

DARKWOODS FOREST CARBON PROJECT VERIFICATION REPORT



Document Prepared By Aster Global Environmental Solutions, Inc.

Project Title	Darkwoods Forest Carbon Project
Version	V3.0
Report ID	19015.01

Report Title	Darkwoods Forest Carbon Project Verification Report
Client	Nature Conservancy of Canada (NCC)
Pages	134
Date of Issue	13 March 2024
Prepared By	Aster Global Environmental Solutions, Inc.
Contact	Corporate Office: 3800 Clermont St. NW, North Lawrence, Ohio 44666 Phone: 330-294-1242; www.asterglobal.com
Approved By	Janice McMahon (President) and Shawn McMahon (Lead Verifier/Vice President)
Work Carried Out By	Lead Verifier: Shawn McMahon; Verification Team Members: Mansfield Fisher; Kevin Markham; Sandesh Shrestha; Caris Lyons; ; Matthew Campbell; Ashley Laux Senior Internal Reviewer: Barbara Toole O'Neil QA/QC: Janice McMahon

Summary

Aster Global Environmental Solutions, Inc., was contracted by Nature Conservancy of Canada (NCC) on 21 July 2022 to conduct the VCS and CCB verification of the Darkwoods Forest Carbon Project. The Darkwoods Forest Carbon Project is an Improved Forest Management (IFM) project implemented in British Columbia, Canada. The verification period is 01 January 2020 – 31 December 2021. The property boundary totals approximately 54,835 hectares based on updated information of which approximately 52,430 hectares is considered forest and identified as the Project Area.

Through payments for ecosystem services generated via the sale of Verified Carbon Units (VCUs), the project proponent (NCC) is able to achieve net GHG emissions reductions and removals through the avoidance of emissions due to commercial logging in the baseline scenario. The project activities are categorized as Agriculture, Forestry, and Other Land-Use (AFOLU). Improved Forest Management (IFM), Logged to Protected Forest (LtPF).

The VCS verification assessed the Project's compliance with the VCS Version 4 (and all associated updates), the selected methodology (VM0012 v1.2 – Improved Forest Management in Temperate and Boreal Forests (LtPF), and the validated VCS Project Document (PD) (Darkwoods Forest Carbon Project, v2.3, dated 16 September 2020). The CCB verification evaluated the Project's compliance with the CCB Program Rules Version 3 (and all associated updates) and the delivery of net climate, community, and biodiversity benefits as stated by the Project Proponent and in accordance with the project's validated CCB PD (v1.8, dated 6 June 2014) and monitoring plan. The scope of the verification included the assessment of the joint CCB and VCS Monitoring Report and the implementation of the GHG project as stated in the validated VCS PD and validated CCB PD for the monitoring period (01 January 2020 – 31 December 2021).

The verification process employed all items from Aster Global's internal verification process, which included using VCS program documents, CCB program documents, ISO-14064-3, ISO 14065, Aster Global's Management System and Management System Manual Section V.2., and Aster Global's Strategic Analysis and Risk Assessment (SARA) process.

During the course of the verification, seventeen (17) VCS findings and twenty-one (21) CCB findings were identified. Summaries of all VCS and CCB findings are included in Appendix B and Appendix C, respectively. After review of all project information, procedures, calculations, supporting documentation and site visits, Aster Global confirms that the monitoring conducted by the Project Proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS and CCB criteria, the validated PDs, and the selected methodology (VM0012, v1.2). Aster Global confirms The Nature Conservancy of Canada Darkwoods Forest Carbon Project Monitoring Report (v1.7 dated 13 March 2024) has been implemented in accordance with the validated VCS and CCB PDs.

Aster Global herein confirms all verification activities – including objectives, scope and criteria, level of assurance, monitoring and project documentation – adhere to the selected methodology (VM0012, v1.2) and VCS Version 4 (and all associated updates) and CCB Program Rules Version 3 (and all updates) and are complete, as documented in this report. Aster Global concludes without any qualifications or limiting conditions that the Darkwoods Forest Carbon Project meets the requirements of VCS Version 4 to a reasonable level of assurance for the reporting/monitoring period (01-January-2020 to 31-December-2021).

The GHG assertion provided by Darkwoods Forest Carbon Project and verified by Aster Global has resulted in the GHG emission reductions or removals of 651,023 tCO₂ equivalents (CO₂e) by the project during the reporting/monitoring period (01-January-2020 to 31-December-2021) and a buffer pool

withholding based on the VCS AFOLU Non-Permanence Risk Tool of 62,276 leading to a VCU issuance of 450,731.

Table of Contents

1	Introduction.....	4
1.1	Objective	4
1.2	Scope and Criteria	4
1.3	Level of Assurance.....	5
1.4	Summary Description of the Project	5
2	Verification Process.....	6
2.1	Audit Team Composition (<i>Rules 4.3.1</i>)	6
2.2	Method and Criteria.....	7
2.3	Document Review	8
2.4	Interviews	8
2.5	Site Inspections	9
2.6	Resolution of Findings.....	9
2.7	Eligibility for Validation Activities	10
3	Validation Findings	10
3.1	Participation under Other GHG Programs	10
3.2	Methodology Deviations.....	10
3.3	Project Description Deviations (<i>Rules 3.5.7 – 3.5.10</i>)	12
3.4	Minor Changes to Project Description (<i>Rules 3.5.6</i>).....	14
3.5	Monitoring Plans (CL3.2, CM3.3, B3.3)	14
4	Verification Findings.....	14
4.1	Public Comments (<i>Rules 4.6</i>)	14
4.2	Summary of Project Benefits.....	14
4.3	General.....	15
4.4	Climate	19
4.5	Community	24
4.6	Biodiversity	25
4.7	Additional Project Implementation Information	28
4.8	Additional Project Impact Information	28
5	Verification Conclusion	28
	Appendix A: LIST OF DOCUMENTS RECEIVED AND REVIEWED	30
	Appendix B: VCS LIST OF FINDINGS	45
	Appendix C: CCB LIST OF FINDINGS.....	64
	GL1.....	131
	GL2.....	132

GL3.....	133
----------	-----

1 INTRODUCTION

1.1 Objective

Nature Conservancy Canada (NCC) commissioned Aster Global to conduct the verification of Greenhouse Gas (GHG) emission reductions for the Darkwoods Forest Carbon Project under the Verified Carbon Standard (VCS), Version 4 and for verification under the Climate, Community & Biodiversity Standards (CCB). The VCS verification objectives were to ensure the project is in conformance with the VCS Program Guide, VCS Standard, and the validated VCS Project Description (PD). Aster Global assessed the GHG emission removals for the AFOLU project, specifically IFM. The CCB verification objectives were to ensure the project's compliance with CCB Program Rules Version 3 (and all associated updates), with verification against the second edition of the Standards (the edition of the Standards to which the CCB PD was validated), and the delivery of net climate, community, and biodiversity benefits were as stated by the Project Proponent and in accordance with the project's validated CCB PD and monitoring plan.

The verification objective included an assessment of compliance with VCS Version 4 and all associated updates, the selected methodology (VM0012, v1.2), and the validated PD. Aster Global (herein referred to as the Validation/Verification Body – VVB/Verification Team – Audit Team) assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period 01 January 2020 – 31 December 2021 through Agriculture, Forestry and Other Land Use (AFOLU) criteria. The project activities are categorized as; "Improved Forest Management, Logged to Protected Forest" (IFM LtPF); specifically, this project utilizes VM0012 v1.2 within project scope 14: Agriculture, Forestry and other Land Use (AFOLU) Requirements. Aster Global assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

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

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

1.2 Scope and Criteria

The scope of the verification included the GHG project and baseline scenarios; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The geographic verification scope is defined by the project boundary, the carbon reservoir types, management activities, growth and yield models, inventory program, and contract

periods. The scope of the initial monitoring period was outlined by the Project Proponent and is re-defined as follows for the GHG project:

Baseline Scenario	Market driven logging operation; 15-year depletion of mature timber stocks; 100-year uneven age harvest schedule with typical regional practice of clearcut logging
Activities/Technologies/Processes	Improved Forest Management, Climate, Community and Biodiversity Benefits, and Sustainable Development Impacts/Benefits utilizing VM0012 and CCB
Sources/Sinks/Reservoirs	Above Ground Tree Biomass (live) Below Ground Biomass Pool (live and dead) Dead Wood Pool Wood Products Pool Combustion of Fossil Fuels by Vehicles / Equipment
GHG Type	CO2
Time Period (start date, crediting period, verification period)	Start Date: 01 April 2008 Crediting Period: 100 years Monitoring Period: 01 January 2020 – 31 December 2021
Project Boundary	The Darkwoods Property Boundary is approximately 54,835 hectares and the Project area is approximately 52,430 hectares near Creston, BC

1.3 Level of Assurance

The level of assurance is used to determine the depth of detail that the verifier places in the Verification and Sampling Plan to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3). For this VCS verification, Aster Global assessed the project (general principles, data, sampling descriptions, documentation, calculations, etc.) to provide reasonable assurance to meet the project level requirements of the VCS Program. Based on the verification findings, a final evaluation statement reasonably assures that the project GHG representations are materially accurate. The evidence used to achieve a reasonable level of assurance is specified in subsequent sections of this report.

1.4 Summary Description of the Project

The project is an improved forest management project with managed logging within the project boundary to protect the forest. Through payments for ecosystem services generated via the sale of Verified Carbon Units (VCUs), the project proponent (NCC) is able to achieve net GHG emissions reductions and removals through the avoidance of emissions due to commercial logging and forest removal for rural residential development expected in the baseline scenario. As stated in Section 3.4 of the VCS PD, the baseline scenario is based on typical market practices in which an accelerated harvest schedule is implemented in which 300,000 m³ per year will be harvested.

The VCS PD states “the project scenario is conservation management activities, wherein NCC undertakes the carbon project and ecosystem protection and enhancement activities. The project scenario periodically involves a low level of timber removal as part of conservation management activities for ecosystem/habitat enhancement, risk management, and other conservation objectives.” The Darkwoods property is managed for conservation and ecological objectives. The project start date is 01

April 2008, when NCC completed the acquisition of the Darkwoods property. As the start date of the project is 01 April 2008 the previous baseline was applied for emission reductions generated through 31 March 2018. The 10-year baseline was re-validated during the previous verification period and followed AFOLU Requirements Section 3.1.10 to quantify emission reductions generated from 01 April 2018 - 31 March 2028.

2 VERIFICATION PROCESS

The verification assessed the Project's compliance with the VCS Version 4 (and all associated updates), the selected methodology (VM0012 v1.2), CCB Version 3 (and all associated updates) and the validated VCS and CCB PDs. The methods employed by Aster Global in the validation and verification process were derived from VCS and CCB program documents and ISO 14064-3 to develop and implement a Verification & Sampling Plan. This verification assessed the GHG emission removals through Agriculture, Forestry and Other Land Use (AFOLU) criteria, specifically, IFM LTPF activities, and assessed the net climate, community, and biodiversity benefits.

According to the ISO 14064-3, the verification criteria are the "policy, procedure or requirement used as a reference against which evidence is compared". Therefore, the reported Project results and supporting evidence were assessed for compliance against the following criteria:

VCS Program Guide (v4, 19 September 2019)

VCS Standard (v4.4, 21 December 2022)

VCS Program Definitions (v4, 19 September 2019)

AFOLU Non-Permanence Risk Tool (v4, 19 September 2019)

Program Validation and Verification Manual (v3.2, 19 October 2016)

VM0012, version 1.2 – Improved Forest Management in Temperate and Boreal Forests, v1.2

CCB Program Rules Version 3.1 (21 June 2017)

CCB Program Definitions, v3.0 (21 June 2017)

Climate, Community and Biodiversity Project Design Standards, Second Edition (December 2008)

Guidance for the Use of the CCB Standards (May 2014)

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan is to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error is reduced to a reasonable level. Modifications to the Verification and Sampling plan were made based upon the conditions observed in order to detect the processes with highest risk of material discrepancy.

The Verification and Sampling Plan was derived from the verification criteria stated above. Specifically, the sampling plan used the VCS guidance documents and ISO 14064-3.

2.1 Audit Team Composition (*Rules 4.3.1*)

For VCS/CCB verifications, Aster Global maintains an experienced internal staff of Lead Verifiers, in addition to Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, Forest

Biometricians, Remote Sensing/GIS Specialists, and VCS-approved AFOLU Experts in IFM, REDD, and WRC categories. Aster Global's Project Lead Verifier, a certified forester was onsite conducting the field verification activities. Aster Global completed all calculation/modeling reviews in-house with our team of forest biometricians, GIS/remote sensing specialists, and soil scientist. Aster Global has been involved in over 68 VCS verifications and over 36 CCB verifications, and more than 14 methodology assessments. Aster Global has a specialist on staff with more than 10 years of CCB experience who is responsible for oversight of all CCB components for project review. All Aster Global staff involved in the verification audit have ecological, biodiversity, natural resources and forestry background to fulfill these requirements.

2.2 Method and Criteria

The verification assessed the Project's compliance with VCS Standard Version 4 (and all associated updates), the selected methodology (VM0012 v1.2), CCB Program Rules Version 3 (and all associated updates), with verification against the second edition of the Standards (the edition of the Standards to which the CCB PD was validated), and the validated VCS PD (v 2.3, dated 16 September 2023) and validated CCB PD (v1.8, dated 6 June 2014). The Verification Team assessed the Greenhouse Gas (GHG) emission removals for the monitoring period/verification period (01 January 2020 – 31 December 2021) under the VCS sectoral scope of Agriculture, Forestry and Other Land-Use (AFOLU). The Verification Team assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

The non-permanence risk analysis was assessed for this verification. The objectives of the verification exercise were to evaluate the MR and assess:

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

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

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

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

monitoring to detect the processes with highest risk of material discrepancy. A detailed field plan was developed to guide the verification site visit and is embedded within the Verification and Sampling Plan.

For the field sampling effort, direct measurement, observation, interviews, and review of the monitoring period emission reductions were conducted in key areas determined to be the greatest risk, followed by ground-truthing and review of project activities. Field sampling and techniques were based on the project parameters/scope and best professional judgment of the Verification Team to meet a reasonable level of assurance as directed by the professional judgment of the Lead Verifier.

In addition, a risk-based approach was used for the on-the-ground field sampling effort to select key areas for spot-checking stratification, meetings with RDCs, direct re-sampling of biomass plots, and observation of stated project activities. Please see Section 2.4 of this report for more details.

The desktop verification component included a full review of all project documentation and calculations received from the Project Proponent as described throughout this report.

2.3 Document Review

A detailed review of all project documentation was conducted to ensure consistency with and identify any deviation from VCS program requirements and the applied methodology (VM0012 v1.2).

Initial review focused on the VCS and CCB PDs and the MR, and included an examination of the project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals. Along with a review of the MR, selected documentation was requested, provided, and subsequently reviewed for consistency, accuracy, and appropriateness with regard to VCS and CCB program requirements, methodological requirements, and the validated VCS and CCB PDs. Documents reviewed include, but are not limited to, land ownership documentation, carbon rights contracts, property boundaries, financial analyses, Non-Permanence Risk Analysis (see Section 3.5 below), maps and aerial images, data from monitoring, biomass and carbon calculation spreadsheets, and responses to Clarifications (CLs). The process of VCS verification involved three formal rounds of assessment by the verification team and resulted in a MR that was in conformance with VCS rules. The process of CCB verification involved five formal rounds of assessment by the verification team and resulted in a MR that was in conformance with CCB rules.

Please see Appendix A for a complete list of documents received and reviewed by Aster Global.

2.4 Interviews

Interview and informal discussions were conducted with project staff throughout the verification, as well as an interview with staff onsite during the verification site visit as part of the overall verification process. Information reported in the MR was supported through the comments from those interviewed. The following is a list of individuals with whom the verification team met with for this verification:

Name	Title
Adrian Leslie	West Kootenay Project Manager
Rob Wilson	Director – Carbon Finance and New Conservation Strategies

Mike Vitt	President, RainCloud Forests
-----------	------------------------------

2.5 Site Inspections

The verification site inspection followed the VVB's prepared Verification and Sampling Plan process. The verification site inspection was conducted on 26-27 September 2022 by an in-country representative of Aster Global. The Project Proponent was interviewed, and the property was toured aerially by helicopter. Field work included direct measurement, observation, and review of stated sustainable development goals of the project. The objective of the field work was to determine key areas of greatest risk, followed by ground-truthing and review of project activities. Field sampling techniques were based on the project parameters/scope and best professional judgment of the Verification Team to meet a reasonable level of assurance as directed by the Lead Validator. Three plots were reproduced to confirm measurement approaches were consistent with project SOP's.

In addition, a risk-based approach was used for the on-the-ground field sampling effort to select key areas for spot-checking stratification, direct re-sampling of assertions, and observation of stated project activities.

2.6 Resolution of Findings

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

This verification involved three (3) formal rounds of assessment by the verification team for VCS conformance and five (5) formal rounds of assessment by the verification team for CCB conformance and resulted in a MR in conformance with VCS and CCB rules. Where findings were noted by the verification team, the Project Proponent implemented corrective actions by amending the MR and providing supporting documentation/calculations and providing written clarification responses. Types of findings were characterized in the following manner:

Non-Conformance Reports (NCRs) were, in general, issued as a response to material discrepancies when:

- PD, MR, calculations, or other supporting documents were out of conformance with documents listed in Section 2.1 above.
- Additional information was required by the verification team in order to confirm reasonable assurance for compliance.

Clarifications (CLs) were, in general, issued when:

- Internal consistency among sections was lacking.
- Mathematical formulae in sections were presented incorrectly.
- Language within a section needed extra clarification to avoid ambiguity.

Opportunities for Improvement (OFIs) were issued when the MR, calculations, or other supporting documents needed enhanced to benefit the general reader or to aid in the review process of the verification team.

During the course of the verification, seventeen (17) VCS findings and twenty-one (21) CCB findings were identified. Detailed summaries of each VCS and CCB finding, including the issue raised, responses, and final conclusions, are provided in Appendix B and Appendix C, respectively. All NCRs/CLs were satisfactorily addressed and closed.

2.6.1 Forward Action Requests

No forward action reports were raised as part of this monitoring/reporting period verification.

2.7 Eligibility for Validation Activities

Aster Global is accredited by the American National Standards Institute (ANSI) under ISO/IEC 17029:2019 for greenhouse gas validation and verification bodies including: ISO 14065:2020 and ISO 14064-3:2019, validation/verification of assertions related to GHG emission reductions and removals at the project level for GHG emission reductions from fuel combustion (Group 1), Land Use and Forestry, subgroup ART TREES (Group 3), Livestock (Group 5) and Waste Handling and Disposal (Group 6) and verification of assertions related to GHG emissions and removals at the organizational level General, subgroup CORSIA (Group1) Manufacturing (Group 2), Power Generation (Group 3) Mining and Mineral Production (Group 5), Metals (Group 6), Chemical Production (Group 7), Oil and gas extraction, production and refining, including petrochemicals (Group 8), and Waste (Group 9).

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The Darkwoods Forest Carbon Project is not seeking registration under any other approved GHG programs.

3.2 Methodology Deviations

There was one (1) new methodology deviation applied during the monitoring period.

Methodology Deviation	VCS Standard v4.4 – 3.19.1 ¹	VCS Standard v4.4 – 3.19.2 ²
The Project has applied a methodology deviation related to the forest inventory data which	This deviation is allowable as it represents a deviation from the criteria and procedures relating	This deviation is allowable as it results in increased accuracy in the measurement of carbon

¹ 3.19.1 - Deviations from the applied methodology are permitted where they represent 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).

² 3.19.2 - Methodology deviations shall not negatively impact the conservativeness of the quantification of GHG emission reductions or removals, except where they result in increased accuracy of such quantification. Deviations relating to any other part of the methodology shall not be permitted.

serves as the basis for the Project's carbon stock estimates. The Project now uses an Enhanced Forest Inventory which combines on-the-ground forest inventory measurements with high-resolution LIDAR data ultimately resulting in a higher resolution information with increased accuracy.	to monitoring or measurement set out in the methodology.	stocks and therefore quantification of GHG emission reductions or removals.
---	--	---

There are 5 methodology deviations that have been assessed and validated in previous verifications:

Methodology Deviation	VCS Standard v4.4 – 3.19.1 ³	VCS Standard v4.4 – 3.19.2 ⁴
1. Timing of plot remeasurement.	This deviation relates to the monitoring or measurement set out in the methodology.	This deviation does not impact conservativeness because plot remeasurements are still conducted in a timely manner.
2. One plot per AU.	This deviation relates to the monitoring or measurement set out in the methodology.	The audit team confirms that this methodology deviation has no impact on the conservativeness of the quantification of GHG removals because these areas are still represented by forest inventory and tree data.
3. Equation 60b.	This equation has been updated in an errata update to the methodology.	This equation has been updated in an errata update to the methodology.
4. Remeasurement of plots in THLB.	This deviation relates to the monitoring or measurement set out in the methodology.	This deviation has no impact on the conservativeness of the project's quantification of GHG reductions/removals.

³ 3.17.1 - Deviations from the applied methodology are permitted where they represent 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).

⁴ 3.17.2 - Methodology deviations shall not negatively impact the conservativeness of the quantification of GHG emission reductions or removals, except where they result in increased accuracy of such quantification. Deviations relating to any other part of the methodology shall not be permitted.

5. Harvested wood product calculations.	This methodology deviation is no longer applicable with VM0012 v1.2.	This methodology deviation is no longer applicable with VM0012 v1.2.
---	--	--

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

Fifteen (15) project description deviations are described in the Darkwoods Forest Carbon Project Monitoring report. Of the fifteen (15) project description deviations, ten (10) project description deviations were described as occurring in previous monitoring periods. The VVB reviewed these and substantiated these nine were previously assessed and validated in previous verifications and were incorporated into the Darkwoods Forest Carbon Project VCS Project Description (v2.3, 16 September 2020). The six (6) new project description deviations for the monitoring period under the current verification were each assessed separately to determine if the deviations impacted:

- The applicability of the methodology.
- Additionality.
- The appropriateness of the baseline/without-project scenario.

The below table identifies each project description deviations that were validated during this verification.

Project Description Deviation	Applicability of the methodology	Additionality	The appropriateness of the baseline/without-project scenario
The change in project area analysis unit (AU) to a basal area (BA) based stratifications.	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.
The change in the property boundary to 54,834.7 ha (previously 54,870.4 ha, decrease of 0.065%).	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.
The deviation in the biodiversity monitoring frequency and reporting, based on an update of the Darkwoods	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.

Property Management Plan (PMP) and biodiversity monitoring plan, reported as part of the project's adaptive management.			
The Project has included a PD Deviation that corrects a reporting error found by the VVB during the verification related to the Table in Section 1.10 of the PD which reports Estimated Annualized GHG emission reductions or removals (tCO ₂ e)	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.
The Project has included a PD deviation related to the forest inventory data which serves as the basis for the Project's carbon stock estimates. The Project now uses an Enhanced Forest Inventory which combines on-the-ground forest inventory measurements with high-resolution LIDAR data ultimately resulting in a higher resolution information with increased accuracy.	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.

The Project implemented a PD Deviation related to the Monitoring Plan as described in the validated PD. The Project has added additional monitoring actions that specifically covers any disturbances that could result in a loss event and additional actions that ensure the Project follows the Loss Event Reporting requirements of the VCS Program.	This project description deviation has no impact to the applicability of the methodology.	This project description deviation has no impact on additionality.	This project description deviation has no impact on the appropriateness of the baseline scenario.
---	--	---	--

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

There were no minor changes to the Project Description reported during the monitoring period.

3.5 Monitoring Plans (CL3.2, CM3.3, B3.3)

Not applicable – the climate, community, and biodiversity impact monitoring plans have been previously validated.

4 VERIFICATION FINDINGS

4.1 Public Comments (*Rules 4.6*)

No public comments were identified as received during the public comment period. This project was open for public comment from 16 September 2022 to 16 October 2022.

4.2 Summary of Project Benefits

Section 1 and 1.2 of the MR provide a description of the project benefits. The audit team confirms that project benefits stated in the aforementioned sections were substantiated with verifiable evidence provided by the project proponent.

Outcome or Impact	Achievements during the Monitoring Period	Verification Discussion and Justification
GHG emission reductions & removals	651,023 tCO ₂ e	The Verification Team reviewed the quantification of the GHG removals and reductions and confirms this is accurate. The reported achievement is substantiated by Section 3.2.4 of the MR.
Improved land management	Net 1,107 ha through avoided harvesting for the project period.	The Verification Team confirms that in comparing the Baseline and Project scenarios 1,107 ha avoided harvesting. The reported achievement is substantiated by Section 3.1.3 of the MR.
Improved land management	Net 2,404 ha non-forest land in which IFM has occurred.	The Verification Team confirms that in comparing the Baseline and Project scenarios for non-forest land 2,404 ha experienced IFM. The reported achievement is substantiated by Section 5.0 of the MR.
Biodiversity conservation	Number of globally Critically Endangered or Endangered species benefiting from reduced threats as a result of project activities measured against the without-project scenario: 1 Endangered species and 1 'vulnerable' species on the IUCN RedListed Species list and an additional 33 provincially listed species at risk	The Verification Team reviewed IUCN's RED List of threatened species, in addition to observing several indicators while on-site. This achievement is substantiated by Section 5.2.2 of the MR.

4.3 General

4.3.1 Implementation Status (G3.4, CL1.5)

No material discrepancies between the project implementation schedule and the validated VCS or CCB project descriptions.

The MR included an implementation schedule, showing all project activities had begun and are ongoing. During this monitoring period no timber harvesting was undertaken.

A list of methodology deviations was discussed in Section 3.2 of this verification report. A list of project description deviations is provided in Section 3.3 of this verification report. No minor changes to the project description were identified for this monitoring period.

Double counting of emissions credits is avoided through VCS registration. The project has not received or sought any other form of environmental credit or participated in any other GHG program.

The Darkwoods project has been verified under the Verra Sustainable Development Verified Impact Standard (SD VSta) Program. Details on sustainable development contributions can be found in the Darkwoods SD VSta Verification Report.

The project has been implemented as described in the VCS and CCB project descriptions.

4.3.2 Risks to the Project (G3.5)

The MR describes actions undertaken during this monitoring period to mitigate likely natural and human-induced risks to the expected climate, community, and biodiversity benefits. The Project Proponent provided the verification team with supporting documentation to substantiate the actions implemented to mitigate these risks. The greatest risk identified, from a large burn in 2021, is documented in the MR and in supporting documents. The effects of this burn on carbon stocks were evaluated by the concurrent VCS verification and the VVB determined reasonable steps have been identified to mitigate such risks.

4.3.3 Enhancement of High Conservation Values (G3.6)

HCVs were maintained or enhanced during the monitoring period through road access management, whitebark pine reforestation, and invasive species control. Supporting documentation including management plans, site inspection reports, and whitebark pine restoration reports were provided to the verification team for review. Based on the evidence provided, the verification team is reasonably assured that HCVs were maintained and enhanced.

4.3.4 Benefit Permanence (G3.7)

The MR states: “The Darkwoods project is based around the conservation of the property in perpetuity and no additional measures were necessary to maintain or enhance the climate, community, and biodiversity benefits during this monitoring period.” The verification team noted this statement is consistent with the validated CCB PD description regarding benefit permanence. The CCB PD describes the legal basis (Environment Canada’s Ecological Gifts Program) for the requirement to ensure conservation related objectives are met in perpetuity. The VVB noted the Project Proponent implemented a new 5-year PMP during this monitoring period, and this updated PMP demonstrates measures to be implemented to maintain and enhance the climate, community, and biodiversity benefits until at least 2025, with provisions for updating the PMP beyond this period through adaptive management. The VVB determined the measures demonstrate project benefits are reasonably expected to continue beyond the project lifetime in accordance with measures outlined in the validated CCB PD.

4.3.5 Stakeholder Engagement (G3.8 – G3.9)

The monitoring report describes several meetings that were held throughout the monitoring period, noting that COVID-19 limited the number of in-person meetings and interactions. The project states these meetings have influenced the project area in multiple ways, including reviewing and developing recreational access agreements, project area research planning and review, and general public outreach and education. Supporting documentation including summary reports and a consultation letter sent to the Ktunaxa Nation were provided to the verification team for review. The documentation provided by the

Project Proponent substantiates the community consultation meetings held during the monitoring period and how these meetings resulted in input taken into consideration by the Project Proponent for management decisions.

The verification team reviewed supporting evidence demonstrating that the link to the Verra public comment page was posted on the Darkwoods website during the public comment period. Along with the consultation letter sent to the Ktunaxa Nation, the verification team is reasonably assured that the public comment period was communicated to the community and project information and documents were made available. The verification team determined the project carried out stakeholder engagement in accordance with measures outlined in the validated CCB PD.

4.3.6 Stakeholder Grievance Redress Procedure (G3.10)

There were no grievances reported during the monitoring period. The project proponent provided the verification team with the Land Information System (LIS) log, which tracks correspondence received about the Darkwoods project. No grievances were reported as having been received. To facilitate verification team review of the LIS log, the project proponent added a column to the LIS to flag any records that would be characterized as related to project grievances. The verification team reviewed the updated list and noted that no correspondence received during the monitoring period was identified or characterized as a grievance with the project.

As there were no grievances reported during the monitoring period, the verification team was unable to confirm the grievance process was followed as outlined in the CCB PD. However, the addition of the column in the LIS for tracking grievances shows that there is a mechanism in place for logging and tracking grievances should the project receive any. The verification team determined the grievance redress procedure has been implemented for logging and tracking grievances in accordance with the project's validated design.

4.3.7 Worker Relations (G4.3 – G4.6)

Training and orientation of NCC employees is governed by the NCC HR policies. The NCC HR Policies 2019 document was provided to the verification team for review, which states that NCC will provide training for staff. The attendance log for carbon plot field training that occurred during the monitoring period was also provided to document the training that occurred during the monitoring period. The verification team determined through review of the clarification provided in the MR and through review of the supporting documentation that the MR identifies orientation and training for the project's employees and relevant people from the communities, and how the local capacity was developed during the monitoring period.

The NCC HR Policies 2019 document provided to the verification team states that NCC is committed to hiring practices that are fair and equitable. There is currently one person employed locally by the project, and no employment positions were available to fill during the monitoring period. The project provided information to the verification team for local contractors hired for work related to the Darkwoods project during the monitoring period.

The verification team reviewed the 2020-2021 COI & HR Policy Sign-Offs Attestation Letter – Darkwoods document which is signed by the NCC Chief Human Resources Officer that states that human resource and conflict of interest policies were followed by all employees for 2020 and 2021. The verification team

noted this document also includes documentation for completion by employees acknowledging NCC's Human Resource Policy. The verification team determined that the NCC HR Policies 2019 and 2018 Health and Safety Manual, along with supporting documentation and attestation from the Chief HR Officer for NCC document how workers are informed of their rights, provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.

The verification team reviewed supporting documentation provided by the Project Proponent regarding how the project informs workers of risks and to minimize risk. The VVB noted the Project Proponent provided an example of a Pre-work/Contractor Site Orientation form completed during the monitoring period, which documents how NCC informs and minimizes risk for employees, including subcontractors.

Based on the supporting evidence reviewed, the verification team is reasonably assured that the relationship between workers and the project upholds the intent and design presented in the validated PD.

