ACAP Albania - Vjosë-Nartë A/R project

Document Prepared by AENOR INTERNACIONAL S.A.U.

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Summary:

The project "ACAP Albania - Vjosë-Nartë A/R project "is an afforestation project, funded by Agenzia Italiana per la Cooperazione allo Sviluppo (AICS), the Italian Agency for Development Cooperation, that aims at preserving several Albanian protected areas, created after Albania entered the European network of Natura 2000.

The Vjosë-Nartë A/R project wants to address the CO_2 emissions reduction goal, by increasing the carbon stock in the Protected Landscape of Vjosë-Nartë through A/R activities. In order to achieve the objective, 9'302 trees have been planted, in an area of 3,37 hectares of surface, characterized by native vegetation.

The purpose of the validation was the independent evaluation of the project's compliance with the VCS Standard v4.2 and ISO 14064-2 2019 and the requirements of the GHG program selected, also the validation applied a strategic and risk analysis required in the norm ISO 14064-3: 2019.The process was performed through a combination of desk review, and communications with relevant personnel and remote audit.

During the validation 3 CLs, 7 CARs and 1 FAR were reported. All these issues where appropriately closed by means of corrections, more clear explanations, and other supported documents.

AENOR carried out a final validation report and deems with reasonable level of assurance that the project complies with all of the validation criteria for VCS. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the validation criteria.

Hence, the audit team concludes that the net GHG emission removals for the lands included in the project boundary at validation stage has been quantified in accordance with VCS rules. AENOR assessed the calculations and can confirm that the estimated GHG emission removals are correct. The project expects the removal of 531 tCO2e for the whole crediting period (19/01/2021 to 18/01/2041). The average annual GHG removal is 26 tCO2e/year. This is a grouped project.

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1 INTRODUCTION

1.1 Objective

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

1.2 Scope and Criteria

Validation Scope: The scope of the validation audit is to validate the emissions reductions and/removals of the proposed project activity in Albania against the Verified Carbon Standard, the identified methodology and associated tools, for the crediting period from 19/01/2021 to 18/01/2041.

The objectives of this audit included a validation of the projects calculated emission removals with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects, besides the assessment of the additionality and the risk assessment report.

The scope was defined as follows:

- The project and its baseline scenarios.
- The physical infrastructure, activities, technologies and processes of the project.
- The GHG sources, sinks and/or reservoirs those are applicable to the project.
- The types of GHGs that are applicable to the project.
- The project crediting period.

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

- VCS Standard v4.2
- VCS Program Guide v4.1
- VCS AFOLU Non-Permanence Risk Tool v 4.0
- AR-ACM0003: Afforestation and reforestation of lands except wetlands, Version 02.0

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

1.3 Level of Assurance

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a

positive evaluation statement reasonably assures that the project GHG assertions are materially correct and is a fair representation of the GHG data and information.

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

Name	Role in the Team
Elena Llorente	Lead auditor
Javier Cócera	Auditor
Marina Arroyo	Auditor in trainee
Juan Carlos Gómez	Technical reviewer

1.4 Summary Description of the Project

The project activity Vjosë-Nartë afforestation project is part of the broader Italian Azione Comunitaria per le Aree Protette dell'Albania (ACAP) project.

This initiative, funded by Agenzia Italiana per la Cooperazione allo Sviluppo (AICS), the Italian Agency for Development Cooperation, aims at preserving some protected areas, created after Albania entered the European network of Natura 2000.

In this context, the Vjosë-Nartë afforestation project, wants to address the CO_2 emissions reduction goal, by increasing the carbon stock in the Protected Landscape of Vjosë-Nartë through A/R activities. In order to achieve the objective, 9'302 trees have been planted, in an area of 3,37 hectares of surface.

Therefore, it is a project of the Afforestation, Reforestation and Revegetation, (ARR) category, VCS sectoral scope 14 (AFOLU).

The purpose of the ACAP project are the following:

- Improve the governance quality of the protected areas.
- Reduce by 30% the environmental degradation of these same areas.
- Remove CO2 emissions and (iv) improve by 10% the visitors in the protected areas.

The project crediting period is 20 years, from 19/01/2021 to 18/01/2041.

2 VALIDATION PROCESS

2.1 Method and Criteria

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

2.2 Document Review

The Project Description Document submitted by the Project Proponent (PP) was reviewed against the approved consolidated methodology and against VCS requirements. Additional background documents related to the project design, baseline and additionality were also made available before and during the remote audit in, along with the non-permanence risk report.

To address the corrective actions and clarification requests that arose from the desk review, the PP revised the project description document version 1 and developed a final version 6.

The supporting documents that were reviewed are all listed in Appendix 1 of this report. AENOR cross-checked and compared then with the relevant sections of the PD.

2.3 Interviews

The AENOR validation team conducted interviews with project developers via remote audit to confirm selected information and to resolve issues identified in the document review. The list of the interviewed people is below detailed.

Due to the COVID-19 pandemic situation, interviews were carried out through videoconference on 1st and 2nd December 2021.

Name	Title/Organization/Community
Manuel Castelletti	Celim project manager
Francesco Tutti	Celim project manager
Nicolo Capella	Carbon Manager, Carbonsink Group

Mirko Favaro	Carbon Manager, Carbonsink Group
Lorela Lazaj	Female beneficiary and representative of NAPA, the National Agency for Protected Areas
Tatjana Mjedis	Female beneficiary, member of RAPA, Regional Agency for Protected Areas
Bojken Sinaj	Representative of NGO present to the first meeting
Nexhip Hysolakoj	Project local management team
Lindrit Beqiraj	Specialist monitoring of Vjosa-Narta Regional Administration for Protected Areas (RAPA)
Denisse Laport	Indirect beneficiary participating to the local stakeholder meeting

2.4 Site Inspections

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

The remote audit was based on the following auditing techniques:

- Document review and cross checks between the information provided in the PD, and supporting information and evidence provided by the PP Emissions calculations, GIS database, and supporting information and evidence provided.

- Review, based on the selected methodologies, tools and the other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations.

- Telephone, teleconference and/or e-mail interviews for the implementation of project activities and the elaboration of project's documents.

As stated in section 2.3, AENOR validation team conducted interviews with project developers via remote audit to confirm selected information and to resolve issues identified in the document review. The list of the interviewed people is below detailed. Due to the COVID-19 pandemic situation, interviews were carried out through videoconference on 1st and 2nd December 2021.

2.5 Resolution of Findings

A total number of 7 CARs and 3 CLs were raised during this validation process.

All findings issued by the AENOR audit team for this validation process have been closed. In accordance with Sections 4.1.13 and 4.1.14 of the VCS Standard v4.2, all findings issued during the validation process, and the inputs for their closure, are described in Appendix 2 of this report.

2.5.1 Forward Action Requests

One FAR was raised for the next verification event:

-For the first verification, the monitoring plan has to be reinforced with specific information, such as allometric equations and the sampling method to measure the trees.

3 VALIDATION FINDINGS

3.1 Project Details

3.1.1 Project type, technologies and measures implemented, and eligibility of the project

The project is classified under sectoral scope 14 “Agriculture, Forestry and Land Use (AFOLU)”. As described in Section A1.1 of the VCS Standard, the project is eligible under the category of Afforestation, Reforestation, and Revegetation (ARR).

The project plans the increase carbon sequestration on Albania with the following species: Pinus halepensis, 4’604, Pinus pinea 2’420, Populus alba, 1’143, Laurus nobilis 1’135 specimens.

AENOR has checked all this information with the management plan Vjose-Narta Landscape Protected Area /10/ and confirms that the information is correct.

3.1.2 Project design

The project will be developed as a grouped project. During the project implementation, an increasing number of new areas are expected to be implemented.

