation team confirmed that there are no differences between the GHG emissions accounting; climate adaptive capacity and resilience; community and biodiversity assessment periods.

3.2.12 Risks to the Project (G1.10)

As summarized in section, 2.1.18 of the CCB-VCS-PD, project proponent identified the main risk of the project activity, which includes Natural and human risks to climate, community, and biodiversity during project life. Natural and human risks includes fires, flooding, and winds that could bring down trees or affect the biodiversity.

SWOT (Strengths, Weaknesses, Opportunities and Threats) analysis enables remote pre-diagnosis of problems using cameras, sensors, drones, and operators to detect problems in a timely manner. It includes forest fires (intentional or not), deforestation, poaching, illegal trafficking (in any of its variants) and agricultural poaching.

The assess to the accuracy of the likely natural and human-induced risks to the expected climate, identified by the project, include the assessment of risk analysis in accordance with the VCS AFOLU Non-Permanence Risk Tool v 4.0. /6/ (all rewired evidence is detailed in section 3.3.10 of this report). Validation team evaluated the risk assessment undertaken by the project proponent and assessed all assumptions, justifications and documentation provided by the project proponent to support the risk to the project. The information included in the project design document was confirmed and is in accordance with the supporting documents-

AENOR deems that the PP correctly identified the risks to the project benefits but the most important is that has designed and is implementing actions to reduce or diminish the negative impacts of these risks in the benefits on the climate, community, and biodiversity

Validation team reviewed the Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis /43/ and the contingency Plan /44/. Moreover, during the on-site assessment validation team confirmed the steps taken to minimize or reduce natural and human-induced risks.

3.2.13 Benefit Permanence (G1.11)

Project design documents describes how the project benefits will maintain and enhance the climate, community, and biodiversity benefits beyond the project. According to section 2.1.19 of CCB-VCS-PD., the project involved community from the beginning to identify risks and needs. Social and economic development projects are designed to be continued throughout the lifetime (there is a commitment to the investors and community to continue the projected activities), with the community overseeing design and construction. At the end of the 100-year protection period, which includes planting native species and

regenerating biodiversity, the land will be donated to the provincial government to be converted into a nature reserve. This donation will not only ensure the continued protection of the area but will also establish a lasting legacy of conservation and sustainable forest management.

It is important to note that Forestal Belga lacks the legal capacity to pledge the land as it will no longer be its property. As stated in the PD, Nideport will take full responsibility for donating the property to the provincial government upon project completion as the new owner and after compensating the land with the carbon credits. In order to secure long-term protection beyond the project's length, this agreement will contain provisions guaranteeing the land's conservation, sustainable management, and suitability as a nature reserve.

AENOR assessed the conservation plan for native forests /30/; community monitoring plan /31/ and the Contingency Plan /44/ to confirm activities carried out to maintain and enhance the climate, community, and biodiversity benefits beyond the project lifetime. Furthermore, during the on-site visit, many actors were interviewed (refer to section 2.4) to confirm the supports provided by the project proponent. Therefore, validation team considers that all measures implemented by the project are enough to ensure the permanence of the Project benefits and to promote its continued operation during its projected lifetime

3.2.14 Financial Sustainability (G1.12)

To demonstrate the profitability and sustainability of the project uses economic indicators detailed in section 2.4.5 of the CCB-VCS-PD. Project proponent provided the project financial model for Long-term viability /46/ starting on 2021. According to the projections, the NPV of the project in the next 10 years would be around \$3,737,231, and the IRR would be 196%. These values were obtained considering a moderate scenario.

In addition, according to the non-performance risk report /45/ the project proponent shared investment funds receipts with auditors, revealing 500,000 USD in 2021. Nideport has not yet generated revenue. However, the project proponent has agreed to purchase 50,000 credits at a reference price of 16 USD/credit, resulting in \$1,300,000 in revenue and funding. This implies that the project secured 80.32% or more of the investment needed to cover the cash out until breakeven, considering the reference price of 16 USD/credit.

Therefore, AENOR is able to confirm that the financial mechanisms adopted provides an adequate flow of funds for project implementation to achieve the project's climate, community and biodiversity objectives and benefits.

3.2.15 Grouped Projects

Not applicable. This is not a grouped project.

1) Eligibility Criteria for Grouped Projects (G1.14)

Not applicable. This is not a grouped project.

2) Scalability Limits for the Grouped Projects (G1.15)

Not applicable. This is not a grouped project.

3) Risk Mitigation Approach for Grouped Projects (G1.15)

Not applicable. This is not a grouped project.

3.2.16 Land-Use Scenarios without the Project (G2.1)

PP has identified two alternative land use scenarios to the IFM project activity. Scenario A - Continued Forest degradation with relogging; and Scenario B - Protection and enrichment of the forest without developing a carbon project. In the scenario A, harvesting activities in the project area have been going on for more than 50 years. As a result of these practices, the forest area is mostly degraded and only parts of it could be harvested. In the scenario B involves protecting project area, developing activities without carbon credits, and relogging, making it financially unfeasible and similar to the project scenario.

Scenarios A and B are both plausible alternative land use scenarios to the IFM project activity that are in compliance with mandatory legislation and regulations in Argentina. In addition, both scenarios have no legal barriers, but Scenario B is not feasible due to financial constraints. Protecting land without carbon credits is not financially attractive, as it would not generate revenue for the project proponent.

Validation team reviewed local regulation; including Climate change law N° 27520 /47/; Defence of forest wealth law N°13273 /48/; Environmental protection budgets of native forests Law N°26331 /49/; Protective Forests Law N° 3426 /50/; and Legal Regime on Forests and Forest Lands law N° 854 /51/. Also, through site visit observations, interviews during the site visit with project developer, and a review of supporting documentation, AENOR's validation team confirms that the potential land-use scenarios and the associated drivers of land use changes are properly justified in the VCS-CCB-PD.

3.2.17 Most-Likely Scenario Justification (G2.1)

As stated in section 3.2.16 of this report, PP has identified two alternative land use scenarios to the IFM project activity. Scenario A - Continued Forest degradation with relogging; and Scenario B - Protection and enrichment of the forest without developing a carbon project. Scenarios A and B are both plausible alternative land use scenarios to the IFM project activity that are in compliance with mandatory legislation and regulations in Argentina. In addition, both scenarios have no legal barriers, but Scenario B is not feasible due to financial constraints. Protecting land without carbon credits is not financially attractive, as it would not generate revenue for the project proponent.

Validation team contrasted provided information against local regulation; including Climate change law N° 27520 /47/; Défense of forest wealth law N°13273 /48/; Environmental protection budgets of native forests Law N°26331 /49/; Protective Forests Law N° 3426 /50/; and Legal Regime on Forests and Forest Lands law N° 854 /51/. Also, through site visit observations, interviews during the site visit with project developer, and a review of supporting documentation, AENOR's validation team confirms that the potential land-use scenarios and the associated drivers of land use changes are properly justified in the VCS-CCB-PD.

Therefore, after analysing, the social baseline and national and local regulation, validation team concludes that scenario A - Continued Forest degradation with relogging is the most likely scenario. Then, AENOR deems that the most-likely land-use scenario is justified.

3.2.18 Community and Biodiversity Additionality (G2.2)

The project proponent provide information about how project activities of both instances would not have been implemented under the without-project scenario. Baseline and projected conditions are detailed in section 2.2.3. of CCB-VCS-PD.

Validation team reviewed the baseline scenario that was reported as identified using the VCS tool VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities. Detail on validation of the baseline scenario and additionality can be found in Section 3.3.4 and 3.3.5 of this report, respectively.

Moreover, to enhance quality of life and climate change resilience, the SPVN GS1 project funds community-led initiatives including the Forest Safety Net and land tenure guarantees for Tekoa Alecrín, as directly observed by AENOR's audit team in January 2023 site visit. Important programs, like "Óga" and "Ra'yi," honor indigenous wisdom and traditions, and "Mujeres Cultivadoras" grants women business owners complete control over identifying their top support requirements. Additionally, the project promotes and protects indigenous medicinal plants.

Nideport serves as a facilitator in the implementation strategies, which entail close cooperation with local communities. To guarantee long-term viability, alliances are formed with foundations and non-governmental organizations. Communities have benefited greatly from the project, as evidenced by quantifiable statistics and impact evaluations. The ability of communities to manage resources and adjust to environmental difficulties has improved, according to monitoring and evaluation studies.

The Validation Team reviewed supporting documentation regarding existing legal and regulatory requirements /47/ /48/ /49/ /50/ /51/ to undertake activities similar to the project activity and the most likely scenario that was clarified by the Project Proponent to be accomplished through legal approvals and a Comprehensive analysis of applicable regulation in Argentina /52/. Section 3.1.5 of the CCB-VCS-PD describes that in the absence of carbon finance, the project is impractical, as the project lands will be managed for conservation purposes and not generate revenue associated with other identified land use scenarios.

The Validation team substantiated no distinct climate, community, or biodiversity benefits are intended to be used as offsets and the only offsets to be generated from the project are Verified Carbon Units (VCUs). Validation team substantiated that the cost analysis provided shows significant expenditure with no financial return for the project proponent in the absence of VCU-related incomes, thus demonstrating a clear financial barrier to project implementation. through the validation activities described, the validation team substantiated the justification for the additionality of the project activities provided by the project proponent are appropriate and accurate.

3.2.19 Stakeholder Access to Project Documents (G3.1)

Project involves free and informed prior consultation with communities, introducing objectives, risks, benefits, and open forums for input. In addition, indigenous peoples and all interested parties have access to the proceedings and documents of the FPIC in Spanish and Guaraní Mbya, both in digital and physical versions, as well as the survey and project documents, statutes, CCB and VCS regulations.

The project's information access strategy includes news portals, NIDEPOR social networks, local radios, newspapers, and face-to-face briefings. A Community Relations Office (RRCC) in Cruce Caballero is planned, with open hours and operational mail and WhatsApp contact numbers.

During the on-site visit, validation team confirmed by interviews with various local actors (see section 2.4 of this report) that the information generated for the design of the project has been explained to the community. Also, the result obtained for the preparation of the documents has been exposed to the community, in a draft of the project description, in the VCS and CCB standard. Moreover, the documentation developed by the project proponent, including previous studies as well as the project description document, were delivered to local stakeholders. In addition, any persons from the communities can directly communicate with the project representatives. These facts were corroborated during the visit assessment

AENOR assessed this during the on-site visit; through the review of the participatory workshops and by reviewing public information the project proponent web page. Therefore, validation team concludes that the stakeholders have access to information regarding project activity.

3.2.20 Community Costs, Risks and Benefits (G3.2)

On November 26th, 2021, a free consultation was held at the Community Hall, providing information on the project's environmental and community benefits, costs, risks, and opportunities. Participants asked questions about financial health, employment, external threats, and project continuity. Consultation involved participatory mapping of HCV identification, risk estimates, and a women's focus group to assess impact on societal roles and gender safeguards.

In the case of Tekoa Alecrín community, PP carried out a SWOT analysis /43/, HCV identification and project formulation workshops /21/ /24/. This included a workshop on gender perspectives regarding the benefits of the project.

During the site visit interviews with the local communities, it was assessed that the ability of the community to understand the information related to the project cost, risks and benefits associated with the project activities.

Validation team finds that the measures provided by PP are adequate to provide the information about community costs, risks and benefits to the stakeholders and ensure their full participation in the project development and implementation process. The dissemination of the information and project's documents will be carried out through meetings and / or workshops with the interested parties.

AENOR deems that the information provided was adequate as well as the communities' ability to understand the information provided and the timeliness of such information.

3.2.21 Information to Stakeholders on Validation and Verification Process (G3.3)

The description of the validation and verification process was made known through workshops, CCB and VCS validation and verification process information was recorded at public consultation meetings and in the Free and Informed Prior Consultation process with Tekoa Alecrín community. Project monitoring milestones will be reported in advance through newsletters, printed documents, and briefings.

Validation team reviewed participation workshop report /21/; survey of rural household's report /22/; NIDEPORT Census report /23/; Workshop presentation /24/; Flyers of project diffusion /25/; Stakeholders meeting reports /26/; project diffusion reports /27/; presentation project diffusion /28/; and Project Control Board Citizen Consultation /29/. The information, also, was corroborated by direct interview with stakeholder, during the on-site visit.

AENOR's validation team confirm the communication methods used to inform communities and other stakeholders of the process for VCS and CCB validation and verification. Validation team determined that the measures taken, and communication methods used to inform community members and other stakeholders of the validation and verification process were conducted appropriately.

3.2.22 Site Visit Information and Opportunities to Communicate with Auditor (G3.3)

According to the project developer communities receive 15-day advance notice of visits via website, newsletters, posters, and face-to-face communication, with contact lists and meeting space provided.

During the presentation of the results obtained in the project, the community was advised and the steps to be followed were explained, also the completion of the CCB-VCS-PD and the auditor's visit, indicating that they could conduct the interviews with the community members and stakeholders.

AENOR, during the on-site visit, could talk with various local actors and checked the attendance list of the workshops. Also, AENOR checked that the communities and other stakeholders were informed of the auditor's site visit in a timely manner before the site visit occurred by reviewing invitation letters /53/ to stakeholders and with interviews during the auditing process.

3.2.23 Stakeholder Consultations (G3.4)

The Validation Team reviewed Section 2.3.7 of the VCS-CCB-PD, revealing stakeholder consultations and their influence on project design. Interviews confirmed that the Project Proponent consulted identified stakeholders and considered input from these meetings. The consultation was extended through radio spots, advertisements in provincial newspapers, and a campaign in stores, churches, community infrastructure. During the survey process, stakeholders in the Project boundary were informed about project steps, including the Public Consultation and auditors' presence. Face-to-face communication was the primary strategy, leading to high-intensity information exchange.

Tekoa Alecrín community has been consulted and has influenced the design of the projects through a CLPI (Free and Prior Informed Consultation, for its Spanish acronym). Between December 2020 and February 2021, a CLPI was conducted with the Tekoa Alecrín community council and other members. The First Chief stated that the CLPI will not be conducted with all community members due to internal organization and tradition. The Council of Authorities was empowered to speak on behalf of the entire Tekoa Alecrín community. On May 19, an agreement was reached on a housing project and seed access for vegetable gardens. A workshop was held to determine the HCV for Tekoa Alecrín community, and a gender workshop was conducted using a focus group methodology. Participants were asked about their opinions, interest in housing construction, knowledge of crops, and specific needs specific to women.

On November 26th, 2021, a stakeholder consultation with communities in Cruce Caballero, Tobuna, Paraje Alegría, and Paraje Piñero involved over 50 participants. The consultation focused on environmental and

community benefits, costs, risks, and opportunities. Participants asked questions about financial health, employment, external threats, and project continuity.

Project proponent provided photographs; workshop report /21/; survey of rural household's report /22/; NIDEPOR', Census report /23/; Workshop presentation /24/; Flyers of project diffusion /25/; Stakeholders meeting reports /26/; project diffusion reports /27/; presentation project diffusion /28/; and Project Control Board Citizen Consultation /29/; also, during the on-site visit the community's member were interviewed. Then, AENOR's validation team is able to confirm that the consultation process is effective and fulfil the requirement of VCS and CCB requirements.

3.2.24 Stakeholder Consultation Channels (G3.5)

To ensure stakeholder consultation, radio spots and advertisements were broadcasted in provincial newspapers, and a campaign was carried out, with posters in shops, churches, community infrastructure, and over 150 households during census. In the case of the Tekoa Alecrin community, direct communications took place with the Council of Authorities who represented the community and committed to inform the community of meetings and discussions and include them in the community's conclusions.

In the case of Tekoa Alecrin projects will continue to be worked using the CLPI methodology (with face-to-face meetings) throughout the project's lifetime, in line with development projects deadlines and requirements."

The results of the socialization and consultation processes are reflected in stakeholders meeting reports /26/; project diffusion reports /27/; which describes the methods, material used, attendance list, photographs and presentations.

In addition, Members of the communities have access to email and phones numbers, which they can use to find out about the project and its results. During the on-site visit the validation team reviewed the communication channel with stakeholders and confirm that there are adequate levels of information sharing and all consultations and participatory processes have been undertaken directly with communities

3.2.25 Stakeholder Participation in Decision-Making and Implementation (G3.6)

Validation team reviewed Section 2.3.10 of the VCS-CCB-PD that describes the measures identified by the Project as needed or taken to enable effective participation with local communities as well as stakeholders. The communities present in the project's area of influence correspond to groups identified in the project design. The interaction with all the actors has been designed in order to taken into account the forms of governance and decision-making of the community.

These include open process of communication and dissemination of all the actions to be carried out, consideration of ethnic differences, the vision of these communities and their language respected, gender balance has been considered in terms of the number of participants in the meetings convened with stakeholders

AENOR's validation team confirming the decision-making and implementation during the on-site visit, by interviewing various local actors. In AENOR's opinion, the measures needed and taken by the Project Proponent to enable effective participation in a culturally appropriate and gender sensitive manner have

occurred as described and should be sufficient in ensuring effective participation throughout the Project Lifetime.

3.2.26 Anti-Discrimination Assurance (G3.7)

Project proponent established a memorandum of understanding defining inclusive participation guidelines and protocols for discrimination, providing beneficiaries with contact with human resources for reporting.

Project proponent account with Code of Conduct / 54/, which prohibits discrimination based on ethnicity, colour, religion, gender, national origin, age, disability, sexual orientation, language, or other protected characteristics. Article 2 prohibits harassment, including verbal, written, sexual, and physical harassment, based on various factors.

AENOR's validation team reviewed Code of Conduct /54/ and Signed MoU /120/ confirming information provided in the CCB-VCS-PD.

3.2.27 Feedback and Grievance Redress Procedure (G3.8)

Project proponent, in section 2.3.12 of the VCS-CCB-PD has established that the project will include a process to receive, listen, respond and resolve claims within a reasonable timeframe. The reception of grievances and comments are done both through face-to-face (during communication meetings) and digital communication channels, such as email and project's WhatsApp publicly available to stakeholders.

Project proponent account with a procedure for solving conflict /55/, which states that project outlines a 72-hour process for handling complaints and comments, including initial contact with stakeholders and resolution attempts. If not resolved, mediation is determined, considering complaint type and stakeholder involvement, including security agent arbitration for illegal activities.

Validation team reviewed assessed the procedure for solving conflict /55/ and confirmed the followed process, during the on-site visit. Therefore, AENOR's validation team is able to confirm that the feedback and grievances producers meets VCS and CCB (G.3.8) requirements .

3.2.28 Worker Training (G3.9)

Project proponent, in section 2.3.14 of the VCS-CCB-PD has established the key aspect for workers training within the framework of project activity. Training activities includes Induction; training and coaching; technical training; and training activity measurement tools.

Project proponent account with a training plan /56/ and training records /57/ in order to identify the measures needed and taken to provide orientation and training to project workers. Validation team, during the onsite visit, interviewed some workers and local actors in order to confirm whether they have received the necessary training to perform their activities, all of them confirmed this fact. Therefore, AENOR's validation team is able to confirm that project proponent will provide orientation and training for those employed through project activities and relevant people from the communities and meet the VCS and CCB (G.3.9) requirement.

3.2.29 Community Employment Opportunities (G3.10)

According to the CCB-VCS-PD (2.3.15) the project aims to create 50 direct job opportunities for communities, with 50% being women. These positions require training on specific tasks and follow a process to ensure fair selection. The steps involved in the selection process ensure a fair chance of filling the positions. Human Resources and Applicant sectors make candidate selection decisions based on background, interview, technical, and psycho-technical evaluations,

AENOR's validation team interviewed some workers (male and female) in the project zone and is able to confirm that the recruitment process provides equitably advantages to the local population. Also, a group of women were interviewed in order to confirm the personnel recruitment and job opportunities. Furthermore, validation team reviewed request for personnel recruitment procedure /58/ and its availability to stakeholders. Therefore, in AENOR's opinion the project has provided, and has measures in place to ensure that the community will be engaged and provided employment consideration for future employment opportunities.

3.2.30 Relevant Laws and Regulations Related to Worker's Rights (G3.11)

The relevant legal framework is listed in section 2.3.16 of the CCB-VCS-PD. AENOR's validation reviewed listed regulation /59/ /60/ /61/ /62/ /63/ /64/ /65/ and is able to confirm the project's adherence to all relevant laws and regulations covering worker's rights and the measures needed and designed to inform workers about their rights. It, also, was corroborated through various interviews with workers in the project zone.

3.2.31 Occupational Safety Assessment (G3.12)

Project developer has analysed the main legal framework related to occupational safety and also has done a specific analysis of the main risks associated to its operations. Based on that, the project developer provides training and personal protective equipment (PPE) for performing the field activities.

The main risk are described in section 2.3.17 of the CCB-VCS-PD. Validation team reviewed the prevention, work wear and personal protection elements procedure /66/ and the main framework regulation /59/ /60/ /61/ /62/ /63/ /64/ /65/ in order to verify the measures to reduce and mitigate identified risks.

Is important to note that AENOR's audit team could witness that strict compliance with the program's set protocol will be guaranteed in situations where communities are allowed to use forest resources, such as gathering firewood. The goal of this protocol is to protect the forest ecosystem and communities by encouraging safe and responsible resource management. It encourages coordinated engagement with the participating security personnel and reduces any hazards.

In order to ensure proper reactions, security agents are educated to differentiate between traditional usage that are allowed and activities that are forbidden. Community members must record the georeferenced location, kind, and amount of fallen firewood in order to collect approved firewood. The possibility of tensions or disputes between community members and security personnel is greatly decreased by recording and sharing this information with security patrols.

Then, AENOR's validation team is able to confirm that the project developer is taking the necessary measures regarding occupational safety of workers.

3.2.32 Project Governance Structures (G4.1)

In section 2.4.1 of the CCB-VCS-PD is established the organizational structure for the governance of the project. The structure was confirmed during the on-site visit by interviewing the general manager, the specialist and coordinators of the project activity, confirming the governance structures, roles and responsibilities of all entities involved in project design and implementation.

3.2.33 Required Technical Skills (G4.2)

According to the CCB-VCS-PD (section 2.4.2) the key technical skills include community engagement, biodiversity assessment, and carbon measurement and monitoring. These include community relations, a community engagement methodology, an ethnographic approach, risk and threat assessment, and biodiversity monitoring. In this sense, validation team confirms that project proponent has previous experiences in developing this kind of projects.

Marcelo Taboada, President and certification officer of NIDEPORT, has over 40 years of experience in business law, auditing, ISO norms, environmental law, risk assessment, and environmental impact assessment. He also manages natural assets and has experience in agricultural management plans and harvesting activities. NIDEPORT has hired Fotosíntesis to conduct forest inventories and Aves Argentinas to conduct biodiversity inventories. Fotosíntesis has experience in forest inventories, afforestation, reforestation, and fire prevention, with a team of forest engineers. Aves Argentinas, a BirdLife International member, specializes in research, education, and conservation projects, focusing on birds.

AENOR's validation team reviewed the resumes of responsible for the project (President) and the responsibility of preparing the document /67/ and concludes that they have all the capabilities and technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring.

3.2.34 Management Team Experience (G4.2)

Section 2.4.3 of the CCB-VCS-PD includes information documenting the expertise and experience of key project management team members. The Validation team reviewed information provided on the project management team's expertise /67/ regarding Nideport, Aves Argentinas, Fotosíntesis, EcoSecurities and ProSustentia and experience and conducted interviews with several of the identified project management staff. Based on review of supporting documentation and site visit interviews, the Validation team determined that the project management team possesses the expertise and prior experience necessary to implement land management and carbon project at the scale of this project.

3.2.35 Project Management Partnerships/Team Development (G4.2)

Section 2.4.4 of the CCB-VCS-PD includes information documenting the expertise and experience of individuals involved in project management partnerships. Site visit interviews with individuals involved in project management partnerships, specifically regarding IFM project development (including monitoring, reporting, and validation/verification processes), as well as forest inventory and biodiversity assessment aspects, substantiate that they require the necessary expertise and experience to support the project and fill any gaps in management team experience.

AENOR's validation team reviewed the resumes of responsible for the project and key personnel /67/ and conclude that the organization has the expertise and prior experience implementing land management and carbon projects at the scale of this project.

3.2.36 Financial Health of Implementing Organization(s) (G4.3)

The financial health of the organization is proved through the financial model - Long term Viability of NIDEPORT /46/. It shows that the NPV of the project in the next 10 years would be around \$3,737,231, and the IRR would be 196%. These values were obtained considering a moderate scenario and could vary according to an optimistic and pessimistic scenario.

AENOR's Validation team verified the project financial model /46/ in order to confirm the financial health to ensure adequate financial support over the project lifetime.

3.2.37 Avoidance of Corruption and Other Unethical Behavior (G4.3)

Project developer account with a Forest Management General Manual /68/, which clearly explain that corruption and other unethical behaviors are totally forbidden. Then, verification team confirm that the personnel are suitable and appropriate and have the management capacity to develop the project, as it was confirmed by AENOR thought auditing processes with the relevant personnel of PP. Also, confirm that the organization have financial health and no corruption activities were identified.

3.2.38 Commercially Sensitive Information (Rules 3.5.13 – 3.5.14)

Confidential documentation pertains to lease terms and potential land purchase between Forestal Belga and NIDEPORT, were excluded from CCB-VCS-PD. However, they were shared whit validation team in order to validate the incomes an expensed included in the cashflow

Also, endangered species and species with hunting pressure, the exact location where it is seen is not reported in public documents. However, biodiversity surveys and reports were shared with validation team

3.2.39 Statutory and Customary Property Rights (G5.1)

Section 2.5.1 of the CCB-VCS-PD states that the Initial Project Instance and all future instances will be on privately owned lands, with the use, access, and management rights of private landowners. The Validation Team assessed provided ownership documents, including title deed (Forestal Belga) /33/ and lease contract /32/. Furthermore, substantiated by site visit interviews with the landowner and Project Proponent confirmed the land of the Initial Project Instance is privately owned. As the land is privately owned, the land use and access rights are owned by the landowner.

A map of the land tenure within, and surrounding the Initial Project Zone is provided in Section 2.5.1 of project design document. Therefore, by reviewing provided geospatial files, landownership documents, and the agreement between the landowner and Project Proponent substantiated the accuracy of the map of tenure, use, access and management rights to lands, territories, and resources in the project zone.

3.2.40 Recognition of Property Rights (G5.1)

Forestal Belga S.A. is the owner of the project area according to the title deed /33/. Project proponent (NIDEPORT) and project area owner has signed a lease contract /32/, which grants the control of project activity. Additionally, PP has provided comprehensive analysis of applicable regulation in Argentina /52/ regarding legal right to control and operate de project activity. Therefore, in AENOR's opinion all property rights are recognized, respected, and supported.

3.2.41 Free, Prior and Informed Consent (G5.2)

Forestal Belga S.A. owns all project land, and the proponent, with legal authorization, conducts research to ensure project avoids encroachment on private, community, or government property.

The project will not encroach uninvited on private property, community property, or government property. No property rights are affected by the project. Furthermore, there is not any community, individual or group of people living in the project area.

Through review of free and informed consultation FPIC) report /69/, review of ownership documents /33/ / and the contract between the landowner and Project Proponent /32/, supported by site interviews with community members and the landowner, the validation team substantiated that the Project Proponent is respecting the property rights of both the landowner and the identified community.

3.2.42 Property Rights Protection (G5.3)

Section 2.5.4 of the CCB-VCS-PD states that the land is privately owned and lacks communities, as explained in section 3.2.40 of this report. Considering that there are no communities or activities within the project area, there will be no relocation of any kind or nature. As well no hunting, unless illegal one, which if detected is reported to the corresponding government authorities. Therefore, the project activities do not lead to any involuntary removal or relocation of property rights holders from their lands or territories and does not force rights holders to relocate activities important to their culture or livelihood.

Site visit interviews with the landowner substantiate this statement, and site visit interviews with community had no claims to the property and none of their property rights would be affected by the project. In addition, during the on-site visit validation team interviewed the security guards in the entrance area to the project in order to confirm the activities carried in order to protect the project zone.

3.2.43 Illegal Activity Identification (G5.4)

Many illegal activities could affect project objectives; for that reason, project proponent identified these activities and implemented the mitigation measures. PP has identified: Forest fires (intentional or not); Deforestation; Poaching; Illegal trafficking (in any of its variants); and Illegal agriculture due to usurpation of land. PP has developed a contingency plan for illegal activities /70/ to address each of the problems outlined before. In addition, Institutions like Border Patrol, monitoring personnel, park rangers, and regional firefighters will support contingency plans.

Site visit interviews substantiate that the identified measures have been undertaken. The validation team determined that the illegal activities identified and their associated measures for mitigation should be

effective in reducing the identified illegal activities so that project benefits are not derived from illegal activities.

3.2.44 Ongoing Disputes (G5.5)

The land is privately owned. There are no identified or ongoing conflicts over land rights. There are no permanently settled local communities with customary land rights within the project area.

The Validation Team reviewed landowner title documents /33/ and carbon rights agreement document /32/ and substantiated the landowner's title to the land and Project Proponent's carbon rights for the project. In addition, during the on-site visit various local actors and local authorities (Intendent of San Pedro municipality) were interviewed in order to confirm provided information by project proponent and no negative comments were received about conflicts or disputes in the project area.

3.2.45 National and Local Laws (G5.6)

National and local laws and regulations in the host country are identified in Section 2.5.7 of the CCB-VCS-PD. The validation team substantiated that the list and description of identified laws are consistent with information on protective forestry law /50/ of Argentina. Interviews with Mayor of San Pedro Intendency further substantiated that the listed laws are relevant to clearing of forests in the project area. Additional clarification from the project proponent was given in a comprehensive analysis of applicable regulation in Argentina /52/, providing the necessary demonstration that the project is in compliance with all identified national local laws and regulations in the host country.