4.3.8 Technical and Management Capacity (G4.2, G4.7)

A summary of key technical skillsets and expertise identified as required to successfully implement a CCB project is included in the monitoring report. MR Section 2.4.1 includes a list of key project management personnel along with a summary of their project responsibilities and related skillsets. The verification team noted that several of the key project personnel are the same as those listed in the 2014 CCB PDD, demonstrating retention of key personnel on the project over an extended period. MR Section 2.4.1 identifies RainCloud Forest as a partner for providing relevant experience identified as needed. Discussions and interviews with key project personnel substantiates the project maintains a management team with the expertise and prior experience implementing land management projects at the scale of this project.

The monitoring report includes a summary of the financial health of the Project Proponent and provides a link to documentation to support this assertion. The verification team noted the support document "2020-2021 Audited Financial Statements" substantiates the financial health of the Project Proponent to implement the project in accordance with the budgets identified in the PMP 2021-2025.

4.3.9 Legal Status (G5.1)

The verification team noted MR Section 2.5.1 states no changes to the laws relevant to the project were implemented in this monitoring period. The MR provides the assurance the project remains in compliance with all laws as per the validated PD.

4.3.10 Rights Protection and Free, Prior and Informed Consent (G5.3-G5.5)

The project area is owned, fee simple, by NCC and no one lives on it or was living on it at the start of the project. No relocations occurred. Site visit observations confirm that no one lives on the property. The VVB noted review of supporting documentation substantiated that no project activities were identified that would affect lands outside the project area. The VVB noted review of supporting documentation substantiated that no project activities were identified that would have resulted in or will require the involuntary removal or relocation of property rights holders or force them to relocate activities important to

their culture or livelihood. The VVB concurred there is no one from whom FPIC must have been received for the project activities undertaken during the monitoring period.

4.3.11 Identification of Illegal Activities (G5.5)

The MR states that no illegal activities have occurred on the project area that affect the project's climate, community, or biodiversity impacts during the monitoring period. The supporting documentation reviewed, including site inspection reports, substantiates that no illegal activities were identified that would have affected the project's impacts.

4.4 Climate

4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

Aster Global conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS Standard, the validated PD, and VM0012 v1.2. Data with associated conversion factors, formulas, and calculations were provided by the project proponent in spreadsheet format to ensure all formulae were accessible for review. The verification team recalculated subsets of the analyses to confirm correctness and assess if data transposition errors occurred to achieve a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 5.1.3 of the VCS Standard. Through this review the VVB was able to confirm that the calculation of Emission Reductions and Removals is accurate. The project proponent also provided answers to questions on calculations to ensure the verification team understood the approach and could confirm its consistency with VM0012 and the PD.

During the course of the review the VVB assessed the potential of activity shifting leakage. As required by Section 8.3.1 of the VM0012 v1.2 methodology, the Project submitted a list of all properties owned by NCC which included the location and description of all forestland holdings. Additionally, to demonstrate that there has been no activity shifting leakage during the monitoring period, the Project submitted financial transactions demonstrating that there was only one timber harvest outside of the Project Area during the monitoring period. The VVB subsequently reviewed the Property Management Plan and confirmed that this harvest was related to the property specific management objectives to control non-native species and expedite the regeneration of native hardwood species. The Project also submitted a signed attestation, attesting that no commercial harvests took place during the monitoring period. In conclusion, the VVB is reasonably assured that there has been no activity shifting leakage.

The VCS Program Definitions define "Harvesting Activity" as "The harvest of trees, vegetation, or other biomass, which results in a reduction by more than 20% of carbon stocks over a five-year period that starts when a reduction of carbon stocks occurs. In the case of grouped projects, the 20% threshold applies to each project activity instance." Over the last 5 years (01 January 2017 – 31 December 2019) the project has harvested approximately 4.1 hectares. Through a review of previous monitoring reports and verification reports, modeling outputs, and independent data checks, the VVB confirmed that over the period 2017-2021 the project has not reached the threshold for Harvesting Activity and is therefore not required to calculate the long-term average.

During the Monitoring Period, there was a fire in 2021 that qualified as a loss event. The Project has appropriately submitted a loss event report and deed of representation as required by the VCS Registration and Issuance document. Through a review of the Project's modeling, third party data reported by the Provincial Government of British Columbia, and a set of independent data checks, the VVB confirmed that the fire resulted in an estimated loss of 235,045 tCO₂e. From the Project Start Date

(1 April 2008) through the end of the previous Monitoring Period (31 December 2019), the previously verified emission reductions and removals totals (i.e. VCUs + Contribution to Buffer) is equal to 3,723,322, which the VVB confirmed through a review of project records on the Verra Registry. The fire in 2021 qualify as a loss event as the estimated loss of 234,045 tCO₂e is greater than 5% of the previously verified emission reductions and removals. Additionally, the Project has appropriately included the fire event into the calculation of both baseline and project emission reductions and removals resulting in accurate Net GHG Emission Reductions and Removals quantified for the Monitoring Period.

Aster Global also reviewed a comprehensive assessment of data collection and storage procedures to ensure all opportunities for error in transposition of data between data were minimized.

Uncertainty was assessed as required. The audit team recalculated the statistics independently to confirm the accuracy of the reported precision. The audit team confirmed no confidence deduction was required.

Field data collection utilized appropriate principles of forestry data collection, including appropriate tools and methods. Collected data was handled appropriately, including a structured process for QA/QC. Analysis of collected data used appropriate formulas, conversions, and parameters, supported by scientific literature. Where ranges of parameters exist, or other types of formulaic uncertainty, appropriately conservative values were used in data analysis.

In conclusion, the quantification methods for GHG emission reductions and removals have been performed correctly and in accordance with the validated PD and VM0012.

4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

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

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

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

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

4.4.3 Non-Permanence Risk Analysis

The Monitoring Report utilized the non-permanence risk analysis tool, AFOLU Non-Permanence Risk Tool, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The verification team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements 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 project proponent. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

The final score was calculated to be 10%. A brief review of each factor is found in the table below:

Risk Factor	Rationale & Quality	Conclusion
Internal Risks		
Project Management	a) 100% native species are used in reforestation. b) Access to the project area is controlled through the use of locked gates at road access points. Additionally, timber harvesting is rare, and no timber theft has occurred in the project area. c) The management team has staff with significant experience in all skills necessary for the successful project implementation. d) The management team maintains a presence in Canada and near the project area. e) See C. f) There is an adaptive management plan in place.	A risk rating of -4 is appropriate given the rationale as the management team has demonstrated appropriate qualifications and all statements made are substantiated.
Financial viability	Project proponents provided the verification team appropriate and verifiable documentation to prove that the project's financial resources are available and have been secured. Items presented to the verification team by project proponents give reasonable assurance that the risk rating for financial viability is appropriately set. Values were sourced from reputable sources and calculations were confirmed correct through data checks.	A review of the financial resources has been confirmed so a risk rating of 0 is appropriate.
Opportunity Cost	The project proponent provided a comprehensive NPV analysis. All assumptions and data used in the NPV analysis were verified	The NPV analysis and supporting materials provided

	by the audit team. Confirmation of participating in The Canadian Ecological Gifts Program was verified which was confirmed to be a legally binding commitment to continue management practices that protect the credited carbon stocks. Additionally, the audit team verified that NCC is in a non-profit organization.	were reviewed and appeared appropriate. A risk rating of -12 is appropriate given the rationale provided.
Project Longevity	The verification team reviewed the documentation provided concerning the contracts that have been signed with RDCs and leaseholders, which cover the entire project lifetime of 30 years. As such, the value applied was appropriate.	A risk rating of 0 is appropriate given the rationale provided.
Total Internal Risks		0
External Risks		
Land Tenure	Verifiers confirmed that the entire project area is owned in fee by NCC, no land use disputes exist, and the project area is in a legally binding commitment to continue management practices that protect carbon stocks over the length of the project crediting period. The verifiers reviewed current road use agreements, documentation from The Canadian Ecological Gifts Program, and title documents.	A risk rating of 0 is appropriate given the rationale provided.
Community Engagement	The verifiers confirmed that there are no communities living within the project area and that there are no communities within 20km who are reliant on the project area.	A risk rating of 0 is appropriate given the rationale provided.
Political Risk	Verification Team confirmed the political risk to be rated correctly for Canada's average governance score from the World Bank of -1.55	A risk rating of 0 is appropriate given the rationale provided.
Total External Risks		0
Natural Risks		
Natural Risk	The project was given a fire risk of "insignificant" and a frequency of "less than every 10 years." The most recent fire occurred in 2021 and affected approximately 1% of carbon stocks. The verification team reviewed the analysis conducted to determine the percentage of stocks affected and confirmed it to be accurate. Mitigation actions for fire are described in the Risk Report and includes a partnership with BC	A combined natural risk rating of 1.50 is appropriate given the rationale provided and all statements made are substantiated.

	Fire Fighting. The risk score of 0.5% is appropriate. Verification Team agrees that the risk of pests and disease in these forests is “insignificant” as the project area is very diverse in terms of species, terrain, and climate. The audit team agrees that “Less than 10 years” is appropriate as there are pests and disease in the area and this is the most conservative selection. The project proponent has an adaptive management plan in place that provides tools to manage and prevent pest and disease outbreaks such as harvesting area that are susceptible to outbreaks. The verification team agrees with the ratings of “insignificant” and “less than every 10 years” as the project area is diverse and there is infrequently damage from extreme weather. The project proponent has an adaptive management plan in place that discusses tools for mitigating extreme weather damage such as maintaining road and stream crossing maintenance. The Verification Team agrees with the projects justification for geologic events given the teams experience working in the region.	
Total Natural Risks		1.50
Overall Risk Rating = 1.5% Non-Permanence Risk Rating = 10% (The minimum that a project is allowed to take)		

In summary, project proponents have accounted for risk factors in a reasonable manner and have reached an overall risk rating that encompasses all risks of non-permanence. The project has applied the Non-Permanence Risk Rating of 10% correctly. As required, risk will be reassessed and given risk scores at each verification period.

4.4.4 Dissemination of Climate Monitoring Plan and Results (CL3.2)

The verification team confirmed during the assessment and interviews that the monitoring plan and results were disseminated to the communities and stakeholders as outlined in the validated PD. The verification team confirmed that the Darkwoods webpage (<https://www.natureconservancy.ca/en/where-we-work/british-columbia/featured-projects/west-kootenay/darkwoods/dw-carbon.html>) contains a link to the Darkwoods project page on the Verra Registry where the monitoring report is available.

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

Not applicable.

4.5 Community

4.5.1 Community Impacts (CM1.1)

The verification team reviewed information provided in the MR against information in the validated CCB PD and supporting documentation provided for VVB review. Supporting documentation and site observations confirmed the Darkwoods project area is a gated private property and there are no communities, indigenous people, or other public communities that live in or are dependent on the project area. Supporting documentation indicates twenty-six recreational dwellings exist on leased land in an area called Tye. The Project Proponent noted these leases are not renewed when they expire. Based on the supporting documentation provided, and site observations, the verification team determined there were no people living in the area directly affected by project activities during the monitoring period.

The validated PD and MR identify a limited number of stakeholders who are impacted by project activities. Review of supporting documentation and interviews with project staff substantiated project activity impacts for the monitoring period were positive or neutral to the stakeholders identified (road and logging contractors, consultants for inventory and monitoring, backcountry recreational users, researchers and NCC staff members). Following review of additional supporting documentation, discussions with project staff, and clarification provided in the MR, the verification team reached an overall conclusion that the assessment of impacts is accurate.

4.5.2 Net Positive Community Well-being (CM1.1)

The verification team noted that travel restrictions associated with public health requirements due to COVID-19 limited opportunities for recreational use of the project area by individuals from local communities as well as scientific researchers. Income opportunities were substantiated for locally-based contractors used by the project. The verification team did not identify any negative impacts to community well-being during the monitoring period. The verification team determined through review of supporting documentation that the net impact of project activities on community groups identified in the validated CCB PD has been positive.

4.5.3 Protection of High Conservation Values (CM1.2)

The verification team reviewed the MR for consistency with the treatment for community-related HCVs in the validated CCB PD. Supporting documentation and site observations substantiate the HCV areas providing ecosystem services were not negatively affected by the project during the monitoring period. The verification team noted the validated CCB PD indicates there are no HCV areas identified as fundamental for meeting the basic needs of local communities or critical for the traditional cultural identity of communities.

4.5.4 Other Stakeholder Impacts (CM2.2-CM2.3)

The verification team reviewed actions identified in the MR against other stakeholder impacts identified in the validated PD, which indicated potential negative economic opportunities to offsite stakeholders from

the lost logging opportunities. The verification team determined that clarification provided in the MR, along with supporting documentation and interviews with project staff substantiated that project activities provided net positive economic benefit to other stakeholders, in addition to recreational and research opportunities, ecosystem services and climate benefits.

4.5.5 Community Monitoring Plan (CM3.1, CM3.2, GL2.5)

The verification team reviewed the community impact monitoring results reported in the MR for the monitoring period against the community impact monitoring plan presented in the validated CCB PD. Review of supporting documentation, clarifications provided by the Project Proponent, and interviews provided reasonable assurance for the accuracy of the Community Monitoring results reported in the MR, regarding the four monitoring activity items identified in the validated CCB PD: economic/employment impact; climate services impact; other ecosystem services provisioning impact; and community amenity value impacts. Supporting evidence reviewed by the verification team substantiated the monitoring was conducted and reported in accordance with dates, frequency, and sampling methods identified for each activity in the monitoring plan. The verification team determined that the MR and supporting documentation substantiated that community monitoring results are reported for community groups in consistency with the monitoring plan presented in the validated CCB PD. The VVB determined the supporting documentation substantiated the community monitoring plan was overall carried out in accordance with the validated CCB PD.

4.5.6 Community Monitoring Plan Dissemination (CM3.3)

Supporting documentation was provided to the verification team demonstrating that the community monitoring results for the current verification period were made available through the Darkwoods webpage on the NCC website and that the dissemination of community monitoring results was undertaken in accordance with approved methods. The verification team confirmed that the Darkwoods webpage contains a link to the Darkwoods project page on the Verra Registry where the monitoring report is available. Based on the information provided, the verification team concluded the results of community monitoring were disseminated in accordance with the validated PD.

4.5.7 Optional Gold Level: Barriers to Benefits (GL2.3)

Not applicable.

4.5.8 Optional Gold Level: Protections for Poorer and the more Vulnerable (GL2.4)

Not applicable.

4.6 Biodiversity

4.6.1 Biodiversity Changes (B1.1)

The verification team reviewed supporting documentation and clarification provided by the Project Proponent to assess reported changes in biodiversity in the project zone due to project activities. The verification team noted the Darkwoods Conservation Area Property Management Plan (PMP) was updated during the monitoring period for 2021-2025, which was determined to be consistent with adaptive management plans identified in the validated CCB PD. The verification team reviewed the reported

changes in biodiversity and determined with reasonable assurance that the MR clearly, accurately, and appropriately demonstrates changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project area during this monitoring period consistent with supporting documentation.

4.6.2 High Conservation Values Protected (B1.2)

The verification team reviewed the MR for consistency with the treatment for biodiversity-related HCVs in the validated CCB PD. The verification team reviewed supporting documentation to substantiate that the four activities identified as to be undertaken to mitigate potential impacts to these HCVs were undertaken. The verification team reviewed supporting documentation for monitoring activities and management plans and determined this supporting information demonstrates that no biodiversity-related HCVs have been negatively affected by the project.

4.6.3 Invasive Species (B1.3)

The verification team reviewed supporting documentation to substantiate that no non-native species were introduced into the project area for use in project activities. Supporting documentation, including reports covering periodic monitoring of invasive species occurrences and describing the periodic removal or control efforts used to prevent the known occurrences from increasing, substantiated efforts to prevent the increase of invasive species present in the project area. The verification team noted supporting documentation indicated no new occurrences of invasive species were noted during the monitoring period, and trends were in line with previous monitoring periods. No undocumented occurrences of invasive species were noted by the verification team during the site visit.

4.6.4 Impacts of Non-native Species (B1.4)

The verification team noted MR Section 5.1.4 is consistent with CCB PDD Section B1.4 in asserting no non-native species are used by the project. Support documentation, discussions with project staff, and site visit observations substantiate information presented in the MR that identifies Whitebark Pine, a native species, as the only species identified as planted in the project area during the monitoring period.

4.6.5 GMO Exclusion (B1.5)

The verification team reviewed supporting information from the project proponent that substantiates the seeds sourced for the seedlings planted during the monitoring period are not GMOs. The verification team noted the monitoring report provides the guarantee that no GMOs were used to generate GHG emissions reductions or removals.

4.6.6 Negative Offsite Biodiversity Impacts and Mitigation (B2.2)

The verification team reviewed the assertion in the MR, that there are no expected negative offsite biodiversity impacts and therefore mitigation is not applicable, against the validated PD. There were no likely negative offsite biodiversity impacts identified by the verification team through review of supporting documentation. The VVB noted MR Section 5.2.1 is consistent with the CCB PDD by stating offsite negative biodiversity impact mitigation is not applicable. The VVB determined this assertion is substantiated by the validated CCB PD assertion for Indicator B2.1 that negative offsite biodiversity

impacts are unlikely, and no negative offsite biodiversity impacts identified by the VVB through review of supporting documentation.

4.6.7 Net Biodiversity Benefits (B2.3)

The verification team reviewed positive biodiversity benefits substantiated through supporting documentation. The verification team determined supporting documentation demonstrates that the net impact of the project on biodiversity is positive, especially when compared to the without-project scenario, and in the absence of any likely negative biodiversity impacts in the project zone. Supporting documentation and monitoring results provided to the verification team for review are in line with the impacts stated in the MR. The verification team noted supporting documentation substantiates the project property has considerable importance because of its adjacency to, and connectivity with, three provincial protected areas, the habitat protection and enhancement activities on the project area, and the contributions to avoided soil disturbance and water quality impacts downstream. The verification team concluded the supporting documentation, including site visit observations, substantiate the net biodiversity impacts of the project are positive.

4.6.8 Biodiversity Monitoring Results (B3.1, B3.2)

The verification team reviewed the community impact monitoring results reported in the MR for the monitoring period against the biodiversity monitoring plan presented in the validated CCB PD. Review of supporting documentation, clarifications provided by the Project Proponent, and interviews provided reasonable assurance for the accuracy of the Biodiversity Monitoring results reported in the MR, regarding the four monitoring activity items identified in the validated CCB PD: compliance monitoring, implementation monitoring, effectiveness monitoring, and validation monitoring.

Supporting evidence reviewed by the verification team determined biodiversity monitoring was not conducted and reported in accordance with dates, frequency, and sampling methods identified for each activity in the monitoring plan incorporated into the validated CCB PD. Monitoring is identified as to occur annually as laid out in the validated PDD, but with adoption of the 2020 Property Management Plan, biodiversity monitoring has shifted to every 5 years. See Section 3.3 Project Description Deviations for more detail on how this deviation was evaluated by the verification team. The verification team determined this deviation was in line with the adaptive management plan identified in the validated CCB PD and that overall effectiveness monitoring was conducted during the monitoring period in accordance with the validated monitoring plan.

The verification team determined that supporting documentation substantiated that with the exception of the reported Project Description Deviation, the biodiversity monitoring plan was carried out in accordance with the validated project design. The VVB determined the supporting documentation substantiated the biodiversity monitoring plan overall was carried out in accordance with the intent of the validated CCB PD and the shift in monitoring frequency would not likely result in a loss of effectiveness in monitoring results of measures taken to maintain or enhance all identified high conservation values.

4.6.9 Biodiversity Monitoring Plan Dissemination (B3.3)

Supporting documentation was provided to the verification team demonstrating that the biodiversity monitoring results for the current verification period were made available through the Darkwoods webpage on the NCC website and that the dissemination of biodiversity monitoring results was

undertaken in accordance with approved methods. The verification team confirmed that the Darkwoods webpage contains a link to the Darkwoods project page on the Verra Registry where the monitoring report is available. Based on the information provided, the verification team concluded the results of biodiversity monitoring were disseminated in accordance with the validated CCB PD.

4.7 Additional Project Implementation Information

The verification team noted the MR included an excerpt from the Darkwoods CCB PD, describing exceptional biodiversity benefits attributed under GL3. The verification team noted this information provides additional project impact information, and as such is treated in section 4.8 of this verification report. The verification team noted that no additional project implementation information was provided in the MR that would have required verification.

4.8 Additional Project Impact Information

The verification team noted the MR included an excerpt from the Darkwoods CCB PD, describing exceptional biodiversity benefits attributed under GL3. The verification team noted some of the information presented in this excerpt was updated with newer information based on other findings from the present verification. Supporting documentation provided by the Project Proponent substantiated the project area continues to maintain the continued presence of Whitebark Pine (*Pinus albicaulis*), a species listed on the IUCN Red List as Endangered. This continued presence of this species confirms the project continues to meet requirements for the Gold Level for Exceptional Biodiversity Benefits.

5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, supporting documentation, and the site visit, Aster Global Environmental Solutions, Inc., confirms that the monitoring conducted by The Nature Conservancy of Canada, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS Version 4 and CCB Second Edition criteria, and the selected methodology (VM0012). Aster Global confirms that The Nature Conservancy of Canada Darkwoods Forest Carbon Project Monitoring Report (v1.7 dated 13 March 2024) has been implemented in accordance with the validated VCS and CCB PDs.

Aster Global confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS Version 4 (and all associated updates), and CCB Project Design Standards (Second Edition), as documented in this report are complete. Aster Global concludes without any qualifications or limiting conditions. The Nature Conservancy of Canada Darkwoods Forest Carbon Project Monitoring Report Monitoring Report (v1.7 dated 13 March 2024) meets the requirements of VCS Version 4 (and all associated updates) and CCB Project Design Standards (Second Edition) for the verification period/reporting period (VCS/CCB: 01 January 2020 – 31 December 2021; 2 years). In addition, Aster Global asserts that the Project complies with the verification criteria for projects set out in the Second Edition of the CCB Standards to achieve Gold Level Distinction for Climate adaptation and Biodiversity. The GHG assertion provided by Darkwoods Forest Carbon Project and verified by Aster Global has resulted in the GHG emission reductions or removals of 651,023 tCO₂ equivalents (CO₂e) by the project during the reporting/monitoring period (01-January-2020 to 31-December-2021) and a buffer pool withholding based on the VCS AFOLU Non-Permanence Risk Tool of 62,276 leading to a VCU issuance of 450,731.

Verification/monitoring period: From 01-January-2020 to 31-December-2021

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

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)	Buffer pool allocation	VCUs eligible for issuance
2020	55,708	457,544	(80,367)	401,836	(38,748)	277,899
2021	(155,602)	93,585	(49,837)	249,187	(23,528)	172,832
Total	(99,894)	551,130	(130,205)	651,023	(62,276)	450,731

Ex-ante vs Ex-Post ERR Comparison

Year	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
2020	413,921	401,836	3%	The MR states “The impact of the 2021 fire and its effect on actual growth and yield rates, an updated LiDAR-based inventory, additional inventory plots post-project implementation, the implementation of improved forest management activities (removal of mountain pine beetle kill, implementing fire guards, etc.) are among the many factors that could contribute to this outcome.” The VVB reviewed the justification and is reasonably assured the justification is appropriate.
2021	430,528	249,187	42%	
Total	844,449	651,023	23%	

SM/MF 19015.01_Darkwoods_CCBVCS_VerReport_Final_V3_20240313
VCS VR PF 02/28/2028

APPENDIX A: LIST OF DOCUMENTS RECEIVED AND REVIEWED

Document Name	Date Received
Data_Package_DW.zip	9/12/2022
DW_Roads.cpg	9/12/2022
DW_Roads.dbf	9/12/2022
DW_Roads.prj	9/12/2022
DW_Roads.sbn	9/12/2022
DW_Roads.sbx	9/12/2022
DW_Roads.shp	9/12/2022
DW_Roads.shp.xml	9/12/2022
DW_Roads.shx	9/12/2022
Plots_2019_Remeasures.cpg	9/12/2022
Plots_2019_Remeasures.dbf	9/12/2022
Plots_2019_Remeasures.prj	9/12/2022
Plots_2019_Remeasures.sbn	9/12/2022
Plots_2019_Remeasures.sbx	9/12/2022
Plots_2019_Remeasures.shp	9/12/2022
Plots_2019_Remeasures.shx	9/12/2022
Plots_2021_NewInstalls.cpg	9/12/2022
Plots_2021_NewInstalls.dbf	9/12/2022
Plots_2021_NewInstalls.prj	9/12/2022
Plots_2021_NewInstalls.sbn	9/12/2022
Plots_2021_NewInstalls.sbx	9/12/2022
Plots_2021_NewInstalls.shp	9/12/2022
Plots_2021_NewInstalls.shp.xml	9/12/2022
Plots_2021_NewInstalls.shx	9/12/2022
Plots_2021_Remeasure.cpg	9/12/2022
Plots_2021_Remeasure.dbf	9/12/2022
Plots_2021_Remeasure.prj	9/12/2022
Plots_2021_Remeasure.sbn	9/12/2022
Plots_2021_Remeasure.sbx	9/12/2022
Plots_2021_Remeasure.shp	9/12/2022
Plots_2021_Remeasure.shx	9/12/2022
CASE11951 Project ID 607 - Darkwoods Forest Carbon Project - CCB - Verification Public Comment Period Requested.msg	9/16/2022
CASE11952 Project ID 607 - Darkwoods Forest Carbon Project - SDVISTA - Verification Public Comment Period Requested.msg	9/16/2022
Darkwoods SD-VISa-Monitoring-Report-2020-2021. v1.0.pdf	9/16/2022
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf	9/16/2022
#BSL_Stand_Age_Sortedr2-MV3.xlsx	9/23/2022
#BSL_Stand_Age_Sortedr2-MV3.xlsx.zip	9/23/2022
BC Ministry 1997biodiversity_guidebook.pdf	9/23/2022
Darkwoods Plot Data 2019 Remeasures.xlsx	9/23/2022
Darkwoods Plot Data 2021 Installs and Remeasures.xlsx	9/23/2022

Dec2020_SDVista_MetricsCalcs.xlsx	9/23/2022
DW_Forest_Inventories.gdb.zip	9/23/2022
Leslie2019_Whitebark.pdf	9/23/2022
Open Notebook.onetoc2	9/23/2022
Proctor et al 2018 Grizzlies & Resource Roads Report.pdf	9/23/2022
SCITWIGcaribou2019.pdf	9/23/2022
SDVista_2020_SpatialFiles.zip	9/23/2022
._BSL_Stand_Age_Sortedr2-MV3.xlsx	9/23/2022
Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0.pdf	9/27/2022
Darkwoods_2020-2021_VCS-Risk-Report-Calculation-Tool_v1.0.xlsm	9/27/2022
#FVS_DW_2022_BSL_2019_Inv_IE_Working.mdb	11/15/2022
#FVS_DW_2022_BSL_2019_Inv_Use_Analysis_IE.mdb	11/15/2022
#FVS_DW_2022_BSL_Grow_2021_Use_Analysis_2019_IE.accdb	11/15/2022
#FVS_DW_2022_BSL_Grow_2021_Working_IE.accdb	11/15/2022
9cb9d64e-b988-4054-b2dd-f57a9c749840.key	11/15/2022
DW_Baseline_FPS_Harvest_Schedule.mdb	11/15/2022
HARVEST_2020-2021.RPT	11/15/2022
HARVEST_2020-2022.RPT	11/15/2022
HARVEST_2020-2023.RPT	11/15/2022
HARVEST_2020-2024.RPT	11/15/2022
HARVEST_2020-2025.RPT	11/15/2022
HARVEST_2020-2026.RPT	11/15/2022
HARVEST_2020-2027.RPT	11/15/2022
HARVEST_2020-2028.RPT	11/15/2022
Lkp_BSL_C_Pools_x_Year_2019_2020_2021.xlsx	11/15/2022
Lkp_BSL_Hrv_C_Pools_x_Year_2016on.xlsx	11/15/2022
VRI_BSL_update.xlsx	11/15/2022
#DW_2022_Carb_Plot_FVS_Compiled_With_Bark_Adj_Working.accdb	11/15/2022
#DW_2022_Carbon_Plots_Use_Working_BA_AU.accdb	11/15/2022
597b4480-c655-4077-8ece-66d880b4f200.key	11/15/2022
Darkwoods Plot Data Final_2019.xlsx	11/15/2022
Darkwoods Plot Data Final_2021_MASTER.xlsx	11/15/2022
DW_2022_CP_FVS_USE_IE.accdb	11/15/2022
DW_2022_CP_FVS_Working_Rev.accdb	11/15/2022
_gdb.WVDAGP-1.40908.43596.sr.lock	11/15/2022
a00000001.freelist	11/15/2022
a00000001.gdbindexes	11/15/2022
a00000001.gdbtable	11/15/2022
a00000001.gdbtblx	11/15/2022
a00000001.TablesByName.atx	11/15/2022
a00000002.gdbtable	11/15/2022
a00000002.gdbtblx	11/15/2022
a00000003.gdbindexes	11/15/2022
a00000003.gdbtable	11/15/2022
a00000003.gdbtblx	11/15/2022

a00000004.CatItemsByPhysicalName.atx	11/15/2022
a00000004.CatItemsByType.atx	11/15/2022
a00000004.FDO_UUID.atx	11/15/2022
a00000004.freelist	11/15/2022
a00000004.gdbindexes	11/15/2022
a00000004.gdbtable	11/15/2022
a00000004.gdbtablx	11/15/2022
a00000004.spx	11/15/2022
a00000005.CatItemTypesByName.atx	11/15/2022
a00000005.CatItemTypesByParentTypeID.atx	11/15/2022
a00000005.CatItemTypesByUUID.atx	11/15/2022
a00000005.gdbindexes	11/15/2022
a00000005.gdbtable	11/15/2022
a00000005.gdbtablx	11/15/2022
a00000006.CatRelsByDestinationID.atx	11/15/2022
a00000006.CatRelsByOriginID.atx	11/15/2022
a00000006.CatRelsByType.atx	11/15/2022
a00000006.FDO_UUID.atx	11/15/2022
a00000006.freelist	11/15/2022
a00000006.gdbindexes	11/15/2022
a00000006.gdbtable	11/15/2022
a00000006.gdbtablx	11/15/2022
a00000007.CatRelTypesByBackwardLabel.atx	11/15/2022
a00000007.CatRelTypesByDestItemTypeID.atx	11/15/2022
a00000007.CatRelTypesByForwardLabel.atx	11/15/2022
a00000007.CatRelTypesByName.atx	11/15/2022
a00000007.CatRelTypesByOriginItemTypeID.atx	11/15/2022
a00000007.CatRelTypesByUUID.atx	11/15/2022
a00000007.gdbindexes	11/15/2022
a00000007.gdbtable	11/15/2022
a00000007.gdbtablx	11/15/2022
a00000009.freelist	11/15/2022
a00000009.gdbindexes	11/15/2022
a00000009.gdbtable	11/15/2022
a00000009.gdbtablx	11/15/2022
a00000009.spx	11/15/2022
a0000000b.freelist	11/15/2022
a0000000b.gdbindexes	11/15/2022
a0000000b.gdbtable	11/15/2022
a0000000b.gdbtablx	11/15/2022
a0000000b.spx	11/15/2022
gdb	11/15/2022
timestamps	11/15/2022
CCFM_T1.1a.pdf	11/15/2022
CCFM_T2.1a.pdf	11/15/2022