AENOR has checked all this information with the management plan Vjose-Narta Landscape Protected Area /10/, the KLM file/5/ and the elegibility map Vjose-Narta /6/ and confirms that the information is correct.

3.1.3 Project proponent and other entities involved in the project

The project is proposed by Carbonsink Group S.r.l. The other entities involved in the project are National Agency of Protected Areas (NAPA) and Vlora Regional Administration of Protected Areas (RAPA Vlore).

The audit team finds that contact and entity information provided in the PD conforms to the VCS requirements.

AENOR has checked this information with ACAP Albania project description document /1/and the legislation Nr 102/11/

3.1.4 Ownership

All project properties are of NAPA and RAPA, namely National and Regional agencies for the Protected areas, as decided, by the Decision of the Council of Ministers nr. 102, that these entities are in charge for the administration of what is within the borders of Albanian protected areas.

Moreover, with the article nr. 7 of the Law 81/2017, it is established that protected areas within national borders are national heritage and, with article nr. 46 of the same law, that forests and waters, public or private, within protected areas, are to be managed by the NAPA and RAPA authorities.

The PP has the project ownership in line with the Section (3.6.) of the VCS Standard.

The audit team has checked the project ownership in accordance with Decision of the Council of Ministers from Albania, nr. 102 /11/ as project ownership arising under law.

3.1.5 Project start date

The project start date is 19/01/2021, which corresponds to the date when the first seedlings were planted, after the purchasing, dated 18/01/2021. /18/

This event corresponds to the first activity: the earliest activity that leads the GHG removal of the project. The audit team has checked the documentation and verify from the report of plantation for the project activity (19/01/2021) and an invoice of the seeds (18/01/2021 /18/), that the project start date for the project is correct.

Then, in opinion of AENOR it is considered reasonable and correct based on the VCS requirements for start date established in Section 3.7 of the VCS Standard.

3.1.6 Project crediting period

Project crediting period: 20 years.

Start date: 19/01/2021, End date: 18/01/2041

According to Section 3.8.3 of the VCS Standard, the crediting period of AFOLU projects will have a minimum of 20 years and a maximum of 100 years. Therefore, the project activity is in line with the length of the crediting period.

In this regard, AENOR can confirm that PP have developed credible and robust plan for managing /10/ and implementing the project over the crediting period in compliance with Section 3.8.4 of the VCS Standard.

3.1.7 Project scale and estimated GHG emission reductions or removals

The project is classified as "project" according to its scale (less than or equal to 300,000 tonnes of CO_2e per year) since it will remove an average of 531 tCO_2e per year during the 20 years of crediting period.

AENOR has checked this against the ACAP-Ex-Ante Estimation_revCS-220216 /7/and deems the calculation correct.

3.1.8 Project location

Vjosë-Nartë afforestation project area covers a total of 3.37 ha, this is for the first instance, of lands located in the Protected Landscape of Vjosë-Nartë, an area situated in southwestern Albania that covers almost 200 square kilometres, with an altitude ranging from 0 to 246 meters above sea level.

The location of the project area of the first instance has been presented in GIS and KML files. AENOR through the review of the shape file in QGIS of 17 eligibility areas, the eligibility map provided and google earth could reviewed the exact location and the species that were planted in 2021 for this project activity. Therefore, AENOR deems correct the project location of all the instances.

3.1.9 Conditions prior to project initiation

Regarding conditions prior to the project initiation, the PD describes in a complete way the climate, hydrology, topography, relevant historic conditions, soils, vegetation and ecosystems for the areas involved in the project.

3.1.10 Project compliance with applicable laws, statutes and other regulatory frameworks

Section 1.14 of the PD provides information related the compliance with the applicable laws, statues and other regulatory frameworks. The main and relevant Laws are detailed, and its enforcement analyzed in the PD. According to the information provided and assessed during the remote audit, the project fulfils with laws mentioned in the PD. Thus, AENOR deems that project complies with applicable laws, statues, and other regulatory frameworks.

AENOR has checked this information with ACAP Albania project description document /1/, the legislation Nr 102/11/ and the legislation Nr.81/2017 for protected areas.

3.1.11 Participation under other GHG programs

GHG removals generated by the project will not be used for compliance with binding limits to GHG emissions since such limits are not enforced in Albania, and there is no emissions trading program in place in the country.

Vjosë-Nartë afforestation project has not been registered or seeking registration under any other GHG programs.

AENOR has checked this against VERRA, GS and UNFCCC website, and deems correct that the GHG removals have been account in other program.

3.1.12 Other forms of credit

GHG removals generated by the project will not be used for compliance with binding limits to GHG emissions since Albania does not have GHG emission compliance nor trading programs in place.

3.1.13 Additional information relevant to the project

Leakage management for AFOLU projects:

According to the applicable methodology only leakage due to the displacement of agricultural activities shall be considered. The project does not displace pre-project agricultural activities. Thus, neither a leakage management plan nor leakage mitigation measures are required.

Commercially sensitive information:

No commercially sensitive information has been excluded from the public version of the project description.

Sustainable development contributions:

With its Intended Nationally Determined Contribution (INDC) Albania aims at reducing CO_2 emissions by 11,5% between 2016 and 2030. This reduction means 708 kT carbon-dioxide emission reduction in 2030. Albania emissions come mainly from two sectors, corresponding with the sectors for which GHG inventory was carried out and they are, namely, (i) energy and (ii) industrial processes sectors.

In the terms of SDGs, the main contribution of this project activity benefits SDGs number 13 (Climate Action) and 15 (Life on Land), showing a good alignment with Albania national priorities,

SDG 13 – Climate Action

The activities of the project involve the planting of 9'302 indigenous trees which will sequestrate CO_2 from the atmosphere and stock carbon in their biomass while growing and hence contributing on mitigating the climate change. This contribution will be measured via the quantity of CO_2 absorbed by the trees in line with the applied CDM methodology.

SDG 15 – Life on Land

The activities of the project aim to promote the development of a forestry ecosystem on land that had previously been characterised by sparse vegetation. The new plantations will favour, through a sustainable use, the restoration of degraded soils, the reduction of the erosion rate and the increase of biodiversity.

AENOR assessed the sustainable contributions to the sustainable development through the review of the project design document/1/ but mainly through the review of the Nationally Determined Contribution (NDC) of the Republic of Albania /22/ provided and remote audit.

3.2 Safeguards

3.2.1 No Net Harm

There is no potential negative environmental or socio-economic impact due to the project. On the contrary, starting from a land where natural regrowth struggles to happen, project activities can only issue environmental and socio-economic benefits.

Documents supporting this information were provided to AENOR and confirms the explanations.

3.2.2 Local Stakeholder Consultation

According to section 2.2 of the PD, a first virtual meeting with national/local authorities, (inter)national NGOs and all the people who were able to connect to the virtual meeting was carried out on the 15th of December 2020, while a second meeting with the four restaurant owners identified, the only ones having their own business in the protected area, was carried out on the 17th of December 2020.

The stakeholders were contacted via email and telephone calls and officially invited to the meetings on the 8th of December. A reminder invitation was sent in order to ensure the presence of more stakeholders.

The main questions raised by participants were noted and clarifications were given by Carbonsink, Celim and RAPA. Most of the discussion and comments given by the participants were positive and the project was appreciated and very welcomed by institutions and civil society.

In general, all the questions aimed at better exploring:

- the carbon market and the typologies of projects that can be explored in Albania (renewable energy and reforestation/conservation projects).
- the number of carbon credits generated by ACAP project and the actual market price.
- the estimation of emission removals related to the plant species selected and the parameters considered in the calculation.
- the timeline of the project activities within the carbon certification scheme.