3.2.46 Approvals (G5.7)

According to section 2.5.8. of the CCB-VCS-PD no additional approval is necessary to carry out the project due to the fact that regeneration activities of natural ecosystems do not need any approval from authorities in Argentina and the project is developing in an owned area.

Validation team assessed local National regulation framework /47 /48/ /49/ /50/ /51/ and additional clarification from the project proponent was given in a comprehensive analysis of applicable regulation in Argentina /52/, providing the necessary demonstration that the project is in compliance with all identified national local laws and regulations in the host country and no additional approval is required.

3.2.47 Project Ownership (G5.8)

Section 2.5.9. states that the land is privately owned by Forestal Belga S.A. /33/. Moreover, there is a signed contract for the irrevocable assignment of the right to the certification of reduction of greenhouse gas emission and the right to generate, use, market sell carbon credits and the implement of corresponding activities in favour of NIDEPOT /32/.

Through review of provided project documentation /32/ /33/ /52/, further supported through site interviews with both the landowner and the project proponent, the validation team substantiated the agreement between the project proponent and landowner regarding land management and carbon rights throughout the project lifetime.

3.2.48 Management of Double Counting Risk (G5.9)

Section 2.5.10. of CCB-VCS-PD stated that the project has not received any form of environmental or social credit, including tradable climate, community, or biodiversity units. The Validation team determined that use of Verra's registry system and ongoing portfolio audits are appropriate measures to manage the risk of double counting.

3.2.49 Emissions Trading Programs and Other Binding Limits

Section 2.5.11 of the PD states that GHG removals generated by the project will not be used for compliance with binding limits to GHG emissions since Argentina does not have GHG emission compliance nor trading programs in place.

The validation team performed an internet search of multiple registries and found no evidence of participation in other emission trading program or other mechanism that includes GHG allowance trading. Then, in AENOR's opinion is reasonably assured that the project is not participating in, nor generating GHG emission reductions and removals to be used in any emission trading or other binding limit program or mechanism.

3.2.50 Other Forms of Environmental Credit

Section 2.5.12 of the CCB-VCS-PD states that the project is a new AFOLU project and is not registered in any other GHG program. The project will only generate credits from the storage of carbon in forest pools, and these are claimed only under the VCS and CCB program. The audit team performed an independent search of other registries and found no evidence that other forms of environmental credit are being sought. In AENOR's opinion is reasonably assured that the project activity is not receiving another form of GHG-related environmental credit.

3.2.51 Participation under Other GHG Programs

The project has not been registered by another GHG program. The validation team performed an independent search on other registries and no evidence was found that it is registered in any other GHG program.

3.2.52 Projects Rejected by Other GHG Programs

The project has not been registered or is seeking registration under any other GHG programs. The validation team performed an independent search on other registries and no evidence was found that it was rejected from other GHG programs.

3.2.53 Double Counting (G5.9)

According to section 2.5.15 of CCB-VCS-PD double counting is avoided as credits will be only sold through the VERRA platform since Argentina does not have GHG emission compliance nor trading programs in place. The Validation Team assessed the management of double counting risk and determined the steps to avoid double counting identified in the project design are appropriate for avoiding double counting.

3.3 Climate

3.3.1 Title and Reference

The approved baseline and monitoring methodology applied is the VCS Methodology VM0005 Version 1.2 Methodology for Improved Forest Management (IFM): Conversion of Low Productive to High Productive Forest /93/.

The project also applies the following CDM and VCS A/R tools:

Reference	Title	Version
CDM Tool	CDM Tool for Calculation of the Number of Sample Plots for Measurements within A/R CDM Project Activities /94/	2.1.0
CDM Methodology	AR-ACM0003: Afforestation and reforestation of lands except wetlands /95/	2.0
CDM Tool	Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity /96/	4.0
VCS Tool	VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities /97/	1.0
VCS Tool	VT0003 Tool for the Estimation of Uncertainty for IFM Project Activities /98/	1.0
VCS Tool	AFOLU Non-Permanence Risk Tool /6/	4.0

The audit team has made an intense review and is able to confirm that all the CDM and VCS tools applied are valid at the time of validation (see CAR ID 10 closed during the auditing process).

3.3.2 Applicability

Section 3.1.2 of the PD states all evidence used to demonstrate each condition of the applicable methodology and the modules and tools used. The assessment was carried out for each applicability criterion and include, among others, the review of evidence and sources provided in the PD, and the compliance check of the local project setting with the applicability conditions in regard to baseline and eligible project activities as follow:

VCS Methodology VM0005 Version 1.2 Methodology for Improved Forest Management (IFM): Conversion of Low Productive to High Productive Forest.

- (a) Project activities aim at the avoidance of relogging of logged-over, degraded natural Evergreen Tropical Rainforest, or the rehabilitation of logged- over natural Evergreen Tropical Rainforest through direct human intervention such as cutting of climbers and vines, liberation thinning and/or enrichment planting, or a combination of these activities

Some of the activities proposed by the project are cutting of climbers and vines, liberation thinning and enrichment planting. Based on the maps (GIS and KML files /19/ /20/) provided by the PP, the on-site visit to the project area made by the audit team, including the visit to some sampling plots and an area of research in enrichment planting to make this process following the best practice available and the interviews to relevant stakeholders (see Section 2.4 and 2.5 for more information), who confirmed that, according to their information, the project is protecting the area to be rehabilitated, the audit team could confirm the aim of project activities.

To confirm that the original forest qualify as an “Evergreen Tropical Rainforest”, validation team reviewed rainfall data /115/ from the past 10 years, measured in a private station, located in Loma Porá meteorological station (26°34' 3.14 "S; 54° 3' 32.11"W), San Pedro, located 13.87 km away from the project activity. Measurements confirms that the average precipitation is 2,480 mm, with maximum peaks in 2014 and 2015 at 3,439 mm and 3,240 mm, respectively. To confirm the data, validation team acceded to the information and the communication that the information was proved by the company Arauco Argentina S.A., owner of the meteorological station. Therefore, AENOR confirms that the project area classifies as an evergreen tropical rainforest.

(b) Land within the project area must have qualified as forest.

As defined in the Argentinian Forest Reference Emission Level (FRE) and its definition of forest, the project area is located within the Misiones Forest, a type of vegetation formation in the Atlantic Forest biome. The audit team assessed the GIS /20/ and KML files /19/, and visited the project area, acknowledging the criteria applied.

(c) In the baseline, the logged-over forest in the project area is unlikely to revert to normal regrowth patterns due to vines and climbers, which may include climbing bamboos, resulting from high-intensity logging operations in the past. In such cases, and subject to appropriate substantiation, regrowth of tree biomass before and following relogging in the baseline can be assumed to be zero. Where this is not the case, ex-ante estimates of regrowth must be made and monitoring of the baseline for ex-post confirmation of regrowth rates must be conducted.

As per methodology (Forest Regrowth), “When accounting for regrowth, ex-ante estimates of tree biomass regrowth in the baseline can be based on peer-reviewed literature providing values for regrowth from comparable residual forest types in comparable areas (...)”

Then, in this context, PP is utilizing peer-reviewed literature that reports regrowth rates in analogous reference areas. Consequently, the regrowth of tree biomass in the baseline scenario, prior to re-logging, is presumed to align with the rate established in published scientific article: *Selective logging of a subtropical forest: Long-term impacts on stand structure, timber volumes, and biomass stocks* (Bedrij et al., 2022) /121/. Thus, baseline tree biomass regrowth (pre-relogging) is modelled using Bedrij et al. (2022) rates as per established in the methodology.

(d) The soil carbon pool within the project boundary is either in a steady state at project commencement, or, if not, the soil carbon pool is only expected to increase more or decrease less in the with-project scenario in comparison to the baseline, and may therefore, conservatively be omitted;

As per the information obtained during the audit process, including the on-site visit to the project area, the audit team has not perceived or received any evidence that may contradict the statements made by the

PP, that is, there are no logging activities in the project scenario. Thus, conservatively, it seems plausible that the soil carbon pool will increase in comparison to the baseline, deciding to be omitted by the PP for conservative purposes.

- (e) Site preparation is carried out so as to avoid levels of soil disturbance or soil erosion sufficient to significantly reduce the soil carbon pool over the project lifetime;

The Project Proponent agreed to proceed according to this methodology requirement, and as per the information obtained during the desk review and the on-site visit, there are no breaches that might have happened already. The site preparation is based on the plan and strategy outlined in forest restoration plan /89/ and Forest Management Plan/108/. The procedures described in the Management and Conservation Plan as well as in the Plantation Report were assessed and audit team confirmed that:

The preparation of planting involves a careful approach to soil restoration. This involves selecting sites based on factors such as soil type, soil composition, and native vegetation.

Areas with lower erosion risk and favorable ecological characteristics are prioritized. Existing vegetation is cleaned manually, avoiding the use of heavy machinery that can compact the soil or alter its structure. This practice minimizes soil disturbance and protects the soil's biota, preserving fertility and water retention.

A manual tool (called "saracua") is used for creating holes, allowing precise plant size measurements to minimize soil alteration. This prevents large holes that could expose the soil to erosion and carbon loss.

During planting, the plant is carefully placed and compacted with the soil, ensuring firm contact between plant roots and soil, facilitating water and nutrient absorption and promoting vigorous growth. This practice reduces the risk of fungi and ensures a solid foundation for the long-term success.

Moreover, during the onsite visit by interviewing workers and asking questions about QA/QC as well as SOPs, crosschecked with what is described in the Management and Conservation Plan. It was confirmed that before beginning reforestation efforts, the necessary preliminary planning and clearance steps must be taken. This entails subsoiling, using a cultivator to prepare the soil, and at the at least, direct clearance of rubbish and undergrowth between the planting strip. Given that it serves as early protection against severe winter frosts and halts the process of water erosion on bare and sloping soils, it is crucial to think about maintaining the current vegetation in between the strips without interference. Therefore, it was verified that the information gathered in the field is reliable and realistic according to the Management and Conservation Plan and the Plantation Report.

- (f) The use of nitrogen fertilizer in the project activities is prohibited;

Nitrogen fertilizers will not be applied in the Project activities.

- (g) During the project crediting period, harvesting must not occur in the with-project scenario;

The Project Proponent agreed to proceed according to this methodology requirement, and as per the information obtained during the desk review and the on-site visit, there are no breaches that might have happened already.

- (h) Biomass burning, fuel gathering, removal of litter, or removal of dead wood do not occur in the baseline scenario and in the with-project scenario within the project boundary;

The Project Proponent agreed to proceed according to this methodology requirement, and as per the information obtained during the desk review and the on-site visit, there are no breaches that might have happened already. During the sampling plots visit, the audit team managed to observe that none of these activities were happening in the project scenario, whereas the information obtained during the interviews facilitated relevant information regarding what was happening during the baseline scenario.

Since the 1960s, Forestal Belga SA, a forestry firm, has owned the project area privately. Since then, it has kept a highly restricted management plan over the whole site, forbidding adjacent communities from engaging in activities like burning biomass, gathering fuel, removing litter, or removing dead wood. Therefore, it is clear that no such activities have occurred during the baseline and in the project scenario

- (i) A reference area may be used to derive relevant parameter values for the baseline scenario. This area must be of similar size as the project area, or larger (i.e., 75% of the project area or more), for which similarity with the project area can be demonstrated using criteria outlined in this methodology, and for which it can be demonstrated that the management is not affected by its selection as a reference area

The Project Proponent has confirmed that will not use a reference area, so this methodology requirement is complied.

- (j) Flood irrigation or drainage of primarily saturated soils are not permitted as part of the project activity, so associated non-CO2 greenhouse gas emissions can be neglected.

The Project Proponent agreed to proceed according to this methodology requirement, and as per the information obtained during the desk review and the on-site visit, there are no breaches that might have happened already. During the sampling plots visit, the audit team managed to observe that none of these activities were happening in the project scenario, whereas the information obtained during the interviews facilitated relevant information regarding what was happening during the baseline scenario.

- (k) There is no peatland within the project area or emissions associated with peatland are not significant.

AENOR's audit team has reviewed the documentation provided by the PP (see footnotes 51 and 52 in Section 3.1.2 of the PD) and made by the Ministry of Environment and Sustainable Development of Argentina and confirms that there are no peatland within the project area.

- (l) The methodology is not applicable to grouped projects.

AENOR's audit team confirms that this is not a grouped project.

- CDM Tool for Calculation of the Number of Sample Plots for Measurements within A/R CDM Project activities v2.1.0

AENOR's audit team confirms that there are no internal applicability conditions.

- AR-ACM0003: Afforestation and reforestation of lands excepts wetlands

- (a) The land subject to the project activity does not fall in wetland category

Based on the geo-referenced data (GIS and KML files /19/ /20/) provided by the PP, the on-site visit to the project area made by the audit team, including the visit to several sampling plots and an area of research in enrichment planting to make this process following the best practice available and the interviews to relevant stakeholders (see Section 2.4 and 2.5 for more information), who confirmed that, according to their information, that as much as they know, there are no wetlands inside the project area.

- (b) Soil disturbance attributable to the project activity does not cover more than 10 per cent of area in each of the following types of land, when these lands are included within the project boundary:
- (i) Land containing organic soils.
 - (ii) Land which, in the baseline, is subjected to land-use and management practices and receives inputs listed in appendices 1 and 2 to this methodology

The Project Proponent has shared with the audit team 2 photos and 12 videos /100/ clearly showing the enrichment and planting process, using manual tools and confirming that the soil disturbance will be lower than 10% of the area. Moreover, during the on-site visit, the audit team requested the PP to provide an example in a sampling plot on how the enrichment process is made.

- Estimation of non-CO₂ GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity 4.0.

- (a) The tool is applicable to all occurrence of fire within the project boundary.

As stated by the PP in the PD, this tool will be automatically applied if fire occur inside the project area.

- (b) Non-CO₂ GHG emissions resulting from any occurrence of fire within the project boundary shall be accounted for each incidence of fire which affects an area greater than the minimum threshold area reported by the host Party for the purpose of defining forest, provided that the accumulated area affected by such fires in a given year is $\geq 5\%$ of the project area.

As described by the PP in the PD, the project activity does not include burning biomass, and in case of a loss event, a loss event report will be submitted to Verra according to the VCS requirements. The audit team has reviewed that the accumulated area affected by occurrence of fire is below 5% in a given year, so the project complies with this applicability tool requirement.

- VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities v1.0
- (a) The IFM project activity is eligible under the current VCS IFM types (see VCS Tool for AFOLU Methodological issues)

The audit team has reviewed the explanations included in the PD to provide eligibility under the current VCS IFM types and to the Low-Productive to High-Productive Forest (LtHP) and deems them as correct.

- (b) Activities within the proposed project boundary performed with or without being registered as IFM project activity shall not lead to violation of any applicable law even if the law is not enforced;

As per the information review during the desk-review and the on-site visit, and the interview with local authorities, the audit team confirms that there is not any evidence that describes a possible infringement of national, regional and local laws and regulations.

- (c) The use of this tool to determine additionality requires the baseline methodology to provide for an approach justifying the determination of the most plausible baseline scenario. Project proponents proposing new baseline methodologies shall ensure consistency between the determination of a baseline scenario and the determination of additionality of a project activity.

The audit team has reviewed that, using the instructions described by VM0005, the PP has completed Section 3.1.4 to determine the most plausible baseline scenario. Forest inventory /36/ /41/ /42/ were carefully assessed to confirm that historical timeline and progressive degradation of native forests in Misiones province.

- VT0003 Tool for the Estimation of Uncertainty for IFM Project Activities v1.0.

- (a) This tool is applicable for use under VM0005 Converting from Low to High Productive Forests.

The audit team confirms that the PP is using VM0005 v1.2.

- The AFOLU Non-Permanence Risk Tool v4.0 does not have special applicability conditions, as confirmed by the audit team.

AENOR's audit team, based on records provided including spreadsheets calculations of the emissions removals /99/, validate the applicability conditions of the methodology applied and tools. In conclusion, the project activity complies with the applicability conditions of the methodology and tool selected by the PP

3.3.3 Project Boundary

Regarding the project boundary, as per what is included in Section 3.1.3 of the PD, the project area boundary comes from a site called "Reserva GS1", with a total area of 24,643 ha. The image provided in this section 3.1.3 of the project design document describes the area in red lines of the project Selva Paranaense Vida Nativa GS1, only containing an area of 22,878.5 ha.

As assessed by AENOR's audit team, the first size mentioned comes from the land owned by Forestal Belga, whereas the second area refers to the native forest and other native vegetation, excluding the non-relevant stratum for this particular project (see more information in Section 3.1.3 of the PD, and in the document provided by the PP named "Surface determination, delimitation and cartographic representation" /101/). The Project Proponent has also included details in the PD of the Management Operations Centre and its location.

AENOR's audit team visited the project area at the beginning of 2023, and managed to visit the Management Operations Centre, the Access Control and the project area boundaries on several occasions. The audit team interviewed a member of the Access Control Gate and several PP members that were located in the Management Operations Centre during the on-site visit, including the owner of Forestal Belga (see more information in Section 2.4 and 2.5 of this report). The GIS and KML files /19/ /20/ disclosed by the PP to the audit team confirms the size and delimitation of the project boundary, and the itinerary made by the audit team to visiting sampling plots were in accordance with the information provided by the PP.

The selected sources, sinks and reservoirs included and excluded in the project area are the following:

Carbon Pools	Included?	Justification/Explanation	Audit team assessment
Above-ground tree biomass	Yes	Major carbon pool assumed to significantly decrease in the baseline, or increase in the project, or both.	AENOR's audit team considers that the selection complies with the methodology requirements.
Above-ground non-tree biomass	No	Pool need not to be measured because it is not subject to significant changes or potential changes are transient in nature.	AENOR's audit team considers that the selection complies with the methodology requirements.
Below-ground biomass	Yes	Major carbon pool assumed to significantly decrease in the baseline, or increase in the project, or both. In this case, we included it due to the conservative assumption that it would increase in the project scenario.	The conservative assumption made by the PP is accepted by the audit team and consider that the selection complies with the methodology requirements.
Dead wood	Yes	In the with-project scenario the dead wood carbon pool is conservatively accounted as zero. The approach used for quantification of avoided emissions from relogging does not require accounting for dead wood. Dead wood in the baseline scenario is derived from peer-reviewed literature sources, whereas in the with-project scenario dead wood has been conservatively accounted as zero. This is conservative, since accounting for dead wood as zero in the with-project scenario is conservative. Accounting for dead wood occurring prior to re-logging as zero is conservative. Therefore, deadwood was conservatively accounted as zero from both the baseline and project scenarios.	AENOR's audit team considers that the selection complies with the methodology requirements.
Litter	No	Conservative approach - unlikely to decrease as a result of the project activity, or increase in the baseline	AENOR's audit team considers that the selection complies with the methodology requirements.
Soil organic carbon	No	Conservative approach - unlikely to decrease as a result of the	AENOR's audit team considers that the selection complies with the methodology requirements.

Carbon Pools	Included?	Justification/Explanation	Audit team assessment
		project activity, or increase in the baseline	
Wood products	Yes	Carbon pool likely to decrease as a result of the project activity. Accounting for wood products as zero in the with-project scenario is conservative.	AENOR's audit team considers that the selection complies with the methodology requirements.

Gas	Sources	Selected	Justification/Explanation	Audit team assessment
Carbon dioxide (CO ₂)	Combustion of fossil fuel in vehicles / machinery	Yes	According to forest management plans, relogging is the baseline activity	AENOR's audit team considers that the selection complies with the methodology requirements.
	Removal of herbaceous vegetation	No	Excluded based on VCS guidance	AENOR's audit team considers that the selection complies with the methodology requirements.
Methane (CH ₄)	Combustion of fossil fuel in vehicles / machinery	Yes	Included as CO ₂ equivalent emission because relogging is the baseline activity	AENOR's audit team considers that the selection complies with the methodology requirements.
	Burning of biomass	No	Not included – no burning allowed; not accounting for methane emissions in the baseline scenario is conservative	AENOR's audit team considers that the selection complies with the methodology requirements.
Nitrous oxide (N ₂ O)	Combustion of fossil fuel in vehicles / machinery	Yes or no	Included as CO ₂ equivalent emission because relogging is the baseline activity	AENOR's audit team considers that the selection complies with the methodology requirements.
	Nitrogen based fertilizer	No	Not included – no use of fertilizer allowed	AENOR's audit team considers that the selection complies with the methodology requirements.
	Burning of biomass	No	Not included – no burning allowed; not accounting for N ₂ O emissions in the baseline scenario is conservative	AENOR's audit team considers that the selection complies with the methodology requirements.

Taking into account the justifications, assumptions and supporting information provided and the design of the project, AENOR deems that project boundary is correctly defined and in compliance with the applicable methodology and VCS requirements.

3.3.4 Baseline Scenario

Section 3.1.4 of the PD describes the baseline scenario determined for the project. As per the tool “VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities” does not separate baseline and additionality steps, the PP decided first to describe the baseline scenario and the results of the steps from the tools are shown in the next PD Section, 3.1.5. Thus, the audit team reviewed this information, making it coincide with the data described in the PD.

As stated in the PD and assessed by the audit team, the baseline scenario is the Alternative Scenario A, the continuation of forest degradation with relogging, as can be found in Section 3.1.5 of the PD. The audit team could access a document that exposed the forecast of native wood extraction to the period 2015-2030 /103/ and a spreadsheet with 55 years of expected extracted native wood, among 15 different species /102/. This information was reviewed and assessed by the audit team during the on-site visit, confirming through on-site documentation provided by the PP the statements made alongside the PD regarding the logging intensity in the project area for the following years.

As was acknowledged by the audit team during the visit to the project area and the sampling plots, Forestal Belga did not have the intention to improve the forest quality or rehabilitate it, that is, cutting of climbers and vines, liberation thinning and enrichment planting, but to harvest those exploitable trees inside the project area. Moreover, some of the interviews to local stakeholders in Misiones were made with people that confirmed the activities that were executed in the baseline within the project area.

Moreover, the analysis found in Section 3.1.5 of the PD regarding forest management practice required by national or provincial laws (the audit team has reviewed Law 26.331/07, Law XVI – Nº 7, 47, 53 and 105, and discussed with local authorities any other relevant laws applicable to the project area), concluded that there are no criteria or set of rules or recommendations of forest management practices apart a common standard of forest management of avoiding harvesting trees below a determined diameters value. As part of this process, the audit team also reviewed Resolution Nº357/19 that modified Decree 1617-86, setting a minimum diameter cut for different tree groups, but this information does not change the solid statements made by the PP alongside Section 3.1.5 of the PD, confirming that Alternative Scenario A, the continuation of forest degradation with relogging, is the baseline scenario.

Based on this evidence, AENOR deems that assumptions, justifications and data used in the identification of the baseline scenario are appropriately justified and can be deemed reasonable. Documentary evidence used in determining the baseline scenario is relevant, and correctly quoted and interpreted in the project description. Relevant national and/or sectoral policies and circumstances have been considered and are listed in the PD.

Thus, AENOR considers that the identified baseline scenario (the continuation of forest degradation with relogging) is correctly justified.

3.3.5 Additionality

As required by VCS Methodology VM0005 Version 1.2 Methodology for Improved Forest Management (IFM): Conversion of Low Productive to High Productive Forest, the PP used the latest version of the VCS Tool for the Demonstration and Assessment of Additionality in IFM Project Activities. The analysis determined the continuation of forest degradation with relogging as the baseline scenario.

The summary of the application of the VCS tool and the assessment of the audit team is the following:

STEP 0. Preliminary screening based on the starting date of the IFM project activity.

The audit team has reviewed that the project crediting start date and the project start date are in accordance with the applicable VCS Methodology (VM0005), and the VCS Standard, v4.4, among other requirements.

STEP 1. Identification of alternative land use scenarios to the IFM project activity

Sub-step 1a. Identify credible alternative land use scenarios to the proposed IFM project activity

AENOR's audit team has reviewed that the tool applied requires identifying realistic and credible land-use scenarios that would have occurred on the land within the proposed project boundary in the absence of the IFM project activity under the VCS. The scenarios should be feasible for the project participants or similar project developers, considering relevant national and/or sectoral policies and circumstances, such as historical land uses, practices and economic trends.

- Scenario A - Continued Forest degradation with relogging: harvesting activities in the project area have been going on for more than 50 years. As a result of these practices, the forest area is mostly degraded and only parts of it could be harvested. Therefore, in this scenario, no direct intervention is done to improve the forest quality or rehabilitate it. The areas which are more degraded are left with no harvesting, while those which are less degraded and still have some exploitable trees, are at least partially harvested. As no activities related to improve the forest quality (cutting of climbers and vines, liberation thinning and enrichment planting, etc.) are done, the forest continues to degrade more over the years.
- Scenario B - Protection and enrichment of the forest without developing a carbon project: this scenario involves the protection of the project area and the development of all project activities (cutting of climbers and vines, liberation thinning and enrichment planting) without the revenue from carbon credits. Relogging does not occur, as the entire area is protected. Therefore, this scenario is similar to the project scenario, but without the development of a carbon project.

Both alternative land use scenarios coincide with the ones stated in the VCS tool as "at least to be included", so AENOR's audit team considers that this sub-step has been made correctly based on the tool requirements.

Sub-step 1b. Consistency of credible alternative land use scenarios with enforced mandatory applicable laws and regulations.

AENOR's audit team has reviewed that the applied tool requires demonstrating compliance with all mandatory applicable legal and regulatory requirements on the previous alternative land use scenarios. The requirements also include as enforced that applicable mandatory legislation needs to comply with compulsory applicable laws and regulations resulting from a systematic lack of enforcement of applicable laws and regulations. Finally, the VCS tool requires removing from the land use scenarios identified in sub-step 1a any land use scenario that does not comply with applicable mandatory laws and regulations in the context of systematic enforcement.

As stated by the PP in the PD and as assessed by the audit team, there is a relevant regulation regarding territorial planning and minimum standards of environmental protection of native forests, Law 26.331/07. This law establishes three territorial categories for conservation of native forests: red, yellow and green, from the most restrictive in terms of protection and conservation, to the least restrictive. AENOR's audit team has reviewed that the project area is located in areas classified as yellow, with few patches classified as green, as can be seen in Figure 19 of the PD, and that the PP holds legal permits to sustainably harvest and manage the yellow classified area /32/ /33/ /104/.

In addition to that area, and as reviewed by the audit team, there is an extensive region of land Series 9 and 6-A (7,850 hectares), as can be seen in Table 5 of the Section 3.1.5 of the PD, in which the change of land use could be authorized. Therefore, the project proponent could request the change from yellow to green land use classification, which would allow them to expand even further the alternative activities that could be developed in the area.

Thus, in accordance of the review made by AENOR's audit team, in Scenario A, a reduced sustainable harvesting activity happens in the land since it is mostly degraded. The sustainable harvest of this area is allowed by Law 26.331/07 and the legal permits the project proponent has. On the other side, in Scenario B, the strata will not be relogged anymore as it will only host activities to improve the forest quality. There is no law, regional and national, that requires the continuation of the sustainable harvesting of native tree species. Therefore, for the first (A) and the second scenario (B), which is choosing not to harvest any more native tree species, the project proponent would act in accordance with the regulations and requirements set for the area, whether its financially beneficial or not for the PP.

As both alternative land use scenarios comply with applicable laws and regulations, AENOR's audit team considers that this sub-step has been made correctly based on the tool requirements.

Sub-step 1c. Selection of the baseline scenario

As mentioned before and as reviewed by the audit team, Scenarios A and B have no legal barriers that prevent them to happen. However, an according to the analysis made by the audit team, Scenario B is not plausible, as it is not financially possible to protect the land and develop activities to improve the forest quality without the revenues from carbon credits. Even if no enrichment or management activities are developed in the area, it is still not financially attractive to protect a land that will not generate revenue for the project proponent, who would benefit more from investing in other activities. In Step 2 of this additionality assessment, the financial analysis is better detailed.

In Scenario A, the company continues to profit from the remaining trees in the native forest. Although the revenue is lower than it could be if the area were in a good state of preservation, the company still profits from relogging activities in both strata, the native forest and the commercial forest. Therefore, this is the most plausible scenario to happen, as the company has no legal obligation to improve the quality of the forest and it could still exploit it, according to the regulation explain in previous sub-steps.

Thus, based on the evidence above, AENOR's audit team deems the PP has identified a realistic and credible financial barrier that prevent the realization of the land use scenarios initially identified in Sub-step 1c, according to the VCS tool applied.

Ahead, it can be found the investment analysis reviewed by the audit team to confirm this appreciation.

STEP 2 – Investment Analysis

Sub-step 2a. Determine appropriate analysis method

According to the review made by the audit team and based on the information included in the PD and the data compiled during the AENOR's on-site visit to the project area, the project is an IFM activity that aims to stop the harvesting activities that have been going on in the project area for more than 40 years. The IFM project activity involves no commercial harvesting nor any other activity that could generate revenues. During the on-site visit, the audit team found nothing that did not coincide with the assessment made in the PD, and the interviews made to nearby stakeholders confirmed that the project has stopped harvesting activities that were happening in the past, and that provided employment to some of them. It is exclusively focused on the cessation of logging activities and the regeneration/conservation of the forest. Additionally, the project proponent has not applied to any private or public scheme that could contribute financially to implementing and maintaining the proposed project activity.

Therefore, the project will not receive payment for environmental services, or any such activity since there is no framework in place for this at a national or provincial level. The audit team interviewed local authorities who confirmed this assessment. Being that the project activity involves enrichment planting and other management activities, the project requires financial investments, without generating any revenue, and is therefore not considered financially attractive or viable.