Lkp_PRJ_C_Pools_x_Year_Leakage_IE.xlsx	11/15/2022
Montane_Forest_Tree_Volume_Biomass.pdf	11/15/2022
NFI13_T16.1.pdf	11/15/2022
NFI13_T4.1.pdf	11/15/2022
NFI3_T15.1.pdf	11/15/2022
NFI3_T21.1_LU_AREA_en.pdf	11/15/2022
DW_2022_Methods_09292022.docx	11/15/2022
###FVS_DW_2022_PRJ_USE_2019_2020_2021_Inv_IE_Use_Analysis.accdb	11/15/2022
#FVS_DW_2022_PRJ_2019_2020_2021_Inv_IE_Use.accdb	11/15/2022
#FVS_DW_2022_PRJ_2019_Inv_Working_IE.accdb	11/15/2022
#FVS_DW_2022_PRJ_IE_Working.accdb	11/15/2022
95f25018-ae4-4d74-b89a-99ac105dad8b.key	11/15/2022
Lkp_PRJ_C_Pools_x_Year_2019_2020_2021.xlsx	11/15/2022
Lkp_PRJ_Hrv_C_Pools_x_Year_2019_2020_2021.xlsx	11/15/2022
VRI_PRJ_update.xlsx	11/15/2022
#DW_2022_Carbon_Plots_Use_Working_BA_AU.accdb	11/15/2022
UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx	11/15/2022
Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0.pdf	11/15/2022
Darkwoods_2020-2021_VCS-Risk-Report-Calculation-Tool_v1.0.xlsm	11/15/2022
Darkwoods - US WGI Governance Index for 2020-2021.xlsx	11/15/2022
Darkwoods Carbon Financial Modeling 2020-2021 v1.0.xlsx	11/15/2022
NCC Carbon Sales 2011-2022 (Confidential).png	11/15/2022
Darkwoods CCBA PDD v.1.8.pdf	11/15/2022
Darkwoods SD-VISa-PDD-v1.2.pdf	11/15/2022
Darkwoods_2018_VCS-Project-Description v2.3.pdf	11/15/2022
Darkwoods SD-VISa-Monitoring-Report-2020-2021. v1.0.pdf	11/15/2022
2018 Health and safety manual.pdf	11/15/2022
2022_Darkwoods-CarbonReport_SpeciesObservations.xlsx	11/15/2022
CKISS_NCC Summary Report 2020-1015994.pdf	11/15/2022
Darkwoods 2020 PMP-1008605.pdf	11/15/2022
Darkwoods 2022 EM Calculations.xlsx	11/15/2022
Darkwoods_Monitoring_2021-1049098.jpg	11/15/2022
Darkwoods2020 Site Inspection Report.docx	11/15/2022
Darkwoods2021Site Inspection Report.docx	11/15/2022
ECA_2020_2021.xlsx	11/15/2022
ECA_July2022.jpg	11/15/2022
HBS_FireGuard2021-1039179.pdf	11/15/2022
HS-Training_PresentationSlides_2021.pdf	11/15/2022
NCC HR Policies.pdf	11/15/2022
NCC media 2020-21.docx	11/15/2022
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf	11/15/2022
Darkwoods Carbon Model 2020-21_v1.4.xlsx	11/15/2022
Darkwoods Plot Data Final_2021_MASTER.xlsx	11/15/2022
FireSeverity_July2022.jpg	11/15/2022
LandsacpeContext_July2022.jpg	11/15/2022

NCC CCBA 2020-21 - Community Valuation Exercisesv1.0.xlsx	11/15/2022
PLANCUT_2020-2021_300k.xlsx	11/15/2022
Plot_Locations_July2022.jpg	11/15/2022
Project_Location_Ortho_July2022.jpg	11/15/2022
Darkwoods SD-VISa-Monitoring-Report-2017-2019. v1.5_Final.pdf	2/10/2023
Darkwoods SD-VISa-Monitoring-Report-2017-2019. v1.5_TrkChg.docx	2/10/2023
Darkwoods SD-VISa-Monitoring-Report-2020-2021. v1.1.pdf	2/10/2023
Darkwoods SD-VISa-PDD-v1.6_Final.pdf	2/10/2023
Darkwoods SD-VISa-PDD-v1.6_TrkChg.docx	2/10/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.1.pdf	2/10/2023
Darkwoods_CCBv2_Round1_20221222-NCCResponses v1.1_Feb7.docx	2/10/2023
Darkwoods_SDVISTA_Verification_Round1_20221222_NCCResponse v1.1.xlsx	2/10/2023
Darkwoods_VCS_Verification_Round1_20221222_NCCResponse v1.1.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
RI_PRR_607_04DEC2020_ProjectResponse2.docx	2/10/2023
._RI_PRR_607_04DEC2020_ProjectResponse2.docx	2/10/2023
Open Notebook.onetoc2	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Evacuation Order Cultus Creek_UPDATED 2021.07.21.pdf	2/10/2023
._KMC License Agreement 2019_executed-284052.pdf	2/10/2023
._N71245 Cultus Creek Fire Reconnaissance post fire hazard.pdf	2/10/2023
._N71245 Fire Analysis Update 1 Jul 30 ver. 2.docx	2/10/2023
._Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
._Re Chad Luke keys for DW2021-1039990.msg	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
._Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
._Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023
._NCC_ Where We Work - British Columbia - Darkwoods Forest Carbon Project.pdf	2/10/2023
._Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
._RE darkwoods carbon webpage.msg	2/10/2023
._Re Darkwoods Verification of 2020 2021 Vintage - Monitoring Reports (VCS CCBSD VISa) - 30-DAY PUBLIC COMMENT PERIOD COMMENCES.msg	2/10/2023
Open Notebook.onetoc2	2/10/2023
._12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023

._2012_FWCP Darkwoods Stewardship 3-Year 2009-2011 Progress Report-35319.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._CKISS_NCC Summary Report 2020-1015994.pdf	2/10/2023
._Whitebark pine restoration Interim Report 2021 NCC.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
._Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
._Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023
._Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
._Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
._Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023
._NCC_Where We Work - British Columbia - Darkwoods Forest Carbon Project.pdf	2/10/2023
._Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
._RE darkwoods carbon webpage.msg	2/10/2023
._Re Darkwoods Verification of 2020 2021 Vintage - Monitoring Reports (VCS CCBSD VISTA) - 30-DAY PUBLIC COMMENT PERIOD COMMENCES.msg	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Indigenous Insights Certificate of Completion_Indigenous Insights Online_Leslie.pdf	2/10/2023
._NCC 2020 Conference Agenda.pdf	2/10/2023
._NCC HR Policies 2019.pdf	2/10/2023
._NCC_CarbonPlot_FieldTrainingLog_Timberland.pdf	2/10/2023
._Registered Professional Biologists Continuing Professional Development Standard.docx	2/10/2023
Open Notebook.onetoc2	2/10/2023
._NCC HR Policies 2019.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2018 Health and safety manual.pdf	2/10/2023
._NCC HR Policies 2019.pdf	2/10/2023
._Wildhorse 2020NCC147 Contract.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._safetySheetEcosense2020.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Vishloff 2020 Mineral claim and access-1007122.msg	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Evacuation Order Cultus Creek_UPDATED 2021.07.21.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._ECA Methods - Darkwoods Verification 2020 and 2021.docx	2/10/2023
._SPATIAL_DATA_ECA_Working_Data.gdb.zip	2/10/2023
._SPATIAL_DATA_SDVista_Table14_Working_Data.gdb.zip	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2018 Health and safety manual.pdf	2/10/2023

._Darkwoods Carbon Field Plot RemeasurementSOP - June2021.pdf	2/10/2023
._Indigenous Insights Certificate of Completion_Indigenous Insights Online_Leslie.pdf	2/10/2023
._NCC 2020 Conference Agenda.pdf	2/10/2023
._NCC EDI Workplan Final October 2021.pdf	2/10/2023
._NCC_CarbonPlot_FieldTrainingLog_Timberland.pdf	2/10/2023
._NCC-EDI-Advisory-Committee-Terms-of-Reference.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._2018 Health and safety manual.pdf	2/10/2023
._NCC HR Policies 2019.pdf	2/10/2023
._NCC_Conflict of Interest Policy.docx	2/10/2023
._safetySheetEcosense2020.pdf	2/10/2023
._Wildhorse 2020NCC147 Contract.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
._SPATIAL_DATA_Boundary_Comparison.gdb.zip	2/10/2023
Open Notebook.onetoc2	2/10/2023
._NCC_DARKWOODS_EFI_REPORT_20220524_REV0.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Darkwoods Carbon Field Plot RemeasurementSOP - June2021.pdf	2/10/2023
._Darkwoods Data Standards_30Nov09.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._TITLE-LB302249-PID-007-608-349.pdf	2/10/2023
._TITLE-LB302250-PID-026-235-927.pdf	2/10/2023
._TITLE-LB302253-PID-007-608-446.pdf	2/10/2023
._TITLE-LB302254-PID-007-608-594.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Easement over Nature Gallery Property-50444.pdf	2/10/2023
._FLNRO license_NewingtonRd2020-1034512 - Copy.pdf	2/10/2023
._Hidden Crk N20157 (Giza) road easement-666.pdf	2/10/2023
._Topaz Crk, Topaz Rd and Topaz Toby Rd permits from MoF-838.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.1.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
._SPATIAL_DATA_PRJ_Inventory_w_AU.gdb.zip	2/10/2023
Open Notebook.onetoc2	2/10/2023
._gdb.WVDAGP-1.40908.43596.sr.lock	2/10/2023
a00000001.freelist	2/10/2023
a00000001.gdbindexes	2/10/2023
a00000001.gdbtable	2/10/2023
a00000001.gdbtablx	2/10/2023
a00000001.TablesByName.atx	2/10/2023
a00000002.gdbtable	2/10/2023
a00000002.gdbtablx	2/10/2023

a00000003.gdbindexes	2/10/2023
a00000003.gdbtable	2/10/2023
a00000003.gdbtablx	2/10/2023
a00000004.CatItemsByPhysicalName.atx	2/10/2023
a00000004.CatItemsByType.atx	2/10/2023
a00000004.FDO_UUID.atx	2/10/2023
a00000004.freelist	2/10/2023
a00000004.gdbindexes	2/10/2023
a00000004.gdbtable	2/10/2023
a00000004.gdbtablx	2/10/2023
a00000004.spx	2/10/2023
a00000005.CatItemTypesByName.atx	2/10/2023
a00000005.CatItemTypesByParentTypeID.atx	2/10/2023
a00000005.CatItemTypesByUUID.atx	2/10/2023
a00000005.gdbindexes	2/10/2023
a00000005.gdbtable	2/10/2023
a00000005.gdbtablx	2/10/2023
a00000006.CatRelsByDestinationID.atx	2/10/2023
a00000006.CatRelsByOriginID.atx	2/10/2023
a00000006.CatRelsByType.atx	2/10/2023
a00000006.FDO_UUID.atx	2/10/2023
a00000006.freelist	2/10/2023
a00000006.gdbindexes	2/10/2023
a00000006.gdbtable	2/10/2023
a00000006.gdbtablx	2/10/2023
a00000007.CatRelTypesByBackwardLabel.atx	2/10/2023
a00000007.CatRelTypesByDestItemTypeID.atx	2/10/2023
a00000007.CatRelTypesByForwardLabel.atx	2/10/2023
a00000007.CatRelTypesByName.atx	2/10/2023
a00000007.CatRelTypesByOriginItemTypeID.atx	2/10/2023
a00000007.CatRelTypesByUUID.atx	2/10/2023
a00000007.gdbindexes	2/10/2023
a00000007.gdbtable	2/10/2023
a00000007.gdbtablx	2/10/2023
a00000009.freelist	2/10/2023
a00000009.gdbindexes	2/10/2023
a00000009.gdbtable	2/10/2023
a00000009.gdbtablx	2/10/2023
a00000009.spx	2/10/2023
a0000000b.freelist	2/10/2023
a0000000b.gdbindexes	2/10/2023
a0000000b.gdbtable	2/10/2023
a0000000b.gdbtablx	2/10/2023
a0000000b.spx	2/10/2023
gdb	2/10/2023

Open Notebook.onetoc2	2/10/2023
timestamps	2/10/2023
Darkwoods Carbon Model 2020-21_v1.5.xlsx	2/10/2023
DW_2022_Methods_09292022_rev01102023.docx	2/10/2023
NCC CCBA 2020-21 - Community Valuation Exercisesv1.1.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
2011 Darkwoods PMP FINAL-24155.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Evacuation Order Cultus Creek_UPDATED 2021.07.21.pdf	2/10/2023
KMC License Agreement 2019_executed-284052.pdf	2/10/2023
N71245 Cultus Creek Fire Reconnaissance post fire hazard.pdf	2/10/2023
N71245 Fire Analysis Update 1 Jul 30 ver. 2.docx	2/10/2023
Open Notebook.onetoc2	2/10/2023
Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
Re Chad Luke keys for DW2021-1039990.msg	2/10/2023
Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023
NCC_Where We Work - British Columbia - Darkwoods Forest Carbon Project.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
RE darkwoods carbon webpage.msg	2/10/2023
Re Darkwoods Verification of 2020 2021 Vintage - Monitoring Reports (VCS CCBSD VISTA) - 30-DAY PUBLIC COMMENT PERIOD COMMENCES.msg	2/10/2023
12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
2012_FWCP Darkwoods Stewardship 3-Year 2009-2011 Progress Report-35319.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
CKISS_NCC Summary Report 2020-1015994.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Whitebark pine restoration Interim Report 2021 NCC.pdf	2/10/2023
Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023
Open Notebook.onetoc2	2/10/2023
Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
Creston Valley CAF Summary Report_FINAL (27Feb2020).pdf	2/10/2023
Indigenous Engagement Letter - Ktunaxa Nation.pdf	2/10/2023
Key points from 2021NCC advisory meeting-1039258.msg	2/10/2023

NCC_ Where We Work - British Columbia - Darkwoods Forest Carbon Project.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Prescribed_Fire_Prescription_Braumandl2020-1015987.pdf	2/10/2023
RE darkwoods carbon webpage.msg	2/10/2023
Re Darkwoods Verification of 2020 2021 Vintage - Monitoring Reports (VCS CCBSD VSta) - 30-DAY PUBLIC COMMENT PERIOD COMMENCES.msg	2/10/2023
Indigenous Insights Certificate of Completion_Indigenous Insights Online_Leslie.pdf	2/10/2023
NCC 2020 Conference Agenda.pdf	2/10/2023
NCC HR Policies 2019.pdf	2/10/2023
NCC_CarbonPlot_FieldTrainingLog_Timberland.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Registered Professional Biologists Continuing Professional Development Standard.docx	2/10/2023
NCC HR Policies 2019.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
2018 Health and safety manual.pdf	2/10/2023
2020-2021 COI & HR Policy Sign-Offs Attestation Letter - Darkwoods.pdf	2/10/2023
NCC HR Policies 2019.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Wildhorse 2020NCC147 Contract.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
safetySheetEcosense2020.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Vishloff 2020 Mineral claim and access-1007122.msg	2/10/2023
Evacuation Order Cultus Creek_UPDATED 2021.07.21.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
ECA Methods - Darkwoods Verification 2020 and 2021.docx	2/10/2023
Open Notebook.onetoc2	2/10/2023
SPATIAL_DATA_ECA_Working_Data.gdb.zip	2/10/2023
SPATIAL_DATA_SDVista_Table14_Working_Data.gdb.zip	2/10/2023
2018 Health and safety manual.pdf	2/10/2023
Darkwoods Carbon Field Plot RemeasurementSOP - June2021.pdf	2/10/2023
Indigenous Insights Certificate of Completion_Indigenous Insights Online_Leslie.pdf	2/10/2023
NCC 2020 Conference Agenda.pdf	2/10/2023
NCC EDI Workplan Final October 2021.pdf	2/10/2023
NCC_CarbonPlot_FieldTrainingLog_Timberland.pdf	2/10/2023
NCC-EDI-Advisory-Committee-Terms-of-Reference.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
2018 Health and safety manual.pdf	2/10/2023
NCC HR Policies 2019.pdf	2/10/2023
NCC_Conflict of Interest Policy.docx	2/10/2023
Open Notebook.onetoc2	2/10/2023
safetySheetEcosense2020.pdf	2/10/2023
Wildhorse 2020NCC147 Contract.pdf	2/10/2023
12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	2/10/2023

Open Notebook.onetoc2	2/10/2023
Open Notebook.onetoc2	2/10/2023
SPATIAL_DATA_Boundary_Comparison.gdb.zip	2/10/2023
VCS_Finding1_BoundaryDiscrepancyExplanation.docx	2/10/2023
Darkwoods Plot Data Final_2021_MASTER_RevFeb4_2022.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
NCC_DARKWOODS_EFI_REPORT_20220524_REV0.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Darkwoods Carbon Field Plot RemeasurementSOP - June2021.pdf	2/10/2023
Darkwoods Data Standards_30Nov09.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Open Notebook.onetoc2	2/10/2023
TITLE-LB302249-PID-007-608-349.pdf	2/10/2023
TITLE-LB302250-PID-026-235-927.pdf	2/10/2023
TITLE-LB302253-PID-007-608-446.pdf	2/10/2023
TITLE-LB302254-PID-007-608-594.pdf	2/10/2023
Easement over Nature Gallery Property-50444.pdf	2/10/2023
FLNRO license_NewingtonRd2020-1034512 - Copy.pdf	2/10/2023
Hidden Crk N20157 (Giza) road easement-666.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Topaz Crk, Topaz Rd and Topaz Toby Rd permits from MoF-838.pdf	2/10/2023
Darkwoods - US WGI Governance Index for 2020-2021 Rev_Feb72022.xlsx	2/10/2023
Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.1.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Open Notebook.onetoc2	2/10/2023
SPATIAL_DATA_PRJ_Inventory_w_AU.gdb.zip	2/10/2023
#BSL_Stand_Age_Sortedr2-MV3.xlsx	2/10/2023
#BSL_Stand_Age_Sortedr2-MV3.xlsx.zip	2/10/2023
BC Ministry 1997biodiversity_guidebook.pdf	2/10/2023
Dec2020_SDVista_MetricsCalcs.xlsx	2/10/2023
Leslie2019_Whitebark.pdf	2/10/2023
Open Notebook.onetoc2	2/10/2023
Proctor et al 2018 Grizzlies & Resource Roads Report.pdf	2/10/2023
SCITWIGcaribou2019.pdf	2/10/2023
SDVista_2020_SpatialFiles.zip	2/10/2023
._#BSL_Stand_Age_Sortedr2-MV3.xlsx	2/10/2023
Open Notebook.onetoc2	2/10/2023
19015.01_Darkwoods_CCBv2_NCRchecklist_Round2_Final_20230413_NCC Responses v1.docx	5/14/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.2.pdf	5/14/2023
NCC CCBA 2020-21 - Community Valuation Exercisesv1.2.xlsx	5/14/2023
12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	5/14/2023
19015.01_Darkwoods_SDVista_v1.0_Ver_checklist_Round2_Final_20230414_NCC Responses v1.xlsx	5/14/2023
Darkwoods SD-VISta-Monitoring-Report-2020-2021. v1.2.pdf	5/14/2023

12Jan2023_Query_LISDocuments_2020-current_Darkwoods.xlsx	5/14/2023
19015.01_Darkwoods_CCBv2_NCRchecklist_Round3_NCC responses.docx	5/24/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.3_May24_trackchg.docx	5/24/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.pdf	5/24/2023
19015.01_Darkwoods_CCBv2_NCRchecklist_Round4_NCCresponse4.docx	6/30/2023
19051.01_Darkwoods_VCS_Verification_Round2_Revised_NCCresponse4.xlsx	6/30/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.4_Jun30.pdf	6/30/2023
PRJ_Inventory_w_BA_CLASS_AU.xlsx	6/30/2023
a00000001.gdbindexes	6/30/2023
a00000001.gdbtable	6/30/2023
a00000001.gdbtablx	6/30/2023
a00000001.TablesByName.atx	6/30/2023
a00000002.gdbtable	6/30/2023
a00000002.gdbtablx	6/30/2023
a00000003.gdbindexes	6/30/2023
a00000003.gdbtable	6/30/2023
a00000003.gdbtablx	6/30/2023
a00000004.CatItemsByPhysicalName.atx	6/30/2023
a00000004.CatItemsByType.atx	6/30/2023
a00000004.FDO_UUID.atx	6/30/2023
a00000004.freelist	6/30/2023
a00000004.gdbindexes	6/30/2023
a00000004.gdbtable	6/30/2023
a00000004.gdbtablx	6/30/2023
a00000004.spx	6/30/2023
a00000005.CatItemTypesByName.atx	6/30/2023
a00000005.CatItemTypesByParentTypeID.atx	6/30/2023
a00000005.CatItemTypesByUUID.atx	6/30/2023
a00000005.gdbindexes	6/30/2023
a00000005.gdbtable	6/30/2023
a00000005.gdbtablx	6/30/2023
a00000006.CatRelsByDestinationID.atx	6/30/2023
a00000006.CatRelsByOriginID.atx	6/30/2023
a00000006.CatRelsByType.atx	6/30/2023
a00000006.FDO_UUID.atx	6/30/2023
a00000006.gdbindexes	6/30/2023
a00000006.gdbtable	6/30/2023
a00000006.gdbtablx	6/30/2023
a00000007.CatRelTypesByBackwardLabel.atx	6/30/2023
a00000007.CatRelTypesByDestItemTypeID.atx	6/30/2023
a00000007.CatRelTypesByForwardLabel.atx	6/30/2023
a00000007.CatRelTypesByName.atx	6/30/2023
a00000007.CatRelTypesByOriginItemTypeID.atx	6/30/2023
a00000007.CatRelTypesByUUID.atx	6/30/2023
a00000007.gdbindexes	6/30/2023

a00000007.gdbtable	6/30/2023
a00000007.gdbtablx	6/30/2023
a00000009.freelist	6/30/2023
a00000009.gdbindexes	6/30/2023
a00000009.gdbtable	6/30/2023
a00000009.gdbtablx	6/30/2023
a00000009.spx	6/30/2023
gdb	6/30/2023
timestamps	6/30/2023
19015.01_Darkwoods_CCBv2_NCRchecklist_Round5_Final_20230719_NCCResponse5.docx	7/21/2023
19051.01_Darkwoods_VCS_Verification_Round2_Revised_NCCresponse4.1.xlsx	7/21/2023
Darkwoods - US WGI Governance Index for 2020-2021 Rev_Jul20_2023.xlsx	7/21/2023
Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.2.pdf	7/21/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.5_Jul20.pdf	7/21/2023
Open Notebook.onetoc2	7/21/2023
PRJ_Inventory_w_BA_CLASS_AUv1.1.xlsx	7/21/2023
CCBVCS_V_PRR_0607_29NOV2023_NCC comments Dec 4 2023.docx	12/4/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Dec4.pdf	12/4/2023
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Dec4_trackchanges.docx	12/4/2023
Darkwoods VCU Summary 2008-2019.xlsx	12/20/2023
CCBVCS_V_PRR_0607_29NOV2023_NCC comments January 11 2024 (1).docx	1/12/2024
Copy of Darkwoods Carbon Model 2020-21_v1.4.xlsx	1/12/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Jan11_final.pdf	1/12/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Jan11_trackchanges.docx	1/12/2024
NCC_DARKWOODS_EFI_REPORT_20220524_REV0.pdf	1/12/2024
CCBVCS_V_PRR_0607_29NOV2023_NCC comments January 11 2024.docx	1/15/2024
Darkwoods Carbon Model 2020-21_v1.4.xlsx	1/15/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Jan11_final.pdf	1/15/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Jan11_trackchanges.docx	1/15/2024
Darkwoods_Forested_Landbase.kmz	1/15/2024
NCC_DARKWOODS_EFI_REPORT_20220524_REV0.pdf	1/15/2024
BSL_Harvests_In888RoadsStreams.xlsx	2/8/2024
CCBVCS_V_PRR_0607_29NOV2023_NCC comments February 07 2024.docx	2/8/2024
Darkwoods Carbon Model 2020-21_v1.6.xlsx	2/8/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb07_final.pdf	2/8/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb07_trackchanges.docx	2/8/2024
Darkwoods_Fire_Severity_2021.zip.zip	2/8/2024
DarkwoodsFire Satellite monitoring summary.pdf	2/8/2024
DW_2021_Remove888_Roads_Streams_.kmz.com	2/8/2024
N71245 Cultus Creek Fire Reconnaissance post fire hazard.pdf	2/8/2024

N71245 Fire Analysis Update 1 Jul 30 ver. 2.docx	2/8/2024
NCC_FeeSimple_with_Forest_for_Darkwoods_FINAL.xlsx	2/8/2024
NCC_Representation_CommercialHarvesting_20202021.pdf	2/8/2024
NCCTransactions_4900_2020-2021.xlsx	2/8/2024
VCS-Loss-Event-Report-Darkwoods-2021Fire_02072024.docx	2/8/2024
VCS-Loss-Event-Representation-Darkwoods-2021Fire-02072024.pdf	2/8/2024
Darkwoods_Fire_Severity_2021.cpg	2/8/2024
Darkwoods_Fire_Severity_2021.dbf	2/8/2024
Darkwoods_Fire_Severity_2021.prj	2/8/2024
Darkwoods_Fire_Severity_2021.sbn	2/8/2024
Darkwoods_Fire_Severity_2021.sbx	2/8/2024
Darkwoods_Fire_Severity_2021.shp	2/8/2024
Darkwoods_Fire_Severity_2021.shx	2/8/2024
Darkwoods_2018_VCS-Project-Description v2.3_final.pdf	2/20/2024
Darkwoods_2018_VCS-Project-Description v2.3_trackchanges.docx	2/20/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb13_final.pdf	2/20/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb13_trackchanges.docx	2/20/2024
NCC_Darkwoods_SupportingInformation_Feb13.zip	2/20/2024
BA_Class_AU.cpg	2/20/2024
BA_Class_AU.dbf	2/20/2024
BA_Class_AU.prj	2/20/2024
BA_Class_AU.sbn	2/20/2024
BA_Class_AU.sbx	2/20/2024
BA_Class_AU.shp	2/20/2024
BA_Class_AU.shp.xml	2/20/2024
BA_Class_AU.shx	2/20/2024
DW_Roads_Main_and_Secondary.cpg	2/20/2024
DW_Roads_Main_and_Secondary.dbf	2/20/2024
DW_Roads_Main_and_Secondary.prj	2/20/2024
DW_Roads_Main_and_Secondary.sbn	2/20/2024
DW_Roads_Main_and_Secondary.sbx	2/20/2024
DW_Roads_Main_and_Secondary.shp	2/20/2024
DW_Roads_Main_and_Secondary.shp.xml	2/20/2024
DW_Roads_Main_and_Secondary.shx	2/20/2024
FWA_StreamNetwork_KOTL_Region.cpg	2/20/2024
FWA_StreamNetwork_KOTL_Region.dbf	2/20/2024
FWA_StreamNetwork_KOTL_Region.prj	2/20/2024
FWA_StreamNetwork_KOTL_Region.sbn	2/20/2024
FWA_StreamNetwork_KOTL_Region.sbx	2/20/2024
FWA_StreamNetwork_KOTL_Region.shp	2/20/2024
FWA_StreamNetwork_KOTL_Region.shp.xml	2/20/2024
FWA_StreamNetwork_KOTL_Region.shx	2/20/2024
Road_Buffer_DW.cpg	2/20/2024
Road_Buffer_DW.dbf	2/20/2024

Road_Buffer_DW.prj	2/20/2024
Road_Buffer_DW.sbn	2/20/2024
Road_Buffer_DW.sbx	2/20/2024
Road_Buffer_DW.shp	2/20/2024
Road_Buffer_DW.shp.xml	2/20/2024
Road_Buffer_DW.shx	2/20/2024
Stream_Buffer_DW.cpg	2/20/2024
Stream_Buffer_DW.dbf	2/20/2024
Stream_Buffer_DW.prj	2/20/2024
Stream_Buffer_DW.sbn	2/20/2024
Stream_Buffer_DW.sbx	2/20/2024
Stream_Buffer_DW.shp	2/20/2024
Stream_Buffer_DW.shp.xml	2/20/2024
Stream_Buffer_DW.shx	2/20/2024
Backus Block PMP 2021-2025-1086680.pdf	2/26/2024
Darkwoods Carbon Model 2020-21_v1.7_Febuary27.xlsx	2/27/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb27_final.pdf	2/27/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.6_Feb27_trackchanges.docx	2/27/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.7_March122024_Final.pdf	3/12/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.7_March122024_TrackChanges.docx	3/12/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.7_March132024_Final	3/13/2024
Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.7_March132024_TrackChanges	3/13/2024

APPENDIX B: VCS LIST OF FINDINGS

VCS Standard Requirements 22 June 2022, v4.3 (Section)	1
VCS Standard VCS Version 4.2 Requirements Document 22 June 2022, v4.3 (Description)	4) Total size of the project area.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR
Aster Global Round 1 Findings	A new PD deviation has been made in the 2020-21 monitoring period. The project area has been updated to 54,834.7 ha from previously reported 54,870.4 ha, a decrease of 0.065%. The VVB noted it is stated in the MR that it is because of sliver polygons discovered between the inventory polygons and the boundary polygon. The MR further states "This area is de minimis, and the removed area does not have any inventory (blank polygons) and does not increase emission reductions claimed by the project." The VVB reviewed inventory shapefiles ("Inventory_BaselineScenario" and "Inventory_ProjectScenario") and confirmed the updated area (54,834.7 ha). However, the VVB was unable to verify the 0.065% decrease that was reported to be caused by the sliver polygons discovered between the inventory polygons and the boundary polygon.
Round 1 NCR/CL/OFI	CL: Please provide all required GIS files (including boundary polygons) and an analysis showing discovered sliver polygons.
Round 1 Response from Project Proponent	The 0.065% difference is based on a slight discrepancy between the full extent of the forest inventory and the full extent of the Darkwoods project boundary, and relates to small 'sliver' polygons. This difference is not discernible until you zoom in. It is primarily along the southern edge of the project. For the purpose of this monitoring period and modelling rework efficiency, we have decided to use the full extent of the inventory (as opposed to the slightly larger property extend). This is conservative as the small excluded area without inventory data does not contribute biomass to the Project or Baseline, and does not affect net emission reductions between the scenarios. **See Boundary_Comparison.gdb copies of the full inventory extent and project boundary for comparison.