Also, there were some critical points related to the origin of the plant species selected and their lack of revenues in terms of plant production compared to other species. These issues were discussed, and the reason of the selection was clarified. The PP specified that all the plants selected are native (no one is

non-native) and that the project aim is reforestation, that is why the selection was made in this sense and not aimed to plant production.

It was also pointed out that the presence of these new plants will positively impact the tourism in the project area.

Therefore, the PP has taken due account of all inputs received during stakeholder consultation and AENOR considers correct the project proponent's responses to the local people.

There are not project design change for the project that result from the local stakeholder consultation.

The participants encouraged to provide continuous inputs throughout the whole duration of the project. Carbonsink is in charge of the communication to stakeholders the process of VCS program validation and verification, the results of monitoring the risks, costs and benefits the project may bring to local stakeholders and all the relevant laws and regulations covering.

AENOR considers that the project proponents, Carbonsink, Celim and Rapa representatives, communicated information about the project design and implementation, risks, costs and benefits, relevant laws and regulations and the process of VCS Program validation are correct.

3.2.3 Environmental Impact

Not applicable. According to Albanian legislation, forestry related environmental impact assessments are mandatory only in case of new forestation, but not for reforestation projects. Before projects activities, there was an artificial wild pine forest.

The audit team had access to the Albanian legislation, Law nr. 10440-2011, and considers that the project complies with the environmental legislation of the country.

3.2.4 Public Comments

During the validation process no public comment was received in AENOR nor noticed from VCS Staff about the project during the public comment period (30/08/2021 to 29/09/2021).

3.2.5 AFOLU-Specific Safeguards

As stated in Section 2.2 in the PD, a local stakeholder consultation was carried out and no conflicts were underlined. Moreover, no agricultural or any other kind of activities were carried out in the project area.

During the remote audit and with the cross check of the project area KLM, AENOR could assess that no local stakeholders are in the protected land area, so no impacts on local stakeholder are foreseen.

3.3 Application of Methodology

3.3.1 Title and Reference

The methodology used is the CDM A/R Large-scale Consolidated Methodology AR-ACM003: Afforestation and reforestation of lands except wetlands v02.0.

Besides the methodological document, the following tools were applied:

- "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities", Version 01
- "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities", Version 04.2
- "Estimation of the increase in GHG emissions attributable to displacement of pre-project agricultural activities in A/R CDM project activity", Version 2.0
- "Calculation of the number of sample plots for measurements within A/R CDM project activities"; Version 2.1.0
- "Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity" Version 02.0

3.3.2 Applicability

The final PD states all evidence used to demonstrate each condition of the applicable methodology. Complete explanations are included in the PD. In opinion of AENOR, the evidence and explanations confirm the fulfilment of the project with the methodology. The assessment was carried out for each applicability criterion and included, among others, the review of evidence and sources provided in the PD and the compliance check of the local project setting with the applicability conditions in regard to baseline setting and eligible project measures as follows:

Applicability of the methodology

Applicability condition	Compliance
a) The land subject to the project activity does not fall in wetland category.	The land does not fall into wetland category. There are no wetlands in the project area. AENOR checked this by supported documents, including the descriptions in the PD /1/, the elegibility map /6/ and also during the remote audit.
b) Soil disturbance attributable to the afforestation and reforestation (A/R) project activity does not cover more than 10% of area in each of the following types of land, when these lands are included within the project boundary:	The project soils are not organic and does not fall within the types of land referred in points (i) and (ii).

Applicability condition	Compliance
i. Land containing organic soils. ii. Land which, in the baseline, is subjected to land-use and management practices and receives inputs listed in appendices 1 and 2 of the methodology.	AENOR checked this by supported documents, including the descriptions in the PD /1/, the elegibility map /6/ and also during the remote audit.

Applicability of the tools

Tool	Applicability condition	Compliance
Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities (Version 01)	• Forestation of the land within the proposed project boundary performed with or without being registered as the A/R CDM project activity shall not lead to violation of any applicable law even if the law is not enforced. • This tool is not applicable to small – scale afforestation and reforestation project activities.	• The project has received all required approvals from the necessary local authorities to start the implementation and the project is considered a large-scale afforestation. As described in Section 3.2 of PD • The project applied the methodology AR-ACM003: Afforestation and reforestation of lands except wetlands v02.0, since the applicability conditions are met, in accordance with this methodology the combined tool for additionally should be applied.
Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities (Version 04.2)	This tool has no internal applicability conditions	N/A
Estimation of non-CO_2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity (Version 04.0.0)	• The tool is applicable to all occurrence of fire within the project boundary. • Non-CO2 GHG emissions resulting from any occurrence of fire within the project boundary shall be accounted for each incidence of fire which affects an area greater than the minimum threshold	It is not applicable to the present project activity since biomass burning practices will not be part of it. The applicability of the tool will be justified separately for each year in case fire has occurred within the project boundary.

Tool	Applicability condition	Compliance
	area reported by the host Party for the purpose of defining forest, provided that the accumulated area affected by such fires in a given year is ≥5% of the project area.	This was confirmed through the review of the evidence provided, including the descriptions in the PD.
Estimation of the increase in GHG emissions attributable to displacement of pre-project agricultural activities in A/R CDM project activity (Version 02.0)	This tool is not applicable if the displacement of agricultural activities is expected to cause, directly or indirectly, any drainage of wetlands or peat lands.	The project activity is not expected to cause, directly or indirectly, any drainage of wetlands or peatland. Thus, there is no displacement of any agricultural activities. This was confirmed through the review of the evidence provided, including the descriptions in the PD.

AENOR, based on records provided including spreadsheets calculations of the emissions removals/7/ has verified that applicability conditions of the different tools are complied.

AENOR after conducting the remote audit, and after the reviewed of the following documentation the descriptions in the PD /1/, the eligibility map /6/, plantation report /9/, and the management plan /10/ can conclude that the project activity complies with the applicability conditions of the methodology, and tools or modules selected by the PP.

3.3.3 Project Boundary

Regarding the Carbon Stock Changes and considering the applicable methodology, the chosen carbon pools and GHG accounted are the following:

Carbon pools		Selected?	Justification/Explanation
Baseline scenario	Above-ground biomass	Yes	Assumed to be nil for the life of the project
	Below-ground biomass	Excluded	Assumed to be nil for the life of the project
	Dead wood	Excluded	Assumed to be nil for the life of the project.
	Litter	Excluded	Assumed to be nil for the life of the project.

Carbon pools		Selected?	Justification/Explanation
	Soil organic carbon	Excluded	Soil organic carbon stocks are expected to remain at a steady state or decrease in the baseline scenario. Assumed to be nil for the life of the project.
Project scenario	Above-ground biomass	Yes	Required. Largest pool affected by project activity.
	Below-ground biomass	Yes	Required. Expected to increase due to project activity.
	Dead wood	Excluded	Not required by the methodology
	Litter	Excluded	Not required by the methodology
	Soil organic carbon	Excluded	Not required by the methodology

Source		Gas	Included?	Justification/Explanation
Baseline	Burning of woody biomass	CO2	No	GHG emissions in the baseline can be conservatively ignored.
		CH4	No	
		N2O	No	
Project	Burning of woody biomass	CO2	No	Burning will not be part of project implementation. Hence, in conformance with the methodology, no emission sources are included in the project boundary.
		CH_4	No	
		N_2O	No	

Based on VCS Methodology Requirements section 3.3.6., the following GHG sources may be deemed insignificant and need not to be accounted for in the case of ARR projects:

- N_2O emissions from project activities that apply nitrogen containing soil amendments and N_2O emissions caused by microbial decomposition of plant materials that fixes nitrogen.
- GHG emissions from the removal or burning of herbaceous vegetation and collection of non-renewable wood sources for fencing of the project area.

- Fossil fuel combustion from transport and machinery use in project activities.