So, in conclusion, the IFM project activity generates no financial or economic benefits other than carbon market-related income. Thus, according to the VCS tool applied to the demonstration and assessment of additionality in IFM project activities, the simple cost analysis (Option I in the VCS tool) shall be applied.

Sub-step 2b. Option I. Apply simple cost analysis

According to the VCS tool, this section requires the PP to document the costs associated with the IFM project activity and demonstrate that the activity produces no financial benefits other than carbon market-related income.

Thus, according to the review made by the audit team, the IFM project activities involve the cessation of logging activities and enrichment planting to regenerate the degraded forest. Additionally, security, management and patrolling activities are required for the purpose of conserving the forest and avoiding any new disturbances from natural or anthropic occurrences. The project also included activities involving the community and biodiversity components. For this purpose, the PP has accounted an expected cashflow for the first 10 years of the project, and the audit team has reviewed the spreadsheet named "*additionality_simplecostanalysis_nideport*" /105/. During the desk-review process, the audit team maintained a profound conversation regarding the expected cashflow for both Scenarios A and B, requesting receipts as extra evidence, to sample different realistic situations defined by the PP regarding each scenario. Moreover, the audit team also reviewed some other spreadsheets, regarding the long-term viability of the Nideport project /46/ the opportunity cost of each scenario /76/ and a financial model /106/ including the one defined for the carbon project implementation case-scenario.

There is more information described in the PD, regarding total costs, revenues and cash flow by year for Scenario A and B. After the maintained meetings by the audit team with the PP, the new evidence provided and the solid calculations provided, AENOR's audit team concludes that the IFM project activity, as per its objective of increasing and maintaining forest in the project area, produces no financial benefits other than

carbon market-related income. Thus, the audit team deems acceptable to proceed with Step 4, common practice analysis.

STEP 4. Common practice analysis

The applied tool describes that this step is an analysis to which extent similar forestation activities to the one proposed as the IFM VCS project activity have been implemented previously or are currently underway. Similar IFM activities are defined as those of similar scale, take place in a comparable environment, among other things, with respect to the regulatory framework and are undertaken in the relevant geographical area, subject to further guidance by the underlying methodology. Other registered IFM VCS project activities shall not be included in this analysis. This step concludes that if Step 4 is satisfied, i.e., similar activities can be observed and essential distinctions between the proposed IFM VCS project activity and similar activities cannot be made, then the proposed VCS project activity is not additional. Otherwise, the proposed IFM VCS project activity is not the baseline scenario and, hence, it is additional.

According to the PD and as per the review made by AENOR's audit team, until the date of the development of this PD, there is no documented evidence that other logging concessions/private area holders in Misiones have converted (any part of) their logging operations into active forest regeneration/conservation projects. Additionally, there are no registered projects with similar IFM activities in the VCS Standard (or any other standard), located in the Misiones province, or even Argentina.

Considering that there is no open-source database available (the audit team could not find any database available either), with information on such activities and similar projects, a historic analysis (10 years prior) of the forestry section in Misiones was done. Between the years of 2011 and 2019 (most recent data), the area of natural forests in the Misiones Province decreased from 1,728,084.03 ha to 1,657,721.42 ha which represents a loss of 70,362.61 or 4.07%. The audit team reviewed the documentation provided by the PP regarding this data, confirming the assessment made by the PP. Meanwhile, the area of commercial plantations increased from 192,557.27 ha to 268,148.82 ha, this represents a growth of 75,591.55 ha or 139,26%. This scenario clearly indicates a historic trend in the region, of prioritizing commercial forestry activities in detriment of the preservation of natural forests.

In order to exhaust all possibilities of investigating similar projects, an analysis was done regarding the main forestry companies present in Misiones, and their activities. The Project proponent represented in the PD the information of 5 different companies: Forestal El Dorado, Forestal Bosques del Plata S.A, LIPSIA S.A., PINDÓ S.A. and Arauco Argentina S.A. The conclusion of the analysis made by the audit team regarding all these companies is that no similar activity to the proposed project activity was identified in terms of location, scale and historical land use. No activity that converts or has converted a logged forest to a IFM forest, entirely for conservation purposes, was identified. Some forestry companies maintain conservation areas, though they only represent a small portion of the lands owned by such companies (maximum of 20%). Furthermore, it was not clear whether these conservation areas are maintained by such companies for reasons of compliance with legislation or not. In the case of the proposed project activity, there is no legal obligation of preserving the land and stopping the forestry activities. Therefore, and in accordance with the VCS tool and VCS requirements, the audit team confirms that the project activity is considered additional.

Thus, in compliance with the applied tool and once each one of the steps has been reviewed and validated by AENOR's audit team, the proposed project activity is not the baseline scenario and is, therefore, additional.

Based on this evidence, AENOR deems that assumptions, justifications and data used in identifying the baseline scenario are appropriately justified and can be considered reasonable. Considering the project activities' rationale and nature, the audit team deems that identifying the barriers is appropriately justified and credible. Documentary evidence in determining the baseline scenario is relevant and correctly quoted and interpreted in the project description. Appropriate national and local circumstances have been considered and are listed in the PD. The procedures for identifying the baseline scenario have been correctly followed according to the steps in the tool, and the identified scenario reasonably represents what might have occurred in the absence of the project. Thus, AENOR considers the identified baseline scenario (continuation of pre-project land use) correctly justified

3.3.6 Methodology Deviations

According to VCS Standard 4.4, AENOR's audit team confirms that projects may deviate from the procedures set out in methodologies in certain cases, where alternative methods may be more efficient for project-specific circumstances, and where the deviation will achieve the same level of accuracy or is more conservative than what is set out in the methodology.

Methodology deviations shall be permitted at validation or verification and their consequences shall be reported in the validation or verification report, as applicable, and all subsequent verification reports. Methodology deviations are not considered to be precedent setting (section 3.19.3 of the VCS Standard 4.4).

The Project Proponent has requested the following VM0005 VCS Methodology deviation in Section 3.1.6 of the PD:

In VM0005, in order to estimate the baseline emissions related to relogging, the methodology equations require information about the timber volume extracted from each tree species in each strata in the project area.

However, we request a deviation in order to use only the timber volume annual values extracted (per tree species) in order to calculate the baseline emissions. Since we can calculate the weighted average wood density from the forest management plans, there is no need to associate each cubic meter of timber extracted with a certain stratum. The crucial factor is the quantity of carbon present in the trees to be harvested, irrespective of their specific strata of origin. Forestal Belga possesses the necessary permits to extract a defined quantity of trees from each species annually, without regard to their strata within the forest. This is specially true because in order to have a more accurate result of the carbon stocks in the tree biomass at $t=0$, the area was stratified (for the forest inventories) in order to reduce the error in the carbon estimations, ie, considering the forest physiognomy and not the forest management plans and permits. Having used the system of measuring species by species and tree by tree, provides much more precise information than that which would be obtained by strata, and provide strong evidence that allow us to be more conservative and accurate taking into account the characteristics of biodiversity and existing species in the forest. These differences by no means significantly impact the homogeneity within each of the project strata.

This is specially true because in order to have a more accurate result of the carbon stocks in the tree biomass at $t=0$, the area was stratified (for the forest inventories) in order to reduce the error in the carbon estimations, ie, considering the forest physiognomy and not the forest management plans and permits.

Thus, AENOR's audit team agrees on the appreciation made by the PP, that is, the deviation fully complies with the VCS Standard version 4.4 due to:

It represents a deviation from the criteria and procedures relating to monitoring or measurement set out in the methodology (i.e., deviations are permitted where they relate to data and parameters available at validation, data and parameters monitored, or the monitoring plan), as can be found in Section 3.19.1 of the VCS Standard 4.4.

It does not impact the conservativeness of the quantification of GHG emission reductions or removals, as can be seen and described in Section 3.19.2 of the VCS Standard 4.4.

Validation teams after reviewing the calculation procedure of the deviation where the timber volume annual values extracted (per tree species) in order to calculate the baseline emission based on weighted average wood density from the forest management plans, confirms that this procedure provides an accurate calculation and there is no need to associate each cubic meter of timber extracted with a certain stratum.

Thus, validation team deems that the proposed methodology deviation meets with the criteria and specifications for permitted methodology deviations as set out in Section 3.19 of the VCS Standards v 4.4, and that the deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals. The audit team considers that the methodology deviation is valid

3.3.7 Quantification of GHG Emission Reductions and Removals

Procedures for quantifying the GHG emission reductions and removals generated by the project during the project crediting period were conducted in accordance with the *VM0005 Version 1.2 Methodology for Improved Forest Management (IFM): Conversion of Low Productive to High Productive Forest*. The validation team performed an intensive review of all input data, parameters, formulas, models, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS documentation, methodology modules, and tools.

Furthermore, the validation team reproduced calculations for selected samples to ensure accuracy of the results. Conversion factors, formulas, and calculations were provided by the PP in spreadsheet format to ensure all formulas were accessible for review. The validation team recalculated subsets of the analysis to confirm correctness. Where applicable, references for analysis methods or default values were checked against relevant scientific literature for best practice.

Quantification of baseline emissions

Section 3.2.1 of the PD describes the procedure for quantification of baseline emissions and/or removals in accordance with VM0005 Methodology. All formulas utilized to estimate baseline carbon stocks and project stock changes comes from the VM0005 Methodology requirements.

According to the PD, baseline scenario is characterized by emissions from relogging, which in the project scenario are absent. The volume of biomass that would have been removed from the project area over the

lifetime of the project is determined by harvesting levels, defined in terms of cubic meters, as determined in advance, and reflected in the forest management plans for the project area (this information has been reviewed by the audit team, and can be found in Section 9.1.1 of the VM0005 Methodology, being confirmed by an acceptable approach).

Net CO₂ equivalent emissions in the baseline have been calculated by using the following formula described in page 14 of the VM0005 Methodology (the parameters can be found in the PD to avoid repetitiveness).

$$\Delta C_{BSL} = \sum_{t=1}^{t^*} \sum_{i=1}^{M_{BSL}} (\Delta C_{REL,i,t} + \Delta C_{tree-exist,i,t}) + GHG_{BSL-E,t}$$

The project assumes that net carbon stock change in existing tree vegetation ($\Delta C_{tree-exist,i,t}$) is estimated using Bedrij et al. (2022) rates /121/ as per established in the methodology.

The emissions due to relogging in the baseline scenario (see the following parameter in the formula above $\Delta C_{REL,i,t}$) are calculated as can be seen in the formula below (the parameters can be found in the PD to avoid repetitiveness):

$$\Delta C_{REL,i,t} = \left[A_{REL,i,t} \times (C_{harvest,i} + (C_{damage,i} - C_{DW,i,t}) - (C_{WP100,i} + C_{WP20,i,t})) \right. \\ \left. + \sum_{t=20}^t (A_{REL,i,t} \times C_{WP20,i,t} \times \frac{1}{20}) + \sum_{t=10}^t (A_{REL,i,t} \times C_{DW,i,t} \times \frac{1}{20}) \right] \times \frac{44}{12}$$

In this project, as per the review made by the audit team, baseline information regarding carbon stocks both in the harvested timber ($C_{harvest,i}$) and in the wood products pool are related to total volume of wood extracted, according to the forest management plans and past extraction volumes assessed by the audit team /102/ /103/.

As per methodology (Forest Regrowth), *“When accounting for regrowth, ex-ante estimates of tree biomass regrowth in the baseline can be based on peer-reviewed literature providing values for regrowth from comparable residual forest types in comparable areas (...)”*

Then, in this context, PP is utilizing peer-reviewed literature that reports regrowth rates in analogous reference areas. Consequently, the regrowth of tree biomass in the baseline scenario, prior to re-logging, is presumed to align with the rate established in published scientific article: Selective logging of a subtropical forest: Long-term impacts on stand structure, timber volumes, and biomass stocks (Bedrij et al., 2022) /121/. Thus, baseline tree biomass regrowth (pre-relogging) is modelled using Bedrij et al. (2022) rates. Then, the emissions due to relogging in the baseline scenario are determined as:

$$\Delta C_{REL,i,t} = \left[A_{REL,i,t} \times (C_{harvest,i} + (C_{damage,i} - C_{DW,i,t}) - (C_{WP100,i} + C_{WP20,i,t})) \right. \\ \left. + \sum_{t=20}^t (A_{REL,i,t} \times C_{WP20,i,t} \times \frac{1}{20}) + \sum_{t=10}^t (A_{REL,i,t} \times C_{DW,i,t} \times \frac{1}{20}) \right] \times \frac{44}{12}$$

To calculate the carbon stock in harvested wood, the PP has used the proposed VM0005 formula: $C_{harvest,i} = \sum_{j=1}^S (V_{harvest,i,j} \times D_j \times CF)$, which uses the total annual volume of timber harvested ($V_{harvest,i,j}$) contained in the forest management plan reviewed and assessed by AENOR /107/ /108/.

In accordance with the VM0005 methodology, emissions from logging-related collateral damage ($C_{damage,i}$) and deadwood ($C_{DW,i,t}$) are incorporated using peer-reviewed emission factors. As per VM0005 v1.2, Section 9.1.2, the damage factor may be derived from peer-reviewed literature if the source is demonstrably representative of the project area. For the project activity, $f_{damage,i}$ is estimated using quantitative field data from Pearson et al. (2014) /122/, a peer-reviewed study that quantifies carbon losses due to logging damage in selectively logged Bolivian forests. The project area shares strong ecological and operational similarities with the Bolivian reference site, including comparable forest structure, biomass levels, dominant species families, and historical logging practices. Additionally, the baseline scenario assumes conventional logging with fewer controls than the Reduced Impact Logging (RIL) methods used in Bolivia. This methodological ensures that the adopted damage factor remains conservative.

The volume-based damage factor (1.23 Mg C/m³) was converted to a carbon-based metric (tC damage per tC extracted). The derived value, $f_{damage,i}$ equals to 3.71, is conservative, traceable, and aligns with the peer-reviewed literature /122/ requested by applied methodology.

The PP used the proposed carbon fraction of dry matter ($CF = 0.47$) and the specific wood density included in the Nideport Calculator PD spreadsheet provided to the audit team /99/, that uses the “Maggio, A.D. & Cellini, J.M. 2016. *Recopilación de ecuaciones de volumen y biomasa de especies forestales de la República Argentina. Ministro de Ambiente y Desarrollo Sustentable de la Nación.* <https://libros.unlp.edu.ar/index.php/unlp/catalog/book/606#accordion-1>” /109/ from Argentina, with more than 16 species, the specific densities and the weighted average density obtained from them ($D_j = 0.77$). According to the review made by the audit team, this information is solid, coming from an official and relevant source, and allows to estimate the carbon stock in harvested timber in stratum, facilitating the process to proceed to estimate the harvested wood products, which are the post-relogging carbon stock stored in long-term wood products after 100 years ($C_{WP100,i}$) and over 20 years ($C_{WP20,i,t}$).

Now, according to the review made by the audit team, to calculate the harvested wood products, the PP used two different steps (1 and 2), as described in the VM0005 methodology (page 18 to 20 of 83). In the first one, the PP calculated the mean stock of extracted biomass carbon by class of wood product (sawnwood according to Winjum et al. in the VM0005 Methodology, 0.84): $C_{XB,ty,i,t} = \frac{1}{A_i} \times \sum_{j=1}^S (V_{ex,ty,j,i,t} \times D_j \times CF)$. The volume of extracted timber used in the estimations ($V_{ex,ty,j,i,t}$) are related to the total volume extracted annually, which was found by the audit team in the documentation provided by the PP /102 /103/. The total area of stratum refers to the entire project area (22,878.5 ha according to the project boundary Section reviewed already by the audit team) and the wood density (D_j), as happened before, came from the Compilation of volume and biomass equations of forest species from Argentina (“Maggio, A.D. & Cellini, J.M. 2016. *Recopilación de ecuaciones de volumen y biomasa de especies forestales de la República Argentina. Ministro de Ambiente y Desarrollo Sustentable de la Nación.* <https://libros.unlp.edu.ar/index.php/unlp/catalog/book/606#accordion-1>”) /109/, with more than 16 species, the specific densities and the weighted average density obtained from them ($D_j = 0.77$). According to the review made by the audit team, this information is solid, coming from an official and relevant source. In Table 6 of the PD, it can be found the results of the carbon stocks in harvested wood products for the first 30 crediting years in the baseline scenario.

This way, according to the review made by the audit team, using equations 7a ($C_{WP100,i}$) and 7b ($C_{WP20,i,t}$) of the VM0005 Methodology (page 18 of 83, see more information on the PD of the formulae and parameters applied), the wood waste fraction (ww_{ty}) default value for developing countries (0.24, see

VM0005 Methodology page 19 of 83), the fraction of wood products that will be emitted to the atmosphere within 5 years (slp_{ty}) for sawnwood (0.20, see VM0005 Methodology page 20 of 83), the fraction of wood products that will be emitted to the atmosphere between 5 and 100 years (fo_{ty} , 0.84 as was mentioned before for sawnwood according to Winjum et al.) and the wood products class, is it possible to estimate both 7a and 7b equations.

Validation team reviewed the post-relogging carbon stock stored in long-term wood products after 100 years ($C_{WP100,i}$) and over 20 years ($C_{WP20,i,t}$), the audit team proceed to review the logging rate. After the review of the audit team, according to Section 9.1.4 of the VM0005 Methodology, pages 27 and 28 of 83, where a management plan exists outlining the phasing of logging activities for either the project area, or the reference area, that management plan may be used. In this case, the approved Forest Management Plan /107/ /108/ assessed by the audit team, does not state a logging rate, but the volume of timber that would be extracted each year. Thus, this annual timber volumes that would be extracted are used as a proxy for the estimation of the baseline net carbon loss for the entire project area. Table 7 of the PD shows the planned logging volume in cubic meters for the entire project area in the baseline scenario up to year 2051, and carbon stock changes due to relogging in the baseline scenario during the first 30 crediting years is shown in Table 8, using all the calculations estimated during the previous explained steps.

All the steps, as explained by the audit team, have been reviewed, assessed and validated, confirming that the procedure applied until this moment by the PP is in compliance with VM0005 and VCS Standard requirements.

Finally, regarding forest regrowth, Since the analysis is based on a scientific publication /121/ that provides verified growth rates, the estimated emissions resulting from regrowth are considered appropriate and reliable. The use of peer-reviewed data ensures the accuracy and validity of the calculations and in accordance to the applied methodology.

Last, to calculate the net CO2 equivalent emissions in the baseline scenario, the PP needed to estimate the GHG as a result of relogging within the project boundary ($GHG_{BSL-E,t}$). The used formula is the 21 in the VM0005 Methodology, as can be seen below:

$$GHG_{BSL-E,t} = E_{clearing,t} + E_{harvesting,t} + E_{extraction,t} + E_{transport,t}$$

Emissions from infrastructure establishment ($E_{clearing,t}$)—such as road construction and log landings—are estimated by accounting for biomass removal, fuel consumption by clearing equipment, and fuel emissions from road grading machinery. As per the methodology, estimating emissions from biomass removal in infrastructure areas requires assessing the extent of affected land. This can be done by applying a standard percentage based on regional land-use patterns. The percentage should be derived from peer-reviewed literature relevant to the project area or, if unavailable, from Pulkki (1997) /123/, which provides a conservative estimate of 12% land clearance for infrastructure in evergreen tropical rainforests under conventional logging.

$$E_{clearing,t} = E_{biomass,t} + E_{felling,t} + E_{grading,t}$$

Following the methodology, emissions from biomass removal in infrastructure zones are determined by estimating the affected land area. A standard percentage, reflecting regional land-use trends, should be applied. This value must be sourced from project-specific peer-reviewed literature or, in its absence, from

Pulkki (1997) /123/, which cites a conservative 12% clearance rate for infrastructure in evergreen tropical rainforests under conventional logging. The infrastructure area (178.39 ha) was estimated via Equation 23, combining a 12% clearance benchmark (Pulkki 1997), a 0.07 annual logging fraction (15-year rotation), and 1,486.6 ha of relogging area. This area drives biomass loss calculations.

Emissions due to the use of equipment for the removal of biomass are quantified with equation 24. As per methodology, when specific fuel consumption data is unavailable, the methodology requires using a conservative default value of 1.73 liters of diesel per cubic meter (FC) for logging operations with old, inefficient machinery.

Emissions due to the use of equipment for grading roads are quantified with equation 25. The fuel consumption factor (FC_{grader}) for road grading machinery is based on VM0005 v1.2's default value for old, inefficient equipment: 1.73 liters of fuel per m³ of harvested timber. Total baseline harvest volume = 75,416.61 m³; Harvested area = 1,486.6 ha; the Fuel consumption per hectare = 51.20 L/ha. This value is used in VM0005 equations to estimate fossil fuel emissions from road grading in the baseline scenario.

Emissions due to the extraction of logs from the forest are estimated as per equation 26, based on Fuel consumption of the equipment employed for harvesting (1.73 liters of fuel per m³ of harvested timber As default fuel consumption); Fuel emission factor (2.90 t CO₂-e kL⁻¹, methodology's default values) and Volume harvested at year t (75,416.61).

Emissions from log extraction and transport to log landing are estimated following equations 27, 28 and 29 as:

$$E_{extraction,t} = \left(D_{extr_{total}} / Eff_{fuel} \right) \times EF_{fuel}$$

$$D_{extr_{total}} = D_{aver_{extrac}} \times N_{trucks} \times 2$$

$$N_{trucks} = V_{extr} / Cap_{truck}$$

The following parameters values are considered according to VM0005, as reviewed by the audit team:

$$FC_{equip} = 1.73 \text{ kL m}^{-3} \quad EF_{fuel} = 2.9 \text{ t CO}_2\text{-e kL}^{-1}$$

$$Eff_{fuel} = 3,000 \text{ km kL}^{-1}; \quad Cap_{truck} = 10 \text{ m}^3 \text{ truck}^{-1}$$

Emissions from log extraction and transport to log landing are estimated, according to the VM0005 Methodology, as:

$$E_{transport,t} = \left(D_{trans_{total}} / Eff_{fuel} \right) \times EF_{fuel}$$

$$D_{trans_{total}} = D_{aver_{extrac}} \times N_{trucks} \times 2$$

$$N_{trucks} = V_{trans} / Cap_{truck}$$

This way, the audit team reviewed the PD spreadsheet /99/, copied to Figure 31: BSL activity emissions, deeming it as correct according to VM0005 requirements. In Table 9 is possible to find the compiled net CO2 equivalent emissions in the baseline scenario for the first 30 crediting years. Thus, quantification methods, data and parameters used in the equations, and any references to any other data sources used, including documentation used as the basis for assumptions and sources of data, have been reviewed, accepting the approach to make the baseline calculations, and proceeding with the review of the project emissions.

Quantification of project emissions

Based on the review made by the audit team, GHG emissions and removals in the with-project scenario are related to regrowth of the residual forest, silvicultural interventions such as climber cutting, liberation thinning, enrichment planting and/or harvesting, or a combination of these activities, and project implementation activities. The information reported by the PP regarding Project Emissions can be found in Section 3.2.2 of the PD, based on VM0005 Methodology, Section 9.2.

Net CO2 equivalent emissions in the with-project scenario (WPS) are estimated as per equation 33 of the VM0005 Methodology:

$$\Delta C_{WPS} = \sum_{t=1}^{t^*} \sum_{i=1}^{M_{WPS}} \Delta C_{P,i,t} + GHG_{WPS-E,t}$$

With this formula, the PP needed to calculate the net carbon stock changes due to forest regrowth and silvicultural interventions ($\Delta C_{P,i,t}$) and GHG emissions related to project implementation ($GHG_{WPS-E,t}$).

To estimate the net carbon stock changes due to forest regrowth and silvicultural interventions ($\Delta C_{P,i,t}$) in the with-project scenario, the audit team reviewed and assessed the following steps executed by the PP:

$$\Delta C_{P,i,t} = \Delta C_{AGB,i,t} + \Delta C_{BGB,i,t} + \Delta C_{DW,i,t} + \Delta C_{WP,i,t} + E_{biomassloss,i,t}$$

The formula above (nº 34 in the VM0005 Methodology) refers to several parameters that either need to be calculated or deemed as zero for conservative purposes, according to the VM0005 Methodology. Accounting for dead wood and wood products in the with-project scenario as zero is conservative (see page 38 of 83 of the VM0005 Methodology). Therefore $\Delta C_{DW,i,t} = 0$ and $\Delta C_{WP,i,t} = 0$

Since the removal of herbaceous vegetation (including climbers and vines) was deemed as an insignificant emissions source alongside the PD (already reviewed by the audit team in previous VR sections) and therefore is not accounted for in the with-project scenario, thus, $E_{biomassloss,i,t} = 0$

Therefore, described equation 34 from the VM0005 methodology is updated to:

$$\Delta C_{P,i,t} = \Delta C_{AGB,i,t} + \Delta C_{BGB,i,t}$$

This way, to initially estimate the net carbon stock change in above-ground tree biomass in the with-project scenario ($\Delta C_{AGB,i,t}$), the PP used the following approved formula (see nº35 in the VM0005 Methodology):

$$\Delta C_{AGB,i,t} = A_{i,t} \times (C_{AGB,i,t} - C_{AGB,i,t-1}) \times 44/12 / T$$

In the same line than before, new parameters inside formulas appeared, and now the PP had to calculate the mean carbon stock in above-ground tree biomass per unit area using the formulae provided in the VM0005 Methodology. To facilitate this process, the parameter is estimated for each stratum on the basis of field measurements in permanent sample plots. In this project both BEF and allometric equations method will be used, depending on the availability of allometric equations.

In the absence of allometric functions, the BEF method was decided to be used, using an approved approach within the VM0005 Methodology, as can be found in the page 39 of 83 of the methodology, reviewed by the audit team. This way, the two methods have been applied, depending on the availability of allometric equations.

Regarding the allometric method, the following sources of allometric equations were used by the PP (in order of preference):

The equations published in Compilation of volume and biomass equations of forest species from Argentina¹ and allometric equations, detailed in appendix 2 of the PD and their sources^{2 3 4 5 6 7} were reviewed and assessed by AENOR's audit team. In cases where the species does not contain biomass models, the volume models (stem or total) were used by the PP together with the density and the biomass expansion factor (BEF). For all cases, the ratio of aerial biomass and root biomass proposed by IPCC was considered, in addition to the equivalent carbon and CO₂ conversion factor. These reviewed data can be found in page 88 of the PD provided by the PP.

All the information reported coincides with the one provided in the spreadsheet calculations /99/, according to the thorough and detailed review made by the audit team.

For the BEF method

The BEF method is based in 6 steps, according to what has been described in the VM0005 Methodology (see pages 39 to 41 of 83). Each of the steps are clearly described both in the VM0005 Methodology and

¹ Maggio, A.D. & Cellini, J.M. 2016. Recopilación de ecuaciones de volumen y biomasa de especies forestales de la República Argentina. Ministro de Ambiente y Desarrollo Sustentable de la Nación. <https://libros.unlp.edu.ar/index.php/unlp/catalog/book/606#accordion-1>.

² Chave et al 2014. Improved allometric models to estimate the aboveground biomass of tropical trees. Global Change Biology. (20)10: 3177-3190.

Sevola, Y. 1975. Cubicación de árboles en el inventario forestal del noroeste argentino. Documento de trabajo N° 20. FAO: DP/ARG/70/536. Salta, Argentina.

³ Conti G, LD Gorne, SR Zeballos, ML Lipoma, G Gatica, E Kowaljow. 2019. Developing allometric models to predict the individual aboveground biomass of shrubs worldwide. Global Ecology and Biogeography 28 (7), 961-975

⁴ Costas, R.; Vera, N.; Lorán, D.; López Cristóbal, L.; Fosco, I.; González, J. 2006. Funciones de volumen para especies de bosque secundario de la Reserva Guaraní. Misiones (Argentina). Rev. FCA UNCuyo 38

⁵ Fassola, H.E.; Crechi, E.H.; Barth, S.R.; Keller, A.E.; Winck, R.A.; Martiarena, R.; Von Wallis, A.; Pinazo, M.; Knebel, O. 2010. Modelos regionales de biomasa aérea de Pinus taeda para Misiones y NE de Corrientes, Argentina. XIV Jornadas Técnicas Forestales y Ambientales. Facultad de Ciencias Forestales, UNaM.

⁶ Friedl, R.; Costas, R.; Maiocco, D.; Grance, L.; Palavecino, A. 1991. Construcción de tablas de volumen estándar para Araucaria angustifolia. VI Jornadas Técnicas. Inventarios, Modelos de Producción y Crecimientos Forestales. El Dorado, Misiones. pág.: 57-68. Maggio, A.D. & Cellini, J.M. 2016. Recopilación de Ecuaciones de Volumen y Biomasa de Especies

⁷ Forestales de la República Argentina - Ministerio de Ambiente y Desarrollo Sustentable de la Nación.

Segundo Inventario Nacional de Bosques Nativos: informe Selva Paranaense: primera revisión (2020). Buenos Aires: Ministerio de Ambiente y Desarrollo Sostenible de la Nación.

the PD, so for avoiding repetition, the audit team confirms that the PP has applied each of the steps in a proper way, coinciding with the information approved in the VM0005 Methodology and the reported calculations already reviewed by the audit team /99/ as well some of the formulas used on these steps are shown below (more information in the PD):

$$C_{AGB,l,j,i,sp,t} = V_{l,j,i,sp,t} \times D_j \times BEF_j \times CF_j$$

$$C_{AGB,i,sp,t} = \sum_{j=1}^{S_{WPS}} \sum_{l=1}^{N_{j,i,sp,t}} C_{AGB,l,j,i,sp,t}$$

$$C_{AGB,i,t} = \frac{1}{A_{sp_i}} \sum_{sp=1}^{P_i} C_{AGB,i,sp,t}$$

For the allometric method

As happened before, according to the VM0005 Methodology, the allometric method is based in 4 steps (this information can be found in the VM0005 Methodology, pages 41 to 44 of 83). The audit team has reviewed that the steps have been properly applied, and as this information can be already found clearly described in the PD, for avoiding repetition, this is not going to be included in here. The audit team confirms that the PP has applied each of the steps in a proper way, coinciding with the information approved in the VM0005 Methodology and the reported calculations already reviewed by the audit team /99/ as well.