Aster Global Round 2 Findings	The VVB conducted an independent GIS analysis and confirmed the discrepancy of 0.065% (~35 ha) due to the sliver polygons discovered between the inventory polygon and the boundary polygon. The VVB is reasonably assured that the discrepancy is de minimis. This item is closed.
--------------------------------------	--

Item Number	2
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	If the project activity area is not homogeneous, stratification should be carried out to improve the accuracy and precision of biomass estimates¹³. Different stratifications may be required for the baseline and project scenarios in order to improve accuracy in the estimates of net GHG removal by sinks. For estimation of the baseline net GHG removals by sinks, or calculation of actual net GHG removals, homogeneous <i>polygons</i>¹⁴ <i>should be defined on the basis of parameters that will be used as key entry variables in the methods used to estimate changes in biomass stocks</i> (for example, growth models or yield curves/tables). These include: 1. Management regime. For example, types of harvesting (clear cutting, patch retention), and land conversions for roads and landings. 2. Site index / anticipated growth rates 3. Forest species 4. Age class Useful tools for defining polygons include ground-truthing maps from satellite imagery, aerial photos, and maps of vegetation, soils, and topography.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	MR, GIS files
Aster Global Round 1 Findings	For this monitoring period the project has implemented a deviation from the AU stratification process described in Section 4.1 of the PDD. Previously, stratification was done based on species and site index. It is stated in the MR that species and site index are not ideal AU criteria for grouping similar carbon content stands as a high level of variation at the plot level, and the inventory accuracy represented in the Uncertainty Factor calculation resulting in decline in accuracy. In this monitoring period the stratification is based on basal area from the new inventory. It is stated that by re-stratifying the AU's on basal area, the project can significantly improve the accuracy of the carbon modeling, as shown by the markedly improved Uncertainty Factor in this monitoring period. However, the VVB could not locate any spatial files pertaining to the updated stratification in this MR.
Round 1 NCR/CL/OFI	CL: Please provide necessary GIS files on the updated stratification to the VVB for review.
Round 1 Response from Project Proponent	Shapefiles derived from the access database AU assignments has been provided

Aster Global Round 2 Findings	The VVB reviewed the AU stratification shapefile and noted that the AU ("BA_CLASS_AU" column) and Basal area criteria ("BASAL_AREA" column) do not follow the AU criteria as described in Section 2.2.4/11 and Table 3. AU Basal Area Criteria 5 BA>0 to <=10 15 BA>10 to <=20 25 BA>20 to <=30 35 BA>30 to <=40 45 BA>40 to <=50 55 BA>50 to <=60 65 BA>60 111 Site Index <8 888 Non Forest Example: For OBJECTID "1" BASAL_AREA = 1, BA_CLASS_AU = 35.
Round 2 NCR/CL/OFI	CL: Please clarify in line with the findings.
Round 2 Response from Project Proponent (DD Month YYYY)	The incorrect BA class table was referenced in creating the spatial file. This has been corrected and now matches the correct modeled BA data from the database. An updated geodatabase has been created. The excel table output has also been provided for reference.
Aster Global Round 3 Findings	"The VVB reviewed the updated geodatabase and confirmed that "BA_CLASS_AU" now matches the AU criteria described in Section 2.2.4/11 and Table 3. However, the VVB noted that values in MR table 7 do not match with values in "PRJ_Inventory_w_BA_CLASS_AU", specifically Area (ha) for BA classes "5" and "35".
Round 3 NCR/CL/OFI	CL: Please address in line with the findings.
Round 3 Response from Project Proponent	The incorrect BA class table was referenced in creating the spatial file. This has been corrected and now matches the correct modeled BA data from the database. An updated geodatabase has been created. The excel table output has also been provided for reference. Table 7 has been updated in the MR.
Aster Global Round 4 Findings	The VVB confirmed that table 7 in the MR has been updated and now correctly corresponds to the data in the associated spatial file. This item is closed.

Item Number	3
--------------------	---

VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	To assure the project includes only eligible management activities, proponents must identify areas within the project boundary that would be subject to timber harvesting and other management activities under the baseline scenario. A timber harvesting land base (THLB) should be identified based upon harvesting plans that reflect the historical and future anticipated location and rates of timber extraction. Specific information used to define the THLB should include: 1. The spatial location and extent of forested versus non-forested areas 2. Merchantable and operable forest areas suited to economic timber extraction 3. The spatial location and extent of legal land use restrictions and legally required protected areas. The THLB is essentially used to refine and focus baseline and project forest management activity projections and modeling, in a manner consistent with the selected scenarios and related common practice.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	#FVS_DW_2022_BSL_2019_Inv_IE_Working.mdb / 9cb9d64e-b988-4054-b2dd-f57a9c749840.key / Darkwoods Carbon Model 2020-21_v1.4.xlsx
Aster Global Round 1 Findings	The VVB noted that in “Groups, FVS_StandInit, #FVS_DW_2022_BSL_2019_Inv_IE_Working.mdb”, there were several different regimes identified, for example, H2020/H2021/F2021L/F2021M, etc., but is unclear of criteria for assigning each regime to Stand_ID. In other words, what are the criteria for assigning different regimes to each Stand_ID? Are the criteria based on FPS projection, or THLB? In addition to this question but not directly related to this finding, the VVB is unclear why FPS was employed as the output from FSP (i.e. 300,895 / 300,553 m3 & 1,028 m3) is not used in the actual calculation of VCU in “Darkwoods Carbon Model 2020-21_v1.4.xlsx”.
Round 1 NCR/CL/OFI	CL: Please clarify in line with the findings.
Round 1 Response from Project Proponent	The Groups indicate a Harvest or Fire (H or F), year of occurrence and for fire, the severity (Low, Medium, High). So for example, H2020 is a harvest (H) in 2020, F2021L is a fire (F) in 2021 of low (L) intensity, etc. FPS was only used to schedule BSL harvests (i.e. select BSL harvest polygons by year to achieve the target harvest volume). The harvest schedule was then implemented in FVS.
Aster Global Round 2 Findings	Response provided here addresses round 1 finding. This item is closed.

Item Number	4
--------------------	---

VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	Typically, inventory data provide only a generalized description of stand attributes such that only average values (versus species-specific estimates) can be used in the ex ante modeling exercise. Some models will require estimates for parameter values not traditionally measured in typical forest inventories activities. Project proponents must make reasonable efforts to acquire sources of such data in accordance with the following priority list (best to least desirable): 1. Project area and forest-type specific 2. Regional estimates, from the same or similar ecosystems or forest types 3. National estimates that represent averages for similar forest types 4. Global estimates for generally similar forest types..
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	#FVS_DW_2022_BSL_Grow_2021_Working_IE.accdb / #FVS_DW_2022_BSL_Grow_2021_Use_Analysis_2019_IE.accdb
Aster Global Round 1 Findings	The VVB noted that (1) in “#FVS_DW_2022_BSL_Grow_2021_Working_IE.accdb”, there were three Treelnit tables, which are FVS_Treelnit / FVS_Treelnit_Sorted / FVS_Treelnit1 differing in data input for several Stand_ID, for example of Stand_ID 4681, there was only one species included, Species AF but there were three species included, Species AF/ES/WL. However, it was noted in VRI_BSL_update table that there were three species included, TREE_SPECIES_CODE BL(AF)/SE(ES)/LW(WL), and (2) in “#FVS_DW_2022_BSL_Grow_2021_Use_Analysis_2019_IE.accdb”, for generating Year 2019 FVS_Treelnit tables (and FVS_GROWN_TREELIST_2022 as well), FVS_Treelnit1 in “#FVS_DW_2022_BSL_Grow_2021_Working_IE.accdb” was used. (3) Please clarify why FVS_Treelnit tables in “#FVS_DW_2022_BSL_Grow_2021_Use_Analysis_2019_IE.accdb” were updated for several Stand_ID from the initial VRI_BSL_update in “#FVS_DW_2022_BSL_Grow_2021_Working_IE.accdb”.
Round 1 NCR/CL/OFI	CL: Please address the findings
Round 1 Response from Project Proponent	1: The FVS_Treelnit and FVS_Treelnit_Sorted tables have the same number of records. The only difference is “_Sorted” is sorted by Stand_ID and Tree_ID. Stand 4681 has 3 species in both tables. You can ignore FVS_Treelnit1 in this database (it was originally put in for quality control to make certain the correct inventory was being used) 2: This has fewer records since the inventory for BSL stands harvested prior to 2019 was generated within FVS using the full regeneration model from the time of the harvest. 3: There was a PRJ harvest in 2021 involving a few stands and reflected in the VRI_BSL_Update. To get the 2019 inventory for these stands, the inventory had to be added back in.

Aster Global Round 2 Findings	1. The VVB confirmed that FVS_TreeInit and FVS_TreeInit_Sorted tables have the same number of records. The only difference is “_Sorted” is sorted by Stand_ID and Tree_ID. This item is closed. 2. The project proponent's response addresses the finding. This item is closed. 3. The project proponent's response addresses the finding. This item is closed.
--------------------------------------	---

Item Number	5
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	The annual change emissions associated with the production of harvested wood products (HWP), $\Delta C_{BSI,HWP,t}$, is calculated as:
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Calculation Check: FVS / FPS / Darkwoods Carbon Model 2020-21_v1.4.xlsx
Aster Global Round 1 Findings	The VVB noted that “Lkp_BSL_Hrv_C_Pools_x_Year_2016on.xlsx” was based on “FVS_Hrv_Carbon_2016on, #FVS_DW_2022_BSL_2019_Inv_Use_Analysis_IE.mdb”, however it was noted that “#FVS_DW_2022_BSL_2019_Inv_Use_Analysis_IE.mdb” had “FVS_Hrv_Carbon1” table, of which the output is same with “FVS_Hrv_Carbon_2016on” table but with more output values. For example of Products column, there were only five values (0.XX, 32.XX, 35.XX, 39.XX, and 42.XX) assigned for Year 2019 for “FVS_Hrv_Carbon_2016on” but Products column of “FVS_Hrv_Carbon1” had more values assigned for Year 2019 (i.e. more StandIDs). The VVB checked that both “FVS_Hrv_Carbon_2016on” and “FVS_Hrv_Carbon1” are from “9cb9d64e-b988-4054-b2dd-f57a9c749840.key”, however it is unsure why “FVS_Hrv_Carbon_2016on” contains less StandIDs while “9cb9d64e-b988-4054-b2dd-f57a9c749840.key” is based on all “BSL_UNIQUE_POLY_ID, VRI_BSL_update.xlsx”. Summarizing, how were StandIDs selected resulting in the total area of 9,958 ha in “Net_ha, Lkp_BSL_Hrv_C_Pools_x_Year_2016on.xlsx”? It looks like “FVS_Hrv_Carbon_2016on” was applied to FPS modeling, which has the same 9,958 ha “Cells D 51 & 52, FVS Carbon and HWP Tables, Darkwoods Carbon Model 2020-21_v1.4.xlsx”, but it is unclear why “9cb9d64e-b988-4054-b2dd-f57a9c749840.key” applied based on all “BSL_UNIQUE_POLY_ID, VRI_BSL_update.xlsx”.

Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response from Project Proponent	For 2011 – 2019 harvests, an estimated inventory was inserted to approximate the harvest volume so below ground dead and HWP pool estimates accumulated and deteriorated going into the new 2020 and 2021 harvests in the new inventory for the BSL. The interest was not on the inventory inserted being correct per se, but rather that the total harvests for 2011-2019 were correct (sum of (harvest per ha * ha) = correct total harvest for each year). That is why few unique harvest values show for 2019. The "9,958 ha" can be ignored - this is an internal number check within the database modeling that is not related to harvest hectares and is not used for any carbon modelling results. For further clarity, we have confirmed the gross harvest hectares by year match in the GIS spatial database and the access modeling databases in both scenarios.
Aster Global Round 2 Findings	Based on the findings clarification call, the response provided here, a review of the Method document (DW_2022_Methods_09292022_rev01102023), and additional data checks, the VVB confirms the round 1 finding has been addressed. This item is closed.

Item Number	6
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	See Eq. 18
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Calculation Check: FVS / FPS / Darkwoods Carbon Model 2020-21_v1.4.xlsx

Aster Global Round 1 Findings	Regarding FPS modeling, it is stated in "DW_2022_Methods_09292022.docx" that "Unharvested stands were grown in FVS from 2020 to 2028 and the FVS Summary table imported into an empty FPS Access database (DW_Baseline_FPS_Harvest_Schedule.mdb).", however, the VVB was unable to retrieve "#FVS_Summary2_Use, DW_Baseline_FPS_Harvest_Schedule.mdb" from other access database files, especially the VVB checked "FVS_Hrv_Carbon1, #FVS_DW_2022_BSL_2019_Inv_Use_Analysis_IE.mdb" and noted that StandID 13, or 1357, for example, was not harvested (maybe associated with SPLabel All_Stands, & GROW in 9cb9d64e-b988-4054-b2dd-f57a9c749840.key) but not included in the "#FVS_Summary2_Use" table. Simply, how was "#FVS_Summary2_Use, DW_Baseline_FPS_Harvest_Schedule.mdb" generated, more specifically, how was Year 2020 data generated (since FVS data were grown back from 2022 to 2019 with other existing old years combined) and were unharvested stands selected? Is "#FVS_Summary2_Use, DW_Baseline_FPS_Harvest_Schedule.mdb" sourced from "FVS_Summary2, #FVS_DW_2022_BSL_2019_Inv_Use_Analysis_IE.mdb"?
Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response from Project Proponent	Only previously unharvested BSL stands were put into FPS and scheduled starting in 2020. The 2020 inventory was generated in the same way as the 2019 inventory. The 2022 grown estimates were adjusted by subtracting 2* the growth rates to get the 2020 estimates. The source of the 2020 estimates was not provided. The only use of these volumes was for scheduling in FPS. The actual growing and harvesting occurs in FVS starting with the 2019 estimates.
Aster Global Round 2 Findings	Based on the findings clarification call, the response provided here, a review of the Method document (DW_2022_Methods_09292022_rev01102023), and additional data checks, the VVB confirms the round 1 finding has been addressed. This item is closed.

Item Number	7
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	1. Apply the most current VCS market leakage tool to determine a discount factor to the net change in carbon stock associated with the activity that reduces timber harvest (see Section 8.3.3); or,
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Lkp_PRJ_C_Pools_x_Year_Leakage_IE.xlsx / DW_2022_Methods_09292022.docx / Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf

Aster Global Round 1 Findings	The VVB noted the following findings regarding market leakage calculations: (1) The VVB noted in “Page 76, Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf” that 7,815,160,000/31,128.470 should be 7,815,160,000/31,128,470. Please update to the correct number and the calculation as well. (2) Please clarify how “Page 76, Top 4 species in the Montane Cordillera ecozone:, Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf” were determined, or provide the source. (3) Please provide the input parameters to the calculator <https://nfi.nfis.org/en/biomass_stand_merch> as the VVB’s calculation differs from the numbers provided in both “DW_2022_Methods_09292022.docx / Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf”: e.g. 158 tons/ha, or 170 tons/ha (the numbers are different between the two documents). Providing a screen capture of the website would be helpful. Please provide the calculation for both “1. Leakage area Total Volume” and “2. Leakage Area Merchantable Volume”. (4) Please update the following in Page 77 & 78 of “Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf” as the numbers differ from “DW_2022_Methods_09292022.docx / Lkp_PRJ_C_Pools_x_Year_Leakage_IE.xlsx”: “Darkwoods Project Area Total and Merch Volume Comparison: Using 2020 and 2021 Baseline Carbon Pool Data: Merch Volume Carbon: (AgML with bark + SD) / 51,887.1 ha, Total Volume Carbon: (AgTL with bark + SD) / 51,887.1 ha -> maybe not “Baseline”, and Table 11 & 12. (5) Finally, the Leakage Discount Factor of 20% may change depending on if Finding (1) is true.																		
Round 1 NCR/CL/OFI	CL: Please address in line with findings.																		
Round 1 Response from Project Proponent	The typo “31,128.470” was changed to “31,128,470” in the methods document. This error did not affect the calculations. The finding is correct and the top 4 species in the reference region had not been updated since the last verification, and had changed on the NFI website data. The updated top 4 species for the Montane Cordillera are shown at the following URL: https://nfi.nfis.org/resources/general/summaries/t1/en/NFI/pdf/NFI_T16_LSAGE20_VOL_en.pdf And summarized in the following table. <table><tr><td>Species</td><td>Vol_million_cubic_meters</td><td>%</td></tr><tr><td>Pine</td><td>2,080.79</td><td>31</td></tr><tr><td>Spruce</td><td>2,073.78</td><td>31</td></tr><tr><td>Fir</td><td>1,505.24</td><td>22</td></tr><tr><td>D-Fir</td><td>1,063.78</td><td>16</td></tr><tr><td>Totals</td><td>6,723.59</td><td>100</td></tr></table> The market leakage calculations in the DW_2022_Methods modeling document and the VCS/CCB Monitoring Report have been updated. Although the biomass ratio changes, this does not change the resulting market leakage factor result.	Species	Vol_million_cubic_meters	%	Pine	2,080.79	31	Spruce	2,073.78	31	Fir	1,505.24	22	D-Fir	1,063.78	16	Totals	6,723.59	100
Species	Vol_million_cubic_meters	%																	
Pine	2,080.79	31																	
Spruce	2,073.78	31																	
Fir	1,505.24	22																	
D-Fir	1,063.78	16																	
Totals	6,723.59	100																	

Aster Global Round 2 Findings	1. The VVB confirmed that the typo has been corrected. This item is closed. 2. The VVB reviewed the URL and confirmed the source of top 4 species. However, the VVB noted "Vol_million_cubic_meters %" for Spruce is incorrectly reported in the MR. 3. The VVB confirmed that the market leakage calculation has been updated in "DW_2022_Methods_09292022_rev01102023" and the MR. This item is closed. 4. Net_ha value (51,887.1) reported in the MR (page 78) does not match with value in "DW_2022_Methods_09292022_rev01102023". 5. The VVB confirmed the Leakage discount factor remains unchanged. This item is closed.
Round 2 NCR/CL/OFI	2,4. CL. Please address in line with the findings.
Round 2 Response from Project Proponent (DD Month YYYY)	2. & 4.: The monitoring report has been updated for 2 typos on pg 78: the spruce % was corrected from 21% to 31%, and the denominator was corrected from 51,887.1 ha to 52,430.6 ha This did not change the result or conclusions.
Aster Global Round 3 Findings	The VVB confirmed that the spruce % and denominator value have been corrected in the revised MR. The VVB acknowledges that these are typographical errors and reassures that they do not affect any of the calculations or outcomes. This item is closed.

Item Number	8
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	See Eq. 59.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods Carbon Model 2020-21_v1.4.xlsx / Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf
Aster Global Round 1 Findings	The VVB noted that "Table 15. Total issuable VCUs and terms used in their calculation for the 2020-2021 verification period, Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf" doesn't match "Cells AO 25 & 26, Summary Tables & Figures, Darkwoods Carbon Model 2020-21_v1.4.xlsx (and other numbers)". Please update to the correct numbers.

Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response from Project Proponent	The correct numbers have been added to the Monitoring Report and match the Darkwoods Carbon Model.
Aster Global Round 2 Findings	The VVB confirmed that the numbers are reported correctly in the updated MR table 15. However, the VVB noted the Gross Emissions Reductions value for year 2020 is incorrectly reported in Table 12.
Round 2 NCR/CL/OFI	CL: Please address in line with findings.
Round 2 Response from Project Proponent (DD Month YYYY)	The typo in Table 12 has been corrected from 501,836 to 401,836. This correction does not affect any of the calculations or outcomes.
Aster Global Round 3 Findings	The VVB confirmed that Gross Emissions Reductions value for year 2020 has been corrected in the updated MR/Table 12. The VVB agrees this is a typographical error and has no impact on any of the calculations or outcomes. This item is closed.

Item Number	9
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	Estimated carbon emissions and removals arising from AFOLU activities have uncertainties associated with forest inventory, carbon stocks, biomass growth rates, modeling error, and their various expansion factors, equations and coefficients. Use of conservative estimates, peer-reviewed scientific data and analysis, and high quality inventory sampling procedures, will mitigate uncertainty, and improve accuracy as new and reliable data are acquired over time.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx / Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf
Aster Global Round 1 Findings	The VVB noted a difference in provided numbers between "Page 79, Table 14. Uncertainty factor calculation summary, Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf" and "UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx". Please update to the correct numbers for "Table 14."
Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response	The correct numbers have been added to Table 14 in the VCS/CCB Monitoring Report.

from Project Proponent	
Aster Global Round 2 Findings	The VVB confirmed that values in table 14 are correctly reported in the updated MR. This item is closed

Item Number	10
VCS Methodology VM0012, Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	Note that physical field plot measurement error is calculated and compared directly against a set of minimum accuracy threshold requirements, as described in Section 9.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Carbon Plots Folder
Aster Global Round 1 Findings	The VVB checked items related to QA/QC for Field Measurements in “Carbon Plots” folder and noted there were tabs (e.g. Remeasure 1_Tree, Remeasure 1_CWD, etc.) in “Darkwoods Plot Data Final_2019.xlsx / Darkwoods Plot Data Final_2021_MASTER.xlsx” which seemed to be related with QA/QC for Field Measurements but was not able to find measurement error calculations specified in “Page 76, VM0012-Improved-Forest-Management-Projects-in-Temperate-and-Boreal-Forests-LtPF-v1.2.pdf”. The VVB was able to find the following related statement: “QA/QC for Field Measurements conducted during the 2017-2019 monitoring period NCC undertook blind check cruises for ~10% of the plots in the season of install or re-measurement. Check plots were undertaken by experienced field staff or Darkwoods staff on a blind basis. 8 check plots were installed relative to the latest plot datasets. DBH, Height, and Age measurements met the accuracy threshold of $\pm 10\%$ at 90% CI, as required by the PDD. The raw QAQC plot data and analysis are available in an Excel file. (Page 68, Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0.pdf)”, however this statement seems to be related to the 2017-2019 monitoring period. Please clarify at where the measurement error calculations locate.
Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response from Project Proponent	The Monitoring Report typo has been updated to 2020-21. The QA/QC plots were completed on 10% of the plots as per the SOP, and that data included in the Darkwoods Carbon Plot Data Final 2021_Master.xlsx sheet, however the calculations for the quality check criteria (dbh, height, tree count) were not included in that file. The QA/QC criteria have been added to the Darkwoods Carbon Plot Data Final 2021 spreadsheet and an updated version uploaded for review. See: Darkwoods Plot Data Final_2021_MASTER_RevFeb4_2022.xlsx Tab: Install QAQC Check.

Aster Global Round 2 Findings	The VVB confirmed the typo has been corrected in the updated MR. QA/QC worksheet has been added to the Carbon plot workbook. This item is closed.
--------------------------------------	---

Item Number	11
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	The uncertainty factor is calculated at each verification and applied annually until the next verification.
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx / DW_2022_Methods_09292022.docx
Aster Global Round 1 Findings	The VVB confirmed in "UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx" that Equations related to uncertainty factor calculations were all correctly applied. However, the VVB was unable to replicate the steps to calculate Measured C (t/ha) (Column E) / Model Wt_Avg_BA_Class C (t/ha) (Column F) / BA_CLASS Area (ha) (Column G) in "UF Calc 2022, UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx" while "DW_2022_Methods_09292022.docx" states the steps for calculation. (1) The VVB was able to open the SQL of "#DW_2022_Carbon_Plots_Use_Working_BA_AU.accdb" (UF Folder) but was not able to follow the steps due to complexity for all calculations including CWD, etc. (2) The VVB noted FSV_Carbon table in "#DW_2022_Carbon_Plots_Use_Working_BA_AU.accdb" (UF Folder) is a result of FVS run from "597b4480-c655-4077-8ece-66d880b4f200.key" using compiled Years 2019 & 2021 data from "Darkwoods Plot Data Final_2019.xlsx / Darkwoods Plot Data Final_2021_MASTER.xlsx" (Carbon Plots Folder), however the VVB was unable to identify how this FVS run was related to calculation of Measured C (t/ha) (Column E). Simply, which is the beginning file to calculate "UF_BA_CLASS_Calcs_Bark_Adjusted.xlsx"? (3) Does Measured C (t/ha) (Column E) include both above and belowground biomass? (4) Finally, it would be helpful for verification if more detailed descriptions are provided on how each table in "#DW_2022_Carbon_Plots_Use_Working_BA_AU.accdb" (UF Folder)" are associated, or through meeting.

Round 1 NCR/CL/OFI	CL: Please address in line with findings.
Round 1 Response from Project Proponent	Regarding 1, 2 and 3: First open the query "make UF_Table_Components" to see how Column E is calculated. This shows how the FVS_Carbon table was used. Column E does incorporate Below Ground, evident in the calculation. Next run the query: make Model_Wt_Avg_BA_CLASS_C_Adj_SD Next run the query: Update Model_Wt_Avg_BA_CLASS_C_Adj_SD using WT The UF_Table_Components table was copied and pasted as UF_Table_Components_ADJ_SD. Next run the query: Update UF_Components_Adj_SD_ModelWt_Avg 4: Certainly we look to improve the documentation at each verification for the Access database. If a meeting would be helpful in the meantime, we can arrange that.
Aster Global Round 2 Findings	1,2,3,4. Following the steps from round 1 response, the VVB was able to confirm "Measured C (t/ha) (Column E) / Model Wt_Avg_BA_Class C (t/ha) (Column F) / BA_CLASS Area (ha) (Column G)". This item is closed.

Item Number	12
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	The project must develop and maintain an up to date monitoring plan which includes: 1. Spatial inventory change monitoring procedures
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0
Aster Global Round 1 Findings	Section 3.1.2 of the MR states "In 2021 NCC undertook a new LiDAR-derived forest inventory which has further brought the stand level inventory metrics up to current. Further details on the inventory data collection and analysis process is available to auditors upon request." The VVB requests for further details about the inventory data collection and analysis procedure.
Round 1 NCR/CL/OFI	CL: Please address in line with the findings.
Round 1 Response	Provided NCC_DARKWOODS_EFI_REPORT_20220524_REVO

from Project Proponent	
Aster Global Round 2 Findings	Referenced SOPs are provided. This item is closed.

Item Number	13
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	3. Standard Operating Procedures (SOPs) for monitoring activities
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_CCB_VCS_Monitoring_Report_2020-2021_v1.0
Aster Global Round 1 Findings	The VVB were unable to locate multiple SOPs that are referenced in the monitoring report.
Round 1 NCR/CL/OFI	CL: Please provide all SOPs referenced in the MR.
Round 1 Response from Project Proponent	PROVIDED: 'Darkwoods Carbon Plot Field Remeasurement SOP - June2021' AND 'Darkwoods Data Standards 30Nov09'
Aster Global Round 2 Findings	Referenced SOPs are provided. This item is closed.

Item Number	14
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate	a) Ownership and resource access/use rights are held by same entity(s)

and Boreal Forests (LtPF) (Description)	
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0
Aster Global Round 1 Findings	The risk report states that NCC owns the project area in fee simple.
Round 1 NCR/CL/OFI	CL: As we are required to reconfirm at each verification, please provide the demonstration of fee title onership as was done in the last verification.
Round 1 Response from Project Proponent	Provided: the 'Darkwoods Fee Title Ownership' with a Title Search file for each of the four parcels
Aster Global Round 2 Findings	The Title Deeds for the 4 parcels were provided to the VVB for review - demonstrating that Nature Conservancy Canada owns the project area in fee simple. This item is addressed.

Item Number	15
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	d) There exist disputes over access/use rights (or overlapping rights)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0

Aster Global Round 1 Findings	The risk report states that there are no title disputes or access/use disputes. An update is being requested on the status of all mutual road agreements.
Round 1 NCR/CL/OFI	CL: Please provide an update on the status of all mutual road agreements, including the actual agreements and any resulting changes.
Round 1 Response from Project Proponent	Provided: 4 Mutual Road Use Agreements
Aster Global Round 2 Findings	The 4 mutual road agreements were provided to the VVB for review, demonstrating that there are no existing land disputes within the project area. This item is addressed.

Item Number	16
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	e) Governance score of 0.82 or higher
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0
Aster Global Round 1 Findings	While the correct risk score is taken, the VVB notes that WGI information is available for 2021, which was not included in the project proponent's average.
Round 1 NCR/CL/OFI	CL: Please provide a Governance score for Canada that includes the most recent 5 years of data.
Round 1 Response from Project Proponent	The Governance score has been updated to the period 2017-2021 and the risk report updated. This did not affect the scoring.
Aster Global Round 2 Findings	The VVB notes that the correct risk score has been chosen and applied. However, the Governance score presented in the Risk Report Section 2.3 is incorrect (Regulatory Quality value for 2020 is outside of WGI score range).
Round 2 NCR/CL/OFI	CL: Please correct the Governance Score reported in the Risk Report.

Round 2 Response from Project Proponent (DD Month YYYY)	MV to check, must be a typo
Aster Global Round 3 Findings	Updated Risk Report not provided.
Round 3 NCR/CL/OFI	CL: Please correct the Governance Score reported in the Risk Report.
Round 3 Response from Project Proponent	The Risk Report and supporting governance score spreadsheet have been updated and new versions provided.
Aster Global Round 4 Findings	The risk report has been updated with the correct governance score. This item is addressed.

Item Number	17
VCS Methodology VM0012 Version 1.2, Sectoral Scope 14 Improved Forest Management in Temperate and Boreal Forests (LtPF) (Description)	a) Fire (F)
Evidence Used to Assess (Location in PD/MR or Supporting Documents)	Darkwoods_2020-2021_VCS-Non-Permanence-Risk-Report_v1.0
Aster Global Round 1 Findings	The project was given a fire risk score of insignificant, and a frequency of less than every 10 years. The most recent fire occurred in 2021 and affected approx. 1% of carbon stocks. Mitigation actions for fire are described in the risk report, which includes a partnership with B.C. Fire Fighting. Please provide the calculation showing that 1% (i.e. less than 5%) of carbon stocks were impacted.
Round 1 NCR/CL/OFI	CL: Please provide the calculation showing that 1% (i.e. less than 5%) of carbon stocks were impacted.

Round 1 Response from Project Proponent	The net tC released from the 2021 fire as modeled by FVS is shown in the FVS outputs in the Darkwoods Carbon Model 2020-21 spreadsheet, FVS Carbon and HWP Tables tab. In 2021, the fire released 64,103 (tC), against a total Ecosystem Carbon in 2021 of 5,962,089 tC, or 1.0752%. No changes are necessary to the risk report document.
Aster Global Round 2 Findings	The VVB reviewed the workbook and associated spatial file and confirmed the response provided here to be accurate. The VVB conducted an independent data check to confirm this. This item is closed.