Methodology AR-ACM0003 states “GHG emissions resulting from removal of herbaceous vegetation, combustion of fossil fuel, fertilizer application, use of wood, decomposition of litter and fine roots of N-fixing trees, construction of access roads within the project boundary, and transportation attributable to the project activity shall be considered insignificant and therefore accounted as zero.”

The only emission source that must be included in the project boundary is methane and nitrous oxide emissions resulting from burning of woody biomass (excluding herbaceous biomass). No burning will be involved as part of project implementation. Hence, in conformance with the methodology, no emission sources are included in the project boundary.

Satellite photographs and GPS equipment were used to delineate the forest areas effectively planted. These areas constitute the project boundaries and have been laid on a geographic information system. No visible landmarks have been set on the field.

Taking into account the justifications, assumptions and supporting information provided and the design of the project,

AENOR after conducting the remote audit, also through checking the methodology AR-ACM0003 and the management plan /10/deems that project boundary is correctly defined and in compliance with the applicable methodology and VCS requirements.

3.3.4 Baseline Scenario

In accordance with the methodology AR-ACM0003 Version 02.0, the PP applied the CDM tool *Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities* version 01 to identify the baseline scenario. The resulting baseline scenario is the continuation of the pre-project land use, i.e., extensive livestock breeding production.

The lands within the project boundary are part of the Protected Landscape of Vjosë-Nartë and the baseline scenario is the continuation of the pre-project land use. In the baseline, the project areas have only scattered shrubs and some isolated trees, but they do not present any other forest cover or other activities. Outside of the project areas several plant species are thriving, but inside them new seedlings struggle to flourish after past natural phenomena happened. In these areas, due to the lack of forest cover, soil is vulnerable to rain and wind erosion, especially along wet areas, and consequent nutrient leaching.

Based on the combined tool, the following steps were applied and appropriately developed and justified in the PD:

Step 0. Preliminary screening based on the starting date of the A/R project activity

The proposed project activity has its starting date after 31 December 1999 but before the date of project's registration. The evidence for the starting date of the project activity being the 19th of January 2021, as descripted in chapter 1.8, corresponds to the date of first planting the seeds.

The incentive from the planned sale of carbon credits was seriously considered in the decision to proceed with the project activity. In fact, the project has received technical assistance for evaluating the feasibility of the project carbon certification before the project's starting date and the foreseen carbon credit revenues were considered before proceeding with starting the project activity. The project, as developed and included in the business plan provided to AENOR, is part of a framework that takes into consideration the possibility for the Albanian Government to sell the future credits generated by the project in order to use these financial resources for the realisation of new instances/projects to be implemented.

Step 1. Identification of alternative scenarios

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

The following baseline scenarios were identified:

Alternative 1: Continuation of the pre-project land use

The project areas were characterised by bare soil land cover and without activities in the baseline situation, with nearby trees struggling to naturally reproduce. The continuation of the pre-project land use i.e., the abandoned state is a realistic and credible alternative scenario.

The PP has provided evidence in the form of maps and statistics from reliable sources to demonstrate that the abandoned state is the pre-project land use.

Alternative 2: Forestation of the land within the project boundary performed without being registered as the Verified Carbon Standard project activity

In this scenario the tree planting activities would be performed without the foreseen carbon credit revenues (i.e., income from selling of carbon credits). Since the project areas are within the borders of a Protected Landscape, namely the Protected Landscape of Vjosë-Nartë, the option that the project areas would have been planted with trees without being certificated for carbon credit generation will be further studied and evaluated as an alternative scenario.

Alternative 3: Forestation of at least a part of the land within the project boundary of the proposed A/R project at a rate resulting from 1) Legal requirements; or 2) Extrapolation of observed forestation activities in the geographical area with similar, socio-economic and ecological conditions to the proposed A/R project activity occurring in a period since 31 December 1989 as selected by the PPs.

In this scenario the forestation activities would be performed resulting from 1) Legal requirements or from 2) Extrapolation of observed forestation activities. This scenario is not a realistic alternative scenario as there is either no legal requirements for forest establishment nor observed forestation activities in nearby areas which could be extrapolated to cover the lands or the parts of the lands within the project boundary (See Step 4 "Common practice analysis).

Thus, this scenario is not a realistic alternative scenario as there is either no legal requirements for forest establishment nor observed forestation activities in nearby areas which could be extrapolated to cover the lands or the parts of the lands within the project boundary.

Outcome of sub-step 1a: alternatives 1 and 2 are plausible.

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

The proposed project activity complies with the applicable laws as identified in section 1.14 of the P.D. Also, both alternative 1 (continuation of the pre-project baseline scenario) and alternative 2 (forestation without being registered under VCS) comply with mandatory applicable laws and regulations.

Outcome of sub-step 1b: alternatives 1 and 2 comply with applicable laws and regulations.

STEP 2. Barrier analysis

Sub-step 2a. Identification of barriers that would prevent the implementation of at least one alternative land use scenarios.

The following barriers were identified and justified by PP in the PD:

a) Investment barriers, other than insufficient financial returns: In general, funds for the management of the protected area are limited to cover: regular maintenance, investigating illegal activity, fire prevention, wildlife census activities. The Vjosë-Nartë A/R project is part of the broader ACAP project, funded by AICS (Agenzia Italiana per la Cooperazione e lo Sviluppo - Italian Agency for Development and Cooperation). In this context, one of the goals is to reduce by 5% the carbon footprint of the whole project area. In order to reach this objective, some funds were allocated to develop a carbon project, expected to be scaled up in the near future. The revenue provided by the selling of carbon credits are necessary to develop new instances of this project. As reported in Narta Vjosa Management Plan, section 2.1.3.3 Responsibilities and personnel; "… personnel is limited in number […] and not well trained and qualified to conduct conservation management activities. They are trying just to protect the area from any damages caused to forest, but not able to execute other jobs, such as research and monitoring, data collection and information management…" AENOR could check this against the Narta Vjosa Management Plan.

b) Institutional barriers: lack of enforcement of legislation relating to forest or land-use where the project activity is to be implemented. As wrote in Narta Vjosa Management Plan, section 2.1.3.1 Legal and institutional frameworks: In fact, up to now, there is an absence of integrated management and lack of cooperation between different institutions.", and 2.1.3.2 Management structures: "As mentioned before, actually there is no proper management structure over the project site of Narta. […] As stated above, there is no proper communication among different sector resulting in lack of integrated management."

c) Technological barriers: lack of access to planting materials and infrastructure for the project activity implementation; lack of skilled and proper staff dedicated to project activity. As mentioned in Narta Vjosa Management Plan, section 2.1.3.5, a.Roads: "[road network] quality isn't very good.", b.Water Supplies: "Despite the high water resources, […] the defficiency is due to ammortisation of the water distribution network, misuse, electric power deficiency, etc…", c.Irrigation: " The irrigated land is much less than the station capacitites. That difference is caused by the partial destruction and ammortisation of the irrigating system.", d.Drainage: " During the last 15 years the investments in the drainage sector have been very low […] As a result the drainage capacity has been largely reduced."

Sub-step 2b: Elimination of land use scenarios that are prevented by the identified barriers

The alternative scenario "Scenario 2", *Forestation of the land within the project boundary performed without being registered as the Verified Carbon Standard project activity,* is prevented by the barriers listed in Sub-step 2a, and thus Scenario 2 is eliminated from further consideration.

Outcome of Step 2b: The only alternative scenario not prevented by any barrier is the Scenario 1 "Continuation of the pre-project land use".

The PP has provided access to different documents and evidence (links in section 3.4 of the PD) that, based on the reliable and recognized sources, and considering the justifications about the project activities and their nature, allows AENOR to deem that the identification of the barriers is appropriately justified and credible.