One of the formulas applied (see nº39 in the VM0005 Methodology), a part of the specific allometric equations applied, can be seen below:

$$C_{AGB,j,i,sp,t} = \sum_{l=1}^{N_{j,sp}} f_l(X, Y, \dots) \times CF_j$$

Chave's allometric models were used to estimate biomass and stored carbon from biometric data collected in 114 permanent plots. The model selection was hierarchical, with specific allometric models prioritized for each species based on diameter ranges. If the models were not applicable, the general biomass model proposed by Chave et al. (2014) was used. For species without allometric models, volumetric models were used, combined with biomass expansion factors and species-specific wood densities. The total carbon content was calculated by multiplying the total biomass by a conversion factor of 0.47. The total carbon was then calculated in tons per hectare. The values were then grouped into strata, converted to volume by stratum, and converted to tons per hectare. The values were then derived from the total carbon and discounted 20% of the volume corresponding to underground biomass.

Is important to note that the methodology combines species-specific allometric models with globally recognized generic equations to estimate forest biomass. Locally developed species-specific allometric models were prioritized, and where species-specific models were unavailable or exceeded their validity ranges, allometric equations from Chave et al. (2014) were utilized. A comprehensive review of the <http://www.globalometree.org/> database was made and expanded by consulting additional scientific publications and datasets.

Chave et al.'s allometric models are widely recognized globally for their robustness and applicability in a wide variety of tropical ecosystems. These models have been successfully applied in studies throughout Latin America, Africa, and Asia, and are the reference standard in projects related to carbon quantification, forest restoration, and REDD+ (Reducing Emissions from Deforestation and Forest Degradation).

The main strength of Chave's models lies in their general applicability, as they integrate key variables such as wood density, total height, and DBH, providing robust estimates from a minimal data set. However, in certain contexts, such as the Atlantic Forest in Argentina, local models may offer greater accuracy due to their specific calibration to the species and ecological conditions of the region.

Nideport opted not to employ the Bioclimatic Stress Variable 'E' introduced in Chave et al. (2014), which accounts for environmental stress factors and is particularly useful in the absence of direct measurements. This decision adheres to the principle of prioritizing direct, high-quality data over indirect estimations when such data is accessible. The exclusion of 'E' minimizes the introduction of uncertainties associated with additional model parameters, enhancing the robustness and reliability of biomass calculations, particularly in areas with sufficient field data.

Regarding the estimation of the annual changes in below-ground tree biomass ($\Delta C_{BGB,i,t}$), these have been estimated for each stratum on the basis of above-ground tree biomass. By using a root:shoot ratio, below-ground biomass has been properly calculated from above-ground biomass, following Equation (40) of the VM0005. The audit team assessed the procedure used by the PP. Calculation of the parameter $\Delta C_{AGB,i,t}$ is described in "Estimation of $\Delta C_{AGB,i,t}$ ".

$$\Delta C_{BGB,i,t} = \Delta C_{AGB,i,t} \times R_j$$

Changes in carbon stocks in dead wood and in wood products are not applicable, because the first one has been conservatively excluded (procedure according to the VM0005 methodology) and there is no logging in the project scenario for the second one, respectively.

In the same line, and already reviewed by AENOR's audit team, emissions due to site preparation for project activities, the removal of herbaceous vegetation, including climber and vines, is deemed an insignificant emissions source and therefore is not accounted for in the with-project scenario, in accordance with the VM0005 methodology.

Ex ante estimations of project emissions and removals

In order to estimate the ex-ante carbon removals due to the forest regeneration in the project scenario, the PP used the Chapman-Richards model as per the AFOLU Carbon Calculator, developed by Winrock⁸. This model developed by Winrock has been thoroughly assessed by AENOR's audit team. The Chapman-Richards model is a growth model that predicts the sigmoidal growth of forest stands or trees over time. It helps forest managers predict future growth. This model allows to obtain the Above-ground and Below-ground biomass; then estimate the carbon stock.. Furthermore, according to this report (refer to footnote 5), species and climate specific logistic growth models based on the Chapman-Richards equation were

⁸ Winrock International. 2014. AFOLU Carbon Calculator. The Afforestation/Reforestation Tool: Underlying Data and Methods. Prepared by Winrock A00International under the Cooperative Agreement No. EEM 060002400.

developed using the FAO (2005) data and the IPCC (2006) climate zones; both references are internationally accepted and recognised.

This model, explained by and reviewed several times for the audit team both on-site and during interviews through Microsoft Teams, estimates the forest carbon growth according to forest age, using potential maximum aboveground biomass as a proxy to estimate carbon sequestration over time (each parameter stated below can be found explained in the PD, so that the audit team avoid repetition).

$$\text{Total Benefit (tCO}_2\text{)} = (\text{AGB Benefit} + \text{BGB Benefit})$$

$$\text{AGB Benefit (tCO}_2\text{)} = \text{Area} \times (\text{AGB}) \times \text{Effectiveness}$$

$$\text{BGB Benefit (tCO}_2\text{)} = \text{Area} \times (\text{BGB}) \times \text{Effectiveness}$$

$$\text{AGB (tCO}_2\text{/ha)} = \text{MAX} \times [1 - \text{EXP}(-k \times \text{Age})]^{1/(1-m)}$$

$$\text{BGB (tCO}_2\text{/ha)} = \text{AGB} \times 0.2^9$$

In order to estimate the carbon removals due to forest regeneration in each stratum, the PP assumed as MAX (for the project area) the aboveground carbon stocks difference between the average AGB found for more preserved forests in the same region (Misiones - the Iguazu National Park - logged until 1934 – AGB: 538.47 ± 65.83 tCO₂/ha) and the average AGB values for the forest strata in Nideport project area (Closed Canopy, Open Canopy, Scattered Canopy, Scrubland, Shifting Agriculture).

This is a conservative assumption, because the model estimation will return carbon values that never surpasses the carbon density found in the densest strata in Iguazu National Park, based on the AGB carbon stocks variation (538.47 ± 65.83 tCO₂/ha).

Stratum	Area (ha)	Carbon density AGB tree biomass (tCO ₂ /ha)	Potential gain in relation to baseline in relation to baseline (tCO ₂ /ha)
Natural Forest with Close Canopy (FCC)	2,711.3	391.23	147.24
Natural Forest with Open Canopy (FOC)	13,517.8	271.06	267.41
Natural Forest with Scattered Canopy (FSC)	6,069.7	273.40	265.07
Scrubland	298.2	147.09	391.38
Shifting-agriculture	281.50	125.83	412.64

⁹ In order to be more conservative, we choose to use the root-shoot ratio of 0.20 to estimate the BGB values, instead the model's original equation $\text{BGB} = 0.489 \times \text{AGB}^{0.890}$.

Table 11 of CCB-VCS-PD shows the net carbon stock gains due to forest regrowth in the project scenario, for each of the stratum included in the project area. As per its relevance, the audit team decided to include this same table below:

Total regrowth in relation to baseline carbon stocks (tCO ₂)						
Year	Closed Canopy	Open Canopy	Dispersed Canopy	Scrubland	Shifting Agriculture	Total
1	372	1,856	834	41	39	3,142
2	1,117	5,569	2,501	123	116	9,426
3	2,234	11,139	5,001	246	232	18,852
4	3,724	18,564	8,336	410	387	31,420
5	5,585	27,847	12,504	614	580	47,130
6	7,819	38,985	17,505	860	812	65,981
7	10,426	51,980	23,340	1,147	1,082	87,975
8	13,405	66,832	30,009	1,474	1,392	113,111
9	16,756	83,540	37,511	1,843	1,740	141,389
10	20,479	102,104	45,846	2,252	2,126	172,809
11	24,575	122,525	55,016	2,703	2,552	207,370
12	29,043	144,802	65,019	3,194	3,015	245,074
13	33,884	168,936	75,855	3,727	3,518	285,920
14	39,097	194,926	87,525	4,300	4,059	329,907
15	44,682	222,773	100,029	4,914	4,639	377,037
16	50,267	250,620	112,532	5,529	5,219	424,167
17	55,853	278,466	125,036	6,143	5,799	471,296
18	61,438	306,313	137,539	6,757	6,379	518,426
19	67,023	334,160	150,043	7,371	6,959	565,556
20	72,609	362,006	162,546	7,986	7,539	612,685
21	78,194	389,853	175,050	8,600	8,118	659,815

Total regrowth in relation to baseline carbon stocks (tCO ₂)						
Year	Closed Canopy	Open Canopy	Dispersed Canopy	Scrubland	Shifting Agriculture	Total
22	83,779	417,699	187,553	9,214	8,698	706,945
23	89,364	445,546	200,057	9,829	9,278	754,074
24	94,950	473,393	212,561	10,443	9,858	801,204
25	100,535	501,239	225,064	11,057	10,438	848,333
26	106,120	529,086	237,568	11,672	11,018	895,463
27	111,705	556,933	250,071	12,286	11,598	942,593
28	117,291	584,779	262,575	12,900	12,178	989,722
29	122,876	612,626	275,078	13,514	12,758	1,036,852
30	128,461	640,472	287,582	14,129	13,337	1,083,982

Regarding GHG emissions as a result of the implementation of the project activity,

There are various sources of emissions resulting from the general project implementation. Based on the information obtained during the on-site visit, the audit team does not find any other possible source of emission that has not been already mentioned in the PD or below, as per their experience on the field:

- Emissions due to administration, data-processing, and/or operating field station(s): grid or generator powered electricity.
- Emissions due to travel of project staff (ground transport, flights, etc.).
- Emissions due to travel and transport of external visitors (e.g., auditing companies, consultants, etc.).

Since it is reasonable to assume the emissions are expected to be lower in the project scenario (and were not accounted for in the baseline), the PP conservatively assumed that $GHG_{WPS-E} = 0$. The audit team has reviewed this appreciation, and deems it as correct as per following a reasonable procedure to conclude that GHG emissions as result of the implementation of the project activity are going to be lower than the ones expected during the baseline scenario.

Leakage

VM0005 only provides for the determination of leakage due to market effects, as already assessed by the audit team (see page 45 and onwards of the VM0005 methodology, and formula 43 below):

$$\Delta C_{LK} = \Delta C_{LK-ME}$$

This methodology applies to project activities, which reduce harvest levels in comparison with the baseline and possible reference areas. Therefore, the following leakage credit adjustment was applied.

The information reported in the table below, is the one described in Section 9.3.2 of the VM0005 Methodology, confirming that the procedure applied by the PP complies with the requirements of the VM0005 until this step.

Project Action	Leakage Risk	Leakage credit adjustment (discount)
Substantially reduce harvest levels permanently (eg, RIL activity that reduces timber harvest by 25% or more across the project area; or, a forest protection/no logging project)	Moderate to High Depends on where timber harvest is likely to be shifted	Depends on where timber harvest is likely to be shifted to: Similar carbon dense forests within the country: 40% Less carbon dense forests within the country: 20% More carbon dense forests within country: 70% Out of country: 0% (according to stated VCS and CDM policy of not accounting for international leakage)

$$\Delta C_{LK-ME} = LF_{ME} \times \Delta C_{REL}$$

LF_{ME} , the leakage factor for market effect calculations, depends upon where in the country logging might be increased, as a result of a decrease in timber supply from the project area. $LF_{ME} = 0$ if it can be demonstrated that no market-effects leakage will occur within national boundaries, eg, if no new concessions are being assigned and annual extracted volumes per hectare in existing concessions have not increased in comparison to previously documented and projected and authorized extraction levels within existing concessions in the host country.

NCS is the mean national forest carbon stock and CBSLpre is the pre-relogging mean carbon stock in above-ground tree biomass across strata in the baseline scenario.

$LF_{ME} = 0.4$	if CBSLpre = NCS
	(if CBSLpre $\leq$ NCS $\times$ 1.15 and $\geq$ NCS $\times$ 0.85)
$LF_{ME} = 0.7$	if CBSLpre < NCS $\times$ 0.85
$LF_{ME} = 0.2$	if CBSLpre > NCS $\times$ 1.15

In this particular, as per the review made by the audit team (this data can be found in the spreadsheet provided by the PP /99/). The market leakage adjustment factor (LFME) must be determined based on the comparison between the carbon stock in the baseline prior to project implementation (CBSLpre) and the Net Carbon Stock (NCS) of timber harvested under the with-project scenario.

The CBSLpre value (78.08 tC/ha) is based on field-based assessments of the pre-relogging mean above-ground tree biomass carbon stock across all strata defined in the baseline scenario. While, NCS value used corresponds to the Mean National Forest Carbon Stock in native forests for the year 2020. According to the FRA 2020 country report for Argentina, the average carbon content in forest biomass (above ground) in native forests was estimated at 85.73 tC/ha in 2020; This estimate was derived by applying IPCC 2006 default coefficients across forest biomes and were weighted by forest area class (FAO, 2020, p. 34)¹⁰. Then,

NCS = 85.73 tC/ha

NCS = 314.34 tCO₂-e/ha

C_{B_{SL},pre} = 78.08 tC tC/ha

The ±15% threshold around the Natural Control Scenario (NCS) defines an interval of [72.87 – 98.59] tC/ha. As the pre-project carbon stock in the buffer zone (CBSLpre) falls within this range—consistent with VM0005, Section 3.2.3—the methodology requires the use of the default Low-Forest-Minimum-Edge (LFME) value of 0.4

Estimating *CBSLpre* involves area-weighting the stocks across the strata (see formula 45 of the VM0005 Methodology below):

$$C_{BSLpre} = \frac{\sum_{i=1}^{M_{BSL}} (C_{BSLpre,i} \times A_{REL,i})}{\sum_{i=1}^{M_{BSL}} A_{REL,i}}$$

This way, for the project area, the PP reported this information already reviewed by the audit team:

Stratum	Area (ha)	AGB (tC/ha)	Total (tC/ha)
Close Canopy Forest	2,711.33	106.7102.43	128.04
Open Canopy Forest	13,517.80	73.9369.97	88.717.46
Dispersed Canopy Forest	6,069.66	74.5669.99	89.487.48

Therefore:

¹⁰ <https://openknowledge.fao.org/server/api/core/bitstreams/d021a014-f561-448b-a960-61bfd044dded/content>

$$C_{BSLpre} = \frac{(2.711,3 \times 106.7) + (13,517,80 \times 73.93) + (6.069,66 \times 89.48)}{(2,711,33 + 13.517,80 + 6.069,66)} = 78.08 \text{ tC/ha}$$

Net GHG Emission Reductions and Removals

The total net GHG benefits from the IFM project activity (ΔC_{IFM}) are calculated as the result of the total carbon loss in the baseline scenario (ΔC_{BSL}) and the net removals through the enhancement of forest growth due to liberation thinning and enrichment planting (ΔC_{WPS}), minus any potential leakage (ΔC_{LK}) that might occur (see formula 46 below of the already reviewed procedure described in the VM0005 by the audit team).

$$\Delta C_{IFM} = \Delta C_{BSL} - \Delta C_{WPS} - \Delta C_{LK}$$

ΔC_{IFM} must be corrected for uncertainty, as follows, using formula 47 from the VM0005 Methodology:

$$C_{IFMERROR} = \sqrt{Uncertainty_{BSL}^2 + Uncertainty_{WPS}^2}$$

These parameters are described below for clarifying purposes, as the audit team considers this part is essential to guarantee relevancy of the data provided as net GHG emission reductions or removals:

Parameter	Description	Unit
$C_{IFMERROR}$	Total uncertainty for IFM project activity	%
$Uncertainty_{BSL}$	Total uncertainty in baseline scenario	%
$Uncertainty_{WPS}$	Sum of the carbon stock changes and greenhouse gas emissions under the with-project scenario up to year t	%

The procedure for estimating $C_{IFMERROR}$ must be in accordance with the most recent version of the Tool for Estimating Uncertainty in IFM Project Activities.

If $C_{IFMERROR} \leq 10\%$ of $\square C_{IFM, t}$ then no deduction must result for uncertainty.

If $C_{IFMERROR} > 10\%$ of $\square C_{IFM, t}$ then the modified value for $\square C_{IFM, t}$ to account for uncertainty must be:

$$= \frac{100 - C_{IFMERROR}}{100} \times C_{IFM, t}$$

Where:

Parameter	Description	Unit
$C_{IFM, t}$	Total net GHG emission reductions from the IFM project activity up to year t	t CO ₂ -e
$C_{IFMERROR}$	Total uncertainty for IFM project activity	%

This way, after applying the total uncertainty for IFM project activity using the requested formula by the VM0005 Methodology, the final result of the ex-ante net GHG emission reductions or removals (apart of the estimated baseline emissions or removals, the estimated project emissions or removals and the estimated leakage emissions) can be seen below:

Year	Estimated baseline emissions or removals (tCO ₂ e)	Estimated project emissions or removals (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated net GHG emission reductions or removals (tCO ₂ e)
Year 1	422,808	-3,142	145,325	280,626
Year 2	443,001	-6,284	154,587	294,698
Year 3	464,323	-9,426	164,300	309,449
Year 4	486,832	-12,568	174,485	324,915
Year 5	326,794	-15,710	112,039	230,465
Year 6	354,046	-18,852	124,108	248,790
Year 7	384,263	-21,994	137,357	268,899
Year 8	417,741	-25,136	151,905	290,972
Year 9	454,807	-28,278	167,881	315,204
Year 10	473,427	-31,420	176,518	328,329
Year 11	474,795	-34,562	178,290	331,067
Year 12	476,163	-37,704	180,062	333,804
Year 13	477,530	-40,846	181,834	336,542
Year 14	478,898	-43,988	183,606	339,280
Year 15	480,266	-47,130	185,378	342,017
Year 16	484,696	-47,130	187,150	344,675
Year 17	489,126	-47,130	188,922	347,333
Year 18	493,556	-47,130	190,694	349,991
Year 19	497,986	-47,130	192,466	352,649
Year 20	543,255	-47,130	210,487	379,898
Year 21	544,101	-47,130	210,825	380,405
Year 22	544,745	-47,130	211,083	380,792
Year 23	545,178	-47,130	211,256	381,051
Year 24	545,389	-47,130	211,341	381,178
Year 25	547,361	-47,130	212,129	382,361
Year 26	549,042	-47,130	212,802	383,370
Year 27	550,404	-47,130	213,347	384,187
Year 28	551,415	-47,130	213,751	384,794

Year	Estimated baseline emissions or removals (tCO ₂ e)	Estimated project emissions or removals (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated net GHG emission reductions or removals (tCO ₂ e)
Year 29	552,040	-47,130	214,001	385,169
Year 30	552,483	-47,130	214,178	385,434
Total	14,606,471	-1,083,982	5,512,110	10,178,342

According to the estimation of the PP, expected net GHG emissions reductions in a 30-year period: 10,178,342 tCO₂e.

AENOR deems that values are correct and consistent with the sources.

The values and estimates presented in the PD are considered reasonable based on the documentation reviewed, further references and the result of the interviews during the onsite visit.

The PD describes in an appropriate way with evidence and justifications how the project activity fulfils with the applicability conditions of the Methodology and applicable tools.

Based on the information reviewed, it can also be confirmed that the sources used are correctly quoted and interpreted in the PD and supporting documents. All assumptions and data indicated in the PD and all relevant sources were checked and confirmed and are listed in the PD, including their references and sources.

In essence, the methodology was correctly applied following the requirements. All values in the PD are considered reasonable in the context of the proposed VCS project activity. Data sources are quoted correctly. Hence, the calculation of baseline emissions, project emissions and the estimated net GHG emission removals are considered correct.

The list of parameters available at validation and the values used was also checked by AENOR and it is deemed complete and consistent with calculations and assumptions considered. The following table summarizes the data/parameters available at validation:

Data/Parameter available at validation	Value	Assessment procedure and result
A _i Area of stratum i	Stratum Area (ha) Closed Canopy (FCC) 2,711.33 Open Canopy (FOC) 13,517.80 Scattered Canopy (FSC) 6,069.66 Scrubland (S) 298.20	Validated value by the audit team as per that the stratification was carried out by interpreting and processing Sentinel-2 satellite images using the Google Earth Engine platform. Two multi-temporal mosaics were used for this; the first is from the year 2020 (144 Sentinel-2 images) and the second from 2021 (88 Sentinel-2 images). From these two mosaics, the median of the values at the pixel

Data/Parameter available al validation	Value	Assessment procedure and result
	Shifting agriculture 281.5 TOTAL 22,878.5	level was calculated, hoping that it represents the state of the coverage at that level. In addition, NDVI vegetation indices, terrain elevation and the Random Forest algorithm were used. The audit team also visited the project area.
GHG _{BSL-E} GHG emissions as a result of relogging within the project boundary in stratum i	62,559 (2022)	Calculated as per logging plans and permits /102/ /103/ /107/ /108/ and reviewed by the audit team.
A _{REL,i} Are relogged in baseline stratum i	1,486.6	The relogged area was estimated as one fifteenth of the total project area subject to harvesting (22,298.9 ha), based on the baseline management plan which established a 15-year logging rotation. This results in an annual relogging area of 1,486.6 ha, reflecting the portion harvested each year under the assumed rotation cycle. The audit team reviewed the evidence provided regarding project boundaries and area /19/ /20/, confirming the reported information.
C _{harvest,i} Carbon stock in harvested timber in stratum i	1.13 (2022)	Calculated based on timber volumes //102/ /103/ /107/ /108/, dividing the total carbon stocks by the logged area (22,878.5). Reviewed and assessed by the audit team.
C _{WP100,i,t} Post-relogging carbon stock stored in long-term wood products (stock remaining in wood products after 100 years) in the baseline scenario in stratum i	-0.13 (2022)	Calculated based on Equation (3), (7a) and (8) of the PD, considering waste wood fraction value of 0.24, adequate for developing countries in the calculations. Then, conservative. Value complying VM0005 Methodology requirements, according to the review made by the audit team.
C _{WP20,i,t} Post-relogging carbon stock stored in short-term and medium-term wood products (stock is expected to be emitted over 20 years with a linear decay function) in the baseline scenario in stratum i at year t	0.99 (2022)	Calculated based on Equation (3), (7b) and (8) of the PD. Value complying VM0005 Methodology requirements, according to the review made by the audit team.
V _{harvest,j,i}	3.38 (2022)	Value according to the forest management plan /107/ /108/, as crosschecked by the audit team.

Data/Parameter available al validation	Value	Assessment procedure and result
Volume of timber harvested in the baseline scenario of species j in stratum i		
D _j Basic wood density for species j	0.70	The value represents a weighted average of the density of all timber species identified in the inventory. This figure is used exclusively for EX ANTE calculations. EX-POST calculations have a different value. Specific information available in appendix 4 of the VCS-CCB PD: Wood density of timber species extracted in the baseline scenario. See spreadsheet calculation /99/. Information assessed by AENOR's audit team.
CF Carbon fraction of dry matter	0.47	Information reported according to the VM0005 Methodology requirements, under the IPCC. Assessed by the audit team.
f _{damage}	3.71	Information reported according to the VM0005 Methodology requirements. A value of 1.23 Mg C/m ³ from Pearson et al. (2014) /122/ is used to estimate this parameter.
C _{XB,ty,i} Mean stock of extracted biomass carbon by class of wood product ty from stratum i	2.40 (2022)	Initial value 2.62 replaced by 2.40. The reason for this change is a review of timber species and the updated average density, as assessed and sampled by AENOR's audit team. This is a result of a more detailed species count, which leads to a lower density, providing a more conservative outcome. Data reported in the forest management plan and permits /102/ /103/ /107/ /108/. Assessed by the audit team.
V _{ex,ty,j,i} Volume of timber extracted from within stratum i (does not include slash left onsite) by species j and wood product class ty	75,461.61 (2022)	Data reported in the forest management plan and permits /102/ /103/ /107/ /108/. Assessed by the audit team.
t _y Wood product class (eg, sawnwood, wood-based panels, other industrial roundwood, paper and paper board, and other)	Several values	Data for sawnwood, wood-based panels, other industrial roundwood, paper and paper board, etc., according to the VM0005 Methodology requirements, as assessed by the audit team.
WW _{ty}	0.24	Value applicable to developing countries as per VM0005 Methodology requirements for

Data/Parameter available al validation	Value	Assessment procedure and result
The fraction immediately emitted through mill inefficiency		developing countries, as assessed by the audit team.
slp _{ty} Fraction of wood products that will be emitted to the atmosphere within 5 years of timber harvest	0.2	Value applicable to sawnwood as per VM0005 guidance for sawnwood. The audit team crosschecked this information.
fo _{ty} Fraction of wood products that will be emitted to the atmosphere between 5 and 100 years of timber harvest	0.84	Value applicable to sawnwood as per VM0005 guidance for sawnwood. The audit team crosschecked this information.
E _{biomass} Emissions due to the removal of the biomass itself at year t	60,478.89	A typical percentage of 12%—derived from Pulkki (1997) /123/—is applied to account for infrastructure impacts under conventional logging in tropical evergreen forests. This percentage is multiplied by the average carbon stock per hectare to estimate associated emissions
E _{felling} Emissions due to the use of equipment for removal of the biomass on the area dedicated to infrastructure	82.75	A conservative estimation was applied, utilizing the methodology's default values, which correspond to the field conditions observed at the project location. The audit team deemed this information as reasonable, and according to the VM0005 Methodology requirements.
E _{grading} Emissions due to road grading	26.49	A conservative estimation was applied, utilizing the methodology's default values, which correspond to the field conditions observed at the project location. The audit team deemed this information as reasonable, and according to the VM0005 Methodology requirements.
E _{harvesting} Emissions due to harvesting	378.37	Calculated using timber volumes harvested as well as default parameters provided by VM0005, as assessed by the audit team.
E _{extraction} Emissions due to extraction of timber from the forest to the log landings	29 (2022)	Value calculated using timber volumes harvested, distance travelled as well as default parameters provided by VM0005, according to the review made by the audit team.
E _{transport}	912 (2022)	Value calculated using timber volumes harvested, distance travelled as well as default parameters provided by VM0005,

Data/Parameter available al validation	Value	Assessment procedure and result
Emissions due to the transport of the timber from the log landings to point of onward sale/transport		according to the review made by the audit team.
BEF Biomass expansion factor for the conversion of annual net increment (including bark) in stem biomass to total above-ground tree biomass increment for species j	1.15	Value obtained from Table 3A.1.10 of the GPG-LULUCF, the lowest value provided in the table to be conservative, as reviewed by the audit team. This request came from the VM0005 Methodology requirements.
R Root:shoot ratio appropriate to species or forest type / biome	0.2	Value obtained from Table 3A.1.18 of the GPG-LULUCF, as assessed by the audit team. This request came from the VM0005 Methodology requirements.
$f_i(X, Y, \dots)$ Allometric equation for species j linking, for example, diameter at breast height (DBH) and tree height (H) to above-ground biomass of living trees	Specific equations were selected and can be found in Appendix 3 of CCB-VCS-PD	Different evidence in Appendix 3 of CCB-VCS-PD /99/ has been provided to the audit team to analyze the accurateness of them.
LF _{ME} Leakage factor for market-effects calculations	0.4	According to the VM0005 Methodology requirements, LFM = 0.4 Since CBSLpre (78.08 tC/ha) falls within $\pm 15\%$ of the NCS range (72.87–98.59 tC/ha), the methodology mandates applying the default 40% market leakage adjustment factor. Audit team reviewed. FAO data from the State of the World Forests /124/ and CBSLpre calculation, confirming that value is as per applied methodology.
NCS The mean national forest carbon stock	314.34	FAO data from the State of the World Forests /124/.

3.3.8 Monitoring Plan

The list of data and parameters monitored is the following (more information in Section 3.3.2 of the VCS-CCB MR):

- Dj – Basic wood density for species j (to be monitored in verification)
- Ai,t - Area of stratum i at year t (total area 22,878.49 ha, 5 strata, including FCC, FOC, FSC, S and shifting agriculture)
- Asp,i - Total area of all sample plots in stratum i (to be monitored in every verification; total sample plot area 13.30 ha, applicable to the 5 strata)
- DBH - Diameter at DBH (1.30m, monitored in every verification)

- H - Height of tree (to be monitored in every verification and to be measured using clinometer)
- Vextr – The volume of timber extracted from within the project boundary (no relogging in the project scenario).
- $\Delta CP_{i,t}$ – Net carbon stock change due to forest regrowth and silvicultural interventions in the with-project scenario in stratum i at year t.
- $\Delta CAGB_{i,t}$ – Net carbon stock change in above-ground tree biomass in the with-project scenario in stratum i at year t.
- $\Delta CBGB_{i,t}$ – Net carbon stock change in below-ground tree biomass in the with-project scenario in stratum i at year t.
- $CAGB_{l,j,sp,i,t}$ - Carbon stock in above-ground biomass of tree l of species j in plot sp in stratum i at year t.
- $V_{l,j,sp,i}$ – Stem volume of tree i of species j in plot sp in stratum i.
- $CAGB_{sp,i,t}$ – Carbon stock in trees in plot sp in stratum i at year t.

AENOR's audit team has reviewed each one of the data and parameters included in Section 3.3.2 of the PD, crosschecking the information and assessing, first, if all the data and parameters described in the methodology and applied tools are included, second, if sources of data and values applied are in accordance with the methodology and applied tools, and third, if all the sections mandatory to answer according to the VCS and CCB Template, based on VCS and CCB Standards, have been answered. Based on this analysis, the audit team has made all the inquiries and considers that the section has been drafted accordingly.