APPENDIX C: CCB LIST OF FINDINGS

	Criterion	Required/ Optional	Conformance Y/N N/A
G1	Original Conditions in the Project Area	Required	Y
G2	Baseline Projections	Required	Y
G3	Project Design and Goals	Required	Y
G4	Management Capacity and Best Practices	Required	Y
G5	Legal Status and Property Rights	Required	Y
CL1	Net Positive Climate Impacts	Required	N/A (Waiver)
CL2	Offsite Climate Impacts ("Leakage")	Required	N/A (Waiver)
CL3	Climate Impact Monitoring	Required	N/A (Waiver)
CM1	Net Positive Community Impacts	Required	Y
CM2	Offsite Stakeholder Impacts	Required	Y
CM3	Community Impact Monitoring	Required	Y
B1	Net Positive Biodiversity Impacts	Required	Y
B2	Offsite Biodiversity Impacts	Required	Y
B3	Biodiversity Impact Monitoring	Required	Y
GL1	Climate Change Adaptation Benefits	Optional	N/A
GL2	Exceptional Community Benefits	Optional	N/A
GL3	Exceptional Biodiversity Benefits	Optional	Y

G1 Original Conditions in the Project Area

Indicator G1.1 – The location of the project and basic physical parameters (e.g. soil, geology, climate).	The VVB reviewed the CCB PDD for information presented for Indicator G1.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1a; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.1 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G1.2 – The types and condition of vegetation within the project area.	The VVB reviewed the CCB PDD for information presented for Indicator G1.2, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1a; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.2 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G1.3 – The boundaries of the project area and the project zone.	The VVB reviewed the CCB PDD for information presented for Indicator G1.3, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1a; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB noted a new PD Deviation related to Indicator G1.3 was applied during this monitoring period, as identified in MR Section 2.2.4 as item 12. The VVB noted this deviation identified an update in the reported size of the project area. The VVB noted this reported deviation is addressed in separate findings for Indicator G3.4 and the update for the reported size of the project area size will not be evaluated further for Indicator G1.3. The VVB noted assertions regarding the effect of this change will be evaluated by the concurrent VCS verification. Item closed.
Date Closed:	5 December 2022

Indicator G1.4 - Current carbon stocks within the project area(s), using stratification by land-use or vegetation type and methods of carbon calculation (such as biomass plots, formulae, default values) from the Intergovernmental Panel on Climate Change's 2006 Guidelines for National GHG Inventories for Agriculture, Forestry and Other Land Use5 (IPCC 2006 GL for AFOLU) or a more robust and detailed methodology.	The VVB reviewed the CCB PDD for information presented for Indicator G1.4, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1a; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.4 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022
Indicator G1.5 - A description of communities located in the project zone, including basic socio-economic and cultural information that describes the social, economic and cultural diversity within communities (wealth, gender, age, ethnicity etc.), identifies specific groups such as Indigenous Peoples and describes any community characteristics.	The VVB reviewed the CCB PDD for information presented for Indicator G1.5, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1b; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.5 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022
Indicator G1.6 - A description of current land use and customary and legal property rights including community property in the project zone, identifying any ongoing or unresolved conflicts or disputes and identifying and describing any disputes over land tenure that were resolved during the last ten years (see also G5).	The VVB reviewed the CCB PDD for information presented for Indicator G1.6, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1b; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be

	reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.6 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G1.7 - A description of current biodiversity within the project zone (diversity of species and ecosystems) and threats to that biodiversity, using appropriate methodologies, substantiated where possible with appropriate reference material.	The VVB reviewed the CCB PDD for information presented for Indicator G1.4, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G1b; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.7 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G1.8 - An evaluation of whether the project zone includes any of the following High Conservation Values (HCVs) and a description of the qualifying attributes. Indicator 8.1 - Globally, regionally or nationally significant concentrations of biodiversity values: - protected areas - threatened species - endemic species - areas that support significant concentrations of a species during any time in their lifecycle (e.g. migrations, feeding grounds, breeding areas). Indicator 8.2 - Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. Indicator 8.3 Threatened or rare ecosystems.	The VVB reviewed the CCB PDD for information presented for Indicator G1.4, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
---	--

Indicator 8.4 - Areas that provide critical ecosystem services (e.g., hydrological services, erosion control, fire control). Indicator 8.5 - Areas that are fundamental for meeting the basic needs of local communities (e.g., for essential food, fuel, fodder, medicines or building materials without readily available alternatives). Indicator 8.6 - Areas that are critical for the traditional cultural identity of communities (e.g., areas of cultural, ecological, economic or religious significance identified in collaboration with the communities).	
Evidence Used to Assess Conformance:	CCB PDD Section G1c; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G1.8 were applied for this monitoring period. The VVB notes separate findings were issued for Indicator B1.1 and B2.3 regarding the MR reporting on “IUCN red-list” species and those findings will not be repeated for Indicator G1.8.
Date Closed:	5 December 2022

G2 Baseline Projections

Indicator G2.1 - Describe the most likely land-use scenario in the absence of the project following IPCC 2006 GL for AFOLU or a more robust and detailed methodology, describing the range of potential land use scenarios and the associated drivers of GHG emissions and justifying why the land-use scenario selected is most likely.	The VVB reviewed the CCB PDD for information presented for Indicator G2.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G2.1; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G2.1 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022
Indicator G2.2 - Document that project benefits would not have occurred in the	The VVB reviewed the CCB PDD for information presented for Indicator G2.2, and reviewed MR sections

absence of the project, explaining how existing laws or regulations would likely affect land use and justifying that the benefits being claimed by the project are truly 'additional' and would be unlikely to occur without the project.	on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G2.2; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G2.2 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G2.3 - Calculate the estimated carbon stock changes associated with the 'without project' reference scenario described above. This requires estimation of carbon stocks for each of the land-use classes of concern and a definition of the carbon pools included, among the classes defined in the IPCC 2006 GL for AFOLU. The timeframe for this analysis can be either the project lifetime (see G3) or the project GHG accounting period, whichever is more appropriate. Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the 'without project' scenario. Non-CO2 gases must be included if they are likely to account for more than 5% (in terms of CO2-equivalent) of the project's overall GHG impact over each monitoring period. Projects whose activities are designed to avoid GHG emissions (such as those reducing emissions from deforestation and forest degradation (REDD), avoiding conversion of non-forest land, or certain improved forest management projects) must include an analysis of the relevant drivers and rates of deforestation and/or degradation and a description and justification of the approaches, assumptions and data used to perform this analysis. Regional-level estimates can be used at the project's planning stage as long as there is a commitment to evaluate locally-specific carbon stocks and to develop a project-specific spatial	The VVB reviewed the CCB PDD for information presented for Indicator G2.3, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
---	---

analysis of deforestation and/or degradation using an appropriately robust and detailed carbon accounting methodology before the start of the project.	
Evidence Used to Assess Conformance:	CCB PDD Section G2.3; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G2.3 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G2.4 - Describe how the 'without project' reference scenario would affect communities in the project zone, including the impact of likely changes in water, soil and other locally important ecosystem services.	The VVB reviewed the CCB PDD for information presented for Indicator G2.4, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G2.4; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G2.4 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G2.5 - Describe how the 'without project' reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).	The VVB reviewed the CCB PDD for information presented for Indicator G2.5, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G2.5; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G2.5 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

G3 Project Design and Goals

Indicator G3.1 - Provide a summary of the project's major climate, community and biodiversity objectives.	The VVB reviewed the CCB PDD for information presented for Indicator G3.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G3.1; MR Sections 2.2.3 and 2.2.4

Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G3.1 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G3.2 - Describe each project activity with expected climate, community and biodiversity impacts and its relevance to achieving the project's objectives.	The VVB reviewed the CCB PDD for information presented for Indicator G3.2, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G3.2; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G3.2 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G3.3 - Provide a map identifying the project location and boundaries of the project area(s), where the project activities will occur, of the project zone and of additional surrounding locations that are predicted to be impacted by project activities (e.g. through leakage).	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed the CCB PDD for information presented for Indicator G3.3, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	MR Section 2.1.7; CCB PDD Section G3.3, CCB PDD Table 1, and CCB PDD Figures 1 and 6; MR Sections 2.2.3 and 2.2.4
Findings:	Instructions for Section 2.1.7 of the MR Template relevant to Indicator G3.3 are: "Include the map of the project location provided in the CCB project description and indicate if there have been any changes to the map since validation." The VVB noted the following: 1) The VVB noted MR Section 2.1.7 includes two figures depicting project location and boundaries, Figures 1 and 2. The VVB noted these figures use different base maps than the corresponding location figures provided in CCB PDD Section G1a. The VVB determined the use of updated base maps for depicting project location and boundaries, with no change in depicted project area boundary meets the intent of the MR template instructions to "include the map of the project location provided in the CCB project description".

	2) The VVB noted MR Section 2.1.7 Figure 3 depicting the project zone appears to be the same as the project zone figure in the CCB PDD (CCB PDD Figure 6). 3) The VVB noted MR includes the statement: "There have been no changes to the property boundary during this monitoring period, however the project area has been updated to 54,834.7 ha (previously 54,870.4 ha). This is a decrease of 0.065% and relates to sliver polygons discovered between the inventory polygons and the boundary polygon. It is de minimis and does not increase emission reductions claimed by the project." The VVB noted this is included as a new PD Deviation related to Indicator G3.3 applied during this monitoring period, as identified in MR Section 2.2.4 as item 12. The VVB noted this is the second PD deviation applied related to reported project area size. To summarize: The VVB noted the validated CCB PDD originally identified the project area as 54,792 ha (135,394 ac). The VVB noted a PD Deviation was previously applied for the 2013-2016 monitoring period to adjust the project area size to 54,870 ha to correct a reported minor discrepancy. The VVB noted this prior PD Deviation is reported as item 1 in Section 2.2.4 in the current MR. The VVB noted the PD Deviation being applied for the 2020-2021 monitoring period is to adjust the reported project area size to 54,834.7 ha. The VVB noted this adjustment was reported as made to correct topology errors in the alignment between inventory polygons and the boundary polygon in the project GIS data. The VVB noted assertions regarding the effect of this change will be evaluated by the concurrent VCS verification. 4) The VVB noted the description for PID 007-608-349 in MR Table 1 does not match the description for this parcel as presented in CCB PD Table 1. The VVB determined clarification is required for this discrepancy.
Clarification Request (CL):	Please provide clarification for item 4 in line with findings for Indicator G3.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	The description in the original CCB PD was cut off after '...except (1) Plans' and is therefore incomplete. The description in Table 1 in the current MR (and also as shown in the VCS PD) is correct. For further clarity the title documents for each PID shown in Table are provided (see Folder VCS Finding 14).
Evidence used to close CL:	The VVB reviewed and confirmed the description included in the revised MR is the current and correct description for the parcel. The VVB confirmed that title documents were provided for the 4 parcels listed in Table 1 of the MR. This item is addressed.
Date Closed:	6 April 2023

Indicator G3.4 - Define the project lifetime and GHG accounting period and explain and justify any differences between them. Define an implementation schedule, indicating key dates and milestones in the project's development.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Sections 2.1.5, 2.1.6, and 2.2.1; CCB PDD Section G3.4; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	Instructions for Section 2.2.1 of the MR Template include the following: "Indicate the key dates and milestones in the project's development and implementation since the beginning of the project lifetime (e.g., dates of construction, commissioning, start of project activities, legal/community agreements and continued operation periods), making note of where these dates have changed since the last validation or verification." The VVB noted the following: 1) The VVB noted MR Section 2.2.1 states: "This monitoring period represents years 10 - 12 ongoing project and includes the calendar years 2017, 2018 and 2019. The VVB determined clarification is required for this statement. 2) The VVB noted the table included in MR Section 2.2.1 does not include the status of key project milestones identified in CCB PDD Section G3.4. The VVB determined clarification is required for this item. 3) The VVB noted MR Section 2.2.1 states: "During this monitoring period, NCC continued to implement the Darkwoods Property Management Plan and undertaken all required monitoring activities on an annual basis." The VVB noted MR Section 5.3.2 states "with the publishing of the new 5-year Property Management Plan in 2020, NCC shifted the reporting of quantitative measures for the Effectiveness Monitoring criteria to every 5 years (as opposed to annually as in pre-2017 monitoring periods)." This VVB notes a separate finding issued for Indicator B3.1 addresses the discrepancy in reported biodiversity monitoring. The VVB determined the statement in MR Section 2.2.1 requires clarification.
Clarification Request (CL):	Please provide clarification for items 1, 2, and 3 in line with findings for Indicator G3.4.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	The section has been corrected to the right monitoring period The section has been modified to reference the CCB PD items that relate to prior periods. Added dates to the table in section 2.2.1 for when access control management was implemented, dates for road management implementation, added date for permanent carbon plot installation and added date for timber harvesting level reduction below 10,000m³/yr. Provided '2012_FWCP

	Darkwoods Stewardship 3-Year 2009-2011 Progress Report' Section 2.2.1 text has been updated.
Evidence used to close CL:	1. The VVB confirmed MR section 2.2.1 has been updated with the correct monitoring period reference. This finding is addressed. 2. The VVB confirmed MR section 2.2.1 has been updated with key milestones for the monitoring period. This finding is addressed. 3. The VVB confirmed MR section 2.2.1 now states monitoring activities have been taken as described in the latest PMP rather than annually. The VVB noted an opportunity for improvement (OFI) to correct a typographical error in this statement in the MR. The VVB noted this change in monitoring frequency from the validated monitoring plan is documented through a PD deviation description provided in Section 2.2.4 of the MR. This item is addressed.
Date closed:	6 April 2023

Indicator G3.5 - Identify likely natural and human-induced risks to the expected climate, community and biodiversity benefits during the project lifetime and outline measures adopted to mitigate these risks.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Section 2.2.5; CCB PDD Section G3.5; Supporting documentation, including: Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020), FireSeverity_July2022.jpg, Darkwoods_Monitoring_2021-1049098.jpg, Darkwoods2020 Site Inspection Report.docx, Darkwoods2021 Site Inspection Report.docx
Findings:	The VVB noted the MR describes actions undertaken during this monitoring period to mitigate likely natural and human-induced risks to the expected climate, community, and biodiversity benefits. The VVB noted the Project Proponent provided supporting documentation to substantiate the actions implemented. The VVB noted the greatest risk identified, from a large burn in 2021, is documented in the MR and in supporting documents. The VVB noted effects of this burn on carbon stocks will be evaluated by the concurrent VCS verification. Item closed.
Date Closed:	5 December 2022

Indicator G3.6 - Demonstrate that the project design includes specific measures to ensure the maintenance or enhancement of the high conservation value attributes identified in G1 consistent with the precautionary principle.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
---	--

Evidence Used to Assess Conformance:	MR Section 2.2.6; CCB PDD Section G3.6; Supporting documentation, including: Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020), FireSeverity_July2022.jpg, Darkwoods_Monitoring_2021-1049098.jpg, Darkwoods2020 Site Inspection Report.docx, Darkwoods2021 Site Inspection Report.docx, CKISS_NCC Summary Report 2021-1015994.pdf, ECA_July2022.jpg
Findings:	Instructions for Section 2.2.6 of the MR Template are: "Describe actions needed and implemented during the monitoring period to ensure the maintenance or enhancement of the high conservation value attributes identified in the project description." The VVB noted the MR makes a general statement that "High conservation values are protected by implementation of the project. No additional steps were necessary to protect high conservation values during this monitoring period." The VVB noted MR Section 2.2.6 does not provide a clear description of the status of actions identified in the CCB as additional commitments for implementation to reduce the risk to HCVs. The VVB determined clarification is required for this item.
Clarification Request (CL):	Please provide clarification for this item in line with findings for Indicator G3.6.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	Added additional text to section 2.2.6 to describe the status of the four actions identified in the CCB PDD to maintain or enhance HCVs. Supporting documentation: 'Whitebark pine Restoration Interim report 2021' and 'CKISS_NCC Summary Report 2020' provided.
Evidence Used to Close CL:	The VVB reviewed Section 2.2.6 of the MR and determined clarification has been provided for how HCVs were maintained or enhanced during the monitoring period, including road access management, whitebark pine restoration, and invasive species control. Supporting evidence was provided to the VVB for review. This item is addressed.
Date Closed:	6 April 2023

Indicator G3.7 - Describe the measures that will be taken to maintain and enhance the climate, community and biodiversity benefits beyond the project lifetime.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Section 2.2.7; CCB PDD Section G3.7; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	Instructions for Section 2.2.6 of the MR Template are: "Describe the measures needed and implemented during the monitoring period to maintain and enhance the climate, community, and biodiversity benefits beyond the project lifetime." The VVB noted the MR states: "The Darkwoods project is based around the conservation of

	the property in perpetuity and no additional measures were necessary to maintain or enhance the climate, community, and biodiversity benefits during this monitoring period.” The VVB noted this statement is consistent with the validated CCB PDD description regarding benefit permanence. The VVB noted the CCB PDD describes the legal basis (Environment Canada’s Ecological Gifts Program) for the requirement to ensure conservation related objectives are met in perpetuity. The VVB noted the Project Proponent implemented a new 5-year PMP during this monitoring period. The VVB determined this updated PMP demonstrates measures to be implemented to maintain and enhance the climate, community, and biodiversity benefits until at least 2025. Item closed.
Date Closed:	5 December 2022
Indicator G3.8 - Document and defend how communities and other stakeholders potentially affected by the project activities have been identified and have been involved in project design through effective consultation, particularly with a view to optimizing community and stakeholder benefits, respecting local customs and values and maintaining high conservation values. Project developers must document stakeholder dialogues and indicate if and how the project proposal was revised based on such input. A plan must be developed to continue communication and consultation between project managers and all community groups about the project and its impacts to facilitate adaptive management throughout the life of the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Sections 2.3.1 and 5.3.3; CCB PDD Section G3.8
Findings:	Instructions for Section 2.3.1 of the MR Template include the requirement: “Describe how communication and consultation about the project has been conducted between the project proponent(s) and communities and other stakeholders during the monitoring period in accordance with the communication and consultation plan, explaining any adjustments made or needed to the plan.” The VVB noted the following: 1) The VVB noted MR Section 2.3.1 states multiple meetings were held with community members and project stakeholders during the monitoring period, but also states that COVID-19 limited the number of in-person meetings, with most interaction occurring online through zoom meetings. The VVB noted MR Section 2.3.1 references a “non-exhaustive list” of meetings shown in Section 5.3.3. The VVB noted Section 5.3.3 lists three meetings for the monitoring period. The VVB noted the list of meetings

	does not clearly demonstrate community consultations were held with community members, project stakeholders, and other stakeholders in accordance with the plan identified in CCB PDD Section G3.8. The VVB determined clarification is required, along with supporting documentation, for the community consultation meetings held during the monitoring period. Instructions for Section 2.3.1 of the MR Template include the requirement: “Explain the processes used throughout the life of the project to consider this input and how this communication and consultation has influenced the project during the monitoring period through adaptive management.” The VVB noted the following: 2) The VVB noted MR Section 2.3.1 states: “These meetings have influenced the project area in multiple ways, from reviewing and developing recreational access agreements; to project area research planning and review; to general public outreach and education.” The VVB noted the three meetings reported in MR Section 5.3.3 partially substantiate this statement. The VVB determined clarification is required, along with supporting documentation, to substantiate how these meetings resulted in the influences stated.
Clarification Request (CL):	Please provide clarification for items 1 and 2 in line with findings for Indicator G3.8.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	Section 2.3.1 has been updated to add examples of how meetings have influenced Darkwoods project management. PROVIDED: 'Creston Valley CAF Summary Report_FINAL' PROVIDED: 'Prescribed_Fire_Prescription_Braumundl2020' PROVIDED: 'Key points from 2021NCC advisory meeting' PROVIDED: 'Indigenous Consultation Letter – Ktunaxa Nation'
Evidence Used to Close CL:	The VVB acknowledges the additional support documentation provided and reviewed these materials and the clarification provided in MR Section 2.3.1. The VVB determined the documentation provided by the Project Proponent substantiates the community consultation meetings held during the monitoring period and how these meetings resulted in input taken into consideration by the Project Proponent for management decisions. This item is addressed.
Date Closed:	6 April 2023
Indicator G3.9 - Describe what specific steps have been taken, and communications methods used, to publicize the CCBA public comment	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.

period to communities and other stakeholders and to facilitate their submission of comments to CCBA. Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages.	
Evidence Used to Assess Conformance:	MR Sections 2.3.2 and 2.3.3; CCB PDD Section G3.9; https://www.natureconservancy.ca/en/where-we-work/british-columbia/featured-projects/west-kootenay/darkwoods/
Findings:	The VVB noted Indicator G3.9 is covered by two sections of the MR Template. The VVB noted the following: 1) Instructions for Section 2.3.2 of the MR Template are: “Describe what specific steps have been taken, and communications methods used, to publicize the public comment period for verification to the Climate, Community & Biodiversity Standards to communities and other stakeholders to facilitate their submission of comments to the VCS.” The VVB noted MR Section 2.3.2 states: “NCC placed a prominent posting on the Darkwoods website with a link to the VCS/CCBA comment website and posted notifications on major social media sites.” The VVB noted the Darkwoods website identifies the CCB program with an embedded link to the CCB Program website, and a link for “reports” that connects to the Verra webpage for the project. The VVB noted the Verra webpage includes information on the public comment period. The VVB was not able to readily locate a notification on the Darkwoods website, blog, or news releases links on the website to identify the public comment period for the Monitoring Report. The VVB determined clarification, along with supporting documentation, is required for this item. 2) Instructions for Section 2.3.3 of the MR Template are: “Describe the process of distributing information on project implementation, monitoring and other key project documents pertaining to the monitoring period to communities and other stakeholders. Describe the actions taken to ensure that informational meetings held to inform the local stakeholders were widely publicized and conducted in relevant local or regional languages.” The VVB noted MR Section 2.3.3 states: “the primary form of project information distribution is through the NCC project webpages.” The VVB noted the Darkwoods website identifies the CCB program with an embedded link to the CCB Program website, and a link for “reports” that connects to the Verra webpage for the project. The VVB noted a community member or stakeholder familiar with the CCB program would be able to locate the monitoring

	report for this monitoring period on the CCB program website. 3) The VVB notes CCB Standards, Second Edition, requirements for Indicator G3.9 include the requirement: "Project proponents must play an active role in distributing key project documents to affected communities and stakeholders and hold widely publicized information meetings in relevant local or regional languages." The VVB noted MR Section 2.3.3 is not clear on whether or how the MR for this requirement was met for the MR for this monitoring period. The VVB determined clarification is required for this item, along with supporting documentation. 4) The VVB noted MR Section 2.3.3 also states: "Project implementation and project area activities are also communicated through meetings with key stakeholders." The VVB noted MR Section 2.3.3 refers to a "non-exhaustive list of stakeholder meetings during the monitoring period is shown in Section 5.3.3." The VVB noted the MR is not clear on how meetings held to communicate results of monitoring or the results of the monitoring report. The VVB determined clarification is required for this item, along with supporting documentation.
Clarification Request (CL):	Please provide clarification for items 1, 3, and 4 in line with findings for Indicator G3.9.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) The website posting the 30 day public comment period notification was live From September 16, 2022 to November 2, 2022. Provided pdf of webpage: 'NCC - Where we work – Darkwoods Forest Carbon Project' Provided internal email announcing the public commenting period on September 16, 2022: 'Re: Darkwoods Verification of 2020 & 2021 Vintage - Monitoring Reports (VCS & CCB/SD VSta) - TO BE POSTED ON NCC WEBSITE - 30-DAY PUBLIC COMMENT PERIOD COMMENCES' Provided internal email indicating the public commenting period announcement has been taken off the website on November 2, 2022: 'RE: Darkwoods carbon webpage' 3) NCC has provided direct notification of the project comment period and links to the project documentation to the Ktunaxa Nation during this monitoring period. See: 'Indigenous Consultation Letter – Ktunaxa Nation'. Other stakeholders have been communicated with on an ad hoc basis based on expressed interest, which may relate to the project area or activities, but not necessarily directly related to project technical documents; which continue to be publicly available via the NCC website for interested parties. Additional explanations of examples of other informational/stakeholder meetings held in the monitoring period have been added in section 2.3.3. NCC has

	communicated with the stakeholders and community members who have shown an interest in the project area and project activities during this monitoring period in a manner suited to the project location and community. 4) See response for #3 above – As described in PD documents and prior verifications, NCC effectively communicates results and monitoring to interested groups on an ad hoc and opportunistic basis, which is a good fit to local practices and communication preferences generally in the community. NCC is widely known and internet and social media, ad hoc or topic driven meetings, and other methods are considered effective to communicate project activities and results. Related, two additional examples of interested stakeholder meetings and discussion of how these have influenced Darkwoods project management are now provided in section 2.3.1. These also relate to Darkwoods communication of activities and results on the project area. See: 'Creston Valley CAF Summary Report_FINAL' 'Prescribed_Fire_Prescription_Braumundl2020' 'Key points from 2021NCC advisory meeting'
Evidence Used to Close CL:	1. The VVB reviewed the emails provided discussing the project public comment period being posted on the NCC website as well as a pdf printout of the website. The VVB determined this supporting documentation substantiates the public comment period was advertised as described. 3. The VVB reviewed the response provided as well as the letter sent to the Ktunaxa Nation. The VVB determined supporting documentation substantiates the process used by the Project Proponent for distributing information on project implementation, monitoring and other key project documents pertaining to the monitoring period to communities and other stakeholders. 4. The VVB reviewed the summaries from forums and other meetings held with the community during the monitoring period which demonstrated that information about the project was shared with the community. The VVB determined the clarification provided by the Project Proponent along with supporting documentation substantiates that the public comment period was communicated to the community and project information and documents were made available. This item is addressed.
Date Closed:	6 April 2023

Indicator G3.10 - Formalize a clear process for handling unresolved conflicts and grievances that arise during project planning and implementation. The project design must include a process for hearing, responding to and resolving	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
---	---

community and other stakeholder grievances within a reasonable time period. This grievance process must be publicized to communities and other stakeholders and must be managed by a third party or mediator to prevent any conflict of interest. Project management must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within 30 days. Grievances and project responses must be documented.	
Evidence Used to Assess Conformance:	MR Section 2.3.4; CCB PDD Section G3.10
Findings:	The VVB noted MR Section 2.3.4 states: "NCC receives feedback generally about regional initiatives and activities on an ongoing basis, and follows the procedures outlined in the CCB PDD. No specific conflicts or grievances related to Darkwoods project implementation have been noted during this monitoring period." The VVB noted the PD states: "NCC has received comments related to Darkwoods throughout the acquisition and project implementation which have been handled through this process, and which have resulted in stakeholder meetings and other resolution actions (examples available upon request)." Full assessment for conformance with this indicator will require review of a copy of the Land Information System log that covers the monitoring period, including the specified grievances and project resolutions.
Clarification Request (CL):	Please provide a copy of the referenced supporting documentation referenced in the finding for VVB review.
Date Evaluated	5 December 2022
Project Proponent Response/Actions and Date:	Provided a copy of the Land Information System (LIS) log that lists all documents uploaded to LIS from Jan 1 2020 to Jan 12, 2023: '12Jan23_Query_LISDocuments_2020-current_Darkwoods' No material grievances or unresolved issues were noted during the monitoring period
Findings Round 2:	The VVB reviewed the spreadsheet provided but was unable to determine which, if any, entries were grievances logged during the monitoring period or whether any grievances were resolved during the monitoring period. The VVB further notes that the VVB was unable to access any of the documents through the URLs provided in the spreadsheet. The VVB understands from the response provided that the Project Proponent has claimed that there were no unresolved or material grievances noted during the monitoring period. However, the VVB has not been provided access to a grievance log or supporting documentation to substantiate this claim.
Clarification Request (CL):	Please clarify which, if any, entries from the LIS log are grievances and provide supporting evidence demonstrating how, in conformance with Indicator 3.10, grievances and project responses were documented, and how grievances were resolved during the monitoring period.

Date evaluated:	6 April 2023
Project Proponent Response/Actions and Date:	There were no material grievances during this monitoring period. The LIS file log was provided as evidence, but there are no grievances on that list. To further clarify for this and future monitoring periods, NCC has added a data column to the LIS list to flag any records related to project grievances, and a copy for this period has been provided.
Evidence used to close CL:	Thank you for the additional clarification. The VVB confirms that the updated LIS list contains a column clarifying if the communication received was a grievance or not. As there were no grievances reported during the monitoring period, the VVB is unable to confirm the grievance process was followed as outlined in the PDD. The addition of the column in the LIS for tracking grievances shows that there is a mechanism in place for logging and tracking grievances should the project receive any. This item is closed.
Date closed:	19 May 2023

Indicator G3.11 - Demonstrate that financial mechanisms adopted, including projected revenues from emissions reductions and other sources, are likely to provide an adequate flow of funds for project implementation and to achieve the anticipated climate, community and biodiversity benefits.	The VVB reviewed the CCB PDD for information presented for Indicator G3.11, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G3.11; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G3.11 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

G4 Management Capacity and Best Practices

Indicator G4.1 - Identify a single project proponent which is responsible for the project's design and implementation. If multiple organizations or individuals are involved in the project's development and implementation the governance structure, roles and responsibilities of each of the organizations or individuals involved must also be described.	The VVB reviewed the CCB PDD for information presented for Indicator G4.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G3.11; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that

	no minor changes to the PD or PD deviations related to Indicator G4.1 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G4.2 - Document key technical skills that will be required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations will be partnered with to support the project or have a recruitment strategy to fill the gaps.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB interviewed representative project management team members.
Evidence Used to Assess Conformance:	MR Section 2.4.1; CCB PDD Section G4.2; interviews/discussions with representative project management team members
Findings:	The VVB noted MR Section 2.4.1 includes a summary of key technical skillsets and expertise identified as required to successfully implement the CCB portion of the project. The VVB noted MR Section 2.4.1 includes a list of key project management personnel along with a summary of their project responsibilities and related skillsets. The VVB noted several of the key project personnel are the same as those listed in the 2014 CCB PDD, demonstrating retention of key personnel on the project over an extended period. The VVB noted MR Section 2.4.1 identifies RainCloud Forest as a partner for providing relevant experience identified as needed. VVB discussions and interviews with key project personnel substantiates the project maintains a management team with the expertise and prior experience implementing land management projects at the scale of this project. Item closed
Date Closed:	5 December 2022

Indicator G4.3 - Include a plan to provide orientation and training for the project's employees and relevant people from the communities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity building efforts should target a wide range of people in the communities, including minority and underrepresented groups. Identify how training will be passed on to new workers when there is	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent. The VVB interviewed representative project management team members.
--	--

staff turnover, so that local capacity will not be lost.	
Evidence Used to Assess Conformance:	MR Section for Indicator G4.3; CCB PDD Section G4.3; interviews/discussions with representative project management team members; supporting documentation: HS-Training_PresentationSlides2021.pdf, 2018 Health and safety manual.pdf
Findings:	Instructions for Section 2.4.2 of the MR Template are: "Describe activities and/or processes implemented during the monitoring period to provide orientation and training for the project's workers and a wide range of people from the communities. Explain how, once it has been built, local capacity is not lost." The VVB noted the following: 1) The VVB noted the section number is missing in the MR for "Worker Training (G4.3), resulting in misnumbering of sections 2.4.2 through 2.4.6. The VVB noted this typographical error is a clarification required for the MR. 2) The VVB noted the MR information for Indicator G4.3 identifies orientation and training processes are provided in two documents. The VVB noted only one of these two documents was provided for VVB review. The VVB determined the Project Proponent must provide a copy of "Human Resources Policy (2019)" for review for the purpose of evaluating conformance with criteria for Indicator G4.3. 3) The VVB noted the MR is not clear on how local capacity is not lost. The VVB determined clarification is required for this item.
Clarification Request (CL):	Please provide the support document "Human Resources Policy (2019)" referenced in item 2. Please provide clarification for items 1 and 3 in line with findings for Indicator G4.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) Section numbers have been updated. 2) Provided: 'NCC HR Policies 2019' 3) Provided: 'Registered Professional Biologists Continuing Professional Development Standard'. as documentation of continuing education for the Darkwoods Project Manager. Provided: 'Indigenous insights Certificate of Completion_Indigenous insights online_Leslie' as an example of ongoing NCC staff training Provided: 'NCC Conference Agenda' as an example of NCC-wide training Provided: 'NCC_CarbonPlot_FieldTrainingLog_Timberland' which is the signature page associated with the Carbon Plot SOP training document Added text in section 2.4.1 on worker training and provided examples of how local capacity is not lost through the ongoing use of local skilled contractors.