Outcome of sub-step 2b: only alternative 1 (pre-project activities) is not prevented by the barriers

Sub-step 2c: Determination of baseline scenario

Therefore, according to the decision tree of sub-step 2b of the tool, it is concluded that Scenario 1 (Continuation of the pre-project land use) is the baseline scenario, and the PP continues with the Step 4 "Common practice analysis".

AENOR deems that assumptions, justifications and data used in the identification of the baseline scenario are appropriately justified and can be deemed reasonable.

Documentary evidence used in determining the baseline scenario is relevant, and correctly quoted and interpreted in the project description.

Relevant national and/or sectoral policies and circumstances have been considered and are listed in the PD.

The procedures for identifying the baseline scenario have been correctly followed according to the steps in the combined tool and the identified scenario reasonably represents what would have occurred in the absence of the project.

Thus, AENOR considers that the identified baseline scenario is correctly justified.

3.3.5 Additionality

According to the *Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities* version 01, the steps described in the previous section shall be complemented with an analysis of the extent to which forestation activity has already diffused in the geographical area of the proposed VCS project activity. This test is a credibility check to demonstrate additionality which complements the barrier analysis (Step 2) above conducted.

Step 4. Common practice analysis

The focus of the analysis was on to which extent similar forestation activities to the one proposed by the project have been implemented previously or are currently underway. According to the combined tool, similar forestation activities are defined as those which are of similar scale or species, take place in a comparable environment, among others, with respect to the regulatory framework and are undertaken in the relevant geographical area, subject to further guidance by the underlying methodology.

As the PP points out on the PD, neither the combined tool nor AR-ACM0003 Version 02.0 provide a definition of the "relevant geographical area". Therefore, the definition contained in the "Tool for the demonstration and assessment of additionality", Version 07.0.0 has been taken as reference.

The tool establishes: "Applicable geographical area should be the entire host country. If the project participants opt to limit the applicable geographical area to a specific geographical area (such as province, region, etc.) within the host country, then they shall provide justification on the essential distinction between the identified specific geographical area and the rest of the host country."

Based on public and accessible information provided by NAPA, in addition to the proposed project, only one project was carried out in 2009 in the Albanian hinterland, but areas were different from the areas covered by this project. Besides, the project was implemented under the CDM framework, hence following different requirements and according to the CDM applicable additionality tool other registered CDM/VCS projects shall not be included in this analysis.

Hence, after the assessment of the explanations and justifications in the PD and the review of the submitted evidence, also detailed in the project documents, AENOR deems credible and reliable the assumptions and approaches followed. The information described in the PD is consistent with evidence provided. They are also considered by the validation team as credible and reliable.

AENOR after reviewing the combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities version 01, the AR-ACM0003 Version 02.0 and the "Tool for the demonstration and assessment of additionality", Version 07.0.0 and the VERRA, CDM website can conclude that there is only one, reforestation project in Albania, this project activity was also validated by AENOR and therefore AENOR can conclude that the location and characteristics are different that this project area, that is a protected area inside Albania.

Thus, it can conclude that similar activities cannot be observed in the project region, then the project activity is not the baseline scenario, and hence it is additional. The income from VCUs will help to overcome the faced barriers by the project and will alleviate the expected long time period for revenues.

3.3.6 Quantification of GHG Emission Reductions and Removals

Procedures for quantifying the GHG emission reductions and removals generated by the project during the project crediting period were conducted in accordance with the methodology "AR-ACM0003: Afforestation and reforestation of lands except wetlands", Version 02.0. The validation team performed an intensive quantification review of all input data, parameters, formulas, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS documentation, methodology modules, and the PD.

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

The net anthropogenic GHG removals by sinks shall be calculated as follows:

$$\Delta C_{AR-CDM,t} = \Delta C_{ACTUAL,t} - \Delta C_{BSL,t} - LK_t$$

Where:

$\Delta C_{AR-CDM,t}$ = Net anthropogenic GHG removals by sinks, in year *t*; tCO_{2-e}

$\Delta C_{ACTUAL,t}$ = Actual net GHG removals by sinks, in year *t*; tCO_{2-e}

$\Delta C_{BSL,t}$ = Baseline net GHG removals by sinks, in year *t*; tCO_{2-e}

LK_t = GHG emissions due to leakage, in year *t*; tCO_{2-e}

Baseline net GHG removals by sinks

Procedures to be used for calculation of *ex ante* baseline net GHG removals by sinks are detailed in the AR-ACM0003 methodology (Version 02.0) under the section 5.4 "Baseline net GHG removals by sinks". According to the methodology baseline net GHG removals by sinks are calculated with the following equation:

$$\Delta C_{BSL,t} = \Delta C_{TREE_BSL,t} + \Delta C_{SHRUB_BSL,t} + \Delta C_{DW_BSL,t} + \Delta C_{LI_BSL,t}$$

Where:

$\Delta C_{BSL,t}$ = Baseline net GHG removals by sinks in year *t*; t CO_2-e

$\Delta C_{TREE_BSL,t}$ = Change in carbon stock in baseline tree biomass within the project boundary in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities"; t CO_2-e

$\Delta C_{SHRUB_BSL,t}$ = Change in carbon stock in baseline shrub biomass within the project boundary, in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities"; t CO_2-e

$\Delta C_{DW_BSL,t}$ = Change in carbon stock in baseline dead wood biomass within the project boundary, in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks in dead wood and litter in A/R CDM project activities"; t CO_2-e

$\Delta C_{LI_BSL,t}$ = Change in carbon stock in baseline litter biomass within the project boundary, in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks in dead wood and litter in A/R CDM project activities"; t CO_2-e

The baseline scenario is the continuation of the pre-activities. This means that the project area without the project activity would have remained as degraded land.

The pre-project trees have not been harvested, but the plantations grow around them. These trees have not been damaged by the project activities and, given their large size, do not suffer from competition with the new implanted trees. In addition, they are not inventoried along with the project trees in monitoring of carbon stocks, but their continued existence will be monitored throughout the crediting period of the project activity.

According to the Section 5 of tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities", the carbon stock and change in carbon stock in trees in the baseline can be accounted as zero.

Also, the shrubs in the baseline may be accounted as zero since the conditions of the methodology are met.

The carbon stock in dead wood and litter are not selected and thus in accordance with the applied methodology these pools are set to zero.

$\Delta C_{BSL,t} = 0$

Therefore, the total baseline net GHG removals by sinks are considered as zero. AENOR deems that this assumption is correct and in accordance with the methodology, tools and the VCS requirements.

Project net GHG removals by sinks

According to methodology AR-ACM003 v.2.0, section 5.5. GHG emissions resulting from removal of herbaceous vegetation, combustion of fossil fuel, fertilizer application, use of wood, decomposition of litter and fine roots of N-fixing trees, construction of access roads within the project boundary, and transportation attributable to the project activity shall be considered insignificant and therefore accounted as zero.

The actual net GHG removals by sinks shall be calculated as follows:

$$\Delta C_{ACTUAL,t} = \Delta C_{P,t} - GHG_{E,t}$$

Where:

$\Delta C_{ACTUAL,t}$ = Actual net GHG removals by sinks, in year t; t CO_2-e

$\Delta C_{P,t}$ = Change in the carbon stocks in project, occurring in the selected carbon pools, in year t; t CO_2-e

$GHG_{E,t}$ = Increase in non-CO_2 GHG emissions within the project boundary as a result of the implementation of the A/R CDM project activity, in year t, as estimated in the tool "Estimation of non-CO2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity"; t CO2-e

The use of fire for site preparation and/or to clear the land of harvest residue prior to replanting is specifically excluded from the project management and therefore project emissions are estimated as zero. As explained in section 3.2 the tool for "Estimation of non-CO_2 GHG emissions resulting from burning of biomass attributable to an A/R CDM project activity" is not applicable to the present project activity since biomass burning practices will not be part of it.