Monitoring Plan for Baseline Regrowth (Summary)

PP implemented a monitoring plan that outlines the strategy for monitoring forest regrowth in the baseline scenario (what would have happened without the project) by using a reference area that strictly complies with the VM0005 methodology. This monitoring plan includes:

1. Reference Area Selection:

- Must be within the same ecoregion (Upper Paraná Atlantic Forest) and have comparable characteristics to the project area in terms of forest type, composition, topography, disturbance history, and legal classification.
- Must have a history of the same silvicultural management and harvesting intensity as the project area.
- Its total size must be **equal to or greater than 75%** of the project area.

2. Monitoring Method:

- Will be conducted through **permanent sample plots** established and measured to high standards (IPCC requirements).
- Parameters measured will include tree species identification, **DBH**, and total height.
- The sampling design will ensure the same **statistical precision and confidence** as the monitoring in the project scenario.

3. Quality Assurance:

- Monitoring frequency will be **synchronized** with the project's monitoring periods.
- Work will be carried out by qualified teams using calibrated equipment.
- Data will be archived and will undergo **independent validation** to ensure transparency and replicability.

In AENOR's opinion implemented monitoring of Baseline Regrowth is a robust monitoring plan, designed in compliance with IPCC standards. Its key strength is the strict selection of a comparable reference area, which ensures a realistic baseline and prevents carbon overestimation. The plan's integrity is reinforced by synchronized measurements, quality control, and independent validation, making it a solid and reliable foundation for transparently quantifying the project's emission reductions.

In the opinion of the AENOR, all necessary parameters required by the selected approved methodology are contained in the monitoring plan. They are clearly described, and the means of monitoring described in the plan comply with the requirements of the methodology.

The monitoring plan presented in the PD complies with the requirement of the methodology. The audit team deems that the climate benefits associated with the implementation of project activities were planned to be monitored through a transparent structure.

The procedures described in section 3.3.3 of the PD were reviewed by the AENOR team and cross-checked against the applicable methodology and associated tools. The audit team found them to be in compliance with methodological requirements, and good practice as defined. The monitoring equipment to be used to collect, correct, and process the data are in compliance with the methodology and the VCS requirements

In opinion of AENOR, all necessary parameters required by the selected methodology are contained in the monitoring plan. They are clearly described, and the means of monitoring detailed in the plan comply with the requirements of the methodology. Tables in section 3.3.2 of the PD detail the different data variable to monitor along with the data unit, recording frequency, purpose of data, QA/QC, etc. Thus, the monitoring plan is in compliance with the applicable methodology. The monitoring plan provides means for internal data review and quality control, and the data presented by the PP included the results of these internal assessments. AENOR considers that information provided is sufficiency and the quality of that information is appropriate to determine the GHG removals

After the review of evidence provided by the PP, the interview, and communications with PP, AENOR confirms that monitoring arrangements described in the monitoring plan are feasible within the project design and that the means considered for the implementation, including data management, quality and assurance control procedures, are sufficient to ensure that the GHG net anthropogenic removals achieved resulting from the proposed VCS project activity can be reported ex post and verified. Therefore, in opinion AENOR, the PP will be able to implement the monitoring plan.

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

The PP considers free and informed prior consultation (FPIC) with social impact assessment as a fundamental axis of the project. During this instance, surrounding communities were invited to the

introduction of the project's main objectives, risks, and benefits, with open instances to comment on it. The audit team visited the project area and nearby villages and met with relevant stakeholders who confirmed they were informed of objectives, risks and benefits.

During the monitoring process, basic documents will be made, reporting results in a simple and inclusive language and with measures of evaluation of processes and results, they will be available on the website, social networks, publications in local newspapers, information meetings with stakeholders during monitoring instances. Moreover, the project's documentation (as well as local language summary) will be available on VCS and CCB webpage, and a public consultation period will take place for stakeholders to comment on each project's design.

Site visit interviews with community members substantiated that general information on the plans was communicated, which demonstrates an appropriate means of notification for the communication. Validation team confirmed that the community has access to the information in Spanish and Guarani; also it was confirmed that young ingenious people speak Spanish as mother tongue.

Validation team determined that the monitoring plan, and any results undertaken in accordance with the monitoring plan, have been and will be disseminated and made publicly available on the internet (available at Nideport's webpage: <https://news.nideport.com>) and communicated to the communities and other stakeholders through the validation activities described.

3.3.10 Non-Permanence Risk Analysis

The project utilized the non-permanence risk analysis tool, AFOLU Non-Permanence Risk Tool 4.0, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing them. The audit team reviewed the Non-Permanence Risk Report following VCS Standard v4.4 Section 3.2.10 and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool.

At all levels, the audit team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the PP. Each risk factor was thoroughly assessed for conformance. A brief review of each factor is shown in the table below.

Risk factor	Risk Rating	Assessment
Internal Risks		
Project Management: It is assessed using table 1 of the VCS AFOLU Risk Tool.	0 (total may be less than zero)	a) The project will plant only native species and will implement management practices to control invasive species, as indicated in the PD and in the Forest Management and Conservation Plan, reviewed by the audit team. The native species to be used in the enrichment plantings have not been previously chosen and will depend on the level of degradation and the forest succession stage of the area. However, the Forest Management and Conservation Plan commits to using native species to promote the regeneration of the native forest: "to favour the general objective, it has been decided to favour the process of natural regeneration of native forests without the need for assistance through

Risk factor	Risk Rating	Assessment
		artificial measures. However, in areas of high impact due to overexploitation, change of use (capuera, in Spanish) and damage, such as forest fires, in which the ecosystem has been seriously damaged, assisted restoration actions will be implemented with preselected native species related to the composition nature of forests/ecosystems. The provision of seedlings for these purposes will come from private forest nurseries, registered with INASE. The selected nurseries are specialized in the production of seedlings of native species". Thus, risk rating=0 is justified. b) The PP is committed to an ongoing enforcement to prevent encroachment by outside actors is required to protect more than 50% of stocks on which GHG credits have previously been issued. The audit team met the person responsible of enforcement during the on-site visit. The PP developed a Contingency Plan to address fire and security issues. Nideport already implanted signages (visited during the on-site visit) in different parts of the reserve that indicate the probability of fires with arrow markers and colors, that vary according to the level of danger and fire rate. The PP also has a close relationship to the firefighter's brigade in the municipality of San Pedro and makes use of digital resources to monitor hotspots and active fires. Regarding security, as detailed in section 2.1 of this NPRR, Nideport hired a security staff that patrols the area, especially the borders of the project area (the one interviewed by the audit team during the on-site visit). Additionally, the PP plans to invest on cameras, drones, and sensors to better monitor the area efficiently, and without risking so much its security staff. Thus, risk rating=0 is justified. c) The management team has individuals with significant experience in all skills necessary to successfully undertake all project activities, as per the review made by the audit team of the project staff management CVs /67/. Moreover, Nideport has also hired other two organizations for conductions inventories: Fotosíntesis and Aves Argentinas and EcoSecurities and Prosustentia. More information in the NPRR. Risk rating=0 is justified. d) Management team maintains a presence in-country and less than one travel day from project site. This has been acknowledged by the audit team site visit in the beginning of 2023, with staff management team members living in the project area and the responsible coming and going back all time. Risk rating=0 is justified.

Risk factor	Risk Rating	Assessment
		e) The management team as such, has no significant experience in AFOLU project design and carbon accounting under the VCS program. However, the presence of Fotosintesis, Aves Argentinas, EcoSecurities and ProSustentia during the on-site visit provided some relevant information about the quality of the team in general. Risk rating=0 is justified. f) There is not an official adaptive management plan in place, therefore, the mitigation for adaptive management is not claimed in this NPRR. Risk rating= 0 is justified.
Financial viability: It is assessed using table 2 of the VCS AFOLU Risk Tool.	2 (total may not be less than zero)	a)-d) Considering the revenue from carbon credits, the project will reach breakeven point in 2023, as indicated in the financial analysis in section 3.1.5 of the PD and in the file "named "GS1 Nideport - Financial Model 10 0423.eco" /106/, reviewed by the audit team, under the option "Project Scenario (with carbon credits)". The investment funds receipts were shared by the PP with the auditors through the drive (confidential), Nideport has received a total of 500,000 USD in funds in 2021, and the project didn't have any revenue until the moment this report was written, since it is still going through its first verification. According to the AFOLU Non-Permanence Risk Tool, the "The percentage of needed funding secured shall be calculated by adding up all funding and revenue already secured and dividing this by the total cash out up to and including the year the project reaches breakeven". Risk rating=0 is justified. e)-h) The PP has signed an agreement of purchase of 50,000 credits. This agreement is also available to the auditors in the drive. The reference price in this agreement is 16.00 USD, what results in a total of 1,300,000 USD in revenue and funding. Therefore, when dividing 1,300,000 USD for the total cash out until 2023 (4,014,784 USD), it is possible to affirm that the project has secured 32% the investment needed to cover the total cash out until the project reaches breakeven, considering the reference price of 16 USD/credit for the 50,000 credits. The financial analysis was done for a 10-year time period. The additionality tool does not specify which time horizon should be used for this kind of analysis; thus, the project proponent followed the instructions in CDM Tool 27 – Investment Analysis, which says that "the investment analysis shall be conducted for at least 10 years and include the fair value of the project activity assets at the end of the assessment period". This information has been reviewed by the audit team. Risk rating=2 is justified.

Risk factor	Risk Rating	Assessment
		i) The project does not have available callable financial resources at least 50% of total cash out before project reaches breakeven. Risk rating=0 is justified.
Opportunity Cost: It is assessed using table 3 of the VCS AFOLU Risk Tool.	-4 (total may be less than zero)	a)-f) According to the spreadsheet shared with the auditor, which compares the Baseline Scenario and the Project Scenario (considering the revenue from carbon credits), it is possible to identify that the NPV of Baseline Scenario is \$153,701, while the one for the Project Scenario is \$4,512,662, considering a moderate price per tons of carbon credit. Therefore, it is possible to affirm that the NPV from the project activities is expected to be at least 50% more profitable than the most profitable land use, which is the continuation of tree harvesting by Florestal Belga, the Baseline Scenario. This information has been reviewed and assessed by the audit team /76/. Risk rating= -4 is justified. g-j) Not applicable. Risk rating = 0 is justified.
Project Longevity: It is assessed using table 4 of the VCS AFOLU Risk Tool.	4 (total may not be less than zero)	a) Not applicable b) a) According to VCS Standard version 4.4, for all AFOLU projects except ALM, the crediting period can vary from 20 to 100 years. This project crediting period is 100 years, which is in accordance with the rules of VCS. The time taken to recover natural forests and their biodiversity varies greatly. According to Rozendaal et al. (2019) secondary forests take around 50 years to recover the species richness of the original forest (this evidence has already been reviewed by the audit team). The authors also state that the full recovery of species composition may take more than 100 years, and that there is an average of 34% diversity recovery after 20 years of natural regeneration (ROZENDAAL et al., 2019). PINAZO and ARTURI (2021) studied how the tree volume of Selva Misionera commercial species recovered from harvesting according to different growth scenarios and harvesting cycles. The authors found that the time taken to recover the tree volume varied from 40 to more than 60 years, depending on if a scenario of maximum or minimum growth was considered (PINAZO; ARTURI, 2021). This evidence has been reviewed by the audit team. According to the PP, the 100 years of project longevity was chosen because it is allowed by the VCS standard version 4.4 and because it considers a timeframe suitable for the natural regeneration and enrichment planting activities to show results. This information has been crosschecked by the audit team.

Risk factor	Risk Rating	Assessment
		Both companies, the project proponent and the owner of the land signed legal agreement to warranty this period, no precondition or exception exists. The legal contract, which has been made available to the audit team, is a purchase contract that includes an initial rental clause, in which only the Lessor may terminate the lease. This clause allows the project proponent to exercise the purchase option and acquire ownership of the land rights where the project is conducted. To purchase the land, it is necessary to obtain carbon credits. Hence, the initial rental period is required to commence the activities described in the Project Design Document (PD), as possession of the land is a prerequisite for these activities. The initial rental period is solely to facilitate the acquisition of carbon credits necessary for the project's commencement Risk rating=4 is justified.
Total internal risk= 2 (total may not be less than zero)		
External Risks		
Land Tenure and resources access/impact: It shall be assessed using table 6 of the Risk Tool.	2 (total may not be less than zero)	a) Not applicable. b) According to the PD and based on the information reviewed by the audit team, Forestal Belga is the ownership of the land. The property title is registered in the notary in the city of Posadas, province of Misiones, and dates from the 3rd of April 1967 /32/ /33/ /104/. Based on the interviews with project management members, employees and local stakeholders, there are no land disputes or overlapping rights between the landowner and any other entity. As mentioned above, the landowner has the necessary documentation proving their ownership right. Additionally, during the community consultations, reviewed by the audit team, no issue of property rights was raised /29/ /37/ /71/ /110/ /111/. Forestal Belga has firmed a contract with the project proponent that allows the latter to implement the carbon project and conduct all the planting and enrichment practices in the project area. For reasons of confidentiality, the PP shared the contract between them in Florestal Belga privately with the audit team, who reviewed the documentation /29/ /37/ /71/ /110/ /111/. Thus, risk rating = 2 is justified. c)-d) Although there are some reports of invasions of the project area (for poaching, illegal trafficking, and illegal agriculture), as detailed in section 2.5.5 of the PD and reviewed by the audit team /113/ /118/ /115/, these activities do not constitute a menace to the project nor characterize a dispute over the land.

Risk factor	Risk Rating	Assessment
		The information regarding the contingency actions for addressing fires and security issues are detailed in the Comprehensive Approach Plan for Nideport Safety, Hygiene and Technology (or just the Contingency Plan), already reviewed by the audit team. The project has hired a security staff that patrols the area, especially the borders of the project area. Besides this, the PP, following the recommendations of the security staff, is willing to invest on cameras, drones, and sensors to better monitor the area a more efficient (reducing the costs against the benefits) and safe way, since the area is big, above 20,000 ha. Risk rating=0 is justified. e) Not applicable. f) Not applicable, as the PP has not reported that the project area is protected by legally binding commitment to continue management practices that project carbon stocks over the length of the project crediting period. Risk rating= 0 is justified. g) Not applicable.
Community engagement: It shall be assessed using table 7 of the Risk Tool.	0 (total may be less than zero)	a-b) Community and stakeholder assessment was conducted as informed in section 4 of the PD (already reviewed and assessed by the audit team) and in the documents shared with the audit team /29/ /37/ /71/ /110/ /111/. No communities live within the Forestal Belga property or the project area. This was informed by the PP and no complaints were raised during the consultation to nearby communities. The audit team interviewed the Tekoa Alecrín indigenous community and other stakeholders that confirmed this information. According to the PD, a free, prior, and informed consent assessment (FPIC) was carried out with Tekoa Alecrín, an indigenous community, in Spanish and Guaraní Mbya, both in digital and physical versions /29/ /37/ /71/ /110/ /111/. For the rural communities, meetings in town halls were carried out /29/ /37/ /71/ /110/ /111/. Because this consultation was not done on the household level, there is no way to guarantee that more than 20 percent of households living within 20 km of the project boundary outside the project area, and who are reliant on the project area, have been consulted. Therefore, to be conservative, it was assumed in the non-permanence risk tool that this percentage was less than 20 percent. This assumption has been assessed by the audit team and confirms that is conservative. Risk rating=5 is justified. c) The project generates net positive impacts on social and economic well-being of local communities is validated under

Risk factor	Risk Rating	Assessment
		the CCB Standards. Proven evidence /29/ /37/ /71/ /110/ /111/ has been shared by the PP and reviewed by the audit team. Risk rating=-5 is justified.
Political Risks: It shall be assessed using table 8 of the Risk Tool.	0 (total may not be less than zero)	a)-e) Argentina presents an average score of -0.078 according to the World Bank Institute's Worldwide Governance Indicators. This has been reviewed by the audit team and confirms the reliability of the source provided. Thus, this is within the range of -0.32 to less than 0.19. Risk rating=2 is justified. f) A mitigation discount of -2 was applied because "the country has an established Designated National Authority under the CDM and has at least one registered CDM Afforestation/Reforestation project". In the case of Argentina, the country has one DNA and one A/R project. The PP has provided a link on the NPRR, reviewed by the audit team. Risk rating=-2 is justified.
Total external risks=2 (Total may not be less than zero)		
Natural risks		
Fire Risk: It shall be assessed using table 10 of the Risk Tool.	$LS \times M = 5 \times 0.5 = 2.50$	According to the PP, there are minor fire events in the region. They rarely affect the project area and, when they do, they are rapidly restrained, so the damages are minor. The audit team interviewed some of them, and relevant stakeholders who confirmed this version of reality. Several documents were found to provide evidence for the significance of forest fires in the province of Misiones and in San Pedro department. In 2012 and 2013, no forest fires were reported for the San Pedro department. For this time period, the areas affected by the fires in other departments near San Pedro were small: 4.5 ha in Eldorado department during 2013, and 0.5 ha in Guaraní department during 2012. This information can be found on footnote number 6, in the NPRR, regarding public statistics about forest fires made by the Argentinian government. The audit team crosschecked the information provided, confirming the assurance of it. In 2017, no forest fires were detected in San Pedro department nor in nearby departments. The area affected by fires in Misiones this year was of 1,775 ha, distributed between 3 departments, all in the south region of the province: the Capital, San Ignacio, Apóstoles³. In 2018, once again, there were no forest fires registered in San Pedro department or in nearby departments. The area affected by the fires in Misiones during 2018 was of 765.50 ha, distributed across the Capital and the Apóstoles departments. This information can be found on footnotes number 3, 7 and 8, in the NPRR, regarding public statistics

Risk factor	Risk Rating	Assessment
		about forest fires made by the Argentinian government. The audit team crosschecked the information provided, confirming the assurance of it. In 2019, San Pedro department registered 1 forest fire, that affected a small area (2.5 ha). Compared to the rest of the province, it corresponded to 2.5% of the fires in natural areas of Misiones. In this same year, other two departments near San Pedro registered fires: Gral. Manuel Belgrano (1 case, affecting 6 ha) and Montecarlo (1 case, affecting 19 ha) . However, in both cases, the area affected (a total of 25 ha) was also small compared to the total area affected by fires in the province this year (798.5 ha). This information can be found on footnotes number 5 and 9, in the NPRR, regarding public statistics about forest fires made by the Argentinian government. The audit team crosschecked the information provided, confirming the assurance of it. This information can be found on footnote number 10, in the NPRR, regarding public statistics about forest fires made by the Argentinian government. The audit team crosschecked the information provided, confirming the assurance of it. Data for fires in Argentina in 2020 was not found. In 2021, once again no fire in natural area was detected in the San Pedro department. In the nearby departments only two forest fires were detected, one in Iguazú and Gral. Manuel Belgrano, that affected an area of 250 ha, which represents only 15% of the area affected by fires in Misiones . Lastly, the Ministry of Ecology of Misiones issued a notification regarding the forest fires in San Pedro and nearby regions from November 2021 until February 2022. The document, available to the auditors, states that due to early actions of the forest rangers corp, the forest fires in nearby areas were contained. The project area was not affected by the forest fire in Parque Provincial Pinãlito, that borders the project area. The document also affirms that Florestal Belga Reserve was not affected by any forest fire during this period. Therefore, fires were considered a minor issue for the project, impacting from 5% to less than 25% of carbon stocks.
Pest and disease outbreaks: It shall be assessed using table 10 of the Risk tool.	LS*M=0	The National Pest Surveillance and Monitoring System (SINAVIMO, in Spanish) and the National Service for Food Health and Quality (SENASA) websites were consulted, but no evidence on the significance of pests and disease outbreaks in natural forests was found. The Food and Agriculture Organization (FAO) considers that diseases affecting natural forests are not common in Argentina and that there is only one insect known to be impacting natural forests (Austrocedrus chilensis) in Argentina. No indigenous or introduced pest was reported to be impacting natural forests in Misiones. The audit team visited the project area, and did not find any inconsistency by visual observation regarding what was

Risk factor	Risk Rating	Assessment
		reported by the PP. Moreover, the audit team interviewed relevant stakeholders, which confirmed they have not noticed any pests or disease outbreaks in the project area or nearby. The PP provided two FAO links to supports their claims, which were reviewed and assessed by the audit team.
Extreme weather: It shall be assessed using table 10 of the Risk tool.	$LS \cdot M = 5 \cdot 1 = 5$	The PP stated in the NPRR that the extreme weather events that happen in the region are normally windstorms. The project proponent stated that inside the project area, the damage caused by these events are very low, affecting less than 25% of the area. Additionally, a search was conducted in several websites to map the main extreme weather events in the province of Misiones. According to the Natural Disaster Prevention Office (OPAD, in Spanish) (see footnote 13 in the NPRR), in the municipality of Posadas, Misiones, the weather phenomena identified in Misiones are electric storms, hail, mesocyclones, tornados, dust storms, landslides, fires, and floods. Electric storms are not a natural risk for the project. They can generate forest fires, but this issue was approached in the paragraphs above, when the fire risk was assessed. Hail also is not an impact in the project area, it may damage crops. Landslides are also not significant enough to impact the project, as explored below, when addressing geological risk in the project area. Floods impact the province of Misiones periodically, especially during the summer. However, the departments are affected by it in different ways. The department of San Pedro is classified in the lowest level of the Flood Maximum Magnitude Index (see footnote 14 in the NPRR) and as mentioned below, in the Geological Risk section, no event of flood that generated hazards was registered in the department of San Pedro by SEGEMAR. This information was crosschecked by the audit team. Regarding windstorms, like tornados and mesocyclones, evidence was found that these phenomena occur in the province of Misiones and in the department of San Pedro. However, it wasn't possible to find a study or statistics for windstorms in the Meteorological National Service (SMN, in Spanish). The SMN has historical data for temperature, sunlight and pluviosity in several meteorological stations in Misiones, but not for wind or windstorms events. See footnotes 15,16, 17 and 18 in the NPRR, which have been reviewed by the audit team. Misiones had one intense windstorm 14 years ago. Despite the occurrence of several windstorms in Misiones (this is detailed in section 3.2) the province is considered to be in a F2 zone of winds (the wind intensity scale varies from F0 to F5).

Risk factor	Risk Rating	Assessment
		Therefore, it is considered in this report that the main extreme weather menace in the project area and nearby areas are windstorms. However, it seems like the majority of these events are not intense (the last devastating tornado occurred 14 years ago) they were considered of minor significance.
Geological risks: It shall be assessed using table 10 of the Risk Tool.	LS*M=0	Not relevant as there is no volcanism, earthquakes, or landslide history in the project area or anywhere near it. Thus LS= 0 is reasonable. Mitigation (M) measures: NA
Total natural risks= 7.5		
OVERALL RISK RATING= 2+2+7.5=12. Then an overall risk rating of 12% is considered.		

AENOR has checked that information provided in the NPRR is consistent with supporting documents provided. The assumptions and justifications provided to determine the risk rating of each risk factor are elaborated and they are based on provided documents using conservative assessments. AENOR deems that information provided is reliable and appropriate from reliable sources. Thus, the overall risk rating of 12% is credible and realistic.

3.3.11 Optional Gold Level: Regional Climate Change Scenarios (GL1.1)

Section 3.4.1 of the PD describes regional climate change scenarios. Under this assessment, the national and sub-national governments have identified climate change scenarios at a subnational and regional level (see footnotes 87 and 88 in the PD, presentation on climate change adaptation plan based on tendencies and forecast of climate change in Argentina and Misiones, already reviewed by AENOR's audit team), and particularly, for the case of the Misiones region, the expected impacts are the following:

- Increase annual media temperature.
- Increase of heat waves and tropical nights.
- Increase of days with intense precipitation
- Increase in dry days.
- Increase in windstorms intensity.
- Increase in hail events.

According to the PP, although there are projects at a sub-national level to protect communities from drought and floods through headwater management and forest sustainable management to assure food security, based on current land use maps the project area would have suffered degradation and deforestation, further increased the risks, and impacted of the changes observed and projected due to climate change. The audit team visited the project area and discussed with relevant stakeholders who confirmed these appreciations regarding climate change and their possible impacts.

It is the opinion of the audit team, based on the support evidence provided by the PP and the observed impacts attributed to climate change described in the Fifth Assessment Report (AR5) of the IPCC, that the PP has appropriately identified the likely climate change and climate variability scenarios affecting the project area.

Considering the main land use scenario of the project area, the potential changes to the land use described by the PP is deemed as reasonable by AENOR

3.3.12 Optional Gold Level: Climate Change Impacts (GL1.2)

Section 3.4.2 of the PD describes some of the impacts due to climate change in the region, based on an assessment made by the provincial government in terms of community well-being and biodiversity. This analysis has been made according to Argentinian national analysis that can be found in footnotes 89 and 90 of the PD, already reviewed and assessed by the audit team, confirming the reported information about community well-being and biodiversity stated in Section 3.4.2.

Some of these climate change impacts are the following:

Community well-being

- Decreased access to drinking water and irrigation due to prolonged droughts.
- Decrease in comfort due to high temperatures with increasing need for cooling systems and water demand.
- Impacts over the food production system and the associated production chain due to prolonged dry days and/or hail leading to an increase in prices.
- Impact on public and private infrastructure due to an increase in extreme events: rural roads, bridges, drains, dams, electricity transmission and distribution networks, and other infrastructure.
- Increased sediment entrainment and obstruction of drainage routes, increased risk of flooding and waterlogging of soils, and soil erosion (changes in physical composition and potential loss of soil fertility).
- Increased impact on indigenous communities due to their close relationship with nature and natural resources.
- Increased heat-related illnesses, water supply, and deficiencies in electricity supply due to high demand, with reduced working days.
- Increased internal migration in search of better economic livelihood conditions, with increased momentum in rural-urban migration flows.
- Increase in vector-borne diseases (dengue fever, etc.) and water pollution.
- Increased risk of health problems, cardiovascular diseases (due to heat waves) and respiratory diseases (due to pollution).
- Increased risk of health problems, cardiovascular diseases (due to heat waves) and respiratory diseases (due to air pollution caused by an increase in the frequency of fires), mainly in the most socially vulnerable groups.

Biodiversity conservation status.

- Impacts on natural ecosystems due to changes in climate.

- Favourable conditions for the development of fires and damage to native forest, biodiversity, primary production and associated industries.
- Increased sediment entrainment and obstruction of drainage routes, increased risk of flooding and waterlogging of soils, and soil erosion (changes in physical composition and potential loss of soil fertility).
- Increased pressure on natural resources due to lack of productivity, price increases, extreme events, job losses, among others.
- Limitation to ecosystem services due to slow adaptation.

The audit team asked relevant stakeholders about observed changes attributable to climate change and their impact to them and they all confirmed how they are being affected already by these changes, coinciding with the information reported.

Thus, AENOR considers that it is demonstrated that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities and the conservation status of biodiversity in the project zone and surrounding regions.

3.3.13 Optional Gold Level: Measures Needed and Designed for Adaptation (GL1.3)

Section 3.4.3 of the PD describes a list of potential adaptation measures based on level of risk in the project area. To support this information, the PP based its claims in the summary guideline from IPCC AR5: Climate change, adaptation and vulnerability (see footnote 91 in the PD), reviewed and assessed by the audit team to confirm the information reported in the PD.

Some of the measures mentioned include the need for the management and conservation of basin headers against drought and floods; the restoration of native forests; housing improvement; and securing food access as well as participating the community in the identification and implementation of adaptation measures. In this line, different programs are being or will be designed with the communities to be implemented in line with needs identified in public participation instances.

Moreover, biodiversity is being lost at an exponential rate and climate change is one more pressure that acts in synergy with other important threats such as habitat loss and invasive exotic species. This makes the impacts on biodiversity even more harmful. Climate change directly impacts birds and their habitats, but at the same time it will complement the already existing pressures. However, biodiversity can play a significant role in climate change adaptation and mitigation strategies. By strengthening ecosystems and their capacity to regulate climate, and by preserving carbon-rich environments such as forests, it is possible to ensure that carbon remains sequestered in the system.

For this reason, the PP has claimed that it is necessary to increase efforts to improve and ensure the resilience of species and their environments by mitigating and adapting to existing threats and those associated with climate change, complementing the activities that ensure carbon sequestration with direct actions on the other mentioned threats.

For instance, the PP proposes that the increase in green corridors connectivity provides an adaptation strategy for species providing a wider space for basic needs fulfilment (nesting, breeding, and feeding). Moreover, watershed restoration will allow the regeneration of environments for the threatened and lesser-

known species that use them (Black-fronted Piping-Guan and Long-tufted Screech-Owl) while protecting the ecosystem services that the streams generate along the entire area. In the same line, anticipated and pro-active disaster and disturbance response may limit the impacts extent allowing for “[a] enhanced ability to make management responses to major natural disturbance and [b] reduced risks of such responses on biodiversity (Millar et al., 2007)” (Subrahmanyam, S. 2015). These reported evidence by the PP have been already reviewed by AENOR’s audit team, confirming that these claims can be found in both supporting evidence.

In Table 15 of Section 3.4.3 of the PD, can be found information about risk, potential adaptation measures, climate factor, temporal term, level of risk, adaptation potential and adaptation related program for the following 6 risks:

- Low water availability.
- Low crop yields. Loss of family income.
- Loss of natural resources’ quality.
- Impact on population’s health.
- Habitat loss (x2).

Based on the evidence and testimonies obtained during the on-site visit, it is the opinion of the audit team that the activities design and implemented by the project deliver the intended impacts on climate change adaptation and assist communities and biodiversity to adapt to the probable impacts of climate change

3.4 Community

3.4.1 Descriptions of Communities at Project Start (CM1.1)

According to section 4.4.1 of the CCB-VCS-PD the research methodology used a mixed multi-stage design to generate primary data on the project area's communities. It involved interviews with maximum variation, using key actor, snowball, and focus groups, and censuses in sites, villages, and indigenous communities. This section also provides complete description of identified communities.