Evidence Used to Close CL:	1. The VVB confirmed the section numbering has been corrected in the MR. 2. The VVB noted NCC HR Policies 2019 document was provided to the VVB for review, which states that NCC will provide training for staff. The VVB acknowledges the attendance log for carbon plot field training that occurred during the monitoring period was also provided to document the training that occurred during the monitoring period. 3. The VVB noted additional information was added to Section 2.4.2 of the MR to describe how local capacity is maintained through the use of local contractors to perform work on the Darkwoods property. The VVB noted the MR now identifies training provided by the Darkwoods Manager for contract crews and other workers when needed. The VVB determined through review of the clarification provided in the MR and through review of the supporting documentation that the MR identifies orientation and training for the project's employees and relevant people from the communities, and how the local capacity was developed during the monitoring period. This item is addressed.
Date Closed:	6 April 2023

Indicator G4.4 - Show that people from the communities will be given an equal opportunity to fill all employment positions (including management) if the job requirements are met. Project proponents must explain how employees will be selected for positions and where relevant, must indicate how local community members, including women and other potentially underrepresented groups, will be given a fair chance to fill positions for which they can be trained.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section for Indicator G4.4; CCB PDD Section G4.4
Findings:	Instructions for Section 2.4.3 of the MR Template are: "Demonstrate that people from the communities have been given an equal opportunity to fill all work positions during the monitoring period (including management) if the job requirements were met. Where relevant, describe the activities and/or processes implemented to ensure community members, including women and vulnerable and/or marginalized people, were given a fair chance to fill positions for which they can be trained." The VVB noted the following: 1) The VVB noted the MR Section for Indicator G4.4 states: "NCC's employments standards are documented in: The Nature Conservancy of Canada Management Policy: Human Resources Policy (2019)." The VVB noted this document was not provided for VVB review. The VVB determined the Project Proponent must provide a copy of

	this document for review for the purpose of evaluating conformance with criteria for Indicator G4.4. 2) The VVB noted the MR states: "NCC employs locally when feasible. For example, a local person staffs the Darkwoods manager position." The VVB noted the MR does not clearly demonstrate that people from the communities have been given an equal opportunity to fill all work positions during the monitoring period if the job requirements were met. The VVB determined this item requires clarification.
Clarification Request (CL):	Please provide the support document "Human Resources Policy (2019)" referenced in item 1. Please provide clarification for item 2 3 in line with findings for Indicator G4.4.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	Provided: 'NCC HR Policies 2019' 2) No work positions were available to be filled during the monitoring period but all contracts have been awarded to local contractors as described in section 2.4.1. The NCC HR Policy covers equal opportunity hiring in Section 12 of 'NCC HR Policies 2019'
Evidence Used to Close CL:	1. The NCC HR Policies 2019 was provided to the VVB for review. The VVB confirmed this document states that NCC is committed to hiring practices that are fair and equitable. 2. The VVB acknowledges the project proponent clarified that only one person is employed locally by the project and that no employment positions were available to fill during the monitoring period. The VVB further acknowledges MR Section 2.4.2 identifies local contractors hired for work related to the Darkwoods project. This item is addressed.
Date Closed:	6 April 2023
Indicator G4.5 - Submit a list of all relevant laws and regulations covering worker's rights in the host country. Describe how the project will inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section for Indicator G4.5; CCB PDD Section G4.5; supporting documentation: 2018 Health and safety manual.pdf
Findings:	Instructions for Section 2.4.4 of the MR Template are: "List all relevant laws and regulations covering worker's rights in the host country and provide assurance that the project has met or exceeded each. Where relevant, demonstrate how compliance was achieved and describe activities

	and/or processes implemented to inform workers about their rights.” The VVB noted the following: 1) The VVB noted the MR lists relevant laws and regulations covering worker’s rights in the host country that are consistent with the information provided in the CCB PDD. 2) The VVB noted the MR provides assurance that the project is fully compliant with these laws and regulations. The VVB noted the MR describes how compliance was achieved during the monitoring period and describes activities and/or processes implemented to inform workers about their rights. The VVB noted the MR states: “All new employees are required to sign a sure indicating agreement and adherence to these policies and all NCC employees must renew this agreement on an annual basis.” The VVB requests representative examples of these documents executed during the monitoring period to confirm compliance with this policy. 3) The VVB noted the MR identifies two documents as substantiating NCC employment policies and worker guidelines. The VVB was not provided with these two documents to review. The VVB determined the Project Proponent must provide copies of “The Nature Conservancy of Canada Management Policy: Human Resources Policy” and the “NCC Darkwoods Occupational Health & Safety Program” for review by for the purpose of evaluating conformance with criteria for Indicator G4.5.
Clarification Request (CL):	Full evaluation of this indicator is pending receipt of supporting documentation for review. Please provide copies of the support documents requested in items 2 and 3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	n/a NCC has provided an attestation and records from the Chief HR Officer for NCC demonstrating compliance with the HR Policy and compliance with the Conflict of Interest Policy. Provided: 2020-2021 COI & HR Policy Sign-Offs Attestation Letter. Updated reference in 2.4.3 to NCC Health, Safety and Environmental Policy (2018). Provided: NCC HR Policies 2019 Provided: 2018 Health and Safety Manual
Evidence Used to Close CL:	2. The VVB reviewed the 2020-2021 COI & HR Policy Sign-Offs Attestation Letter – Darkwoods document which is signed by the NCC Chief Human Resources Officer that states that human resource and COI policies were followed by all employees for 2020 and 2021. The VVB noted this document also includes documentation for

	completion by employees acknowledging NCC's Human Resource Policy. 3. The VVB acknowledges and reviewed the two requested documents that were provided to the VVB. The VVB noted these documents identify the procedures by which NCC informs workers of their rights and complies with all relevant labor laws. The 2018 Health and Safety law also includes the agreements between NCC and contractors. The VVB determined that the NCC HR Policies 2019 and 2018 Health and Safety Manual, along with supporting documentation and attestation from the Chief HR Officer for NCC document how workers are informed of their rights, provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved. This item is addressed.
Date Closed:	6 April 2023

Indicator G4.6 - Comprehensively assess situations and occupations that pose a substantial risk to worker safety. A plan must be in place to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks will be minimized using best work practices.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section for Indicator G4.6; CCB PDD Section G4.6; supporting documentation: 2018 Health and safety manual.pdf
Findings:	Instructions for Section 2.4.4 of the MR Template are: "Provide an assessment of substantial risks to worker safety that have arisen due to project implementation. Describe activities and/or processes implemented to inform workers of risks and how to minimize such risks. Show how risks were minimized." The VVB noted the following: 1) The VVB noted the MR identifies forestry operations as a substantial risk, with third-party contractors operating as independent contractors and using self-audits for compliance with safety programs. 2) The VVB noted the MR states: "NCC undertakes pre-work reviews with contractors as described in the NCC Darkwoods Occupational Health & Safety Program, which includes a pre-work safety site orientation checklist." The VVB requests representative examples of these documents executed during the monitoring period to confirm compliance with this policy.
Clarification Request (CL):	Full evaluation of this indicator is pending receipt of supporting documentation for review. Please provide copies of the support documents requested in item 2.

Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) n/a 2) An example of safety documentation has been provided. See: 'safetySheetEcosense2020'
Evidence Used to Close CL:	2. The VVB acknowledges the supporting documentation provided. The VVB noted the Project Proponent provided an example of a Pre-work/Contractor Site Orientation form completed during the monitoring period, which documents how NCC informs and minimizes risk for employees, including subcontractors. This item is addressed.
Date Closed:	6 April 2023

Indicator G4.7 - Document the financial health of the implementing organization(s) to demonstrate that financial resources budgeted will be adequate to implement the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section for Indicator G4.7; CCB PDD Section G4.7; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020); https://nccreport.ca/wp-content/uploads/2021/12/2020-21-Audited-Financial-Statements-for-Donor-Reporting.pdf
Findings:	The VVB noted the MR provides the summary of the financial health of the Project Proponent and provides a link to documentation to support this assertion. The VVB noted the support document "2020-2021 Audited Financial Statements" substantiates the financial health of the Project Proponent to implement the project in accordance with the budgets identified in the PMP 2021-2025. Item closed.
Date Closed:	5 December 2022

Indicator G5.1 - Submit a list of all relevant national and local laws and regulations in the host country and all applicable international treaties and agreements. Provide assurance that the project will comply with these and, where relevant, demonstrate how compliance is achieved.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 2.5.1; CCB PDD Section G5.1
Findings:	The VVB noted MR Section 2.5.1 states no changes to the laws relevant to the project were implemented in this monitoring period. The VVB noted the MR provides the assurance the project remains in compliance with all laws as per the PD. Item closed.
Date closed:	5 December 2022

Indicator G5.2 - Document that the project has approval from the appropriate authorities, including the	The VVB reviewed the CCB PDD for information presented for Indicator G5.2, and reviewed MR sections
--	---

established formal and/or traditional authorities customarily required by the communities.	on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G5.2; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G5.2 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator G5.3 - Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property, or government property and has obtained the free, prior, and informed consent of those whose rights will be affected by the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed the information presented in the MR against information presented in the validated CCB PDD and supporting documentation.
Evidence Used to Assess Conformance:	MR Section 2.5.2; CCB PDD Section G5.3; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	The VVB noted this indicator was originally addressed through successful validation of the CCB PDD. The VVB noted the MR identifies the project area as fee simple private land not containing or involving any areas not privately owned by the Project Proponent. The VVB noted review of supporting documentation substantiated that no project activities were identified that would affect lands outside the project area. Item closed.
Date Closed:	5 December 2022

Indicator G5.4 - Demonstrate that the project does not require the involuntary relocation of people or of the activities important for the livelihoods and culture of the communities. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior, and informed consent of those concerned and includes provisions for just and fair compensation.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed the information presented in the MR against information presented in the validated CCB PDD and supporting documentation.
Evidence Used to Assess Conformance:	MR Section 2.5.3; CCB PDD Section G5.4; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	The VVB noted this indicator was originally addressed through successful validation of the CCB PDD. The VVB noted the MR identifies the project property as private land not containing any permanent habitation or community activities and not requiring relocation of

	communities. The VVB noted review of supporting documentation substantiated that no project activities were identified that would have resulted in or will require the involuntary removal or relocation of property rights holders or force them to relocate activities important to their culture or livelihood. Item closed.
Date Closed:	5 December 2022

Indicator G5.5 - Identify any illegal activities that could affect the project's climate, community or biodiversity impacts (e.g., logging) taking place in the project zone and describe how the project will help to reduce these activities so that project benefits are not derived from illegal activities.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed the information presented in the MR against information presented in the validated CCB PDD and supporting documentation.
Evidence Used to Assess Conformance:	MR Section 2.5.4; CCB PDD Section G5.5; Darkwoods_Monitoring_2021-1049098.jpg, Darkwoods2020 Site Inspection Report.docx, Darkwoods2021 Site Inspection Report.docx,
Findings:	The VVB noted the MR states: "No illegal activities have occurred on the project area that affect the project's climate, community or biodiversity impacts during this monitoring period. The VVB noted review of supporting monitoring documentation substantiated that no illegal activities were identified that have affected the project's climate, community and biodiversity impacts. Item closed.
Date Closed:	5 December 2022

Indicator G5.6 - Demonstrate that the project proponents have clear, uncontested title to the carbon rights, or provide legal documentation demonstrating that the project is undertaken on behalf of the carbon owners with their full consent. Where local or national conditions preclude clear title to the carbon rights at the time of validation against the Standards, the project proponents must provide evidence that their ownership of carbon rights is likely to be established before they enter into any transactions concerning the project's carbon assets.	The VVB reviewed the CCB PDD for information presented for Indicator G5.6, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section G5.6; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator G5.6 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Waiver for Climate Section

<u>From CCB Standards v3.1 (2017):</u> This section [Climate Section] is used to demonstrate a project's net positive climate benefits and not for claiming greenhouse gas (GHG)⁷¹ emissions reductions and removals units that may be used as offsets. This section is not required⁷² for projects that have met the requirements of a recognized GHG Program.⁷³ ⁷¹ Greenhouse gases are defined as gaseous components of the atmosphere that trap infrared heat and contribute to the Earth's greenhouse effect. In addition to carbon dioxide (CO₂), prominent GHGs related to forests include methane (CH₄) and nitrous oxides (N₂O). ⁷² The optional Gold Level for climate change adaptation GL1 may be used if the project is eligible for a waiver of the Climate Section CL1-4. ⁷³ A list of GHG Programs recognized by the CCB Program is published on the VCS website. See also the CCB Program Rules.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD. For the Climate Section, the VVB considered the following: CCB Program Rules v3.1 (2017), Section 3.3.1: In order to use a recognized GHG program to substitute for Climate, Community & Biodiversity Standards Climate Section, the project must <i>inter alia</i> have the same name, the same project area, the same project proponent, the same project start date (i.e., the date on which activities that lead to the generation of GHG emission reductions or removals are implemented), the same activities and the same without-project scenario in both programs. CCB Program Rules v3.1 (2017), Section 3.3.3: In order to demonstrate that a project has met the verification requirements of the CCB Program and a recognized GHG program, the combined template for the recognized GHG program and the CCB Program document (e.g., the <i>CCB & VCS Project Monitoring Report Template</i>) shall be used to demonstrate that the project meets the requirements for verification of the recognized GHG program. The time period documented for verification must be the same under both the CCB Program and the recognized GHG program. CCB Program Rules v3.1 (2017), Section 3.3.4: If a project meets the requirements of a recognized GHG program resulting in a waiver of the Climate Section of the <i>Climate, Community & Biodiversity Standards</i>, the project must be verified to the CCB Program at the same time and every time that it is verified to the recognized GHG program. It may be verified to the GHG program without being verified to the CCB Program.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB noted the combined template (CCB & VCS Project Monitoring Report Template) is used to demonstrate that the project meets the requirements. The VVB determined that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

CL1 Net Positive Climate Impacts

Indicator CL1.1 - Estimate the net change in carbon stocks due to the project activities using the methods of calculation, formulae and default values	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm
--	--

of the IPCC 2006 GL for AFOLU or using a more robust and detailed methodology. The net change is equal to carbon stock changes <i>with</i> the project minus carbon stock changes <i>without</i> the project (the latter having been estimated in G2). This estimate must be based on clearly defined and defensible assumptions about how project activities will alter GHG emissions of carbon stocks over the duration of the project or the project GHG accounting period.	eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL1.2 - Estimate the net change in the emissions of non-CO2 GHG emissions such as CH4 and N2O in the <i>with</i> and <i>without</i> project scenarios if those gases are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the project's overall GHG emissions reductions or removals over each monitoring period.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL1.3 - Estimate any other GHG emissions resulting from project activities. Emissions sources include, but are not limited to, emissions from biomass burning during site preparation, emissions from fossil fuel combustion, direct emissions from the use of synthetic fertilizers, and emissions from the decomposition of N-fixing species.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.

Date Closed:	5 December 2022
Indicator CL1.4 - Demonstrate that the net climate impact of the project is positive. The net climate impact of the project is the net change in carbon stocks plus net change in non-CO2 GHGs where appropriate minus any other GHG emissions resulting from project activities minus any likely project-related unmitigated negative offsite climate impacts (see CL2.3).	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL1.5 - Specify how double counting of GHG emissions reductions or removals will be avoided, particularly for offsets sold on the voluntary market and generated in a country with an emissions cap.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

CL2 Offsite Climate Impacts ("Leakage")

Indicator CL2.1 - Determine the types of leakage that are expected and estimate potential offsite increases in GHGs (increases in emissions or decreases in sequestration) due to project activities. Where relevant, define and justify where leakage is most likely to take place.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL2.2 - Document how any leakage will be mitigated and estimate	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing
--	---

the extent to which such impacts will be reduced by these mitigation activities.	verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL2.3 - Subtract any likely project-related unmitigated negative offsite climate impacts from the climate benefits being claimed by the project and demonstrate that this has been included in the evaluation of net climate impact of the project (as calculated in CL1.4).	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CL2.4 - Non-CO2 gases must be included if they are likely to account for more than a 5% increase or decrease (in terms of CO2-equivalent) of the net change calculations (above) of the project's overall off-site GHG emissions reductions or removals over each monitoring period.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

CL3 Climate Impact Monitoring

Indicator CL3.1 - Develop an initial plan for selecting carbon pools and non-CO2 GHGs to be monitored, and determine the frequency of monitoring. Potential pools include aboveground biomass, litter, dead wood, belowground biomass, wood products, soil carbon and peat. Pools to monitor must include any pools	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
--	--

expected to decrease as a result of project activities, including those in the region outside the project boundaries resulting from all types of leakage identified in CL2. A plan must be in place to continue leakage monitoring for at least five years after all activity displacement or other leakage causing activity has taken place. Individual GHG sources may be considered 'insignificant' and do not have to be accounted for if together such omitted decreases in carbon pools and increases in GHG emissions amount to less than 5% of the total CO₂-equivalent benefits generated by the project. Non-CO₂ gases must be included if they are likely to account for more than 5% (in terms of CO₂-equivalent) of the project's overall GHG impact over each monitoring period. Direct field measurements using scientifically robust sampling must be used to measure more significant elements of the project's carbon stocks. Other data must be suitable to the project site and specific forest type.	
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022
Indicator CL3.2 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	As part of the verification process, the VVB initially reviewed information provided in the MR undergoing verification and compared this information to information previously provided in the validated CCB PDD to confirm eligibility for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards.
Evidence Used to Assess Conformance:	MR Section 3
Findings:	The VVB determined through project document review that the project is eligible for and will meet the requirements for a waiver of the Climate Section CL 1 to CL 4 of the CCB Standards with successful concurrent verification to VCS Standards for this monitoring period. Item closed.
Date Closed:	5 December 2022

CM1 Net Positive Community Impacts

Indicator CM1.1 - Use appropriate methodologies to estimate the impacts on communities, including all constituent socio-economic or cultural groups such as indigenous peoples (defined in G1), resulting from planned project activities. A credible estimate of impacts must include changes in community well-being due to project activities and an evaluation of the impacts by the affected groups. This estimate must be based on clearly defined and defensible assumptions about how project activities will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities (including water and soil resources), over the duration of the project. The 'with project' scenario must then be compared with the 'without project' scenario of social and economic well-being in the absence of the project (completed in G2). The difference (i.e., the community benefit) must be positive for all community groups.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent. The VVB also reviewed the information presented in MR Section 1.2 relevant to this indicator.
Evidence Used to Assess Conformance:	MR Sections 4.1.1, 4.1.2, and 1.2; CCB PDD Section CM1; NCC CCBA 2020-2021 – Community Valuation Exercisesv1.0.xlsx
Findings:	The VVB noted Indicator CM1.1 is covered by two sections of the MR Template, 4.1.1 and 4.1.2, with achievements on community impacts during the monitoring period and during the project lifetime to be summarized in Section 1.2. The VVB noted the following: 1) Instructions for Section 4.1.1 of the MR Template are: "Describe all the impacts on each community group (identified in the validated CCB project description in conformance with G1) resulting from project activities under the with-project scenario. Impacts must include all those identified in the CCB project description and any other unplanned impacts. Explain and justify key assumptions, rationale and methodological choices. Provide all relevant references." The VVB noted MR Section 4.1.1 describes general impacts to the communities and community use of the project area during the monitoring period. The VVB noted the MR identified closures during 2020 due to COVID-19 pandemic, and closures during 2021 due to fire. 2) The VVB noted MR Section 4.1.1 states there is one full time site supervisor directly employed by the project "along with a constant level of regional and national

	staffing related to Darkwoods.” The VVB noted The VVB noted MR Section 1.2 reports “39 FTE” people directly working on project activities during the monitoring period, with a reference to supporting documentation in MR Tables 17 and 18. The VVB noted the MR Template reporting requirements for this item in MR Section 1.2 are “Employed in project activities means people directly working on project activities in return for compensation (financial or otherwise), including employees, contracted workers, sub-contracted workers and community members that are paid to carry out project-related work.” The VVB noted the MR identified one FTE person directly employed in project activities, but the MR sections and tables referenced as containing supporting documentation for achievements listed in MR Section 1.2 do not clearly identify how 38 additional FTE people are directly employed in project activities. The VVB noted clarification, along with supporting documentation, is required for this item. 3) The VVB noted MR Section 1.2 reports “177 FTE” as the achievement during the project lifetime, with a footnote clarification provided that this is “Calculated by adding current period result to previous reported values from the prior Darkwoods CCB_VCS Monitoring Report 2017-2019.” The VVB noted the MR does not clearly identify how 39 new FTE employment positions were created during the monitoring period or how 177 FTE people are now directly employed in project activities. The VVB noted clarification, along with supporting documentation, is required for this item. 4) The VVB noted MR Section 1.2 reports the number of women employed in project activities, expressed as number of full time employees as “Data not available” for the monitoring period and for the project lifetime. The VVB determined clarification is required for why the number of women directly working on project activities are not able to be quantified. 5) The VVB noted MR Section 1.2 Standardized Benefit Metrics for Training are reported as “Data not available” for the monitoring period and for the project lifetime. The VVB determined clarification is required for why training is not able to be quantified and reported. 6) The VVB noted MR Section 1.2 Standardized Benefit Metrics for Livelihoods are reported as “Data not available” for the monitoring period and for the project lifetime. The VVB determined clarification is required for why metrics for people with improved livelihood is not able to be quantified and reported. 7) The VVB noted the MR states the metrics for Health and Education metrics are “Not Applicable”. The VVB noted health and education are not identified in the CCB
--	---

	PDD as community benefits or impacts associated with the project. 8) Instructions for Section 4.1.2 of the MR Template are: “Demonstrate that the net well-being impacts of the project are positive for all identified community groups compared with their well-being conditions under the without-project land use scenario.” The VVB noted MR Section 4.1.2 states “As there are no people or communities that live within or depend on the project area for their livelihoods; and there are no direct community impacts in either the with- or without-project scenarios on the project area.” The VVB noted MR Section 4.1.2 provides generalized descriptions for well-being impacts on community members in the project zone engaged in forestry economic activities under the anticipated without-project scenario as well as under the with-project conditions. The VVB noted the CCB PDD does not clearly identify how the net well-being impact on this community group is positive. The VVB determined clarification is required for this item. 9) The VVB noted MR Section 4.1.2 does not address other community groups in the project zone. However, the VVB noted the CCB PDD identified community members engaged in forestry economic activities as the only group as materially affected by the project under the without-project or with-project scenarios, and this group is addressed by item 8 in these findings. 10) The VVB noted MR Section 4.1.2 states the implementation of the project has: “Contributed direct economic development through project activities, but negatively impacted the economic benefits of the higher timber harvesting in the baseline scenario”. The VVB noted the “direct economic development impact” contributed within the project zone during this monitoring period is not clearly identified defined or described in MR Section 4.1.2. The VVB determined clarification, along with supporting documentation, is required for this item. 11) The VVB noted Standardized Benefit Metrics for Well-being are reported as “Data not available” for the monitoring period and for the project lifetime. The VVB determined clarification is required for why metrics for people with improved well-being is not able to be quantified and reported.
Non-conformance Request (NCR):	Please provide clarification for items 2, 3, 4, 5, 6, 8, 10, and 11 in line with findings for Indicator CM1.1.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) n/a 2 & 3) Table 1.2 , footnote 6 and 7 discuss reporting employment including employees, contracted and sub-contracted, community members, etc. NCC employs 1 full

	time employee on site, but also employees regional and national staff, contractors, sub-contractors, and other community members on the property. For clarity, the MR does not state that only 1 FTE is involved in project activities, only that there is one person full time on site. NCC is a national scale diverse, integrated, and complex business operation that employs staff, contractors, sub-contractors, and other service providers locally, regionally, and nationally across multiple projects and work. Hence there is not a direct employment list, nor is it possible to create that across internal and external providers. NCC can track and allocate spending to Darkwoods, which serves as the best measure of employment impact. For other purposes in the CCB project NCC therefore uses a proxy of reporting on total spending, including local, regional, national staff, contractors, and other services in total, then converts this to a FTE using factors that are comparable baseline employment calculations. This is done to consistently report on the comparison of net benefits between the baseline and project, as required by CCB, and discussed at length in the CCB PD. The NCC spending in this monitoring period (as referenced and converted to FTE in Tables 17 & 18) includes primarily spending related to Darkwoods that is primarily related to paying employees, contractors, sub-contractors in some capacity, although it also may contain a lesser amount of spending on services (which, technically, are related to employment in some form or another). So, although NCC's reporting of FTE's is broadly based on a conversion from spending, and uses FTE conversion factors used to compare to the baseline, it is a direct and repeatable measure of direct spending on the project, and relates to direct employment in various forms that are directly related to the project. Although perhaps Section 1.2 is designed for projects involving more simple direct employment, NCC feels the current spending reporting and conversion to FTE effectively communicates the actual employment impact in a modern, diversified economy such as Darkwoods. More importantly, this reporting is consistent with the measures of community net benefit used in the document, and is consistent with all prior reporting in validation and multiple verifications for CCB. The conversion to FTE is documented in the MR. The total spending is reported in the MR. Further supporting details on NCC spending is confidential, but available for review upon request. The project has retained this reporting format, but is open to further discussion as necessary. 4, 5, 6, 7). For Section 1.2 the MR template requires reporting using "not applicable" or "data not available" for metrics not reported by the project. The listed metrics are either not tracked by NCC, not relevant to the project conditions or operating environments, and/or not legally or socially appropriate to track in Canada in this situation. None of the 'Not applicable' or 'Data not Available' metrics
--	--

	in 1.2 are a part of the project design, nor are they tracked in community monitoring in the validated PD. In prior verifications, a discussion around how to report these (when Table 1.2 was added to the template) for Darkwoods indicated most of these factors are not technically 'not applicable', but not involved in the project or reportable, so 'data not available' was recommended as appropriate for these sections. Obviously most of these sections are designed for projects in developing nations where elements such as gender employment/involvement targets, local base level training, education and health can be material factors in project design and operation. Darkwoods operates in a fully modernized economy where things like basic level employment/training, base education, health, and basic livelihoods, etc. are either not relevant to the society, or more nuanced societal level issues well beyond the scope of the project. Further, NCC is a highly diverse, progressive modern organization, with a high proportion of women throughout the organization and leadership (including the CEO). NCC does not discriminate on gender (by law) and has generally moved beyond tracking and reporting specific gender related metrics, especially as gender has become more nuanced and complex in Canadian society. Health (and particularly women's health) and similar elements are viewed as private in Canada and NCC is not in a position to request such information from internal or 3rd party providers, nor report on it. In sum, these elements listed as 'Data not available' technically have some tangential existence for Darkwoods, but the data is not available or reportable. If the VVB feels "not applicable" is more appropriate to the template requirements, we can change the table, but otherwise as described above, these elements are not part of the project design or monitoring metrics, and there either is no data tracked for reporting, or it would be inappropriate or infeasible for the project to do so in the summary table 1.2. 8) First, as noted, there are no direct communities impacts on the project area. There are no direct impacts on any group in the community within the project area. No further data or metrics are provided for groups directly affected on the project area. CCB requires the project to describe and document positive and negative impacts on local communities. It does not mandate that there can be no negative impacts, nor does it require groups outside the project area to be distinctly identified and every group be a positive impact. That would likely be impossible in most projects given the additionality of the project requires a change in practice that will affect some individuals or groups. The PD has an in depth discussion of the community context (outside the project area, in a project zone), and primarily considers the collective net impacts across the
--	--

	broader community. It does specifically discuss the potential negative impacts on the logging industry as logging dramatically reduced, but also discusses mitigation efforts in the early years of the project to blunt any specific impacts. It is further noted that Darkwoods is within a fully developed and diversified economy, and discusses the regional relevance of logging and other factors. The PD descriptions, conclusions and metrics have obviously been validated and verified multiple times. The PD, and subsequent MR's have all demonstrated a net benefit to communities using the methods in the PD. There is no requirement that every potential individual or group be positive, particularly when none are on the project area, and none are dependent on the project area for their livelihood. That background in mind, it is not clear that any change is necessary – the MR follows the PD, and demonstrates a net positive impact for the communities in the project zone. 9) See 8. 10) 4.1.2 does describe the impacts and benefits to the communities in the project zone. The metrics and period results are reported and discussed in Section 4.3. Note that the metrics in Tables 20-24 on community benefits were out of date (similar to other VCS tables in the MR) and have been updated. This changed some of the conclusions noted in the text, primarily by bringing the climate benefits and project activity value above the estimated logging activity value, which is similar to prior verification periods. 11) See above – these metrics are either not available, not appropriate to collect data on an report, and/or not relevant to the fully developed society in which the project sits.
Findings Round 2:	Items 2 and 3. The VVB reviewed and acknowledges the Project Proponent's response on these two items. The VVB noted the response provided by the Project Proponent appears to primarily address the economic impact of the project which includes presenting results based on the methodology outlined in the validated CCB for estimating the economic impact on communities from the project. For clarification, the VVB has determined there continues to be a discrepancy between the direct, project-related employment reported in MR Section 4.1.1. and the direct, project-related employment reported in Table 1.2. Based on a review of the response provided by the Project Proponent, review of supporting documentation, and review of the instructions within the MR template, specifically footnotes 5 and 6 associated with Table 1.2 (footnotes 7 and 8 of the Project Proponent's MR), the VVB determined a nonconformance

	exists for the information presented by the Project Proponent in Table 1.2 on the number of people employed in project activities. Items 4, 5, and 6. The VVB reviewed and acknowledges the responses for the additional clarification on why “data not available” is used in Table 1.2 of the MR for these three items. The VVB acknowledges that Project Proponent does not monitor these three standardized benefit metrics for reporting, and noted the reasons provided by the Project Proponent. The VVB acknowledges that reporting for these three items in Table 1.2 in the MR is in line with previous monitoring reports that have been verified by past VVBs and accepted by Verra. These items are addressed. Items 8, 9, and 10. The VVB reviewed and acknowledges the responses provided for these items. The VVB noted the corrections made by the Project Proponent to Tables 19 and 24 provide the demonstration for how, in consistency with the methodology identified in the validated CCB PD, that project activities during the monitoring period resulted in net positive social and economic well-being benefits. These items are addressed. Item 11. The VVB acknowledges the response provided. The VVB recognizes that this information is not available. This item is addressed.
Non-conformance Request (NCR):	Please address the non-conformance identified for items 2 and 3 for Indicator CM1.1.
Date Evaluated:	6 April 2023
Project Proponent Response/Actions and Date:	Items 2 & 3: the finding is correct that we were not reporting the direct project employment in Section 1.2 (currently it reports the economic benefit metrics, which are converted into a comparable FTE metric for the net benefits assessments in CCB). The project does not specifically track direct employment numbers due to the number of different parties working highly variable hours in relation to Darkwoods. In order to estimate FTE direct employment related to Darkwoods, while maintaining consistency with the economic assessments, the project can convert the economic spending from Table 18 into an estimate of actual direct FTE employment by using a direct employment compensation amount. In this case, it is conservative to assume an average salary for all parties engaged on Darkwoods at an average salary rate from an actual NCC job posting for a job similar to the Darkwoods Site Manager position. In this case, an average salary level of \$85,260/yr is a representative of the average person working on the project area. By dividing the spending reported in the MR Table 18 by \$85,260 will provide a good estimate of full-time employment (FTE). So, for example, Table 18 reports 2021 NCC staff costs at

	\$160,170, which at \$85,260 is approximately 1.9 FTE, which NCC reports is approximately correct for internal staffing directly engaged on Darkwoods annually. By extending this salary estimate to the balance of the reported expenditures (monitoring period total \$1,631,850 or average \$815,925/yr @ \$85,260 = 9.6 FTE/yr). Although not exactly a measure of only staff spending, the project team feels this is a good representation of the direct employment for the complex mix of all activities involved in a year of Darkwoods. Table 1.2 has been updated to reflect these numbers. Further, because the selected average salary is 2x the economic benefit salary factor, then the project lifetime can be recalculated by simply dividing by 2 (or multiplying by the original \$42,630 factor, then dividing by the direct employment factor \$85,260). This then also creates a reasonable cumulative lifetime direct employment estimate for Table 1.2. Table 1.2 has been updated and an explanatory footnote added, Section 4.3 updated slightly, and an explanatory footnote has been added to Section 4.3.2. (14 May 2023)
Findings Round 3:	The VVB reviewed the alternative method outlined by the Project Proponent for determining FTE by using salary estimates and expenditures. The footnote instructions for section 1.2 of the MR state: "Full time equivalency is calculated as the total number of hours worked (by full-time, part-time, temporary and/or seasonal staff) divided by the average number of hours worked in full-time jobs within the country, region or economic territory." The information required is not available for the project to demonstrate that it is in conformance with this reporting requirement.
Non-Conformance Request (NCR):	Please address in line with the finding.
Date evaluated:	22 May 2023
Project Proponent Response/Actions and Date:	The project does not have total hours worked by all related project work available as data. However, the project has estimated the FTE based on the method described in the Round 2 response, based on spending (which is tracked) and an assumed average annual salary across all project-related work (based on a published salary range from NCC). The project has now referenced the average number of hours worked per year in Canada from OECD data. Although a redundant calculation, the project can estimate from total dollars spent / average salary = 9.6 FTE * 1,665 average hours per year = 15,984 total hours worked per year. 15,984 total hours / 1,665 hours/yr = 9.6 FTE. Although we do not have the total hours data for the project, we can reasonably estimate a direct employment FTE for Table 1.2, and we've added the total hours per year data to the footnote in the table.