$GHG_{E,t} = 0$

Change in the carbon stocks in project, occurring in the selected carbon pools in year t is calculated as follows:

$$\Delta C_{P,t} = \Delta C_{TREE_PROJ,t} + \Delta C_{SHRUB_PROJ,t} + \Delta C_{DW_PROJ,t} + \Delta C_{LI_PROJ,t} + \Delta SOC_{AL,t}$$

Where:

$\Delta C_{P,t}$	=	Change in the carbon stocks in project, occurring in the selected carbon pools, in year *t*; t CO_2-e
$\Delta C_{TREE_PROJ,t}$	=	Change in carbon stock in tree biomass in project in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities"; t CO_2-e
$\Delta C_{SHRUB_PROJ,t}$	=	Change in carbon stock in shrub biomass in project in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities"; t CO_2-e
$\Delta C_{DW_PROJ,t}$	=	Change in carbon stock in dead wood in project in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks in dead wood and litter in A/R CDM project activities"; t CO_2-e
$\Delta C_{LI_PROJ,t}$	=	Change in carbon stock in litter in project in year *t*, as estimated in the tool "Estimation of carbon stocks and change in carbon stocks in dead wood and litter in A/R CDM project activities"; t CO_2-e
$\Delta SOC_{AL,t}$	=	Change in carbon stock in SOC in project, in year *t*, in areas of land meeting the applicability conditions of the tool "Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities", as estimated in the same tool; t CO_2-e

For conservativeness, only change in carbon stock in trees biomass of project will be considered. Therefore, change in carbon stock in shrubs, dead wood, litter biomass and SOC are accounted as zero.

Above and below ground biomass carbon pools

- *Change in carbon stock in trees in a year*

According to the "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activity" tool, v. 4.2, section 7 "Estimating change in carbon stock in trees in a year" change in carbon stock in trees in a year (annual change) between two successive verifications is estimated on the assumption of linear change.
Change in carbon stock in trees in a year is estimated as follows:

$$\Delta C_{TREE,t} = \frac{C_{TREE,t_2} - C_{TREE,t_1}}{T} \times 1\ year$$

Where:

$\Delta C_{TREE,t}$ = Change in carbon stock in trees within the project boundary in year t; t CO2e

$C_{TREE,t2}$ = Carbon stock in trees within the project boundary at time t2; t CO2e.

$C_{TREE,t1}$ = Carbon stock in trees within the project boundary at time t1; t CO2e.

T = Time elapsed between two successive estimations (T=t2 – t1); yr.

According to the tool, carbon stock in trees at a point of time can be estimated by using one or a combination of four methods.

- *Ex-ante estimation (projection) of carbon stock in trees*

Method (b) "Estimation by modeling of tree growth and stand development" has been applied as follows:

$$C_{TREE} = 44/12 * B_{TREE} * CF_{TREE}$$

Where:

CTREE: Carbon stock in tree biomass in tree biomass within the project boundary at a given point of time; t CO2-e

BTREE: Biomass of trees within the project boundaries at a given point in time; t d.m.

CFTREE: Carbon fraction of tree biomass; t C (t d.m.)$^{-1}$

With:

$B_{TREE} = VTREE * DJ * BEF\ J,2 * (1+ RJ)$

VTREE:	Stem volume of tree species; m^3
DJ :	Basic wood density of tree species j; t d.m. /m^3
BEF J ,2:	Biomass expansion factor for conversion of stem biomass to above-ground tree biomass, for tree species j; dimensionless
RJ:	Root-shoot ratio for tree species j; dimensionless

VTREE is estimated by using the vegetation volumetric growth of tree species j in one hectare in one year; m3/ha/year (MAI) as entry data into project participant´s spreadsheet calculation.

- *Ex-post estimation of carbon stock in trees*

Ex-post estimations will be based on method (a) of the applicable tool ("Estimation by measurement of sample plots").

According to the tool, mean carbon stock in trees within the tree biomass estimation strata and the associated uncertainty will be estimated, during the verification of this project activity these issues will be calculated and developed.

- *Change in carbon stock in shrub biomass in the project*

Regarding change in carbon stock in shrub biomass in the project, since the baseline scenario is the continuation of extensive pre activities. Therefore, it is not a source of GHG emissions.

$AC_{SHRUB_PROJ,t} = 0$

Litter and Dead Wood Carbon Pools

This carbon pool has not been selected, since it is optional.

Soil organic carbon Pool

This carbon pool has not been selected, since it is optional.

Leakage

According to the applied methodology the only leakage emissions that can occur are the GHG emissions due to displacement of pre-project agricultural activities. As described in the PD, in the project area there are no agricultural or any other kind of activity implemented, hence, no leakage is foreseen and hence accounted as zero.

$LK_t = 0$

Based on interview and the evidence provided, AENOR deems this consideration as credible.

Therefore, he leakage equations are not necessary to be applied. The project correctly applies the methodology and tools.

Estimated Net GHG Emission Reductions and Removals

According to the applied methodology the net anthropogenic GHG removals by sinks are calculated as follows:

$$\Delta C_{AR-CDM,t} = \Delta C_{ACTUAL,t} - \Delta C_{BSL,t} - LK_t$$

Where:

$\Delta C_{AR\text{-}CDM,t}$	Net anthropogenic GHG removals by sinks, in year t; tCO_2-e
$\Delta C_{ACTUAL,t}$	Actual net GHG removals by sinks, in year t; tCO_2-e
$\Delta C_{BSL,t}$	Baseline net GHG removals by sinks, in year t; tCO_2-e
LK_t	GHG emissions due to leakage, in year t; tCO_2-e

The following table summarizes the GHG removals:

Year	Estimated baseline emissions or removals (t CO_2e)	Estimated project emissions or removals (tC CO_2e)	Estimated leakage emissions (t CO_2e)	Estimated net GHG emission reductions or removals (t CO_2e)
2021	0	25	0	25
2022	0	28	0	28
2023	0	27	0	27
2024	0	27	0	27
2025	0	27	0	27
2026	0	27	0	27
2027	0	27	0	27
2028	0	27	0	27

2029	0	27	0	27
2030	0	27	0	27
2031	0	27	0	27
2032	0	27	0	27
2033	0	27	0	27
2034	0	27	0	27
2035	0	27	0	27
2036	0	27	0	27
2037	0	27	0	27
2038	0	27	0	27
2039	0	27	0	27
2040	0	27	0	27
Total	**0**	531	**0**	531

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

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

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

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

AENOR checked the ACAP ex ante estimation /7/ and compared the formulas with the ones in the methodology AR-ACM0003 and the tool "Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/RCDM project activities (Version 04.2)" and deems that the calculation is in accordance with the relevant methodology.

Also, the data used for the estimation of wood density for the pinus halepensis /15/ and the Laurus nobilis /14/ were checked with independent reports.

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

3.3.7 Methodology Deviations

No deviations were detected from the applicable methodology.

3.3.8 Monitoring Plan

The monitoring plan presented in the PD complies with the requirement of the methodology AR-ACM0003. The assessment team checked all parameters presented in the monitoring plan against the requirements of the methodology. For the monitoring of carbon stock changes, the requirements and parameter list as per methodology and associated tools were followed.

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

The list of parameters available at validation is the following:

MAI Mean annual increment for planted species

D_j wood density for planted species

$BEF_{2,j}$ Biomass expansion factor for planted species

R_j Root-shoot ratio for tree species

CF_{TREE} Carbon fraction of tree biomass

The list of parameters to be monitored is the following:

A_i Area of stratum i

$A_{BURN,i,t}$ Area burnt in stratum I In year t,ha

T Time period elapsed between two successive estimations of carbon stock in trees an shrubs

$A_{PLOT,i}$, Total area of sample plots in stratum i

n_i Number of sample plots in each stratum

w_i Ratio of the area of stratum i to the sum of areas of biomass estimation strata

DBH Individual trees' diameter at breast height

The procedures described in section 5 of the PD were reviewed by the AENOR team and cross-checked against the applicable methodology and associated tools. The audit team found to be in compliance with methodological requirements, and good practice as defined.