To assess well-being information; community characteristics; and diversity within the community, validation team by reviewing the report on the results of the census carried out by PP /23/ and official census report /13/ /14/ determined that the description provided in the project design document about communities accurately reflects publicly available information. Then, in AENOR's opinion, description of the community stated in the CCB-VCS-PD is in line with VCS and CCB requirements. Provided information was confirmed during the on-site visit through interviews with local authority and local stakeholders.

3.4.2 Interactions between Communities and Community Groups (CM1.1)

The assessment of the interaction between the communities and groups presented in section 4.1.2 of the CCB-VCS-PD at the Project start was carried out through workshops, interviews and surveys. Community organizations like churches, neighbourhood unions, cooperatives, and picnic areas have low participation. The neighbourhood relationship is close, but social cohesion is lacking for project management. In the case of Tekoa Alecrín community, faced challenges due to colonial and private encroachment. This has hindered their traditional way of life and increased inter-ethnic contact with dominant society. Interaction with other localities is limited, confined to state and private indigenous agencies, public services, and commercial centres.

The community interactions were confirmed during the on-site visit. Some stakeholders were interviewed (section 2.4 details the activities and topics covered) in order to confirm the start of the project between the communities and community groups described in Section 4.1.2 of the project description. Also, census carried out by PP /23/ and free and informed consultation (FPIC) report /69/ were assessed to confirm that/ what is reported in the CCB-VCS-PD are properly addressed.

3.4.3 High Conservation Values (CM1.2)

Climate change impacts communities, leading to reduced water sources, low land productivity, and crop damage. This worsens small agricultural producers' economic situation, increasing dependence on native forests for resources and ecosystem services. Based on this, the identified HCV for the community during the public consultation and further specific HCV workshops in Alecrín village are detailed in section 4.1.3 of the CCB-VCS-PD.

Validation team assessed all identified HCVs listed and described in section 4.1.3. of the project design document. They were contrasted against census report carried out by PP /23/ and the free and informed consultation (FPIC) report /69/. Then, validation team confirm the information with respect to how the qualifying attributes for HCVs related to community well-being have been assessed by PP.

3.4.4 Without-Project Scenario: Community (CM1.3)

The Validation Team reviewed the without-project scenario for community well-being as described in Section 4.1.4 of the CCB-VCS-PD and in clarifications provided. PP has developed a flowchart about the projection of the without-project scenario. The population's quality of life would deteriorate without a project, considering poverty, informal work conditions, and institutional disarticulation limiting community development assistance. It is expected to increase existing poverty and destitution, reduction of ecosystem services -specifically freshwater access-, as well as the absence of education levels that create economic opportunities.

The report on the results of the census carried out by PP /23/ and project feasibility study /34/ were reviewed and assessed during the on-site visit in order to confirm the plausible scenario without project. AENOR's validation team through review of project documentation, supported by site visit interviews, confirms that the expected changes to community well-being in the without project scenario as identified in the CCB-VCS-PD are appropriate and that scenario described is the most likely.

3.4.5 Expected Community Impacts (CM2.1)

Validation Team reviewed expected community impacts identified in Section 4.2.1 of the CCB-VCS-PD and compared the expected impacts to the project activities identified in Section 1.2 standardized metric benefits). Validation team determined that the expected community impacts presented in the project design document are aligned with project activities most affecting community well-being.

The project generates net positive impacts on the well-being of communities and the community groups over the project lifetime. This fact was verified against agreements /37/ /71/ /72/ between PP and differentness local actors of the project activity and project feasibility study /34/.

It is important to note that all project activities will be made possible through the support of international investors, rather than donations from non-profit organisations.

In addition to reviewing provided evidence, community well-being high conservation value areas identified in section 4.1.3 of the VCS-PD were confirmed during the on-site visit through interviews with local stakeholders (Cooperative Nueva Esperanza and Tekoa Alecrin community). Then, AENOR's validation team confirms that the information reported in the CCB-VCS-PD are properly addressed.

3.4.6 Negative Community Impact Mitigation (CM2.2)

Validation team reviewed Section 4.2.2 of the CCB-VCS-PD, which stated that the protection of the native forest comes the risk of limiting communities' access to natural resources currently obtained from the native forests. However, PP's initiatives aim to develop communities that mitigate negative well-being impacts and protect identified HCVs.

Regarding access to forest resources, the project seeks to limit illegal activities that put biodiversity in danger, like hunting, while fuel wood will be formalized and is expected to increase volume in the medium turn with forest enrichment.

Validation team assessed project feasibility study (community section) /34/ and through site visit interviews with the leader of Tekoa Alecrin community confirms the measures to mitigate negative impacts to communities.

3.4.7 Net Positive Community Well-Being (CM2.3, GL1.4)

The project is expected to positively impact community well-being compared to the without-project scenario, which faces challenges like limited economic opportunities, disarticulated public support, and climate change impacts. The without-project scenario includes migration, lower incomes, limited water access, biodiversity loss, and forest resource loss.

Section 4.2.3 of the CCB-VCS-PD describes the net well-being impacts of the project. The audit team during the interviews with the community members confirms a net positive impact in the community well-being derived from the project, for example: A portion of the carbon credit emission will be used to support community projects (including education, health, HCV, community infrastructure).

Thus, the audit team deems the net impact of the project on the community wellbeing is positive and there was no evidence found on the contrary. The list of benefits described in the CCB-VCS-PD is considered as credible and achievable by the audit team.

3.4.8 High Conservation Values Protected (CM2.4)

The Validation Team reviewed Section 4.2.4 of the CCB-VCS-PD in comparison to HCVs identified in Section 4.1.3 and to impacts identified under the without-project scenario in Section 4.1.4. Validation team was able to confirm that PP collaborates with communities through participatory processes to develop initiatives addressing negative well-being impacts and protecting identified HCVs, focusing on community development and enhancement. In this sense, the project will not negatively impact community well-being, as it promotes native forest protection, ensuring stable conservation value and improved availability. This high conservation value will be accessed by community groups in the medium term, ensuring coordinated access to fuel wood.

It is important to note that both state security forces and company patrols participate in an awareness and capacity-building program. This includes community relations training programs that uphold the set procedures. Park rangers, the company's security patrols, are specially educated to discourage poaching and stop illegal entry into the forest. A strong ban on harming or using violence against intruders is emphasized in their standards. Arrests may be made with the assistance of state security forces in situations where intruders are found to be engaging in crimes in flagrante delicto, such as purposefully starting fires or poaching endangered or protected species, guaranteeing responsible and lawful involvement.

Site visit interviews with the community leader from Tekoa Alecrin community confirm that the project will not negatively impact community well-being. Therefore, in AENOR's opinion the Project activities represent an opportunity to better protect the HCVs identified by implementing the activities described in section 4.2.4 of the CCB-VCS-PD.

3.4.9 Impacts on Other Stakeholders (CM3.1)

Validation Team reviewed Section 4.3.1. of the CCB-VCS-PD that identify potential positive and negative impacts that the project activities are likely to cause on the well-being of identified other stakeholders. For example:

- In San Pedro town has a fire station equipped with trained firefighters for forest fires, located 30 km from the project area. Investment plans include provisioning and delivery of critical equipment to mitigate fires in the project area, surrounding lands and communities.
- Misiones' Ministry of Ecology and Natural Resources has a Department of Park Rangers, authorized to carry weapons, provide equipment, and train in Environmental Intelligence. They are crucial in preventing threats. Then, PP will promote training of new park rangers.
- The cessation of native forest exploration activities on the farm could impact production chain changes and transport service companies, as previous owners conducted activities against forest productivity.
- The Mbya Guaraní practice of mobility and inter-community migration is still prevalent, with individuals and families migrating to new communities for better quality of life. After the housing census, those migrating to Alecrin Tekoa will not receive a housing module, as agreed with the Council of Authorities under the FPIC framework.

Validation team determined that generalized potential positive and negative impacts are described, as well as the specific positive and negative impacts for each identified other stakeholder. Validation team reviewed the generalized potential positive impacts and other stakeholder specific potential positive impacts and determined them to reasonably identified. Validation team assessed agreements /37/ /71/ /72/ between PP and different local actors of the project activity and project feasibility study /34/. Therefore, in AENOR's opinion the potential impacts would impact in favourable manner in well-being of the other local stakeholder.

3.4.10 Mitigation of Negative Impacts on Other Stakeholders (CM3.2)

Validation team determined, as described in Section 3.4.9 of this validation report, that potential negative impacts for both general and other stakeholder specific were identified, though each negative impact identified was determined to be relatively minor or reputational rather than consequential. The project has only negative impacts on companies in the wood product production chain and informal labour employers. As the project is medium-scale and the plantation forestry activity extends, no mitigation measures are needed. However, local communities will benefit from job opportunities for implementing the forestry plan and new productive projects.

During the on-site assessment, validation team consulted whether the project would impact negatively; however, the response of the interviewees were only positive impacts on the local population (for example job creation for local stakeholders and taxes increases for government agencies).

3.4.11 Net Impacts on Other Stakeholders (CM3.3)

According to the information contained in the description documents of the communities adjacent to the project area, the interviews conducted; and following the CCB standard, it is possible to affirm that the net

impact of the Project is positive. Then, the audit team concluded that the likelihood of positive and the project will not produce net negative impacts on the well-being of other stakeholders.

3.4.12 Community Monitoring Plan (CM4.1, CM4.2, GL1.4, GL2.2, GL2.3, GL2.5)

Final version of CCB-VCS-PD (section 4.4.1) has included information related to the monitoring plan to assess the effectiveness of those measures taken to maintain or enhance all identified HCV related to community well-being. Validation team reviewed the community monitoring plan provided in section 4.4.1 in comparison to requirements of the CCB program and to community well-being impacts identified by the Project Proponent in section 2.1.11 of the project design document, project activities and theory of change.

Validation team through review of community monitoring plan and supporting evidence /23/ /34/ /37/ /71/72/ is able to confirm that the project monitoring plan was developed through a participatory process between NIDEPOR's community relations team and stakeholders, enabling joint selection of variables, indicators (including well-being impacts and impacts on women), and time periods for management evaluations. Therefore, in AENOR's opinion monitoring plan includes all CCB requirements.

3.4.13 Monitoring Plan Dissemination (CM4.3)

Section 4.4.2 of the CCB-VCS-PD describes how the current community monitoring plan and results of monitoring undertaken in accordance with the monitoring plan will be disseminated. The project's information access strategy includes news portals, social networks, local radios, newspapers, and face-to-face briefings with stakeholders. A short-term Community Relations Office (RRCC) in Cruce Caballero is planned, working with open hours to facilitate community outreach. Furthermore, indigenous peoples have access to proceedings, documents, and meetings from public consultations in Spanish and Guaraní Mbya, as well as survey and project documents, statutes, and regulations.

Site visit interviews with community members substantiated that general information on the plans was communicated, which demonstrates an appropriate means of notification for the communication. Validation team confirmed that the community has access to the information in Spanish and Guaraní; also it was confirmed that young indigenous people speak Spanish as mother tongue.

Validation team determined that the monitoring plan, and any results undertaken in accordance with the monitoring plan, have been and will be disseminated and made publicly available on the internet (available at Nideport's webpage: <https://news.nideport.com>) and communicated to the communities and other stakeholders through the validation activities described.

3.4.14 Optional Gold Level: Exceptional Community Criteria (GL2.1)

The description mentioned in section 4.5.1 of CCB-VCS-PD was verified against public information of Provincial Institute of Statistics and Census of Misiones (<https://ipecmisiones.org/info-destacada/aglomerado-posadas-3-trimestre-2018-2>) in the reports: Situation of poverty and indigence multi-causal agglomerate Posadas – Third quarter of 2018" /73/ and Permanent Household Survey /74/, which describes the Poverty Line method measures household resources and compares them to meet basic family needs. The census collected data on per capita monetary income by percentage of working household members, revealing an average earning range of \$50.01-\$150, 150 with a tendency to earn between US\$75 and US\$100. The data reported by official sources show clearly the social condition of poverty of the majority of the inhabitants of the project area. In addition, according to UNDP 2021 report on

Human Development Indices by Country /75/ confirm, although the country has a medium-high level of development, the project area is below the national poverty line.

Therefore, in AENOR's opinion the project activity qualify for the Exceptional Community Benefits Gold Level due to projects aim to reduce poverty and inequality in resource access for vulnerable community groups like women, indigenous peoples, and rural households, focusing on universal benefits beyond universal benefits.

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

The project aims to provide net positive well-being benefits, including job opportunities, improved working conditions, environmental service payments, HCV, native forest conservation, and community enhancement programs. In short-term the project offers job opportunities, housing improvements, and active community participation, enhancing well-being in the project zone. In long term, the community benefits include improved well-being, forest and biodiversity ecosystem services, soil erosion prevention, drought reduction, and local temperature control. Moreover, programs strengthen gender perspectives in agricultural production, while training and job experiences enhance technical skills and installed capacities.

Validation team assessed agreements /37/ /71/ /72/ between PP and different local actors of the project activity and project feasibility study (community section) /34/ to validate the short-term and long-term net positive well-being benefits for smallholders/community members generated by the project activities. Also, provided information in section 5.4.2 of the CCB-VCS-PD were contrasted during the site visit by interviewing local stakeholder. Therefore, in AENOR's opinion the project activity qualify for the Exceptional Community Benefits Gold Level.

3.4.16 Optional Gold Level: Community Participation Risks (GL2.3)

The project involved communities from the beginning to identify risks, needs, and understand the project's social and economic development, which will be continued throughout its lifetime. Public consultation led to participatory mapping of HCV identification, risk estimates, and women's impact on society, considering gender safeguards in labour division, resource access, and participation. In this sense, validation team through interviews during the on-site visit and by requesting additional clarification identified no specific risk from the participation of the communities in the project

Validation team assessed agreements /37/ /71/ /72/ between PP and different local actors of the project activity and project feasibility study (community section) /34/ to identify risks for the community members and measures taken to manage the identified risks. Also, interviews which local actors confirmed the participatory process used to identify risks for the smallholders/community members in the project and measures taken to manage the identified risks.

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

PP has identified three marginalized and/or vulnerable community groups: Women; Tekoa Alecrin community; and vulnerable people (economic and social vulnerability with their income and livelihoods, schooling and food sovereignty in a critical state). Section 4.5.4. of the CCB-VCS-PD addressed net positive impacts; benefit access and negative impacts of these groups.

Validation team assessed agreements /37/ /71/ /72/ between PP and different local actors of the project activity and project feasibility study (community section) /34/. Also, during the interview with stakeholders it was confirmed that the marginalized and/or vulnerable community groups will gain net positive benefits. For example, women training will take place to improve and gain new skills, including technical assistance to improve existing project's productivity and outcomes. Also, the Tekoa Alecrin community will improve their health and family relations by reducing overcrowding in houses, by improving housing material conditions.

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

According to the PP the without project scenario demonstrates a historical trend of gender-based allocation of productive and reproductive work, with men having salaried jobs in forestry and perennial crops, while women engage in unpaid domestic work, such as sowing and harvesting food, cleaning, and caring for children, the elderly, and disabled.

In the case Tekoa Alecrin women community has limited participation in meetings, with 30% to 50% of attendees being women. They remain in separate physical areas and have a timid attitude. The symbolic geography of the Mbya Guaraní significantly influences socialization and labour division. Women engage in domestic tasks, while young men do salaried work outside the community. This fact, also, was corroborated during the on-site visit.

In this sense, project activity is given support to the Nueva Esperanza Cooperative, founded in 2006, focuses on agroecological and sustainable forest governance. This cooperative is a group of 12 women aged 30-50, who works in the forest, gathering fruits for vinegars, liqueurs, and condiments. They also create a nursery to conserve native species and raise environmental awareness. Project offers workshops and training on environment preservation, native plant seed care, and gender violence prevention, promoting socio-community contribution. This fact was verified during the on-site visit.

The community's projects on Tekoa community aim to improve housing conditions, reduce overcrowding, and provide food security. Vegetable garden training and adaptation to climate change projections will also be implemented.

Validation team assessed community monitoring plan; agreements /37/ /71/ /72/ between PP and different local actors of the project activity and project feasibility study (community section) /34/. Also, women from Nueva Esperanza Cooperative were consulted about project impacts and benefit access, confirming net positive impacts on the well-being of women and that women participate in or influence decision making.

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

Section 4.5.6. of the CCB-VCS-PD provides a participatory carbon budgeting mechanism description, in which the population of the project's area of influence can determine how the budget will be used. The annual amount is based on the company's profits from issuance of carbon credits, with the allocation based on these profits.

Project's benefit sharing mechanism were contrasted during the on-site visit by interviewing women from Nueva Esperanza Cooperative about project impacts and benefit access. Validation team, also, assessed the Nideport financial projection /76/, confirming the sharing of benefits with communities.

3.4.20 Optional Gold Level: Benefits, Costs, and Risks Communication (GL2.7)

Validation team reviewed section 4.5.7. of CCB-VCS-PD and confirmed that stakeholder consultations were conducted to include the indigenous Tekoa Alecrín community, including meetings with community chiefs. Two meetings were held to tour the village and meet with community members. A FPIC process was agreed upon to define projects addressing first-order problems for the Tekoa Alecrín. More meetings were held to define the housing project, design, materials, training, and family census.

Validation team, by interviewing local stakeholders, confirmed workshops /24/ carried out by PP, where they were informed about project benefits, costs and risks. AENOR's validation team considered workshops carried out by PP and stakeholders are enough to confirm that community members understood the information communicated about predicted and actual benefits, costs and risks.

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

Validation team assessed section 4.5.8. of CCB-VCS-PD, according to this, local government lacks coordination and cooperation between civil, private, and state sectors for public policy design, implementation, and monitoring. This results in atomized institutions working on similar issues, leading to inefficiency and ineffectiveness in resources and projects. In response to disarticulation, the PP (Nideport) took the initiative to generate coordination and cooperation among stakeholders, addressing the lack of local government initiative.

Validation team reviewed stakeholder data ordered by project /77/ to confirm provided information in the project design document. Also, it was contrasted during the on-site visit. Therefore, in AENOR's opinion governance and implementation structures enable effective participation of community members in project decision-making and implementation.

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

Project proponent development programs defined based on community needs and threats identified during public consultation. They are discussed and designed by the community and PP in meetings with focal groups. Implementation involves community involvement in job creation or environmental service payment. Program monitoring is publicly available, with management working with the defined community group.

Project proponent developed many projects for community groups, detailed in section 4.5.9. of CCB-VCS-PD. Validation team confirmed this fact during the on-site visit and by reviewing stakeholder data ordered by project /77/. Then, in AENOR's opinion plans developed by PP and smallholders and/or community members, are effectively and actively in project design, implementation and management.

3.5 Biodiversity

3.5.1 Existing Conditions (B1.1)

Original biodiversity conditions in the Project Zone and expected changes under the without-project land use scenario are described in section 5.1.1 of the CCB-VCS-PD and provides a description of the biodiversity of The Paranaense rainforest, better known as the Misiones rainforest, is located in the north of Argentina, in the province of Misiones on the border with Brazil and Paraguay.

Validation team reviewed conducted studies by project proponents, including Fauna Baseline report – June 2020 /78/; flora data base /79/; Forestry inventory report 2021 /41/; Biodiversity inventory report /42/; General bird survey, management recommendations and future actions /81/. Also, it was assessed scientific paper reports, such as: Biodiversity hotspots for conservation priorities, Myers et al, 2000 /82/; key biodiversity areas Argentina republic (KBA), Gil G, 2022 /83/; Effective climate change adaptation strategies for biodiversity conservation, Subrahmanyam S., 2015 /84/; and publication such as: A biodiversity vision for the upper Paraná Atlantic forest ecoregion, WWF, 2003 /85/; Plan for the conservation of Yacutinga in Argentina, Fariña, 2021 /86/; Determination of priority forest areas for jaguar habitat connectivity in the Green Corridor of Misiones, Master Thesis, Martines P, 2013 /87/; Misiones sheet, WWF, 2021 /88/.

In addition of reviewing publication, papers and report; Validation Team interviewed the project's biodiversity monitoring consultant and also interviewed project staff involved in biodiversity and forest inventory monitoring activities, about aspects of the project including existing conditions.

Through review of these documents, supported by site visit observations and interviews, validation team determined that CCB-VCS-PD gives a complete description of the biodiversity within the project zone and threats to biodiversity; also include biodiversity strategy and scientific articles developed by different authors in the project zone. The identified threats to the biodiversity come from the unsustainable resource use activities, such as: extraction of native wood, loss of forest functionality and connectivity; illegal hunting; fish poaching; and presence of invasive exotic species. The audit team has reviewed the evidence provided and considered that considers that the project design document complies with information requirement of CCB standard.

3.5.2 High Conservation Values (B1.2)

The project aims to improve biodiversity by forming a corridor between state natural areas, Piñalito Yabotí and Cruce Caballero Provincial Reserve. It also conserves other HCVs, such as water bodies and banks, by reducing anthropogenic activities and native forest conservation. This will help preserve the environment and enhance the services provided by these areas.

Validation team reviewed the biodiversity HCVs identified in Section 5.1.2 of the CCB-VCS-PD and contrasted it against conducted studies by project proponents /41/ /42/ /78/ /79/ /80/ /81/; scientific papers /52/ /83/ /84/ and publication /85/ /86/ /87/ /88/; also with observation during the on-site visit and interview with consultants. Then, after reviewing evidence provided, considered that the information detailed in the CCB-VCS-PD describe the HCV in the project zone properly.

3.5.3 Without-project Scenario: Biodiversity (B1.3)

Section 5.1.1. of CCB-VCS-PD predicts biodiversity loss without the project, with four main threats identified within the province: Extraction of native wood, loss of forest functionality and connectivity; Illegal hunting; Fish poaching; and Presence of invasive exotic species. Then, validation team determined through review of project documentation, supported by site visit observations and interviews, that without the project the biodiversity would experience negative impacts

Considering the sources of the information provided by the PP and the rationale of the causal relations described in the CCB-VCS-PD, the audit team found no inconsistencies in the description of the potential without-project scenario and considers expected changes to biodiversity conditions in the without-project scenario were well defined and are in compliance with the CCB requirements. Therefore, validation team considers that the CCB-VCS-PD describes the project scenario of biodiversity in the project zone properly.

3.5.4 Expected Biodiversity Changes (B2.1)

Validation Team reviewed Section 5.2.1 of the CCB-VCS-PD that provides a description of expected changes to biodiversity under the with-project scenario. The project is expected to have a positive impact on biodiversity, maintaining or increasing the existence of species of flora and fauna in the project area. In this sense PP has identified: Improved biodiversity in regenerated and conserved areas, including protected areas serving as green corridors; reduction invasive species; degradation reduction in the areas to be regenerated and conserved; Improvement from a low to high productive forest; and IUCN species increase in the project area (over the 4 EN species identified - *Amazona vinacea*, *Pipile jacutinga*, *Sylvilagus brasiliensis*, *Melanophryniscus aff. devincenzii*).

The validation of the key assumptions, rationale and methodological choices used to anticipate changes in biodiversity resulting from project activities under the with-project scenario were validated against conducted studies by project proponents /41/ /42/ /78/ /79/ /80/ /81/; scientific papers /52/ /83/ /84/ and publication /85/ /86/ /87/ /88/; also with observation during the on-site visit and interview with consultants. Therefore, in AENOR's opinion the expected positive impacts for the identified biodiversity elements under the with-project scenario are based on appropriate key assumptions, rationale, and methodological choices used to anticipate change in biodiversity resulting from project activities.

3.5.5 Mitigation Measures (B2.3)

The project aims to improve HCV areas by extending the Green Corridors between Peñalito Reserve and Yabotí, promoting habitat restoration and enhancing endangered species populations. It includes training and equipment facilitation for stakeholders in threat control, reducing biodiversity threats in the project area and zone. State-of-the-art monitoring technology will reduce threats and enable continuous biodiversity monitoring, generating periodic information on species response to activities.

The project has a Forest Restoration Plan /89/ to address 30% failure in seedling establishment due to biotic and abiotic factors. To reduce their impact, two annual monitoring are planned for the last two campaigns, assessing seedling status.

Those activities were validated biodiversity monitoring plan; Conservation plan for native forests /30/; Forest Restoration Plan /89/ and during the on-site visit. Then, validation team considers these strategies

reasonable to mitigate negative impacts on biodiversity. Also, is able to confirm that PP is taken measures needed for maintenance or enhancement of the HCV attributes.

3.5.6 Net Positive Biodiversity Impacts (B2.2, GL1.4)

The biodiversity section outlines project activities aimed at preserving and recovering exploited areas, restoring natural capital, and restoring biodiversity. These activities include protecting native species, strengthening ecosystem services, preserving cultural values, and proactively contributing to local communities. The focus is on combating climate change.

The project aims to recover native forests, avoiding deforestation, to connect existing KBA areas, provide food, shelter, and reproductive sites for species, and offer ecosystem services for climate change adaptation, including flooding control, temperature reduction, and soil erosion reduction.

Those activities were validated biodiversity monitoring plan; Conservation plan for native forests /30/; Forest Restoration Plan /89/ and during the on-site visit. Therefore, validation team considers that the key assumptions, rationale and methodological choices used to anticipate net impacts on biodiversity in the project zone will be positive compared with conditions under the without-project land use scenario.

3.5.7 High Conservation Values Protected (B2.4)

The project aims to improve biodiversity by forming a corridor between Piñalito and Yabotí state natural areas. It also conserves water bodies and banks, reducing anthropogenic activities and native forest conservation, while providing environmental services. The project focuses on technology to monitor biodiversity evolution and threats, including centralized Monitoring and Control Centres for fire, deforestation, and poaching control. This will enhance security, forestry, and environmental issues. Native forest enrichment and regeneration, based on stratum needs, will enhance HCV protection, water courses, endangered species, and ecosystem services

Validation team determined, as described in Section 3.5.5 of this validation report, that appropriate measures have been identified to maintain or enhance HCV attributes, and that the measures are consistent with the precautionary principle, as they appropriately address potential threats. Based on review of supporting documentation and clarifications provided by the Project Proponent, the Validation Team determined that project activities involving infrastructure or operations are not expected to have negative impacts on biodiversity HCVs. Validation Team has concluded the project has not and is not expected to negatively affect any biodiversity-related HCVs.

3.5.8 Species Used (B2.5)

PP has considered a list of 16 native species for planting seedlings in the Restoration /89/ and Enrichment Plan /40/ for the first 10 years was established through rigorous analysis of reports, harvest shipments, and Biomass inventory. The list was based on various sources, including Forestal Belga SA's Sustainable Management Plan /90/ the National Forest Inventory /91/, and other sources.

After reviewing project documentation /40/ /89/ /90/ /91/, supported by site visit interviews, validation team substantiated that no introduction of species are going to be occurring. Site visit observations and interviews with project management staff substantiated no non-native species are used or planned for use by the

Project and no introduction of invasive species is proposed. Validation team determined project activities are not anticipated to facilitate the spread of invasive species into any area affected by the Project

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

The project plans only to reintroduce baseline native species, so no known invasive species will be introduced. Site visit observations and interviews with project management staff substantiate no non-native species are used or planned for use by the Project.

3.5.10 GMO Exclusion (B2.7)

No GMOs will be used to generate GHG emissions reductions or removals as the project aims to enrich and regenerate the area with native species.

The Validation Team reviewed Sections 5.2.8 and 5.2.9. of the CCB-VCS-PD that provides the required guarantee that the Project will not use any GMOs to generate emissions reductions or removals. Site visit observations and interviews with project management staff substantiate that no GMOs would be used.

3.5.11 Inputs Justification (B2.8)

Native forest activities will be enhanced using seedlings of native species, but mineral additives may not be used due to soil conditions and nutritional characteristics. Weed control will be manually implemented through community-based programs. Weeds will be cleared within 1mt radius, and seedling evolution and health will be monitored.

Site visit observations and interviews with project management staff substantiate the current condition. Inputs are not needed or anticipated to be used for the project

3.5.12 Waste Products (B2.9)

Project generates domestic waste from offices, monitoring centres, requiring source-classification and treatment in nearby town. The waste management plan in place for this waste includes different steps which will be extended to the waste management throughout the project lifetime:

Validation team, by observing the waste management process, during the site visit, and contrasting this process against waste management plan /92/ is able to confirm the project proponent classify and manage all waste products resulting from project activities.

3.5.13 Negative Offsite Biodiversity Impacts (B3.1) and Mitigation Measures (B3.2)

PP has identified two aspects that may impact offsite of the project zone: Project area security increase may increase poaching and hunting pressure on neighbouring lands; and public sector could rest in private conservation projects, reducing investment to other HCV areas.

Validation team by site visit observations and interviews with project management staff was able to confirm that identified potential impact offsite of project zone will be mitigated with appropriate measures.

3.5.14 Net Offsite Biodiversity Benefits (B3.3)

Negative impacts outside the project zone include increased poaching and hunting pressure but compensate for the positive effects on biodiversity. For example: connection to the other two areas that make up a major green corridor in the province; and enrichment and regeneration, avoiding plantations and indiscriminate logging in an area with critically endangered species. Moreover, project activity will generate jobs and training opportunities to reduce illegal activities in project zones; also, the increase in capacity building with training and equipment for first responders and rangers. Therefore, validation team considers that these benefits are greater than any impact on biodiversity derived from off-site project activity due to unsustainable resource management.

In AENOR's opinion, project proponent adopted resorbable and likely measures. Validation team, by reviewing the biodiversity monitoring plan and site observation confirms that the net effect of the project on biodiversity is positive and any potential negative impact are mitigated.