Findings Round 4:	The VVB acknowledges that the project proponent has added the average number of hours worked per year for full time employees in Canada to their estimation. As stated in the previous finding, the instructions for section 1.2 state that full-time equivalency is calculated using the total number of hours worked. As stated by the project proponent, the total number of hours worked is not available. The information required is not available for the project to demonstrate that it is in conformance with this reporting requirement.
Non-Conformance Request (NCR):	Please address in line with the finding.
Date evaluated:	20 June 2023
Project Proponent Response/Actions and Date:	If the definitions for Table 1.2 are hard coded to only include calculations from total hours worked, then the project does not have this data. Therefore the report table has been changed to "Data not available" as per the template instructions. A footnote has been left for explanation and the available data.
Evidence Used to Close NCR:	The verification team confirmed that Table 1.2 now states "Data not available" for number of people employed by the project, expressed as FTE. The footnote included provides the estimate for FTE working on the Darkwoods project. This item is addressed.
Date Closed:	5 July 2023

Indicator CM1.2 - Demonstrate that no High Conservation Values identified in G1.8.4-6 will be negatively affected by the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Section 4.1.3; CCB PDD Section G1 (subsection G1.8) and Section CM1 (subsection CM1.2); Supporting documentation, including: Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020), FireSeverity_July2022.jpg, Darkwoods_Monitoring_2021-1049098.jpg, Darkwoods2020 Site Inspection Report.docx, Darkwoods2021 Site Inspection Report.docx, CKISS_NCC Summary Report 2021-1015994.pdf, ECA_July2022.jpg
Findings:	Instructions for Section 4.1.3 of the MR Template are: "Demonstrate that none of the HCVs related to community well-being in the project zone that were identified in the validated CCB project description have been negatively affected by the project." The VVB noted the following: 1) The VVB noted MR Section 4.1.3 addresses the community-related HCV category for areas that provide critical ecosystem services in consistency with the treatment for this HCV in the CCB PDD. Supporting documentation substantiates the HCV areas providing

	these ecosystem services were not negatively affected by the project during the monitoring period. 2) The VVB noted MR Section 4.1.3 states there are no HCV areas associated with community well-being. The VVB noted this statement is consistent with information presented in the CCB PDD that there are no HCV areas identified as fundamental for meeting the basic needs of local communities or critical for the traditional cultural identity of communities. Item closed.
Date Closed:	5 December 2022

CM2 Offsite Stakeholder Impacts

Indicator CM2.1 - Identify any potential negative offsite stakeholder impacts that the project activities are likely to cause.	The VVB reviewed the CCB PDD for information presented for Indicator CM2.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section CM2 (subsection CM2.1); MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the CCB PDD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of the MR that no minor changes to the PD or PD deviations related to Indicator CM2.1 were applied for this monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator CM2.2 - Describe how the project plans to mitigate these negative offsite social and economic impacts.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 4.2.1; CCB PDD Section CM2
Findings:	Instructions for Section 4.2.1 of the MR Template are: "Describe the activities and/or processes implemented to mitigate the negative well-being impacts on other stakeholders." The VVB noted MR Section 4.2.1 states: "No additional specific steps were necessary or taken to further mitigate negative impacts on outside stakeholders, as the expected net benefits will be positive." The VVB noted CCB PDD Section CM2 identifies potential negative economic opportunities to offsite stakeholders from the lost logging opportunities are partially offset by anticipated employment value gained by the implementation of the project as well as "the larger benefits from the project scenario related to climate services, ecosystem services provisioning". The VVB noted MR Section 4.2.1 does not describe activities or processes implemented to mitigate the negative well-being impacts on other stakeholders identified in the validated CCB PDD. The VVB noted clarification is required for this item.
Clarification Request (CL):	Please provide clarification for in line with findings for Indicator CM2.2.

Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	As discussed in prior findings – there are no communities on the project area and therefore no direct impacts on communities requiring mitigation. CCB does not mandate zero negative impacts, nor does it require mitigation of every potential negative impact to all groups outside the project area. CCB does require a net benefit to <i>communities</i> in the project zone, which the project has demonstrated. No further mitigation is required beyond demonstrating a net benefit, which the PD describes in depth in terms of concept. However, the PD does describe steps taken in the first monitoring periods to mitigate some more obvious impacts to specific groups and individuals (i.e. ramp down on harvesting over 3-5 years, road reclamation work to prior contractors, retention of an employee to retirement, if we recall; which were intended to provide time to transition to other areas/work - this was over 10-12 years ago and is long passed reporting in current MR's). The PD also describes the economic diversification of the region (highly diverse, highly interconnected, and highly mobile), relevance/magnitude of Darkwoods to the local forest industry (limited/minor), and even community economic development surveys (logging is not an important factor, even 10-15 years ago). However, the key point is no groups are dependent on Darkwoods for their livelihood that might required active mitigation. Overall benefits are net positive as shown in the validated PD, prior verifications, and this MR. The benefits described fit very well with the local communities goals/values and fit within the context of the regional economy and society. No further action has been taken for this finding, however if a discussion would help clarify the project design further, it can be arranged.
Evidence Used to Close CL:	The VVB reviewed and acknowledges the response provided for this finding. The VVB noted the Project Proponent's response to the finding for Indicator CM 2.2 did not provide the information or clarification requested by the Round 1 finding for this Indicator. However, the VVB noted the corrections made by the Project Proponent to Tables 19 and 24, in response to Findings for Indicator CM1.1 provided documentation that could be used by the VVB for determining how the Project Proponent demonstrated, in consistency with the methodology identified in the validated CCB PD, that project activities during the monitoring period resulted in net positive social and economic well-being benefits for offsite stakeholders that would mitigate potential negative offsite stakeholder impacts identified in the validated PDD. The VVB determined that the corrected information supports the description provided in MR Section 4.2.1 that no additional specific steps were necessary or taken to further mitigate negative impacts on outside stakeholders. Item closed.
Date Closed:	6 April 2023

Indicator CM2.3 - Demonstrate that the project is not likely to result in net negative impacts on the well-being of other stakeholder groups.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 4.2.2; CCB PDD Section CM2
Findings:	Instructions for Section 4.2.2 of the MR Template are: "Demonstrate that the project activities have not likely resulted in net negative impacts on the well-being of other stakeholders." The VVB noted MR Section 4.2.2 provides references to demonstration of "net benefits" in Section 4.1.2 and 4.3.2, which "act as proxies for the net impact on other stakeholders outside the project zone as well." The VVB noted clarification requests in separate findings were issued for Indicator CM1.1 which is covered in MR Section 4.1.2. The VVB noted a clarification request in a separate finding was issued for Indicator CM2.2. The VVB noted full assessment of this item is pending resolution of findings for Indicator CM1.1 as well as Indicator CM2.2, however, the VVB determined clarification is required for MR Section 4.1.2 to demonstrate how project activities have not likely resulted in negative impacts on the well-being of other stakeholders.
Clarification Request (CL):	Please provide clarification in line with findings for Indicator CM2.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	As noted in the finding, this has been discussed in responses above. The PD describes the project zone and assumptions about offsite stakeholders outside the project zone clearly, which has been validated and verified in multiple prior periods. The project clearly looks at metrics that estimate positive and negative impacts, and the PD discusses the regional context in some depth. As noted in the PD, the impacts and benefits attributed to the local project zone or local communities outside the project area in general are also generally applicable to external 'off-site' stakeholders/communities as well, and in fact the economic impacts (positive and negative) decline as you get further from the project zone, while some of the key benefits are regional in nature (i.e. climate benefits, ecosystem services), which conceptually reinforces the point. No further changes have been made, but if a discussion is required or clarification from Verra required we will set this up.
Evidence Used to Close CL:	The VVB reviewed and acknowledges the response provided for this finding. The VVB noted the corrections made by the Project Proponent to Tables 19 and 24, in response to Findings for Indicator CM1.1 provided information that could be used by the VVB for determining how the Project Proponent demonstrated, in consistency with the methodology identified in the validated CCB PD, that project activities during the monitoring period resulted in net positive social and economic well-being benefits for offsite stakeholders. The VVB determined that resolution of the findings for Indicator CM 2.2 and the information

	provided in the corrected Tables 19 and 24 support the assertion that project activities have not likely resulted in net negative impacts on the well-being of other stakeholders. Item closed.
Date Closed:	6 April 2023

CM3 Community Impact Monitoring

Indicator CM3.1 - Develop an initial plan for selecting community variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's community development objectives and to anticipated impacts (positive and negative).	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 4.3.2; CCB PDD Section CM3.1; Darkwoods Carbon Financial Modeling 2020-2021 v1.0.xlsx; NCC CCBA 2020-2021 – Community Valuation Exercisesv1.0.xlsx
Findings:	Instructions for Section 5.3.2 of the MR Template relevant to Indicator CM3.1 are: "Present the results of the community impact monitoring which should include: • All communities, community groups, other stakeholders, and HCVs related to community well-being identified in the monitoring plan. • Community variables selected in the validated project description. • Dates, frequency, sampling methods used, and other information regarding the monitoring process. • Results and evaluation of monitoring." The VVB noted the monitoring plan presented in Section CM3.1 of the validated CCB PDD identifies four monitoring activity items. The VVB noted the following: 1) The VVB noted MR Section 4.3.2 presents information on economic/employment impact monitoring and reporting in line with the monitoring plan presented in CCB PDD Section CM3.1 for this impact. The VVB noted MR Section 4.3.2 reports on annual expenses related to the project, and reports on the analysis of comparative employment value estimates between the baseline scenario and the project expenses during the current verification period. The VV noted the information presented is consistent with numbers reported in supporting documents. The VVB noted closure of this item is pending results of the concurrent VCS verification of the timber harvest in 2021 as reported in MR Section 2.1.1, which forms the basis for information on direct economic benefits in this monitoring period as reported in Table 17 of MR Section 4.3.2.

	2) The VVB noted MR Section 4.3.2 presents information on climate services impact monitoring and reporting in line with the monitoring plan presented in CCB PDD Section CM3.1 for this impact. The VVB noted MR Section 4.3.2 reports on ex-ante projections for net emissions from the relevant baseline and years covered by this monitoring period, and updated relevant average carbon value measures; reports on the VCUs projected and issued, along with approximate sales proceeds and prices; and reports on calculated average estimated climate services value for the verification period. The VVB noted the information presented is consistent with numbers reported in supporting documents. The VVB noted closure of this item is pending results of the concurrent VCS verification of the net emissions reductions asserted for the years 2020 and 2021. 3) The VVB noted MR Section 4.3.2 reports there were no unplanned land use changes to the project area during this monitoring period that materially affected ecosystem services provisioning. The VVB noted MR Section 2.1.1 states there was a natural cause forest fire in 2021 with a mix of burn severities affecting 4,485.1 ha of the project area. The VVB noted the qualitative assessment presented for other ecosystem services provisioning impact does not clearly identify the impact of this fire on the ecosystem services evaluated. The VVB determined clarification is required for this item. 4) The VVB noted MR Section 4.3.2 presents a qualitative value assessment for other ecosystem services for the baseline impacts and project impacts. The VVB noted the qualitative assessment does not clearly identify how the values for project impacts for the assessment relate to the monitoring period 2020-2021. The VVB noted Table 21 states no public access permits were issued in 2020 or 2021, but Table 20 reports positive project impacts on Recreational Hunting/Fishing and Outdoor Recreation during this monitoring period. The VVB determined clarification is required for this item. 5) The VVB noted MR Section 4.3.2 states there were no unplanned land use changes to the project area during this monitoring period that would impact community amenity values. The VVB noted MR Section 4.1.1 states: “the 2021 fire started on July 1 and required NCC to again close the property due to public safety concerns so the numbers of visitors during this monitoring period are abnormally low.”. The VVB determined clarification is required for this item. 6) The VVB noted MR Section 4.3.2 states there were no new quality of life or community environmental values surveys located since the materials reviewed in the CCB PDD. The VVB noted Table 21 states no public access permits were issued in 2020 or 2021, but MR Section 4.3.2 for Community Monitoring Activity 4 – Community Amenity Value Impacts also states “NCC continues to be engaged with a significant number of community groups and users related to the project area and project activities.” The VVB determined clarification is required for this statement along with supporting documentation.
Clarification Request (CL):	Please provide clarification for items 3, 4, 5, and 6 in line with findings for Indicator CM3.1. The VVB notes full evaluation of this indicator is also pending resolution of separate findings as noted in items 1 and 2.
Date Evaluated:	5 December 2022

Project Proponent Response / Actions and Date:	Note the Community Valuation Exercises spreadsheet and corresponding tables in the MR were found to be out of date (similar to VCS tables) and have been updated. 3) Updated text in section 4.3.2 to describe impacts of the fire on ecosystem services and provided the 'N71245 Cultus Creek Fire Reconnaissance post fire hazard' and 'Evacuation Order Cultus Creek_UPDATED 2021.07.21' and 'Prescribed_Fire_Prescription_Braumandl2020 as supporting documentation 4) Section 4.3.2 has been updated to clarify the impacts of the pandemic and fires are relative in the project and baseline and remain unchanged. 5) Text was updated in 4.3.2 to describe how there is no permanent impact on outdoor recreation, but it was temporarily negatively impacted because Darkwoods was temporarily closed to the public and the Regional District of Central Kootenay issued an Evacuation Order for the area. 6) The exceptional circumstances in both 2020 (Covid) and 2021 (fire) were temporary and relationships with user groups has been maintained. For example, NCC continues to work with the Creston Valley Rod and Gun Club to manage the non-motorized hunt in Darkwoods (see: http://www.crestonvalleyrodandgunclub.org/search/label/Darkwoods%20Info). We have maintained our agreement with the Kootenay Mountaineering Club. Provided: 'KMC License Agreement 2019_executed.' NCC has continued to work directly with the Lower Kootenay Band to provide access to local First Nations. Provided: 'Re: Chad Luke Keys for DW2021'
Findings Round 2:	The VVB acknowledges the response and supporting documentation provided. Item numbers refer to the original item numbers included in Round 1 Findings for this indicator. Items 1 and 2 were pending resolution of findings for the concurrent VCS verification. Closure of the VCS findings will satisfy the requirements under CCB. Item 3. The VVB noted MR Section 4.3.2 has been updated to describe how the 2021 fire impacted ecosystem services during the monitoring period. The VVB determined the monitoring and reporting conducted for this fire, along with supporting documentation, substantiated the reported impact of this fire on ecosystem services, and further that services that were negatively impacted were expected to return to normal. This item is addressed. Item 4. The VVB noted Table 21 states no public access permits were issued in 2020 or 2021, but Table 20 reports positive project impacts on Recreational Hunting/Fishing and Outdoor Recreation during this monitoring period. The VVB determined clarification is required for how positive project impacts were determined to have occurred for the monitoring period 2020-2021 for Recreational Hunting/Fishing and Outdoor Recreation as reported in Table 20. Item 5. The VVB noted clarification has been added to the MR stating that there was no permanent impact on outdoor recreation from the temporary closures during the monitoring period. This item is addressed. Item 6. The VVB reviewed the clarification and supporting documentation provided. The VVB confirmed the agreement with the KMC was in place

	throughout the monitoring period (valid until July 2022). The Project Proponent also provided evidence that NCC continued to work and communicate with the Lower Kootenay Band during the monitoring period. This item is addressed.
Clarification Request (CL):	Please provide clarification for item 4 in line with findings for Indicator CM3.1.
Date Evaluated:	6 April 2023
Project Proponent Response / Actions and Date:	The project agrees that the Recreational Hunting/Fishing and Outdoor Recreation elements were impacted by project area closures due to the fires and pandemic during this monitoring period. We assume the same issues would have affected the baseline scenario. Therefore, the qualitative assessments in Table have been modified to show an assessed value of "0" instead of the previous "+" or "-" rating, which reflects the idea that those activities were temporarily on hold in both scenarios. Table 20 and the related text has been updated with the new counts of qualitative impacts. The community valuation exercises spreadsheet has been updated and new version 1.2 provided. These activities have resumed in 2022 and will be re-assessed at the next verification for the next monitoring period. (15 May 2023)
Evidence Used to Close CL:	The VVB confirms that Table 20 in the MR has been updated to state "0" for recreational hunting/fishing for the monitoring period and includes footnote explanations stating that these activities were impacted by fires and the pandemic. This item is addressed.
Date Closed:	19 May 2023

Indicator CM3.2 - Develop an initial plan for how they will assess the effectiveness of measures used to maintain or enhance High Conservation Values related to community well-being (G1.8.4-6) present in the project zone.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 4.3.2; CCB PDD Section CM3.1; CCB_VALID_REP_ENG_607_26JUN2014.pdf (Section CM3); NCC CCBA 2020-2021 – Community Valuation Exercisesv1.0.xlsx
Findings:	The VVB noted CCB PDD Section CM3.1 states that Community HCV monitoring is "Not applicable". The VVB noted the validated CCB PDD does not provide an explanation for why this monitoring was considered not applicable. The VVB noted the Validation Report states: "As no community HCV's were identified in the Project area, this indicator is not applicable to the Project." The VVB noted CCB PDD Section G1.8 identifies the project area provides critical ecosystem services, consistent with Indicator G1.8.4 for HCVs related to community well-being. The VVB noted Table 20 of the MR provides a qualitative assessment of the critical ecosystem services identified in CCB PDD Section G1.8, including water quality/quantity, key species habitats, and pollinator services. The VVB determined the community-related HCVs identified by the CCB PDD were monitored during the monitoring period.

	Item closed.
Opportunity for Improvement (OFI)	The VVB noted an OFI, which does not require action by the Project Proponent to close this finding. The VVB noted inclusion of a statement in MR Section 4.3.2 would be helpful to identify the items covered by other reported community monitoring that includes the specific community-related HCVs identified in the CCB PDD.
Date Closed:	5 December 2022

Indicator CM3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 4.3.3; CCB PDD Section CM3.3
Findings:	Instructions for Section 4.3.3 of the MR Template are: "Describe how the monitoring plan (if not disseminated in a previous monitoring period) and any results of monitoring undertaken in accordance with the monitoring plan have been disseminated and made publicly available on the internet. Describe how summaries (at least) of the results have been communicated to the communities and other stakeholders." The VVB noted the following: 1) The VVB noted the validated CCB PDD does not provide a description for how the results of the community impact monitoring are to be disseminated or communicated to the communities and other stakeholders. The VVB noted instructions in the MR Template provide minimum requirements for reporting on dissemination of results of monitoring by making them publicly available on the internet. The VVB noted MR 5.3.3 identifies the methods by which the Project Proponent indicated "general project information" is primarily distributed through the NCC project webpages. The VVB noted the MR does not clearly identify how any results of monitoring undertaken in accordance with the monitoring plan have been disseminated and made publicly available on the internet. The VVB determined clarification is required for this item. 2) The VVB noted MR Section 4.3.3 references additional description presented in Section 5.3.3, Tables 22 and 23, and a "non-exhaustive list of stakeholder meetings during the monitoring period". The VVB noted the MR does not clearly describe how summaries (at least) of the results of community impact monitoring for this monitoring period have been communicated to the communities and other stakeholders. The VVB determined clarification is required for this item, along with supporting documentation for the information covered by meetings identified in Tables 22, 23, and 27.

Clarification Request (CL):	Please provide clarification for items 1 and 2 in line with findings for Indicator CM3.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	See response to Finding G3.9. 1. NCC has provided direct notification of the project comment period and links to the project documentation to the Ktunaxa Nation during this monitoring period. See: 'Indigenous Consultation Letter – Ktunaxa Nation'. Other stakeholders have been communicated with on an ad hoc basis based on expressed interest, which may relate to the project area or activities, but not necessarily be directly related to project technical documents. Project documents continue to be publicly available by request at any time, and via the NCC website for interested parties during public comment periods. Additional explanations of examples of other informational/stakeholder meetings held in the monitoring period have been added in section 2.3.3. NCC has communicated with the stakeholders and community members who have shown an interest in the project area and project activities during this monitoring period in a manner suited to the project location and topic of community interest. It is important to understand that 2. See response for #1 above – NCC communicates results and monitoring on an ad hoc basis to interested groups. The level of ongoing communications about activities and results on the project area is significant, but it is generally directed by community request or interest. The level of communication is high for (primarily) biodiversity and conservation interests, but these are usually targeted interests, not towards the overall carbon project or within the full carbon project context. Related, two additional examples of interested stakeholder meetings and discussion of how these have influenced Darkwoods project management are now provided in section 2.3.1. These also relate to Darkwoods communication of activities and results on the project area. It should be noted in general that during validation and in prior verifications, Verra has been involved in various clarifications related to Darkwoods that would be available in prior verification materials. In particular, Verra has previously provided guidance related to the style of communication NCC undertakes, which generally was found to be sufficient and suited to the project situation. Similarly guidance has been provided previously related to the projects approach to community benefits as well. We would have to revisit these, as Verra guidance is usually specific to a question, but these type of findings have been all dealt with before, to the satisfaction of Verra and prior VVB's (including Aster Global, for the 2017-2019 monitoring period). It may be worth reviewing the prior verification findings for relevant guidance and findings in the communication and community benefits sections.

Evidence Used to Close CL:	Items 1 and 2. The VVB acknowledges the responses provided and supporting documentation provided for the notification letter submitted to the Ktunaxa Nation. Based on the clarification provided in the response, the VVB determined that although no plan was presented in the validated CCB PDD for how to disseminate the results of community monitoring, the verification report issued in 2018 for the monitoring period 1 January 2013 to 31 December 2016 included a statement regarding the acceptability of disseminating results of community monitoring by making the results available through an internet link on the Darkwoods website. The VVB determined from supporting documentation provided in response to findings for Indicator G3.9 that the monitoring results for the community monitoring for the current period under verification had been made available through an internet link on the Darkwoods webpage. The VVB located the link through the Darkwoods webpage on the NCC website, and confirmed the link took the user to the Darkwoods project page on the Verra Registry where the monitoring report under verification is located. Item closed.
Date Closed:	6 April 2023

B1 Net Positive Biodiversity Impacts

Indicator B1.1 - Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defensible assumptions. The 'with project' scenario should then be compared with the baseline 'without project' biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent. The VVB also reviewed the information presented in MR Section 1.2 relevant to this indicator.
Evidence Used to Assess Conformance:	MR Section 5.1.1; MR Section 1.2; CCB PDD Section B1.1; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	The VVB noted the following: 1. Instructions for Section 5.1.1 of the MR Template include the requirement: "Describe all the changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project zone during this monitoring period." The VVB noted MR Section 5.1.1 does not directly describe these changes and impacts. The VVB noted Table 25, referred to in MR Section 5.1.1, presents projected targets for the time period 2021-2025 but does not present results for the monitoring period. The VVB noted Table 26, referred to in MR Section 5.1.1, presents results comparing baseline to project results at the end of 2021 but does not describe changes during this monitoring period. The VVB noted MR Section 5.1.1

	refers to the Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020) (= PMP), but the location of information within the PMP related to reporting requirements for this aspect of Indicator B1.1 is not clearly identifiable. The VVB determined clarification is required within the MR to describe all the changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project zone during this monitoring period. 2. Instructions for Section 5.1.1 of the MR Template include the requirement: "Impacts must include all those identified in the validated CCB project description and any other unplanned impacts." The VVB noted MR Section 5.1.1 does not clearly identify impacts that are consistent with the impacts identified in the validated CCB PDD Section B1.1 or discuss whether any other unplanned impacts occurred. The VVB determined clarification is required for this item. 3. Instructions for Section 5.1.1 of the MR Template include the requirement: "Explain and justify key assumptions, rationale and methodological choices. Provide all relevant references." The VVB noted MR Section 5.1.1 does not provide a clear explanation or justification but references the 2021-2025 PMP as providing "detailed descriptions of the biodiversity effectiveness program, including targets background, references and assumptions." The Project Proponent provided the VVB with a copy of 2021-2025 PMP for review. The VVB noted the location of information within the PMP related to reporting requirements for this aspect of Indicator B1.1 is not clearly identifiable. The VVB noted MR Section 5.1.1 does not provide a clear explanation and justification for all key assumptions, rationale, and methodological choices for reporting biodiversity changes relevant to Indicator B1.1. The VVB determined clarification is required for this item. The VVB reviewed MR Section 1.2 for standardized benefit metrics reported for Biodiversity Conservation. The VVB noted the following: 4. The VVB noted MR Section 1.2 states "Data not available" for both "Achievements during Monitoring Period" and "Achievements during the Project Lifetime" for the metric "Change in the number of hectares significantly better managed by the project for biodiversity conservation, measured against the without-project scenario." The VVB noted CCB PD Section G3.1 states "the major objectives of the project were to protect and enhance the long-term function of the natural ecosystems on the Darkwoods property." The VVB determined clarification is required for the absence of reported data for this item.
--	---

	5. The VVB noted MR Section 1.2 references Section 5.2.2 as the location of data for substantiating information reported for the Monitoring Period column for the metric “Number of globally Critically Endangered or Endangered species benefiting from reduced threats as a result of project activities, measured against the without-project scenario”. The VVB noted MR Section 5.2.2 is the MR section for reporting on “Net Offsite Biodiversity Benefits” for Indicator B2.3. The VVB determined clarification is required for whether the achievements for this metric are linked to offsite benefits rather than to benefits in the project area from reduced threats in the project area from project activities. 6. The VVB noted MR Section 1.2 reports “9 IUCN Red-Listed Species and an additional 27 significant species at risk” for both “Achievements during Monitoring Period” and “Achievements during the Project Lifetime”. The VVB noted only one of the nine species listed as “IUCN Red-Listed” in MR Section 5.2.2 and in MR Section 7 is designated as Critically Endangered or Endangered per IUCN’s Red List of Threatened Species. The VVB determined clarification is required to address this discrepancy in reporting for MR Section 1.2.
Clarification Request (CL):	Please provide clarification for items 1, 2, 3, 4, 5, and 6 in line with findings for Indicator B1.1.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) Caption for Table 25 was updated to clarify that it describes the status of the biodiversity targets in 2020 (at the time of writing the 2021 – 2025 Property Management Plan) and are not projections. Table 26 was updated to add the status of all metrics in the Project at the start of the monitoring period which demonstrate that all metrics showed improvement during the monitoring period. 2) Inserted footnotes to table 25 to clarify relationship between targets described in the CCB PDD and the MR. Clarified text in section 5.1.1 to indicate that there have been no unplanned impacts of the project 3) Ecological justification for the selected biodiversity targets are described in Table 7 of the 2020 Darkwoods PMP. Table 12 of the 2020 Darkwoods PMP describes the monitoring and reporting requirements. 4) Updated Table 1.2 to show the entire project area is significantly better managed during the monitoring period and ongoing in the project for biodiversity conservation. For example, access management access affects the entire project area for the protection of key species such as Grizzly Bears. 5) Moved relevant text from section 5.2.2 to section 5.1.1 to clarify that the link with the project area instead of offsite benefits. Updated reference in Section 1.2 from 5.2.2 to 5.1.1. 6) Updated Section 1.2 and Section 5.1.1 in the MR to include only IUCN ‘Endangered’ and ‘vulnerable’ species. Those listed as ‘Least Concern’ have been

	removed and added to the number of provincially listed species to include those that were previously listed as 'least concern'
Findings Round 2:	Item 1. The VVB noted the change to the caption for Table 25, and also noted clarification added to MR Section 5.1.1 to describe Table 25 as representing the status of the biodiversity targets in 2020. The VVB reviewed the changes to Table 26 and confirmed the additional information presented in Table 26 clearly demonstrates changes in and impacts to biodiversity resulting from project activities under the with-project scenario in the project area during this monitoring period consistent with supporting documentation. This item is addressed. Item 2. The VVB noted the footnotes added to Table 25 clearly describe how the targets relate to the targets identified in the validated CCB PDD, including a new target not identified in the CCB PDD. The VVB noted the statement identified by the Project Proponent as added to Section 5.1.1 (to indicate that there have been no unplanned impacts of the project) was not able to be located by the VVB in Section 5.1.1, however the clarification added through footnotes to Table 25 provided the clarification requested by the VVB. This item is addressed. Item 3. The VVB acknowledges the response provided and was able to locate and review the information contained within the tables referenced in the response that are included in the 2020 PMP provided for VVB review. This item is addressed. Item 4. The VVB noted the response provided by the Project Proponent states Section of Table 1.2 has been updated "to show the entire project area is significantly better managed during the monitoring period and ongoing in the project for biodiversity conservation." However, the VVB noted Table 1.2 was updated to report 54,835 ha of non-forest land in which improved land management has occurred as a result of the project's activities during the monitoring period and during the project lifetime. The VVB noted clarification is required for these claims of improvements to non-forest land. The VVB further noted clarification is required for the Biodiversity Conservation section of Table 1.2, for whether data is available for the number of hectares significantly better managed by the project for biodiversity conservation. Item 5. The VVB noted Table 1.2 now references Section 5.1.1 as the source of information for the MR section containing information for the reported number of Critically Endangered or Endangered species. The VVB noted Section 5.1.1 of the MR was revised to include the specific species occurring within the project area that are

	designated within these IUCN risk categories. This item is addressed. Item 6. The VVB noted Section 1.2 and 5.1.1 of the MR have been updated with the correct number of species meeting within the specified IUCN red-list risk categories. This item is addressed.
Clarification Request (CL):	Please provide clarification for Item 4 in line with the finding and update the MR as needed.
Date Evaluated:	6 April 2023
Project Proponent Response/Actions and Date:	The value of 54,835 ha (the entire project area) is an appropriate metric for the impacts of improved land management because several biodiversity indicators are related to changes/improvements to management of the entire area. For example, the biodiversity effectiveness monitoring target for grizzly bears is fundamentally about restricting road access and human interactions, and is based on a metric of distance from roads. This metric is directly affected by the project scenario reducing road construction and road access as compared to the baseline scenario. This distance from roads applies across forested, non-forested, and non-THLB land; effectively the entire project area. The hydriparian target is a similar example, where the metrics are based on the forest impacts across entire watersheds. Although in this second case the 'activity' is restricted to THLB forest areas, the ECA metric is assessing the impact across all watersheds and the entire project area. Therefore, the Section 1.2 metric is appropriate and has been retained. (15 May 2023)
Findings Round 3:	The VVB understands that the entire project area (54,835 ha) has experienced improved land management because of the implementation of the project. However, the row in question in Section 1.2 specifically states: "Number of hectares of non-forest land in which improved land management has occurred as a result of the project's activities, measured against the without-project scenario." It is unclear how reporting 54,835 ha of non-forest land in which improved land management has occurred is accurate.
Clarification Request (CL):	Please clarify how reporting 54,835 ha of non-forest land in which improved land management has occurred as a result of the project's activities, measured against the without-project scenario is appropriate, and provide supporting documentation as necessary.
Date Evaluated:	19 May 2023
Project Proponent Response/Actions and Date:	We had mis-read the Table 1.2 requirement – the table has now been updated to specify the hectares of non-production forest affected by improved land management. For Darkwoods this is equivalent to the non-Timber Harvesting LandBase (non-THLB). The non-THLB land area is tracked within inventory data sources and can be found reported in the VCS 2018 PD v2.3, Table 13, Page 54.