In the opinion of the AENOR team, all necessary parameters required by the selected methodology are contained in the monitoring plan. They are clearly described, and the means of monitoring detailed in the plan comply with the requirements of the methodology. Tables in section 5 of the PD detail the different data variable to monitor along with the data unit, recording frequency, purpose of data, QA/QC, etc. Thus, the monitoring plan is in compliance with the applicable methodology.

The sampling design and stratification is also detailed in section 5 of the PD. Equations for the estimation of the sample size have been checked by the audit team. Permanent sampling plots will be used for sampling over time to measure and monitor changes in carbon stocks from the most relevant carbon pools over the time.

The number of plots required for measuring the variation within the project boundary and strata shall be estimated by using the CDM A/R Methodological Tool *Calculation of the number of sample plots for measurements within A/R CDM project activities*.

In opinion of the AENOR assumptions considered for sampling design are reasonable and credible and consistent with calculation. Thus, AENOR deems the sampling plan correct, but in accordance with the FAR issued, will have to be reinforced for future verifications.

According to the PP the implementation of the monitoring plan includes a QA/QC system to minimize errors in measurement and data analysis, and to provide documentation and consistency in data archiving. Quality Assurance measures are implemented, in order to verify that data quality objectives are met, and in general, to support the effectiveness of the QC system.

QA/QC plan includes procedures such as (1) collecting reliable field measurements, (2) documenting data entry and analysis techniques and (3) data maintenance and archiving

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

3.4 Non-Permanence Risk Analysis

PP has elaborated VCS Non permanence Risk Report for the validation process according to the AFOLU Non-Permanence Risk Tool v4.0

Below, it is explained the assessment and the issues raised on regard the non-permanence risk rating determined by the PP in the report dated on 24 December 2021 version 02.0

Risk factor	Risk Rating	Findings and mitigation activities	CARs/CLs
Internal Risks			
Project Management: It is assessed using table 1 of the VCS AFOLU Risk Tool.	-2 (total may be less than zero)	a) Planted species are all native of the eco-region where they have been planted. The PP has provided documental evidence. Risk rating=0 is justified. b) Project trees were planted in an area managed and controlled by NAPA Vlore, the authority in charge for the	No corrective actions or clarifications were requested.

Risk factor	Risk Rating	Findings and mitigation activities	CARs/CLs
		management of protected areas of the region rating=0 is justified. c) In accordance with the evidence provided, Management team includes individuals with significant experience in all skills necessary to successfully undertake all project activities. Risk rating=0 is justified. d) The management team of the project has specially dedicated staff based in the project area (project manager, operators, etc.). . Risk rating=0 is justified. e) The project entity has contracted Carbonsink a climate change consultancy firm with large experience in carbon credit certification process. Most of the experience was focused in CDM and VCS projects Risk rating= -2 is justified. f) BDU II does not have in place an adaptive management plan. Risk rating=0 is justified.	
Financial viability: It is assessed using table 2 of the VCS AFOLU Risk Tool.	0 (total may not be less than zero)	a)-c) Not applicable. Then the score for this factor is 0. d)Based on the financial spreadsheet information it is possible to determine that the project cash flow breakeven point is less than 4 years from the current risk assessment. Risk rating=0 is justified. e)-h) The reforestation project, part of the broader ACAP project, has already received public funds, for this first instance to be implemented Risk rating=0 is justified. i) Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven. The reforestation project has already received public funds for the first instance implemented. Risk rating=-2 is justified.	No corrective actions or clarifications were requested.

Risk factor	Risk Rating	Findings and mitigation activities	CARs/CLs
Opportunity Cost: It is assessed using table 3 of the VCS AFOLU Risk Tool.	-10 (total may be less than zero)	a)-c) Not applicable. d) The alternative scenario is the continuation of pre-project activities and the land would continue in its state of abandonment. Hence, there is no profitable alternative scenario. Risk rating=0 is justified. h) Project is protected by legally binding commitment to continue management practices over the length of the project crediting period. By the Decision of the Council of Ministers nr. 102 (04/02/2015), NAPA, and consequently RAPA Vlore, are in charge for the administration of the project areas with no planned expiry. Hence, it is very likely they will keep implementing protection practices over at least 100 years. Risk rating=-2 is justified. j) By the Decision of the Council of Ministers nr. 102 (04/02/2015), NAPA, and consequently RAPA Vlore, are in charge for the administration of the project areas with no planned expiry. Hence, it is very likely they will keep implementing protection practices over at least 100 years. Risk rating=-8 is justified.	No corrective actions or clarifications were requested.
Project Longevity: It is assessed using table 4 of the VCS AFOLU Risk Tool.	0 (total may not be less than zero)	a) Strong arguments to ensure that the planted forest will continue at least for the next 100 years b) not applicable Risk rating=0 is justified.	No corrective actions or clarifications were requested.
Total internal risk=0(total may not be less than zero)			
External Risks			
Land Tenure and resources access/impact: It shall be assessed using table 6 of the Risk Tool.	0 (total may not be less than zero)	a) Yes, by the Decision of the Council of Ministers nr. 102 (04/02/2015), NAPA, and consequently RAPA Vlore, are in charge for the administration of what is within the borders of Albanian protected areas. Risk rating= 0 is justified. b) Not applicable	No Corrective Actions or Clarifications were requested.

Risk factor	Risk Rating	Findings and mitigation activities	CARs/CLs
		c)-d) There are no disputes over land tenure or ownership of the project area in more than 5 % of the project area nor disputes over access/use rights (or overlapping rights). Risk rating=0 is justified. e) Not applicable. f) Yes, by the Decision of the Council of Ministers nr. 102 (04/02/2015), NAPA, and consequently RAPA Vlore, are in charge for the administration of what is within the borders of Albanian protected areas. Risk rating= -2 is justified. g) Not applicable.	
Community engagement: It shall be assessed using table 7 of the Risk Tool.	0 (total may be less than zero)	a) not applicable, there are not communities in the project area, project areas are accessible for local communities only for recreational activities. Not applicable. b) Not applicable c) Not applicable.	No Corrective Actions or No Corrective Actions or Clarifications were requested
Political Risks: It shall be assessed using table 8 of the Risk Tool.	0 (total may not be less than zero)	a-b) Not applicable c) According to the World Bank Institute Worldwide Governance Indicators. Governance score estimation is -0.04.. Risk rating=-2 is justified AENOR verified the value and reliability of source. d)-e) Not applicable. f) The country has an established Designated National Authority under the CDM and has at least one registered CDM Afforestation/Reforestation project registered. Risk rating=0 is justified.	No Corrective Actions or Clarifications were requested.
Total external risks=0 (Total may not be less than zero)			
Natural risks			
Fire Risk: It shall be assessed using table 10 of the Risk Tool.	LS*M=0.5	Minor significance. Every 10 to less than 25 years Thus LS= 1 is reasonable. Mitigation (M) measures: risk mitigation plan, Forestry Management system has in place a procedure regarding fire management	No Corrective Actions or Clarifications were requested

Risk factor	Risk Rating	Findings and mitigation activities	CARs/CLs
		Then, M=0.5 is reasonable.	
Pest and disease outbreaks: It shall be assessed using table 10 of the Risk tool.	LS*M=1	Minor significance. Every 10 to less than 25 years likelihood. Thus LS= 1 is reasonable. Mitigation (M) measures: The management plan of the area does not include information on pest and disease outbreaks. Furthermore, there are no historical records of such a phenomenon. Then, M=1 is reasonable.	No Corrective Actions or Clarifications were requested
Extreme weather: It shall be assessed using table 10 of the Risk tool.	LS*M=0.5	Minor significance. Every 10 to less than 25 years Thus LS= 1 is reasonable. Mitigation (M) measures: Project proponent will implement irrigation activities to prevent high mortality rates during the first hot season, when seedlings are more vulnerable to high temperatures Then, M=1 is reasonable.	No Corrective Actions or Clarifications were requested
Geological risks: It shall be assessed using table 10 of the Risk Tool.	LS*M=0	No carbon stock losses expected to be cause by geological risks. Thus LS= 0 is reasonable. Mitigation (M) measures: none. Then, M=1 is reasonable.	No Corrective Actions or Clarifications were requested
Total natural risks=2			
OVERALL RISK RATING=0+0+2=2. Then a minimum risk of 10% is considered.			