3.5.15 Biodiversity Monitoring Plan (B4.1, B4.2, GL1.4, GL3.4)

The project proponent has developed a comprehensive monitoring plan; including, intermediate monitoring (annually); Exhaustive monitoring (every three years); and trigger species to be monitored. Final version of CCB-VCS-PD (section 5.4.1) includes information related to the biodiversity indicators, frequency and means of verification.

Validation team reviewed supporting documentation /78/ /79/ /80/ /81/ and conducted interviews with the biodiversity monitoring consultant and project staff that been involved with existing conditions studies and will be conducting the biodiversity monitoring. Furthermore, due to project intends to meet the Gold Level for exceptional biodiversity benefits, validation team assessed the monitoring plan to review the proposed indicators of population trends of each trigger species and/or the threats to such species.

AENOR deems that the biodiversity monitoring plan identifies biodiversity variables to be monitored, the areas to be monitored, the sampling methods and the frequency of monitoring and reporting following the CCB requirements in this regard. The monitoring variables are directly linked to the project's biodiversity objectives and the expected effectiveness of the measures taken to maintain or enhance identified high conservation values related to nationally significant biodiversity present in the project zone. Thus, AENOR deems the biodiversity monitoring plan was elaborated according to the CCB requirements.

3.5.16 Biodiversity Monitoring Plan Dissemination (B4.3)

Project information will be accessible to the public through various channels, including monitoring documents, social networks, local newspapers, stakeholder meetings, and VCS and CCB webpages. These documents will be in simple, inclusive language and evaluated through measures.

Site visit interviews with community members substantiated that general information on the plans was communicated, which demonstrates an appropriate means of notification for the communication. Validation team confirmed that the community has access to the information.

Validation team determined that the monitoring plan, and any results undertaken in accordance with the monitoring plan, have been and will be disseminated and made publicly available on the internet (available

at Nideport's webpage: <https://news.nideport.com>) and communicated to the communities and other stakeholders through the validation activities described.

3.5.17 Optional Gold Level: High Biodiversity Conservation Priority Status (GL3.1)

Validation team reviewed Section 5.5.1 of the CCB-VCS-PD that discusses the project's qualification for the Exceptional Biodiversity Benefits Gold Level. Validation team reviewed supporting documentation in special key biodiversity areas Argentina republic (KBA), Gil G, 2022 /83/; including literature and information cited from IUCN and conducted interviews with the project's biodiversity monitoring consultant regarding data collected from the Initial Project Property.

Validation team determined from review of the cited literature /78/ /79/ /80/ /81/ /81/ /82/ /83/ /84/ /85/ /86/ /87/ /88/ and data sources that the CCB-VCS-PD uses appropriately documented sources as the basis for each trigger species' estimated population per area of appropriate habitat. Therefore, the project could obtain the Gold Level of exceptional benefits for biodiversity thanks to biodiversity conservation due to the fact that the project area host threatened species from the IUCN Red List, including: *Amazona vinacea*, *Pipile jacutinga*; *Sylvilagus brasiliensis*; *Melanophryniscus aff. Devincenzii*.

3.5.18 Optional Gold Level: Trigger Species Population Trends (GL3.2, GL3.3)

Validation team reviewed section 5.5.2 of the CCB-VCS-PD to confirm whether the trigger species identified in Section 5.4.1 of the project design document are being addressed. Validation team determined from review of the cited literature /78/ /79/ /80/ /81/ /81/ /82/ /83/ /84/ /85/ /86/ /87/ /88/ and data sources that the CCB-VCS-PD appropriately describes population trends; appropriately describes the estimated population size; and appropriately describes the most likely changes under the without-project land-use scenario. Then, in AENOR's opinion the projections meet the requirements of Indicator GL3.2.

In addition. validation team reviewed the measures identified as needed and to be taken to maintain or enhance the population and reduce threats to each of the trigger species and determined that the identified measures are consistent with the measures identified as needed to maintain the biodiversity HCV attributes as identified in Section 5.2.2 of the CCB-VCS-PD. Review of provided project and supplemental documentation, supported by site visit observations and interviews with the biodiversity monitoring consultant substantiate that the measures identified are appropriate. Then, in AENOR's opinion the measures identified meet the requirements of Indicator GL3.3.

4 VALIDATION CONCLUSION

AENOR has performed a validation of the IFM project: “SELVA PARANAENSE VIDA NATIVA - GS1” and has verified that the project is in compliance with the Verified Carbon Standard version v4.4; the VCS Methodology Requirements, v4.3; and Climate, Community & Biodiversity Standards, v3.1 without qualifications or limitations.

The validation process has been conducted by AENOR in accordance with ISO 14064-3:2019, on the basis of all issues and criteria of CCB and VCS standards. The conclusions of this report show that the project, as it was described in the project documentation, is in line with all criteria applicable for the validation.

The validation consisted of the following three phases: i) a desk review of the project design and the baseline and Monitoring Plans; ii) follow-up interviews with project stakeholders; iii) the resolution of outstanding issues and the issuance of the final validation report and opinion. In the course of the validation process corrective actions and clarifications were raised; all have been successfully closed as explained in the validation protocol annexed to this report.

The Project participant applied the VM0005: Methodology for Improved Forest Management: Conversion of Low Productive to High Productive Forest, version 1.2. Besides, the following tools are applied: VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities, version 1.0; and AFOLU Non-Permanence Risk Tool, v4.0

In line the tool VT0002, the CCB-VCS-PD provides the investment barrier analysis to demonstrates that the proposed project activity is not a likely baseline scenario. GHG net anthropogenic removals by sinks attributable to the project are, hence, additional to any that would occur in the absence of the project activity.

The review of the project design documentation and additional documents related to baseline and monitoring methodology; and the subsequent background investigation, follow-up interviews and review of comments by parties have provided AENOR with sufficient evidence to validate the fulfilment of the stated criteria.

The conclusions are summarised as follows:

- The project is in line with all criteria of the VCS Standard v4.4; VCS Methodology Requirements, v4.3; and Climate, Community & Biodiversity Standards, v3.1.
- The project additionality is sufficiently justified in the CCB-VCS-PD.
- The Monitoring Plan is transparent and adequate.

The analysis of the baseline emission, project emissions and leakage has been carried out in a transparent and conservative manner, so that project activity will prevent the emissions of 186,557 tCO₂e per year, on average which corresponds to approximately 10,178,342 tCO₂e for period of 30 years (without discounting buffer emissions).

Date: 13 August 2025



Lead Auditor
Richard Daniel GONZALES TOLEDO

APPENDIX I: LIST OF EVIDENCE

N°	Documents reviewed or referenced
1	VCS Program Guide v4.3
2	VCS Standard v4.4
3	VCS Methodology requirements v4.3
4	VCS Programme definition v4.3
5	VCS Validation and verification manual v3.2
6	VCS AFOLU Non-Permanence Risk Tool, v4.0
7	Climate, Community & Biodiversity Standards, v3.1
8	CCB Program Rules, v3.1
9	CCB-VCS-PD, project description, initial version (version 1, dated on 31 October 2022)
10	CCB-VCS-PD, project description, final version (version 9, dated on 29 July 2025)
11	Statistics of Argentina 2020 Yearbook
12	Management Report 2022 of National Parks Administration
13	Argentina Census report 2010
14	Argentina Census report 2021
15	Reference region map
16	Project area map
17	Leakage belt map
18	HCV maps
19	KLM files
20	GIS Data
21	Citizen participation workshop report
22	Survey of rural households report
23	Report on the results of the census carried out by NIDEPORT
24	Workshop presentation
25	Flyers of project diffusion
26	Stakeholders meeting reports
27	Project diffusion reports
28	Presentation project diffusion
29	Project Control Board: • <i>Citizen Consultation</i> • <i>CPLI (FPIC) Tekoa Alecrin</i>
30	Conservation plan for native forests
31	Community monitoring plan
32	Nideport SA and Forestal Belga SA lease contract with option to purchase until December 2027.

N°	Documents reviewed or referenced
33	Land title deed
34	Feasibility study - GLOBAL SEVEN CONSERVATION PROJECT
35	Biodiversity baseline report 2021
36	baseline forestry inventory
37	Agreement between project proponent and Tekoa Alecrín community
38	Communities' Invitation to public consultation
39	Stop logging report
40	Enrichment and restoration report
41	Forestry inventory report: • Calculation of stored carbon 2021 • Calculation of stored carbon 2022
42	Biodiversity inventory report
43	Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis
44	Contingency plan
45	Non-permanence Risk Report
46	Financial model for long-term viability
47	Climate change law N° 27520
48	Defence of forest wealth law N°13273
49	Environmental protection budgets of native forests Law N°26331
50	Protective Forests Law N° 3426
51	Legal Regime on Forests and Forest Lands law N° 854
52	Comprehensive analysis of applicable regulation in Argentina<
53	Invitation letters to audit meetings
54	Code of Conduct (POE-01-Reg-01)
55	Procedure for solving conflict
56	Training Plan
57	Training records
58	Personnel recruitment procedure
59	Law 20744 on Employment Contracts and its amendments.
60	Law 24013 on Employment.
61	Law 24557 on Labour Risks.
62	Law 26390 on Prohibition of Child Labour and Protection of Adolescent Labour.
63	Law 19587 on Hygiene and Safety at Work.
64	Law 11544 on Working Hours
65	Law 24557 on Labour risk

N°	Documents reviewed or referenced
66	Prevention, work wear and personal protection elements procedure
67	Curriculum Vitae: Marcelo Taboada, Pablo Gallardo, Mariano Iturbe; Claudio Estaban Guillermo Colella; Hugo Barreto; Tomas Gonzalez; Guillermo Videla; Gustavo Alvarez; Rodrigo Fariña; Josefina Uijt; Federico Russo; Juan Carlos Russel; Heinrich Burschel
68	Forest Management General Manual
69	Free and informed consultation (FPIC) report
70	Contingency plan for illegal activities
71	Nueva Esperanza Cooperative Project
72	Oga project
73	Provincial Institute of Statistics and Census of Misiones' report Situation of poverty and indigence multi-causal agglomerate Posadas – Third quarter of 2018
74	Provincial Institute of Statistics and Census of Misiones' report: Permanent Household Survey
75	UNDP 2021 report on Human Development Indices by Country
76	Nideport financial projection: Nideport Opportunity cost spreadsheet
77	Stakeholder data ordered by project
78	Fauna Baseline report – June 2020
79	Flora data base
80	Bird Survey Winter 2022
81	General bird survey, management recommendations and future actions 2021
82	Biodiversity hotspots for conservation priorities, Myers et al, 2000
83	key biodiversity areas Argentina republic (KBA), Gil G, 2022
84	Effective climate change adaptation strategies for biodiversity conservation, Subrahmanyam S., 2015.
85	A biodiversity vision for the upper Paraná Atlantic forest ecoregion, WWF, 2003
86	Plan for the conservation of Yacutinga in Argentina, Fariña, 2021
87	Determination of priority forest areas for jaguar habitat connectivity in the Green Corridor of Misiones, Master Thesis, Martines P, 2013
88	Misiones sheet, WWF, 2021
89	Forest Restoration Plan
90	Forestal Belga SA's Sustainable Management Plan
91	National Forest Inventory
92	Waste management plan
93	VCS Methodology: VM0005, Version 1.2, Methodology for Improved Forest Management (IFM): Conversion of Low Productive to High Productive Forest
94	CDM Tool for Calculation of the Number of Sample Plots for Measurements within A/R CDM Project Activities, version 2.1.0

N°	Documents reviewed or referenced
95	AR-ACM0003: Afforestation and reforestation of lands except wetlands, version 2.0
96	Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity, version 4.0
97	VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project Activities, version 1.0,
98	VT0003 Tool for the Estimation of Uncertainty for IFM Project Activities, version 1.0
99	Emission reduction calculation spreadsheets: • <i>ERR_Calculation_Spreadsheet_Aug.25</i> • <i>01. 2021_Field_database_SPVN_GS1</i> • <i>02. 2022_Field_database_SPVN_GS1</i>
100	Photos and videos showing the enrichment and planting process
101	Surface determination, delimitation and cartographic representation report
102	Forestry native extraction 2015.21-2055
103	Forestry extraction projection 2015 -2030
104	Forestal Belga S.A. – Power of Attorney
105	Nideport Additionality simple cost analysis
106	GS1 Nideport – Financial Model
107	Forest Management and Conservation Plan
108	Forest Management Plan
109	Evidence of allometric equations used
110	First report of socialized documentation
111	Second report of socialized documentation
112	Training reports: • <i>San Pedro Fire Department</i> • <i>Fire management</i> • <i>Ophidian</i>
113	Instruction reports to: • <i>Park ranger</i> • <i>Court of San Pedro</i> • <i>Security of Piñalito</i>
114	Thanks acknowledgement: • <i>Gendarmerie</i> • <i>Misiones police office</i>
115	Rainfall precipitation data
116	Impact of bamboo trees in the project area: Ecological group dynamics and implications for natural succession and restoration of the native forests of the Parana jungle (NIDEPORT)
117	Tree regeneration and microclimate in a liana and bamboo-dominated semideciduous Atlantic Forest. Forest Ecology and Management (Campanello, P. I., Genoveva Gatti, M., Ares, A., Montti, L., & Goldstein, G. 2007).

N°	Documents reviewed or referenced
118	Outcomes of a native bamboo on biomass and carbon stocks of a neotropical biodiversity hotspot (De Campos Gorgulho Padgurschi, M., Soares Reis, T., Ferreira Alves, L., Aparecida Vieira, S., & Alfredo Joly, C.(2021)
119	Bamboo dominance reduces tree regeneration in a disturbed tropical forest. Oecologia (Larpkern, P., Moe, S. R., & Totland, Ø. 2011).
120	Signed MoU with Cooperativa Nueva Esperanza; Pueblo Originario TEKOA ALECRIN; Escuela Provincial de Educación Técnica N° 31; and Escuela Primaria N° 482
121	Long-term impacts on stand structure, timber volumes, and biomass stocks (Bedrij et al., 2022).
122	Pearson, T.R.H., Brown, S., Casarim, F.M. (2014). Carbon emissions from tropical forest degradation caused by logging. Environmental Research Letters, 9(3), 034017.
123	Pulkki, R.E. (1997). Literature synthesis on logging impacts in moist tropical forests. FAO Working Paper GFSS/WP/06
124	FAO Forest Resources Assessment (FRA):

APPENDIX II: VALIDATION PROTOCOL (FINDINGS)

CORRECTIVE ACTION REQUESTS (CARS)

CAR ID	01	Date: 06/02/2023
Description		
Many sections of the project description has not been filled in accordance whit paragraph 1.2.1 of VCS standard v4.4, which stated that the operating language is English. Many tables, figures, maps, flow charts, etc. of the VCS-CCB-PD contains Spanish information.		
Project proponent response		Date: 10/03/2023
<i>Figures, maps, etc. have now been translated according to paragraph 1.2.1 of VCS standard.</i>		
Documentation provided by Project proponent		
New version of the PD submitted: "20230316_PD_Nideport"		
VVB Assessment		Date: 05/04/2023
PP has updated the CCB-VCS-PD considering the VCS requirements, all information included in this document is in English. Then, CAR 01 is closed		

CAR ID	02	Date: 06/02/2023
Description		
Some sections of the CCB-VCS-PD have not been filled following the instructions included in the project description template. i.e.:		
- The cover page: ✓ The format of the date is not as per: DD-Month-YYYY ✓ The gold level criteria does not provide a brief description of the activities planned and the expected results that enable the project to qualify for each relevant Gold Level - Section 2.1.1. has not included: ✓ A brief description of the scenario existing prior to the implementation of the project ✓ The project's climate, community and biodiversity objectives - Section 2.1.4. has not been completed - Section 2.2.1. has not been completed - Section 2.2.2. has not been completed - Section 2.4.5 has not been completed - Section 2.5.7 has not demonstrated how the compliance, of listed laws, are achieved - Section 3.1.3 has not included additional requests information: a diagram or map of the project boundary, clearly showing the physical locations of the various installations or management activities taking place as part of the project activity. - Section 3.1.4 has not provided requested information by applied methodology (section 6 of Approved VCS Methodology VM0005) - Section 3.3.3 added subtitles (the template shall not be modified) - Section 4.1.4 has not described the expected changes in the well-being conditions and other characteristics of communities and community groups under the without-project land use scenario. - Section 5.1.1. has not explained nor justify key assumptions, rationale and methodological choices. Neither been provided all references. - Section 5.5. has not been completed - Appendix 1 does not provide any additional information. - Appendix 4: <i>Project Cash Flow</i>, included in section 3.1.5. (page 64) is not included in CCB-VCS-PD - Footnote 73, refers to appendix 4.5; however, it was not included nor provided.		

Project proponent response	Date: 10/03/2023
- The cover page: this section was corrected. - Section 2.1.1.: The section now includes in more detail the objectives for climate, community, and biodiversity - Section 2.1.4.: The section now includes the table - Section 2.2.1.: Information regarding this section is provided in section 3.1.5 - Section 2.2.2.: Information regarding this section is provided in section 3.1.5 - Section 2.4.5.: is completed - Section 2.5.7.: Information is in analysis provided by Nideport CEO and external law environmental firm - Section 3.1.3.: Attached is the document "Installations physical locations" which images shows the location of the facilities used to plan the activities, the sites where the technical team works and meets with different actors to develop field activities. Also, the location of the entrance control gate to the project area. On the other hand, this document also provides images detailing the area assigned for the restoration work of the native forest. Also, the trial with native species carried out for reforestation. - Section 3.1.4: the details about Florestal Belga's compliance with the environmental practices commonly considered a minimum standard in the area are detailed in the newest version of the PD. Section 3.1.4 updated to provide baseline information (mainly related to relogging timber volumes) accordingly to section 6 of VM0005 v1.2 - Section 3.3.3.: is updated showing the clear location of the installations and management activities that are part of the project activity Section 3.3.3. subtitles were removed and document updated. - Section 4.1.4.: The information was detailed in the flowcharts, but is now included as part of the text - Section 5.1.1.: More information now provided showing that laws are insufficient to protect native forests in Misiones, due to limited budget access, among others. A document pointing to the importance of the site in terms of biodiversity was also attached. - Section 5.5.: More information on the KBA included. - Appendix 1: section deleted. - Appendix 4: Is now information related to wood density. - Footnote 73: corrected.	
Documentation provided by Project proponent	
New version of the PD submitted: "20230316_PD_Nideport" "Without-Project Biodiversity Scenario" & pdf "Tesis_Julia_Martinez_Pardo" doc "Installations physical locations" doc "Decreto1617-86_Resolucion357-19 doc"	
VVB Assessment	Date: 05/04/2023
CCB-VCS-PD was updated considering requested information by template. Then, CAR 02 is closed.	

CAR ID	03	Date: 06/02/2023
Description		
The implementation Schedule, described in section 2.1.13 of the CCB-VCS-PD does not describe the current situation of project activity. Then, PP is requested to update this section and provide evidence of updated dates.		
Project proponent response		Date: 10/03/2023
Implementation table updated and further detail of dates included. Evidence for the dates available in Drive folder:		
Documentation provided by Project proponent		
-		

VVB Assessment	Date: 05/04/2023
PP has updated the CCB-VCS-PD, section 2.1.13., considering the current situation of project activity. Then, CAR 3 is closed	

CAR ID	04	Date: 06/02/2023
Description		
PP has not documented project benefits including climate, community and biodiversity benefits that would not have occurred in the absence of the project (section 2.2.4), <u>explaining how</u> existing laws, regulations and governance arrangements, or lack of laws and regulations and their enforcement, would likely affect land use and justifying that the benefits being claimed by the project are truly “additional” and would not have occurred without the project. (refer to section G2.2 of CCB standard)		
Project proponent response		Date: 10/03/2023
<i>Information has been added in section 2.2.4 to evidence the threats the Paranaense forest is suffering and how the project provides additionality to climate, biodiversity and community benefits above the existing laws which present challenges for their implementation.</i> <i>In the case of community additional benefits, no projections or classical linear interpolation can be made due to the absence of official published primary data on the population, housing and households of the project area in particular, over a period of at least 10 years. In this line, based on a mixed strategy, future perceptions of the population and short-term trend of the regular patterns of the results of the rural household census carried out by the project were conducted and the analysis constitutes the maximum methodologically acceptable scenario projection according to the available data. These results have been summarized in flowcharts (see section 4.1.4), made together with the communities. Methodologically, the appropriate way is to measure the benefits through the methodology of control groups, where a group is taken from the area of influence and a stimulus is applied to it (receiving benefits) and another group is taken (with the same characteristics as the previous group) and no stimulus is applied to (it does not receive benefits at this stage). Then the measurement results in groups A and B are compared. It is worth mentioning that the group that does not receive a stimulus in this stage will receive it in the next one. In this way, it would be possible to establish seriously, through a comparative analysis of groups with and without stimulus (benefits) and to verify the additionality proposed by the project (CAF’s management evaluation methodology available at: https://www.caf.com/es/actualidad/capacitacion/2022/09/introduccion-a-la-evaluacion-de-impacto-para-la-gestion-publica-6%C2%BA-ed/).</i>		
Documentation provided by Project proponent		
New version of the PD submitted: “20230316_PD_Nideport”		
VVB Assessment		Date: 05/04/2023
PP has updated the CCB-VCS-PD, considering CCB requirements (G2.2). Then, CAR 4 is closed		

CAR	05	Date: 06/02/2023
Description		
Section 2.4.5 of the CCB-VCS-PD has not documented the financial health of the implementing organization(s) (refer to section G4.3 of CCB Standard). Supporting evidence was not provided.		
Project proponent response		Date: 10/03/2023
<i>The section was completed, and evidence was submitted.</i>		
Documentation provided by Project proponent		

Excel file "Long term viability Nideport"	
VVB Assessment	Date: 05/04/2023
PP has included requested information by the template; however, provided evidence (long term viability) contains not traceable information. Then, CAR 5 remains open.	
Project proponent response	Date: 14/04/2023
<i>The Excel file for the long-term viability of the project was updated and the errors corrected. The file is named "20230413_Long-term viability Nideport" and it was sent via email to the auditors, to prevent formula errors.</i> <i>In order to properly check the files, the iterative calculations option should be enabled by following this procedure: File > Options > Formulas > Enable iterative calculations > OK</i>	
Documentation provided by Project proponent	
VVB Assessment	Date: 03/05/2023
PP has provided requested evidence. However, the values reported for IRR and NAV in the VCS-CCB-PD are differences from values of the provided spreadsheet. PP is requested to clarify the inconsistency. CAR 05, remains open	
Project proponent response	Date: 05/05/2023
<i>Values for IRR and NAV in the corrected PD match those presented in the document "2023-05-04_Long-term viability Nideport".</i>	
Documentation provided by Project proponent	
New PD version with track changes enabled 20230505_PD_Nideport_trackchanges.docx	
VVB Assessment	Date: 19/05/2023
PP has updated the PD correctly, considering the values of spreadsheet calculation. Then, CAR 5 is closed.	

CAR	06	Date: 06/02/2023
Description		
During the validation was identified commercially sensitive information, which has been excluded from the public version of the project description; however, section 2.4.7 of CCB-VCS-PD does not describe it.		
Project proponent response		Date: 10/03/2023
<i>CAR corrected in the newest version of the PD shared in the drive. Copies of commercially sensitive documents have been showing in video conference and sent exclusively to the auditors by email.</i>		
Documentation provided by Project proponent		
New version of the PD submitted: "20230316_PD_Nideport". Emails with commercially sensitive information.		
VVB Assessment		Date: 05/04/2023
PP has included information regarding commercially sensitive information that has been excluded from the public version of the project description. Then, CAR 6 is closed.		

CAR	07	Date: 06/02/2023
Description		
PP has not demonstrated (Section 2.3.12 of CCB-VCS-PD), as per requested by CCB standard (G3.8), that a clear grievance redress procedure has been formalized to address disputes with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation. Provided evidence: "Feedback and Grievance Redress Procedure" was designed for the attention of suggestions, complaints, claims or complaints of <u>clients</u>, this document do not refer to communities		
Project proponent response		Date: 10/03/2023
<i>The grievance and inquires processes were detailed in the newest version of the PD.</i>		
Documentation provided by Project proponent		
<i>New version of the PD submitted: "20230316_PD_Nideport".</i>		
VVB Assessment		Date: 05/04/2023
The grievance and inquires procedure is described in the updated VCS-CCB-PD. Then, CAR 07 is closed.		

CAR	08	Date: 06/02/2023
Description		
According to CCB standard, CM2.2, <i>PP shall describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes</i>; however, as identified during the on-site visit, the measures needed to mitigate the loss of employment due to the cessation of forestry activities, are not included in the CCB-VCS-PD.		
Project proponent response		Date: 10/03/2023
<i>There is a general confusion here addressed in terms of jobs lost in with-project scenario. Cruceca SA was owner of the sawmill, these being part of the same business group as Forestal Belga SA. As a result of Presidential Decree 297/2020 of March 19, 2020, SARS-ASPO "Preventive and Mandatory Social Isolation", Cruceca SA interrupted the sawmill's activity and during August 2020, approximately 30 workers were laid off. Therefore, at the beginning of the project, the sawmill was already closed and its personnel disengaged. In this sense, the cessation of these jobs was prior to the start of operations for the beginning of project development and for reasons independent of it. Therefore, the development of the "Selva Paranaense Vida Nativa" (SPVN) project is not directly related to the loss of these jobs. On the other hand, Forestal Belga SA maintains the same payroll of registered employees, regardless of the cessation of logging and the start of the project with the consequent interruption of the exploitation of the native forest.</i> <i>In the public consultation held on November 26, 2021, the speakers proposed the goal of 15 jobs by 2022, having only been able to reach the selection stage of 7 positions to be filled in that year. This generated some discomfort in a segment of the population of the area of influence, which maintained expectations in the generation of jobs.</i> <i>The expectations of a certain segment of the population are an impact not because of Nideport's operations, but because of the unforeseen delays, and it is not necessary to mitigate the labor impacts of external and foreign ventures, but to have a plan for the correct management of expectations with respect to the company's own goals.</i>		
Documentation provided by Project proponent		
<i>New version of the PD submitted: "20230316_PD_Nideport".</i>		

VVB Assessment	Date: 05/04/2023
PP has clarified requested information and included a plan for the correct management of expectations with respect to the company's own goals. Then, CAR 8 is closed.	

CAR	09	Date: 06/02/2023
Description		
According the CCB Standard: <i>If a project intends to meet the Gold Level for climate change adaptation benefits (GL1), the community monitoring plan must include indicators for adaptation benefits for biodiversity. If the project intends to meet the Gold Level for exceptional biodiversity benefits (GL3), it must also include indicators of the population trend of each trigger species and/or the threats to such species.</i> However, the monitoring plan, included in the CCB-VCS-PD, does not include such indicators.		
Project proponent response		Date: 10/03/2023
New indicators have been included in the biodiversity’s monitoring plan (green corridor sizes; connectivity, disturbance anticipation, disturbance extent) but others related to climate change adaptation were already included such as population fluctuations, acclimatization, adaptation in line with scientist methodology for analysing biodiversity adaptation monitoring (Pearse-Higgins et al, 2022 and Subrahmanyam, S. 2015). For the case of trigger species, more information is now provided regarding threats and projections.		
Documentation provided by Project proponent		
Pearse-Higgins et al, 2022 – referenced in the PD text Subrahmanyam, S. 2015 – referenced in the PD text New version of the PD submitted: “20230316_PD_Nideport”.		
VVB Assessment		Date: 05/04/2023
PP has updated the VCS-CCB-PD, including indicator to meet the gold level criteria. Then, CAR 09 is closed.		

CAR ID	10	Date: 06/02/2023
Description		
PP has not demonstrated the applicability condition 2, 3, and 4 of the applied methodology. Neither is justified the non-applicability of condition 11 (section 3.1.2 of CCB-VCS-PD). Moreover, PP has not demonstrated neither justified how the project activity meets each of the applicability conditions of applied <u>tools</u> (section 3.1.2 of CCB-VCS-PD). Also, PP is applying no longer valid tools:		
✓ The CDM tool AR-ACM0002 was replaced by AR-ACM0003; ✓ The CMD tool "Estimation of GHG emissions due to clearing, burning and decay of existing vegetation attributable to a CDM A/R project activity" is an inactive tool; the active one is: "Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity"		
In addition, PP has not demonstrated how the project activity meets the requirements of project category: <i>Conversion of low-productive forests to high-productive forests (LtHP)</i> – stated in section 2.1.10 of the CCB-VCS-PD-, as per the <i>Methodology requirements v4.3</i> definition, i.e.: Sections: A1.4, 4).		
Project proponent response		Date: 10/03/2023
Applicability conditions 2 (area qualifies as forest land),3 (area is unlikely to revert to normal regrowth patterns) and 4 (reasons for conservative exclusion of the SOC pool) of VM0005 are now demonstrated in the PD.		

Condition 11 of VM0005 states VM0005 is not applicable to grouped projects. Nideport is not a grouped project activity and no further instances will be added in the future.

The applicable tools were updated accordingly to active status:

tool Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity is no longer active and was substituted by Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity.

Section 2.1.10 was updated in order to demonstrate the project is a Low-Productive to High-Productive Forest project activity.

CDM Tool for testing significance of GHG emissions in A/R CDM project activities is no longer active and therefore is not used.

The document "CDM tool AR-ACM0003" shows results obtained with tool AR-ACM0003. In addition, document "Clarificación respecto a la modificación en la cantidad de UM entre inventarios" was added with the clarification of the difference in the amount of sample plots between inventories. Fire was not used as a management tool.

Documentation provided by Project proponent

Document "CDM tool AR-ACM0003".