Findings Round 4:	The VVB acknowledges that the project is now reporting 12,039 ha of non-Timber Harvesting LandBase (non-THLB) as the number of hectares of non-forest land in which improved land management has occurred as a result of the project's activities. The VVB has reviewed the definition of non-THLB area as defined in the PD, and it is unclear how the entire area qualifies as non-forest and how it has been improved during the monitoring period. The VVB noted the VCS PD explicitly included "otherwise unreachable and uneconomic timber", among categories, in its description of areas removed from the productive landbase and reported in Table 13 as "Non-THLB Area". Additionally, it was noted that the Monitoring Report Table 7 reports THLB Area for the project as 52,430 ha, which is different than the 42,831.1 ha reported in Table 13 of the validated VCS PD. The VVB determined clarification is required for this difference for the THLB reported.
Clarification Request (CL):	Please clarify in line with the finding.
Date Evaluated:	20 June 2023
Project Proponent Response/Actions and Date:	Table 1.2 has been updated to report the number of hectares of non-forest area within the project area. This was generated from GIS data, including various non-treed polygons, wetlands, streams and water, and other non-forest such as permanent roads, etc. Table 7 reports on total hectares by BA across the inventory, not THLB. Perhaps it could have been done either way, but the carbon plot calculations and weighting are done by total area by BA class, which is 52,430 ha. The reference to "THLB Area" is an error left over from an old reporting format and has been deleted from Table 7.
Findings Round 5:	The VVB notes that Section 1.2 now states that 8,014 ha of non-forest land has been subject to improved land management. 1. The MR template instructions state: "Data included in the Monitoring Period column shall be substantiated in this document as denoted by the corresponding section reference." The metric in question references Section 5.0 of the MR. The VVB reviewed Section 5 and did not find supporting evidence substantiating the 8,014 ha value stated in Section 1.2. Specifically, it is unclear how the project has demonstrated all non-forested areas (i.e., permanent roads) have experienced improved land management during the monitoring period. Please clarify. 2. Additionally, it is unclear which GIS files were used to calculate the 8,014 ha of non-forested land. Please clarify and provide associated GIS files to support this number.
Clarification Request (CL):	Please clarify in line with the findings.
Date Evaluated:	10 July 2023
Project Proponent Response/Actions and Date:	1. The Footnote has been further clarified to explain why the entire non-forest area is included. The change in management that affects many of the biodiversity

	elements in CCB are related to access management, which include a change in management on the non-forest areas (eg. Access management improved grizzly bear habitat by reducing road densities and reducing traffic on remaining permanent roads). Additional text has been added to Section 3.2 to clarify the non-forest process. And a footnote has been added to Table 26 to tie together the reference from Table 1.2 as it relates to non-forest. 2. The project inventory spatial file has been provided previously. The file reference is called 'Inventory_ProjectScenario' within the 'DW_Forest_Inventories' geodatabase. To replicate our process for determining the area of non-forested land they will want to calculate the total net area of: Land cover class 1 polygons that are 'Treed Coniferous' or 'Treed Mixed' (LAND_COVER_CLASS_CODE_1 = 'TC' OR LAND_COVER_CLASS_CODE_1 = 'TM') and where the land cover class 1 percent is ≥ 10 (LAND_COVER_PCT_1 ≥ 10). This calculation equals 46,820 ha and represents the forested land. We used the 'Net_Area' field for the calculation so road/stream buffers are removed from what is considered forested. If we subtract 46,820 (forested land) from the total project area of 54,834, we get a non-forested area of 8,014 ha.
Evidence Used to Close CL:	The VVB confirmed that additional clarification on how IFM has occurred on non-forested lands has been added to Section 3.2 and 5.0 of the MR. The additional detail added substantiates the metric included in Table 1.2, including access management, and watershed management. The VVB reviewed the relevant shapefile and replicated the analysis performed for determining the area of non-forested land. This item is addressed.
Date Closed:	25 July 2023
Indicator B1.2 - Demonstrate that no High Conservation Values identified in G1.8.1-3 will be negatively affected by the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	CCB PDD Sections G1.8 and B1.2; MR Section 5.1.2
Findings:	The VVB noted MR Section 5.1.2 provides generalized descriptions of the biodiversity-related HCVs and references CCB PD Section G1.8 for more information. The VVB noted MR Section 5.1.2 identifies four activities

	undertaken to mitigate potential impacts to these HCVs. The VVB reviewed supporting documentation for monitoring activities and management plans and determined this supporting information demonstrates that no biodiversity-related HCVs have been negatively affected by the project. Item closed.
Date Closed:	5 December 2022
Indicator B1.3 - Identify all species to be used by the project and show that no known invasive species will be introduced into any area affected by the project and that the population of any invasive species will not increase as a result of the project.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Section 5.1.3; CCB PD Section B1.3; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020); Invasive Plant Management Report 2020
Findings:	The VVB noted MR Section 5.1.3 is consistent with CCB PDD Section B1.3 in asserting no known invasive species will be introduced to the Darkwoods project area. The VVB noted MR Section 5.1.3 describes efforts for periodic monitoring invasive species occurrences, and describes the periodic removal or control efforts used to prevent the known occurrences from increasing. The VVB noted MR Section 5.1.3 presents results of invasive species removal efforts for the 2013-2016 period. The VVB noted similar activities undertaken in 2020 are reported in a support document provided to the VVB. The VVB determined clarification is requested for why information relevant to the monitoring period 2020-2021 is not presented in the MR.
Clarification Request (CL):	Please provide clarification in line with the finding for Indicator B1.3
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	The map and text in section 5.1.3 have been updated to show and discuss work done during the monitoring period
Evidence Used to Close CL:	The VVB confirmed Section 5.1.3 of the MR has been updated to replace the map depicting work conducted in 2103-2016 with a map and text describing the work that was done for invasive species control in 2020. The VVB noted the MR explains that field work was not completed in 2021 due to safety concerns from the fire. The VVB noted the MR states no new occurrences were noted during the monitoring period, and that observations were in line with trends from previous periods. The VVB noted these statements are consistent with monitoring results and species occurrence records provided to the VVB. This item is addressed. The VVB noted an opportunity for improvement (OFI) within MR Section 5.1.3 to fix a typographical error as well as address the "Error! Reference source not found" statement within this section.
Date Closed:	6 April 2023

Indicator B1.4 - Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Project proponents must justify any use of non-native species over native species	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 5.1.4; CCB PDD Section B1.4
Findings:	The VVB noted MR Section 5.1.4 is consistent with CCB PDD Section B1.4 in asserting no non-native species are used by the project. The VVB noted MR Table 26 identifies Whitebark Pine, a native species, as the only species identified as planted in the project area during the monitoring period. Item closed.
Date Closed:	5 December 2022

Indicator B1.5 - Guarantee that no GMOs will be used to generate GHG emissions reductions or removals.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template. The VVB reviewed supporting documentation provided by the Project Proponent.
Evidence Used to Assess Conformance:	MR Section 5.1.5; CCB PDD Section B1.5; https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/tree-seed/seed-production
Findings:	The VVB noted MR Section 5.1.5 provides the guarantee that no GMOs were used to generate GHG emissions reductions or removals, which is consistent with the assertion in CCB PDD Section B1.5 that GMOS will not be used by the project. The VVB reviewed supporting information from the Project Proponent, available through embedded links in the MR, that substantiates the seeds sourced for the seedlings planted during the monitoring period are not GMOs. Item closed.
Date Closed:	5 December 2022

B2 Offsite Biodiversity Impacts

Indicator B2.1 - Identify potential negative offsite biodiversity impacts that the project is likely to cause.	The VVB reviewed the CCB PDD for information presented for Indicator B2.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
Evidence Used to Assess Conformance:	CCB PDD Section B2.1; MR Sections 2.2.3 and 2.2.4
Findings:	This indicator was originally addressed through successful validation of the PD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of MR that no minor changes to the PD or PD deviations related to Indicator B2.1 were applied for this monitoring period. For reference purposes, the VVB noted the validated CCB PDD states negative offsite biodiversity impacts are unlikely. Item closed.
Date Closed:	5 December 2022

Indicator B2.2 - Document how the project plans to mitigate these negative offsite biodiversity impacts.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 5.2.1; CCB PDD Section “B2.1”; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020)
Findings:	The VVB noted MR Section 5.2.1 is consistent with the CCB PDD by stating offsite negative biodiversity impact mitigation is not applicable. The VVB determined this assertion is substantiated by the validated CCB PDD assertion for Indicator B2.1 that negative offsite biodiversity impacts are unlikely, and no negative offsite biodiversity impacts identified by the VVB through review of supporting documentation. Item closed.
Date Closed:	5 December 2022

Indicator B2.3 - Evaluate likely unmitigated negative offsite biodiversity impacts against the biodiversity benefits of the project within the project boundaries. Justify and demonstrate that the net effect of the project on biodiversity is positive.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 5.2.2; CCB PDD Section B2.3; Darkwoods Conservation Area Property Management Plan 2021-2025 (NCC, 2020); 2022_Darkwoods-CarbonReport_SpeciesObservations.xlsx
Findings:	Instructions for Section 5.2.2 of the MR Template are: “Describe the evaluation of unmitigated negative offsite biodiversity impacts and compare them with the project’s biodiversity benefits within the project zone. Justify and demonstrate that the net effect of the project on biodiversity is positive.” The VVB noted the following: 1) The VVB noted MR Section 5.2.2 describes positive biodiversity benefits for the project area, and positive biodiversity benefits from the project area’s adjacency to and connectivity with three provincial protected areas. The VVB noted, as demonstrated in findings for Indicator B2.2, that no negative offsite biodiversity impacts were identified that would require mitigation. The VVB noted that the net effect of the project on biodiversity has been demonstrated and described as positive, but MR Section 5.2.2 does not provide a clear justification statement in line with the instructions from the MR Template. The VVB noted clarification is required for this item. 2) The VVB noted the statement regarding “IUCN red-list species found on the property” referenced in MR Section 5.2.2 includes several species with IUCN Red List designation of “Least Concern”. The VVB noted this statement is not clear why only a few of the IUCN-designated Least Concern species documented on the property are included in this list. The VVB determined clarification is required for this statement.

Clarification Request (CL):	Please provide clarification for items 1 and 2 in line with findings for Indicator B2.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1) Added some clarifying text in section 5.2.2. 2) Updated Section 5.2.2 in the MR to include only IUCN 'Endangered' and 'vulnerable' species as examples of net offsite biodiversity benefits.
Evidence Used to Close CL:	Item 1. The VVB noted additional detail has been added to Section 5.2.2 of the MR demonstrating that the net impact of the project on biodiversity is positive, especially when compared to the without-project scenario. The VVB noted Section 5.2.2 now provides clear justification for the net impact on biodiversity being positive in line with the supporting documentation and monitoring result reviewed. This item is addressed. Item 2. The VVB noted MR Section 5.2.2 was revised to clarify the distinction between IUCN species risk categories and other risk designations. This item is addressed.
Date Closed:	6 April 2023

B3 Biodiversity Impact Monitoring

Indicator B3.1 - Develop an initial plan for selecting biodiversity variables to be monitored and the frequency of monitoring and reporting to ensure that monitoring variables are directly linked to the project's biodiversity objectives and to anticipated impacts (positive and negative).	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 5.3.2; CCB PDD Section B3.1
Findings:	Instructions for Section 5.3.2 of the MR Template relevant to Indicator B3.1 are: "Present the results of the biodiversity impact monitoring which should include: • All biodiversity variables identified in the monitoring plan, including HCVs. • Dates, frequency, locations, sampling methods used and other information regarding the monitoring process. • Results and evaluation of monitoring" The VVB noted the following: 1) The VVB noted Section B3.1 in the validated CCB PDD refers to "NCC 2011" for the biodiversity monitoring plan. The VVB noted CCB PDD Section B3.1 does not identify the variables, dates, frequency, locations, sampling methods, or other information regarding the monitoring process. The VVB determined the Project Proponent must provide a copy of "NCC 2011" for review by the VVB for the purpose of evaluating whether biodiversity

	monitoring has been undertaken during the monitoring period in accordance with the validated monitoring plan. 2) The VVB noted CCB PDD Section B3.1 states that “eight high priority EM questions/objectives were determined to be urgent for implementation (see NCC 2011, Table 12).” The VVB noted Table 26 in MR Section 5.3.2 reports on six targets. Full assessment of this item is pending receipt of the biodiversity monitoring plan presented in “NCC 2011”, however, the VVB determined clarification will be required for reporting on six rather than eight targets. 3) The VVB noted MR Section 5.3.2 states “with the publishing of the new 5-year Property Management Plan in 2020, NCC shifted the reporting of quantitative measures for the Effectiveness Monitoring criteria to every 5 years (as opposed to annually as in pre-2017 monitoring periods).” Full assessment of this item is pending receipt of the biodiversity monitoring plan presented in “NCC 2011”, however, the VVB noted this change in the monitoring plan, including monitoring and reporting frequency as described in MR 5.3.2, is not presented as either a PD Deviation or Minor Change to the PD in MR Section 2.2.3 or 2.2.4. The VVB determined this is a nonconformance to be corrected and will also require a copy of the monitoring plan presented in “NCC 2011” for comparison with changes in monitoring proposed in the 2021-2025 PMP.
Non-conformance Request (NCR) / Clarification Request (CL):	Please provide the support document “NCC 2011” referenced in item 1. Please provide clarification for item 2 in line with findings for Indicator B3.1. Please address the nonconformance identified for item 3 in line with the findings for Indicator B3.1.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	1. The CCB PDD references ‘NCC, 2011’, which is the first Property Management Plan developed for Darkwoods by NCC in 2011 (see references in CCB PDD). PROVIDED: ‘2011 Darkwoods PMP’. The Effectiveness Monitoring Indicators are described in Table 13 of the 2011 PMP. The targets are the same (with updated names, as described in the footnotes of Table 25 of the MR) while several of the measures have been refined, updated and improved over the past decade in accordance with adaptive management principles described in the PD and to reflect available data and improved understanding of biodiversity values. 2. PROVIDED ‘2011 Darkwoods PMP’, where Table 12 describes the eight high priority EM questions, which are not the same as the 6 biodiversity targets. The monitoring of the biodiversity targets are specifically described in Table 13 of the 2011 PMP, which matches the targets in Table 26 of the MR. .

	3. A PD deviation #13 has been added to section 2.2.4.
Findings Round 2:	Item 1. The VVB acknowledges receipt of the requested “NCC 2011” document (2011 Darkwoods PMP) that was referenced in the validated CCB PDD as containing details for the biodiversity monitoring plan. The VVB compared the biodiversity monitoring results reported for the 2020-2021 monitoring period against the six biodiversity targets identified in the validated CCB PDD for Effectiveness monitoring, and against the methods, and monitoring frequencies identified for these six targets in NCC 2011. The VVB noted NCC 2011 identifies the monitoring frequency for these six targets as “TBD”, but Section B3.3 of the validated CCB PDD committed to annual monitoring activities. The annual monitoring requirement is further addressed by Item 3 of this Finding for Indicator B.1. Based on review of the information provided and supporting documentation, the VVB determined Effectiveness monitoring was conducted during the monitoring period in accordance with the validated monitoring plan. However, the VVB noted MR Section 5.3.2 does not report on three other types of biodiversity monitoring identified in Section B3.1 of validated CCB PDD: Compliance monitoring, Implementation monitoring, and Validation monitoring. The VVB noted the monitoring methods and frequencies for these biodiversity monitoring activities are not clearly identified in the validated CCB PD nor in NCC 2011. The VVB determined clarification is required from the Project Proponent on these three monitoring activities before the VVB can fully assess conformance with the monitoring plan for the monitoring period. Item 2. The VVB acknowledges receipt of the requested NCC 2011 document and noted the NCC 2011 document provides the explanation for the eight high priority EM questions/objectives referenced in Section B3.1 of the validated CCB PDD. The VVB confirmed NCC 2011 does not identify these eight high priority EM questions/objectives as indicators for monitoring under the biodiversity monitoring plan. This item is closed. Item 3. The VVB confirmed that a PD Deviation has been added to MR Section 2.2.4, stating that monitoring reporting will happen every 5 years instead of every year based on the adaptation of a newer version of the PMP than the one cited as the basis for the validated biodiversity monitoring plan. The VVB noted this change in biodiversity monitoring frequency is in line with the updated 2020 PMP and the justifications presented. The VVB determined that based on the original frequency of Effectiveness monitoring identified as “TBD” in NCC 2011, identified as the basis for the biodiversity monitoring plan in the validated CCB PDD, the overall protected status of

	the project area, and the length of time under which this project has been monitored and results of biodiversity monitoring to date, that this deviation will not materially impact the project. The VVB noted the description for the PD Deviation related to this item cites the 2016 PMP, rather than the 2020 PMP. The VVB determined clarification is required for this item.
Clarification Request (CL):	Please provide clarification for Item 1 in line with the finding. Please provide clarification for Item 3 in line with the finding, and please provide a copy of the 2016 PMP referenced in the PD Deviation.
Date Evaluated:	6 April 2023
Project Proponent Response/Actions and Date:	Item 1: the project has updated Section 5.3.2 to include all 4 monitoring elements from the CCB PD Section 3.1. Item 3: the deviation text has been updated to correct the reference to the reporting period of 2020 from the 2016 PMP. (15 May 2023)
Evidence Used to Close NCR / CL:	Item 1: MR section 5.3.2 has been updated and now reports on all 4 monitoring elements identified in the PD. The results of these monitoring elements are substantiated throughout the MR. This item is closed. Item 3: The VVB confirmed that the PD deviation has been corrected and now references the 2020 PMP. This item is closed.
Date Closed:	22 May 2023

Indicator B3.2 - Develop an initial plan for assessing the effectiveness of measures used to maintain or enhance High Conservation Values related to globally, regionally or nationally significant biodiversity (G1.8.1-3) present in the project zone.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Section 5.3.2; CCB PDD Section B3.2
Findings:	Instructions for Section 5.3.2 of the MR Template relevant to Indicator B3.2 are: “Present the results of the biodiversity impact monitoring which should include:” ... • “Effectiveness of measures used to maintain or enhance HCVs.” 1) The VVB noted CCB PDD Section B3.2 states that an “Effectiveness Monitoring Plan for all priority questions was completed in 2011” and refers to a set of eight indicators listed in Table 18. The VVB noted Table 18 in the CCB PDD does not present an effectiveness monitoring plan for HCVs. The VVB noted Table 23 in the CCB PDD is entitled “Summary of Effectiveness Monitoring – Darkwoods (NCC, 2013)”, but the table is

	illegible. The VVB determined the Project Proponent must provide a copy of “NCC, 2013” for review by the VVB for the purpose of evaluating whether the HCV effectiveness monitoring has been undertaken during the monitoring period in accordance with the validated monitoring plan. 2) The VVB noted Table 26 in MR Section 5.3.2 presents six targets reported for the summarized biodiversity effectiveness monitoring results. Full assessment of this item is pending receipt of the biodiversity monitoring plan presented in “NCC, 2013”, however, the VVB determined clarification will be required for reporting on six rather than eight indicators stated in CCB PDD Section B3.2.
Clarification Request (CL):	Please provide the support document “NCC, 2013” referenced in item 1. Please provide clarification for item 2 in line with findings for Indicator B3.2.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	The VVB is correct - the CCB PD mis-references Table 23 as Table 18. A clear copy of this correct table is shown in Table 18 of the project SDVISTa PD. This validated monitoring plan included 8 indicators of 5 different targets (no indicator for ‘Rare ecosystems and features’ had been developed). The Target names have been updated for most of the targets as described in the footnotes of Table 25 of the CCB MR, and several of the measures in Table 26 of the CCB MR have been refined, updated and improved over the past decade in accordance with adaptive management principles and to reflect available data and improved understanding of biodiversity values. See response for #1 above. PROVIDED ‘2011 Darkwoods PMP’, where Table 12 describes the eight high priority effectiveness monitoring questions that will address the 6 biodiversity targets. The plan for effectiveness monitoring in the CCB PD is in “NCC 2013” Table 18 of the SDVISTa PD which uses the same biodiversity targets and refines the indicators. In this MR, the target names have been updated for most of the targets as described in the footnotes of Table 25 of the CCB MR, and several of the measures in Table 26 of the CCB MR have been refined, updated and improved over the past decade in accordance with adaptive management principles and to reflect available data and improved understanding of biodiversity values. The monitoring of the biodiversity targets are specifically described in Table 13 of the 2011 PMP, which matches the updated targets in Table 26 of the MR.
Findings:	Item 1. The VVB acknowledges the response provided and reviewed Table 18 within the SD VISTa PD and confirmed this table is also labeled as “Summary of Effectiveness Monitoring – Darkwoods (NCC, 2013)” and

	appears to be the same table as the illegible table (Table 23) in the validated CCB PD. The VVB noted this table did not establish any additional monitoring requirements for HCVs, but reported on monitoring conducted. The VVB noted that the validated CCB PD identifies that for monitoring for HCVs, an “Effectiveness Monitoring Plan for all priority questions was completed in 2011.” The VVB noted from review of NCC 2011 that for the monitoring plan, that HCV monitoring is not treated separately but HCVs, and HCV monitoring, are embedded within the other biodiversity monitoring. The VVB noted the MR provides a summary of the effectiveness of measures used to maintain or enhance the HCVs identified in the validated CCB PDD. The VVB noted that, as indicated in the response for Indicator B3.1, that a PD Deviation has been added to MR Section 2.2.4 to update monitoring to the PMP for 2020-2025 and to reduce the frequency of monitoring to every 5 fives. A separate finding regarding the PD Deviation has been issued for Indicator B3.1 and will not be repeated here. This item is closed. Item 2. The VVB acknowledges the response provided. A review of the monitoring requirements established in NCC 2011 confirms that although the validated CCB PDD states a set of eight indicators had been monitored to date, the monitoring requirements established in NCC 2011 required only six of the seven reported on in Table 25 of the revised MR. Supporting documentation provided for the monitored HCVs provided substantiated the status of the HCV targets as reported. Item closed.
Date Closed:	6 April 2023
Indicator B3.3 - Commit to developing a full monitoring plan within six months of the project start date or within twelve months of validation against the Standards and to disseminate this plan and the results of monitoring, ensuring that they are made publicly available on the internet and are communicated to the communities and other stakeholders.	The VVB reviewed the information reported in the MR for this indicator against the instructions presented in the MR Template.
Evidence Used to Assess Conformance:	MR Sections 5.3.1 and 5.3.3; CCB PDD Section B3.3
Findings:	The VVB noted the following: 1) The VVB noted MR 5.3.1 states Biodiversity Monitoring Plan Development is “Not applicable.” The VVB noted CCB PDD Section B3.1 identified the existence of the full monitoring plan, as referenced in VVB findings for Indicator B3.1. The VVB determined this item was completed in conformance with MR Template instructions. 2) The VVB noted MR 5.3.3 identifies the methods by which the Project Proponent indicated the results of various aspects of biodiversity monitoring have been disseminated. The VVB noted the MR does not clearly

	identify how the monitoring results for this monitoring period were disseminated, or whether at least a summary of the monitoring results has been disseminated in accordance with the monitoring plan. The VVB noted the validated CCB PDD does not provide a description for how the results of the biodiversity monitoring are to be disseminated or communicated to the communities and other stakeholders. Full assessment of this item is pending receipt of the biodiversity monitoring plan presented in "NCC 2011", however, the VVB determined clarification is required for this item.
Clarification Request (CL):	Please provide clarification for item 2 in line with findings for Indicator B3.3.
Date Evaluated:	5 December 2022
Project Proponent Response/Actions and Date:	See Finding CM3.3
Evidence Used to Close CL:	The VVB acknowledges receipt of the requested NCC 2011 document that was referenced in the Biodiversity Monitoring Plan section of the validated CCB PDD. The VVB noted that information on how the biodiversity monitoring results were to be disseminated in accordance with CCB requirements was not located in this document. However, based on the clarification provided in the response to findings on Indicator CM3.3, the VVB determined that although no plan was presented in the validated CCB PDD for how the results of biodiversity monitoring would be disseminated, the verification report issued in 2018 for the monitoring period 1 January 2013 to 31 December 2016 included a statement regarding the acceptability of disseminating results of biodiversity monitoring by making the results available through an internet link on the Darkwoods website. The VVB determined, from supporting documentation provided in response to findings for Indicator G3.9, that the monitoring results for the biodiversity monitoring for the current period under verification had been made available through an internet link on the Darkwoods webpage. The VVB located the link through the Darkwoods webpage on the NCC website, and confirmed the link took the user to the Darkwoods project page on the Verra Registry where the monitoring report under verification is located. Item closed.
Date Closed:	6 April 2023

Gold Level Section

GL1 Climate Change Adaptation Benefits

Indicator GL1.1 - Identify likely regional climate change and climate variability scenarios and impacts, using available studies, and identify potential changes in the local land-use scenario due to these climate change scenarios in the absence of the project.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box

Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for climate change adaptation benefits.
Date Closed:	5 December 2022

Indicator GL1.2 - Identify any risks to the project's climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts and explain how these risks will be mitigated.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for climate change adaptation benefits.
Date Closed:	5 December 2022

Indicator GL1.3 - Demonstrate that current or anticipated climate changes are having or are likely to have an impact on the well-being of communities <i>and/or</i> the conservation status of biodiversity in the project zone and surrounding regions.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for climate change adaptation benefits.
Date Closed:	5 December 2022

Indicator GL1.4 - Demonstrate that the project activities will assist communities <i>and/or</i> biodiversity to adapt to the probable impacts of climate change.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for climate change adaptation benefits.
Date Closed:	5 December 2022

GL2 Exceptional Community Benefits

Indicator GL2.1 - Demonstrate that the project zone is in a low human development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for exceptional community benefits.
Date Closed:	5 December 2022

Indicator GL2.2 - Demonstrate that at least 50% of households within the lowest category of well-being (e.g., poorest quartile) of the community are likely to benefit substantially from the project.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box

Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for exceptional community benefits.
Date Closed:	5 December 2022

Indicator GL2.3 - Demonstrate that any barriers or risks that might prevent benefits going to poorer households have been identified and addressed in order to increase the probable flow of benefits to poorer households.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for exceptional community benefits.
Date Closed:	5 December 2022

Indicator GL2.4 - Demonstrate that measures have been taken to identify any poorer and more vulnerable households and individuals whose well-being or poverty may be negatively affected by the project, and that the project design includes measures to avoid any such impacts. Where negative impacts are unavoidable, demonstrate that they will be effectively mitigated.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for exceptional community benefits.
Date Closed:	5 December 2022

Indicator GL2.5 - Demonstrate that community impact monitoring will be able to identify positive and negative impacts on poorer and more vulnerable groups. The social impact monitoring must take a differentiated approach that can identify positive and negative impacts on poorer households and individuals and other disadvantaged groups, including women.	
Evidence Used to Assess Conformance:	CCB PDD Title Page box; MR Title Page box
Findings:	Not applicable, the Project is not seeking to be validated to the Gold Level for exceptional community benefits.
Date Closed:	5 December 2022

GL3 Exceptional Biodiversity Benefits

Project proponents must demonstrate that the project zone includes a site of high biodiversity conservation priority by meeting either the vulnerability or irreplaceability criteria defined below:

Indicator GL3.1 – Vulnerability Regular occurrence of a globally threatened species (according to the IUCN Red List) at the site: 1.1 - Critically Endangered (CR) and Endangered (EN) species - presence of at least a single individual; or	The VVB reviewed the CCB PDD for information presented for Indicator B2.1, and reviewed MR sections on Minor Changes to Project Description (Rules 3.5.6) and Project Description Deviations (Rules 3.5.7-3.5.10).
--	--

1.2 - Vulnerable species (VU) - presence of at least 30 individuals or 10 pairs.	
Evidence Used to Assess Conformance:	CCB PDD Section GL3; MR Section 7; 2022_Darkwoods-CarbonReport_SpeciesObservations.xlsx
Findings:	This indicator was originally addressed through successful validation of the PD and does not need to be reevaluated at verification unless minor changes to the PD or PD deviations are applied during this monitoring period. The VVB determined from review of MR that no minor changes to the PD or PD deviations related to Indicator B2.1 were applied for this monitoring period. The VVB noted the MR includes reporting for Indicator GL3 under MR Section 7 (Additional Project Impact Information). The VVB noted CCB PDD does not identify which of the two criteria, Indicator GL3.1 or GL3.2 allow the project to meet an eligibility criterion for Exceptional Biodiversity Benefits. The VVB noted the information presented in MR Section 7 attributed to GL3 does not conform to reporting requirements for Indicator GL3, but Section 7 does identify two species that would allow the project to meet eligibility requirements for Indicator GL3.1. VVB noted the MR Section 7 states that Whitebark Pine is present on the property, which is substantiated by supporting documentation. The VVB notes Whitebark Pine is reported on the IUCN Red List as having been determined to be “Endangered” during the last IUCN assessment for this species in 2011 with updated status published in 2013. The VVB noted the MR does not report on population of Bull Trout, designated by IUCN as “Vulnerable”, but CCB PDD Section G1.7 states that an estimated 12,000 Bull Trout are caught annually in Kootenay Lake, which is adjacent to the project area and is the receiving water for project area streams. The VVB notes separate findings were issued for Indicator B1.1 and B2.3 regarding the MR reporting on “IUCN red-list” species and those findings will not be repeated for Indicator GL3.1. Item closed
Date Closed:	5 December 2022

OR

Indicator GL3.2 – Irreplaceability A minimum proportion of a species’ global population present at the site at any stage of the species’ lifecycle according to the following thresholds: 2.1 - Restricted-range species - species with a global range less than 50,000 km² and 5% of global population at the site; or	
--	--

2.2 - Species with large but clumped distributions - 5% of the global population at the site; or	
2.3 - Globally significant congregations - 1% of the global population seasonally at the site; or	
2.4 - Globally significant source populations - 1% of the global population at the site.	
Evidence Used to Assess Conformance:	CCB PDD Section GL3; MR Section 7
Findings:	Not applicable, the VVB determined no information was presented for this indicator in the CCB PDD, and no information was presented for this indicator in MR Section 7. Only one indicator under GL3, either GL3.1 or GL3.2 is required to be met for demonstration of exceptional biodiversity benefits, and demonstration was substantiated as met for GL3.1 as noted for findings for Indicator GL3.1.
Date Closed:	5 December 2022

Validation/Verification Report Requirements for Public Comment Period

CCB 30 Day Public Comment Period Dates:	16 September 2022 to 16 October 2022
Please describe all ways in which the 30 day comment period was publicized, especially in regard to local stakeholders. Supply copies (newspaper ads, emails, etc.) when possible.	The 30-day comment period was publicized on the Verra Registry database webpage for the project.
How many comments were received?	No comments on the monitoring plan were reported as received by Verra.
Supply copies of all comments submitted to the auditors, if any were received during the comment period.	No comments received.
Respond to all comments appropriately, and show whether these comments caused modifications in some aspect of the project or PD.	No comments received.