Document "Clarificación respecto a la modificación en la cantidad de UM entre inventarios".

VVB Assessment

Date: 07/04/2023

1. The PP has updated Section 3.1.2 of the CCB-VCS-PD and demonstrated compliance with VM0005 Methodology applicability conditions number 2, 3, 4 and 11.
2. The PP has properly replaced the inactive CDM tool AR-ACM0002 for AR-ACM0003 and the inactive CDM tool "Estimation of GHG emissions due to clearing, burning and decay of existing vegetation attributable to a CDM A/R project activity" for the active one "Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity".
3. The PP has previously stated that Section 2.1.10 of the CCB has been updated in order to demonstrate that the project is a Low-Productive to High-Productive Forest project activity. However, no changes have been included in the last CCB-VCS-PD version provided. Nevertheless, the audit team has acknowledged that Section 3.1.2, "project compliance with VT0002 Tool for the Demonstration and Assessment of Additionality in IFM Project activities", first applicability condition, has been updated and the new CCB-VCS-PD provides explanations to demonstrate that the project is a Low-Productive to High-Productive Forest project activity. Clarify if a possible mistake has been made.
4. The PP has correctly updated Section 3.1.2, excluding the use of CDM Tool for testing significance of GHG emissions in A/R CDM project activities, as it is no longer active.
5. The audit team has reviewed the information provided by the PP, and could not find any folder with the previously mentioned Documentation provided by Project Proponent, including the "CDM tool AR-ACM0003" and the "Clarificación respecto a la modificación en la cantidad de UM entre inventarios".
6. Regarding compliance with each of the tools' applicability conditions:
 - a) AR-ACM0003 applicability condition 1, does not provide evidence that the land subject to the project activity does not fall in wetland category, as required by VCS.
 - b) AR-ACM0003 applicability condition 2, "soil disturbance attributable to the project activity does not cover (...)", the updated Section 3.1.2 states that "since the project activity mainly consists in stop relogging activities, soil disturbance will dramatically decrease in the project scenario". However, Section 2.1.1 of the CCB-VCS-PD states that, "the project activity is IFM with areas that will be enriched and regenerated by planting more than 430,000 native trees in the first 5 years (...)" and many other sections describe a possible scenario in which there is going to be soil disturbance, in opposition to the statement made in Section 3.1.2 reflecting that the project

activity mainly consists in stopping relogging activities. <u>Provide clear explanations and evidence on this requirement.</u> c) CDM tool “estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity”, applicability condition number 2, the CCB-VCS-PD Section 3.1.2 <u>does not demonstrate and justify how the project activity meets this applicability condition, as required by the Template. Provide clear explanations and evidence on this requirement, instead of stating “Applicable”.</u> d) VT0002 Tool for Demonstration and Assessment of Additionality in IFM Project Activities, applicability condition number 3, <u>does not demonstrate and justify how the project activity meets this applicability condition, as required by the Template. Provide clear explanations and evidence on this requirement, instead of stating “Applicable”.</u>	
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Then, **CAR 10 remains open**

Project proponent response	Date: 12/04/2023
3. Section 2.1.10 has been updated in order to demonstrate that the project is a Low-Productive to High-Productive Forest project activity 5. The “CDM tool AR-ACM0003” and the “Clarificación respecto a la modificación en la cantidad de UM entre inventarios” files were uploaded in folder “Hoja de cálculo de reducción de emisiones y sus evidencias”, in the shared drive. d) The compliance with applicability condition number 3 is justified and demonstrated in the newest version of the PD. 6.a. Further evidence is provided in the document “Non-wetland eligibility compliance” in the folder “Hoja de calculo y reducción de emisiones y sus evidencias” 6.b. Images and footage show that soil disturbance will be lower than the threshold required by AR-ACM0003 applicability condition #3. There is no subsoiling or other high soil-disturbing activities to plant the trees. 6.c. This text was added to the newest version of the PD: “This project activity does not include burning biomass. In case of a loss event caused by fire, a loss event report will be submitted to Verra as per the VCS Standard. In this case, given the threshold of fire occurrence in ≥5% of the area is met, this tool will be applied. “	
Documentation provided by Project proponent	
“Non-wetland eligibility compliance” “Clarificación respecto a la modificación en la cantidad de UM entre inventarios” “CDM tool AR-ACM0003” New version of the PD submitted: “20230412_PD Nideport” Images of the tree planting procedures are in the shared folder	
VVB Assessment	Date: 10/03/2023
3. Section 2.1.10 now has been updated to demonstrate that the project is a Low-Productive to High-Productive Forest project. 5. Clarifications have been shared with the audit team. 6a. Information included in the “non-wetland eligibility compliance” docx documental evidence is accepted. 6b. Photos and videos provided are accepted. However, no information has been included in the PD regarding the evidence provided. Include extra clarifications on the PD to support your claims. X 6c. New information included in the PD regarding Non-CO2 GHG emissions resulting from any occurrence of fire is accepted. 6d. New information included in the PD regarding compliance with the third applicability condition of VT0002 is accepted. Then, CAR 10 remains open.	
Project proponent response	Date: 05/05/2023

Information about manual planting activities that keep the soil disturbance below the threshold required by the methodology is now provided in section 3.1.2 of the PD.	
Documentation provided by Project proponent	
New PD version with track changes enabled 20230505_PD_Nideport_trackchanges.docx	
VVB Assessment	Date: 19/05/2023
PP has updated properly the CCB-VCS-PD. Then, CAR 10 is closed	

CAR	11	Date: 06/02/2023
Description		
Section 3.2 of the CCB-VCS-PD does not describe the complete procedure for quantification of baseline emissions, project emission, leakage emissions and buffers, including all relevant equations and summary results, from applied methodology, tools, allometric equation, etc.; <u>justifying all relevant methodological choices</u> . Furthermore, the spreadsheet of ex-ante emission reduction calculation, including supporting evidence was not provided.		
Project proponent response		Date: 10/03/2023
Summarized results were included in section 3.2 of the PD Allometric equations are provided in Appendix 4 of the PD		
Documentation provided by Project proponent		
Base_de_datos_SPVN_GS1_2022_FINAL_BosqueNativo.xls nideport_calculator_PDD.xls		
VVB Assessment		Date: 05/04/2023
Section 3.2 has been updated to describe the complete procedure for quantification of baseline emissions, project emission, leakage emissions and buffers, including all relevant equations and summary results, and Appendix 4 now includes allometric equations. However, the following issues have been raised: - Section 3.2.1, Logging Rate, Table 8, $\Delta CREL, i, t$ tCO₂ column does not coincide with the one provided in the "20230317_nideport_calculator_PDD" spreadsheet, "Tables_01" sheet. - Section 3.2.1, Logging Rate, Table 9, $\Delta CREL, i, t$ tCO₂ and $\Delta CBSLtCO_2$ columns does not coincide with the ones provided in the "20230317_nideport_calculator_PDD" spreadsheet, "Tables_01" sheet. - Section 3.2.2, Table 11, Total regrowth in relation to baseline carbon stocks, Total column, does not coincide with the one provided in the "20230317_nideport_calculator_PDD" spreadsheet, "Regeneration_model" sheet. - Then, CAR 11 remains open .		
Project proponent response		Date: 14/04/2023
Table 8 of the PDD now fully matches the one provided in "20230317_nideport_calculator_PDD" spreadsheet, "Tables_01" sheet. Table 9 of the PDD now fully matches the one provided in "20230317_nideport_calculator_PDD" spreadsheet, "Tables_01" sheet. Table 11 in the PDD, and it fully matches the one provided in the "20230317_nideport_calculator_PDD" spreadsheet, "Regeneration_model" sheet, located in columns U to AA		
Documentation provided by Project proponent		
New version of the PD submitted: "20230412_PD_Nideport".		
VVB Assessment		Date: 03/05/2023

Section 3.2.1 Logging Rate, Tables 8 and 9, and Section 3.2.2, Table 11, now coincides with the one claimed in the “20230317_nideport_calculator_PDD” spreadsheet.
Thus, **CAR 11 is closed.**

CAR	12	Date: 06/02/2023
Description		
The requested information of the NPR report is not completed following the instruction included in the template. The template do not correspond to the short form (name of document refer to it) <i>Where a section is not applicable, explain why the section is not applicable (i.e., do not delete the section from the final document and do not only write “not applicable”).</i> Date of monitoring period is not as per: DD-Month-YYYY to DD-Month-YYYY Contact information is not complete (telephone, email) Internal/external risks sections do not include relevant documentary evidence Natural risks section do not explain the significance and likelihood of the natural risk nor any mitigation activities implemented. Relevant evidence is not include.		
Project proponent response		Date: 10/03/2023
<i>The short form was now used as the template for the Non-Permanence Risk Report (NPR).</i> <i>The non-applicability of a section or risk was explained.</i> <i>The date format was corrected.</i> <i>Contact information was detailed (email). The company doesn't have a telephone.</i> <i>Evidence was provided for the internal and external risks. The link to the website from the evidence came from was provided along the text. If the evidence is a document (pdf, word, or power point), the document was uploaded to the drive.</i> <i>The natural risk section was updated to explain the significance and likelihood of the natural risk, nor any mitigation activities implemented individually. The link to the website from the evidence came from was provided along the text. If the evidence is a document (pdf, word or power point), the document was uploaded to the drive.</i>		
Documentation provided by Project proponent		
- “20230309_VCS-NPR-Short-Form” word file - “Anuario_de_estadistica_forestal_2018-2020” pdf file - “Anuario_de_estadisticas_forestales_2017-2018_reedicion_2021” pdf file - “Anuario_estadistica_forestal_2019-2021” pdf file - “Forest_fires_evidence_2012-2013” pdf file - “Forest_fires_evidence_2017” pdf file - “Nota Guardaparques_Incendios 2021-22” pdf file - The CVs and institutional presentations cited in CL 5 - Other evidence, such as articles, referenced inside the NPR		
VVB Assessment		Date: 07/04/2023
The PP has updated the NPRR report and has provided the VVB with the correct short-form format drafted.		

The date format has been corrected.

Contact information has been updated and properly included.

Most of the Internal, External and Natural Risk Sections have been properly updated according to the requirements of the NPR Tool. However, the section Financial Viability does not provide further information to demonstrate that the project cash flow breakeven point is less than 4 years and up to less than 7 years from the current risk assessment and that the project has secured 80% of the funding needed to cover the total cash out before the project reaches breakeven, comparing to the previous NPRR report version. Moreover, this section does not provide information to explain why the total cash out provided to the audit team has not been calculated considering the crediting period (100 years). Also, Political Risk Section in the NPRR short form does not match the information integrated into the Risk Report Calculation Tool. Project proponent is requested to provide a new Risk Report Calculation Tool, as the audit team is struggling to check some of the numbers attached to it.

Then, CAR 11 remains open.

Project proponent response

Date: 14/04/2023

The section Financial Viability, of the NPR, was updated in order to indicate the spreadsheet where the auditors can check that the project reaches breakeven point in 2023, which is the point in time when the project's revenue becomes equal to the project's costs.

The project proponent checked the Non-Permanence Risk Tool to make sure that the option selected for the question "How many years does it take for the cumulative cashflow to break even?" was letter D: "Project cash flow breakeven point is less than 4 years from the current risk assessment".

The section Financial Viability, of the NPR, was updated in order to explain how the project has secured its funding. The secured funding is estimated in 32%.

The section Financial Viability, of the NPR, was updated in order to explain why a 10-year time horizon was used for the financial analysis.

The Non-Permanence Risk Tool was updated to match the information in the NPR. The governance score in the political risk section of the Non-Permanence Risk Tool was updated.

Documentation provided by Project proponent

VVB Assessment

Date: 03/05/2023

The audit team now can access the spreadsheet named "GS1 Nideport – Financial Model 10 0423.eco".

The Financial Sustainability NPRT option letter D has been chosen; explanations regarding how the project has secured its funding has been included; explanations have been included in order to explain why a 10-year time horizon was used for the financial analysis, and corrections have been made to secure that the governance score in the political risk sections is correct.

Thus, **CAR 12 is closed.**

CLARIFICATION REQUESTS (CLS)

CL	01	Date: 06/02/2023
Description		
PP is requested to clarify how the start date of the project activity meets the definition described in the VCS Program Definitions v4.3: <i>The start date of an AFOLU project or jurisdictional REDD+ program is the date on which activities that led to the generation of GHG emission reductions or removals are implemented (e.g., planting, changing agricultural or forestry practices, rewetting, restoring hydrological functions, or implementing management or protection plans).</i>		
Project proponent response		Date: 10/03/2023
<i>The activities that led to generation of GHG emission reductions started to be implemented by December 15th, which is the official start date of our project activity. This can be assessed by the evidence provided which presents the sales of native wood which occurred in early January 2022. Therefore, it can be conservatively estimated that the wood was harvested by mid of December, to be sold on January 3. After this date, Florestal Belga only has invoices from the sale of commercial wood.</i>		
Documentation provided by Project proponent		
Word file "Evidencias STOP LOGGING", that contains the invoices from the sales of native wood and the explanation regarding the last harvesting and sale of native trees.		
VVB Assessment		Date: 05/04/2023
PP has clarified properly the start date; verification team consider that it meets the VCS program definition. Then, CL 01 is closed.		

CL	02	Date: 06/02/2023
Description		
PP is requested to clarify how was determined the duration of crediting period (100 years) and provide evidence that the proponent will have the legal right to control and operate the project during the whole crediting period.		
Project proponent response		Date: 10/03/2023
Attached there is a document that technically describes the reason for the 100-year period proposed by Nideport for the restoration of the native forest.		
Documentation provided by Project proponent		
Document "About 100 years period"		
VVB Assessment		Date: 05/04/2023
According to provided evidence " <i>Nideport SA and Florestal Belga SA have signed a lease with option to purchase until December 2027</i> ". Also, PP has provided an exhaustive assessment regarding legal right to control and operate de project activity. Then, CL 02 is closed.		

CL	03	Date: 06/02/2023
Description		
According to provide evidence (title deed) the owner of the project area is "Forestal Belga Sociedad Anónima". Then, PP is requested to clarify and provided evidence that the proponent have the legal right to control and operate the project and demonstrate that all property rights are recognized, respected, and supported.		

Project proponent response	Date: 10/03/2023
<i>Forestal Belga Sociedad Anónima is the owner of the project area according to the title deed. As per evidence presented project proponent has clear legal right to control and operate the project and to ensure that all property rights are recognized, respected, and supported.</i> <i>Documentation provided demonstrates that the necessary permits and permissions from relevant authorities to use the land for the proposed project. Therefore, all relevant laws and regulations related to land use and development have been complied with.</i>	
Documentation provided by Project proponent	
Contract between Nideport and Florestal Belga, presented to the auditors under a confidentiality agreement.	
VVB Assessment	Date: 05/04/2023
PP has provided signed contract, which grants the control of project activity. Additionally, PP has provided an exhaustive assessment regarding legal right to control and operate de project activity. Then, CL 03 is closed.	

CL	04	Date: 06/02/2023
Description		
According to the CCB-VCS-PD, section 2.5.8, <i>regeneration activities of natural ecosystems do not need any approval from authorities in Argentina</i>. Therefore, PP is requested to provide an analysis of relevant applicable laws (national and local), in order to confirm this claim (refer to section G5.7 of CCB standard)		
Project proponent response		Date: 10/03/2023
<i>This analysis was done by Nideport CEO Marcelo Taboada and an external Environmental Law Firm is annexed in the shared drive.</i>		
Documentation provided by Project proponent		
Word file "Analysis of Applicable Regulation in Argentina"		
VVB Assessment		Date: 05/04/2023

PP has provided requested analysis, including applicable regulation to project activities. Verification team reviewed such report and listed laws and concludes that project activity complies with national and local regulation. Then, **CL 04 is closed.**

CL	05	Date: 06/02/2023
Description		
PP is requested to provide evidence of management team's expertise and prior experience implementing land management and carbon projects at the scale of this project (e.g. resume of key team members, including consultants). Refer to section G4.2 of CCB standard.		
Project proponent response		Date: 10/03/2023
<i>The experience of the management team and the consultants is detailed in section "Project Management" of the Non-Permanence Risk Report, and it is supported by the CVs and institutional presentations added to the shared drive.</i>		
Documentation provided by Project proponent		

- "About ecosecurities" pdf file
- "About ProSustentia ENGLISH 2023" pdf file
- "Aves Argentinas' Profile" word file
- "CV - Burschel, Heinrich" pdf file
- "CV - Cellini, Juan Manuel" pdf file
- "CV - Ochoa Ferreyra, Mario" pdf file
- "CV - Ortellado, Leandro" pdf file
- "CV - Russel, Juan Carlos" pdf file
- "CV - Russo, Federico" pdf file
- "CV - Sofía Rodríguez R – 2023" pdf file
- "CV Colella Guillermo" pdf file
- "CV COMPLETO MARTIN COUCHOT" pdf file
- "CV Marcelo A. Taboada 1 23" pdf file
- "CV Tomás Gonzalez Arata" word file
- "MAT ANEXO" pdf file
- "Pablo Gallardo - Curriculum Vitae – 2023" pdf file

VVB Assessment

Date: 05/04/2023

PP has provided supporting evidence of all team involved in developing the project documents. Then, **CL 05 is closed**

CL

06

Date: 06/02/2023

Description

PP is requested to provide evidence of *Long-term Viability* of project activity (section 2.1.20 of CCB-VCS-PD), as per section G1.12 of CCB standard.

Project proponent response

Date: 10/03/2023

*Excel file "Long term Viability of Nideport" was added to the shared drive.
In this spreadsheet, in tab "Control tab", cell F2, it is possible to change the "Scenario B (No registered project scenario)" to the "Project Scenario (with carbon credits)".
The "Project Scenario (with carbon credits)" is not part of the scenarios built for the additionality assessment, but it is displayed in this spreadsheet to prove the project long-term viability. It contains an estimate of revenues from the sale of carbon credits.*

Documentation provided by Project proponent

Excel file "Long term Viability of Nideport"

VVB Assessment

Date: 05/04/2023

PP has provided requested information; however, the evidence (long term viability) contains not traceable information. Then, **CL 06 remains open.**

Project proponent response

Date: 14/04/2023

*The Excel file for the long-term viability of the project was updated and the errors corrected. The file is named "20230413_Long-term viability Nideport" and it was sent via email to the auditors, to prevent formula errors.
In order to properly check the files, the iterative calculations option should be enabled by following this procedure: File > Options > Formulas > Enable iterative calculations > OK*

Documentation provided by Project proponent

VVB Assessment

Date: 03/05/2023

PP has provided requested provided evidence opened and traceable. Then **CL 06 is closed.**

CL	07	Date: 06/02/2023
Description		
PP is requested to clarify, which indicators are used to monitor the impacts identified in section 4.3.1. (Impacts on Other Stakeholders) of CCB-VCS-PD.		
Project proponent response		Date: 10/03/2023
<i>Net impacts on other stakeholders are expected to be positive. New indicators on other stakeholder's impacts now included in the corresponding section:</i> <i>• Sinergies with other security authorities</i> <i>• Equipment delivered to security authorities</i> <i>• Illegal activities in Piñalito reserve</i> <i>These have also been included in the MR document and the results for the corresponding monitoring period.</i>		
Documentation provided by Project proponent		
New version of the PD submitted: "20230316_PD_Nideport".		
VVB Assessment		Date: 05/04/2023
PP has explained properly, which indicator are used to monitoring impact on other stakeholders. Then, CL 7 is closed.		

CL	08	Date: 06/02/2023
Description		
Regarding the additionality, PP is requested to clarify how was determined that proposed project activity, without carbon revenues, is economically or financially less attractive than at least one of the other land use scenarios, as per paragraph 14 of applied tool. Also, is requested to clarify how was determined the 10 years analysis period. Finally, PP is requested to provide supporting evidence and assumption for determining financial investments, stated in section 3.1.5 (page 64-65) of CCB-VS-PD.		
Project proponent response		Date: 10/03/2023
<i>The Excel spreadsheet "GS1 Nideport - Financial Model 30-1-23 - v4.eco" was added to the shared drive.</i> <i>The spreadsheet contains the financial analysis of the two Scenarios designed in the Additionality section: Scenario A, that is the continuation of Florestal Belga's activities, and Scenario B, that displays the cash flow for the project activities implementation without them being registered as a carbon project. By comparing the financial indicators of both Scenarios it is possible to affirm that Scenario B is less attractive than Scenario A.</i> <i>Regarding the time period chosen, the applied additionality tool does not establishes a number of years for the financial analysis. The 10 years was chosen based on the CDM TOOL 27, that "the investment analysis shall be conducted for at least 10 years and include the fair value of the project activity assets at the end of the assessment period."</i> <i>As for the evidence for the financial investments, in the same spreadsheet it is possible to see all the financial details of Nideport that served as inputs to build the analysis.</i>		
Documentation provided by Project proponent		
"GS1 Nideport - c 30-1-23 - v4.eco" Excel file		
VVB Assessment		Date: 05/04/2023

PP has updated the financial model including two scenarios, comparing the financial indicators. Even values are included in the updated CCB-VCS-PD, the scenario B of the "GS1 Nideport - Financial Model 30-1-23 - v4.eco" spreadsheet contains error in some cells, so the IRR nor NAV are verifiable. Then, **CL 08 remains open**

Project proponent response

Date: 14/04/2013

The Excel file for the financial analysis of the additionality assessment was updated and the errors corrected. The file is named "GS1 Nideport - Financial Model 10 0423.eco" and it was sent via email to the auditors, to prevent formula errors.

In order to properly check the files, the iterative calculations option should be enabled by following this procedure: File > Options > Formulas > Enable iterative calculations > OK

Documentation provided by Project proponent

VVB Assessment

Date: 03/05/2023

PP has provided requested evidence. However, The value reported for NAV (scenario B) in the VCS-CCB-PD is different from value of the provided spreadsheet. Also, many values from cash flow scenarios are different from updated spreadsheet. PP is requested to clarify the inconsistency. **CL 08, remains open**

Project proponent response

Date: 05/05/2023

Values for IRR, NAV and cashflow in the corrected PD match those presented in the document "2023-05-05_GS1 Nideport - Financial Model".

Documentation provided by Project proponent

New PD version with track changes enabled 20230505_PD_Nideport_trackchanges.docx

VVB Assessment

Date: 19/05/2023

PP has updated the additionality section of CCB-VCS-PD, considering the updated values from financial model. Then, **CL 8 is closed.**

CL

09

Date: 06/02/2023

Description

Regarding project boundary, PP is requested to clarify and justify:

- ✓ Whether "Below-ground biomass" will be included in the carbon pools (section 3.1.3 of CCB-VCS-PD).
- ✓ The reason of the inclusion of "Tree harvesting" source, which is not included in the Methodology.
- ✓ Whether Relogging is not the baseline activity

Project proponent response

Date: 10/03/2023

*Below ground biomass is included in section 3.1.3 and the table "carbon pools" is updated
The tree harvesting source is now excluded and the document has been updated
Relogging is the baseline activity, and the document has been updated accordingly*

Documentation provided by Project proponent

VVB Assessment

Date: 05/04/2023

Below-ground biomass has been clearly included in the carbon pools. Tree-harvesting has been reasonable excluded from Carbon Pools table. Relogging as baseline activity has been updated in Section 3.1.4. Then, **CL 09 is closed.**

CL	10	Date: 06/02//2023
Description		
Project proponent is requested to clarify how the project area was stablished (22,878.5 ha) and how this area is in line with title deed.		
Project proponent response		Date: 10/03/2023
<i>Attached there is a document describing the differences and difficulties involved in determining the surface of a property with the characteristics of the project.</i>		
Documentation provided by Project proponent		
"Determinación de superficie, delimitación y representación cartográfica" doc		
VVB Assessment		Date: 05/04/2023
The audit team could be not able to find stated document (uploaded in drive). PP is requested to provided it. Then, CL 10 remains open.		
Project proponent response		Date: 12/04/2023
The document "Determinación de superficie, delimitación y representación cartográfica" was upload to the drive, inside folder "Evidencia del estatus legal y derecho de uso (property rights)".		
Documentation provided by Project proponent		
"Determinación de superficie, delimitación y representación cartográfica"		
VVB Assessment		Date: 03/05/2023
Requested evidence was provided. No discrepancies were found. Then, CL 10 is closed.		

APPENDIX III: LIST OF PERSONS INTERVIEWED DURING THE ON-SITE VISIT

Persons interviewed on 18/01/2023



HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre y verdadera y de la mejor manera posible. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: Aserradero de Cruce de Caballero (centro de operaciones)

Fecha/Date: 18/01/2023

Equipo Auditor/Auditor Team: AENOR; Richard González y Daniel Bermejo

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
STELLA GAMA	+552199355449	ECOSECURITIES	<i>[Signature]</i>
PABLO CALLAZO	8993482620276	NIDEPORT	<i>[Signature]</i>
MARIANO ITURBE	+543435122308	NIDEPORT	<i>[Signature]</i>
CLAUDIO ESTEBAN	230-4522728	NIDEPORT	<i>[Signature]</i>
RODRIGO FARINA	05491159978812	AVES ARGENTINAS	<i>[Signature]</i>
FEDERICO RUSSO	2216733725	FOTOSINTESIS	<i>[Signature]</i>
HEINRICH BUNSCHEL	+543754 860004	"	<i>[Signature]</i>
COLELLI GUILLERMO	+543487330956	NIDEPORT	<i>[Signature]</i>
JUSTINA VITTIENBORGARD	+5491150367019	ProSustentia	<i>[Signature]</i>
AZUL TOPPER	+5491140469093	ECOSECURITIES	<i>[Signature]</i>
JACOBO CURRIALES	+573222695652	Verra	<i>[Signature]</i>
TOMAS GONZALEZ ARIZA	+5491123309426	NIDEPORT	<i>[Signature]</i>
MORCELO TABORA	+5491154307179	NIDEPORT	<i>[Signature]</i>
VICTOR GUILBERG	+5491140691415	Sociedad de Inversión	<i>[Signature]</i>
RUISE L. JUAN CARLOS	+549375162201	FOTOSINTESIS	<i>[Signature]</i>
BARRETO HUGO FERRARI	+543751522426	NIDEPORT	<i>[Signature]</i>

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre y verdadera y de la mejor manera posible. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: *El Casco, punto de acceso predio, parcelas de muestreo del área protegida*

Fecha/Date: *18/03/23*

Equipo Auditor/Auditor Team: *AENOR; Richard González y Daniel Bermejo*

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
<i>Alvez Gustavo</i>	<i>03751-316936</i>	<i>Forestal Balga SA</i>	<i>[Signature]</i>
<i>Zússer Juan L.</i>	<i>+5493751603209</i>	<i>FOTOSINTESIS ARS</i>	<i>[Signature]</i>
<i>Russo FEDERICO</i>	<i>2216733725</i>	<i>FOTOSINTESIS</i>	<i>[Signature]</i>
<i>BURSCHER HEINRICH</i>	<i>3764990004</i>	<i>FOTOSINTESIS</i>	<i>[Signature]</i>
<i>Camendorelmer</i>	<i>3755273665</i>	<i>FOTOSINTESIS</i>	<i>[Signature]</i>

Persons interviewed on 19/01/2023

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

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I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: *Cooperativa Nueva Esperanza, Paraje Gentil*

Fecha/Date: *19/01/23*

Equipo Auditor/Auditor Team: *AENOR; Richard González y Daniel Bermejo*

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
<i>LORENA Mielnichuk</i>	<i>3751-342961</i>	<i>Coop. Nueva Esperanza</i>	<i>[Signature]</i>
<i>Campa Emilio</i>	<i>8751-544770</i>	<i>Coop. Nueva Esp.</i>	<i>[Signature]</i>
<i>Fereyre Angelica R.</i>	<i>1161195896</i>	<i>Coop. Nueva esp.</i>	<i>[Signature]</i>
<i>Barloja Raquel</i>	<i>3751-604453</i>	<i>Coop. N. Esperanza</i>	<i>[Signature]</i>
<i>Rivas Maritza Nilda</i>	<i>32119112</i>	<i>Coop. N. Esperanza</i>	<i>[Signature]</i>
<i>De Cuna Nélida</i>	<i>51-311534</i>	<i>Coop. N. Esperanza</i>	<i>[Signature]</i>
<i>Chacon Estefani</i>	<i>3757-5716-24</i>	<i>Coop. N. Esperanza</i>	<i>[Signature]</i>

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre y verdadera y de la mejor manera posible. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: Tekoa Alecrin

Fecha/Date: 19/03/23

Equipo Auditor/Auditor Team: AENOR; Richard Gonzales y Daniel Bernijo

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
Sebastián Benítez	3751 670471		
Alejo Benítez	3755-751483		
Benítez Victoriano	3751 665213		
ROSALINDO			
Aguino Javier			
SILVIA BENÍTEZ			
Jonathan Velazquez			
MARIA ROSA			
alba			
Velazquez Carlos	3751 308312		
Rosalma Vasila			

AENOR
Confía

HOJA DE PRESENCIA/PRESENCE SHEET

Por la presente firmo que he respondido a las preguntas del equipo auditor de manera libre y verdadera y de la mejor manera posible. Las respuestas fueron proporcionadas imparcialmente sin la influencia o la presión de partes interesadas.

I hereby sign that I have answered the auditor team's questions freely and truly to the best of my abilities. The answers were provided unbiasedly without the influence or pressure of parties.

Lugar/Location: Intendencia de San Pedro, Misiones

Fecha/Date: 19/03/23

Equipo Auditor/Auditor Team: AENOR; Richard Gonzales y Daniel Bernijo

Nombre/Name	Teléfono/Phone	Empresa/Company	Firma/Signature
Miguel A. Cassarotes	3751 522850	Municipalidad de San Pedro	Miguel A. Cassarotes