The non-permanence risk deduction to be applied for the project is 10%.

Therefore, the overall risk is 10 %, the total number of credits to be deposited in the afoul pooled buffer account is 53 and the VCUs is 478 tCO2eq.

AENOR has checked that information provided in the Non-Permanence Risk Report is consistent with the support documents provided. AENOR deems that information provided is reliable and appropriate. Thus, the overall risk rating is credible and realistic.

4 VALIDATION CONCLUSION

AENOR has performed the validation of the ACAP Albania - Vjosë-Nartë A/R project and has verified that the project is in compliance with the Verified Carbon Standard version 4.2 without qualifications or limitations. The project is located in Albania.

The validation process was performed on the basis of all issues and criteria of VCS. The conclusions of this report show that the project, as it was described in the project documentation, is in line with all criteria applicable for the validation.

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

In detail the conclusions can be summarized as follows:

- The project is in line with all criteria of the VCS Standard v4.2.

- The project additionality is sufficiently justified in the PD.

- The Monitoring Plan is transparent and adequate.

- The analysis of the baseline emission, project emissions and leakage has been carried out in a transparent and conservative manner.

-The project is likely to achieve estimated GHG emission removals.

Date:20 September 2022



Elena Llorente

Validation Leader

APPENDIX I: LIST OF EVIDENCE PROVIDED

1. ACAP Albania project description document v08
2. ACAP Albania VCS-Non-Permanence-Risk-Report v2.2 20220307
3. ACAP Albania VCS Risk Report Calculation Tool v02
4. Previous versions of the ACAP Albania VCS project description document
5. Project area KLM, Pinus pinea, Pinus halepensis, Laurus nobilis.
6. Elegibility map Vjose-Narta
7. ACAP - Ex-Ante_Estimation_revCS-220216
8. BusinessPlan_1stIssuance
9. Plantation report Vjose-Narta
10. Management Plan: Vjose-Narta Landscape Protected Area
11. Legislation, Nr. 102, dated 4.2.2015
12. Law, Nr. 81/2017 for protected areas
13. Environmental Albanian, Law nr. 10440-2011
14. Inter-tree and intra-tree variation in the physical properties of wood of laurel (Laurus nobilis), European Journal of Forest Research (2018)
15. Pinus halepensis, wood density, Huesca providence, environmental department, Mediterranean area.
16. CV Lorela Lazaj
17. CV Nexhip Hysolakoj
18. Financial offer PAPAF 09
19. LSC_Participants List Vjose-Narta
20. Ftesa Konsultim Publik_ LSC_Invitation
21. Evaluation Forms Vjose-Narta
22. Nationally Determined Contribution (NDC) of the Republic of Albania.

APPENDIX II: FINDINGS

Corrective action requests (CARs)

CAR ID:	01	Date: 31/08/2021
Description of CAR		
The following sections of the "*project details"* headland of the PD have not been completed properly: 1. In the section 1.1, the number of *Pinus pinea* planted is not determined properly according to the spreadsheet calculation. 2. In the section 1.1 of the PD the amount of CO_2 removed in tCO_2e is not determined properly, given that this quantity is not the same than the rest of the PD or spreadsheet calculations. 3. In the PD the numeration of the sections after 1.3 are not organized according to the template. 4. In the section "Project proponent" the organization stated is "National Agency of Protected Areas (NAPA)". However, according to VCS Registry the project proponent is "Carbon Sink Group s.r.l.". 5. In the section 1.10 of the PD, the number of trees planted is not determined properly, given that is not the same among different sections of the PD. 6. In the section 1.10, it is stated that the project starts on January the 18th, when the seed purchasing is carried out. Nevertheless, the plantation project starts one day later, 19th of January. According to VCS Standard v.4.1, for AFOLU projects, the start date, is the date on which activities that led to the generation of GHG emissions reductions or removals are implemented. Purchasing the seeds does not implement the GHG reductions or removals.		
Project Participant response		**Date:** 08/10/2021
1. This error comes from a typo in cell A5 of RawDatatab in the spreadsheet, in which it was typed 500 instead of 200. Section 1.1, together with all the numbers in the next sections that were influenced by this typo, has now been fixed, according to the finding. 2. Section 1.1 has now been fixed, according to the finding. 3. According to the template (Project Description, v4.0) the sections are properly organized 4. As correctly stated by the finding, the project proponent is indeed Carbon Sink Group s.r.l., and the section has now been fixed. 5. The section has now been fixed, according to the finding. 6. The section has now been fixed, according to the finding.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 23/12/2021

The correct information has been included in the PD The CAR 01 is closed

CAR ID:	02	Date: 31/08/2021
Description of CAR		
The following sections of the "*Safeguards*" headland of the PD have not been completed properly: 1. In the PD, section 2.1, it is stated that there are not negative effects because the project started from a degraded land. However, the figure 4 shown that there are forested zones previously to the reforestation. Furthermore, checking the KML file provided, it is shown that the area is found in forested areas. *1)* 2. Section 2.2 of the PD does not provide the whole information that the template requires: • *"How due account of all and any input received during the consultation has been taken. Include details on any updates to the project design or justify why updates are not appropriate.* *For AFOLU projects, also demonstrate how the project has or will communicate the following:* • *The project design and implementation, including the results of monitoring.* • *The risks, costs and benefits the project may bring to local stakeholders.* • *All relevant laws and regulations covering"* 3. In the section 2.2 of the PD, as in different parts of the document, the number of trees planted is not determined properly, given that is not the same among different sections of the PD.		
Project Participant response		**Date:** 08/10/2021
1. Yes, degraded is not the right word. The meaning of the sentence is that the project takes place in patches where, for several reasons, like land conformation and disturbing human activities, the regrowth of the forest cannot happen naturally (section 2.1 fixed, according to the finding). 2. Please refer to section 2.2 "Local Stakeholder Consultation" at points "4. Discussion on continuous input mechanism" and "5. Closure of meeting". 3. The section has now been fixed, according to the finding.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 18/11/2021

There are some points, that there are still not in the PD:

4. Section 2.2 of the PD does not provide the whole information that the template requires:
   - *"How due account of all and any input received during the consultation has been taken. Include details on any updates to the project design or justify why updates are not appropriate.*
   2) For AFOLU projects, also demonstrate how the project has or will communicate the following:
   - *The project design and implementation, including the results of monitoring.*
   - *The risks, costs and benefits the project may bring to local stakeholders.*
   - *All relevant laws and regulations covering"*

Project Participant response	**Date:** 23/12/2021

4. Please refer to section 2.2 "Local Stakeholder Consultation" at points "3. Questions for clarifications", ". Discussion on continuous input mechanism" and "5. Closure of meeting"

VVB Assessment

The correct information has been included, the CAR 2 has been closed.

CAR ID:	03	Date: 31/08/2021
Description of CAR		
The following sections of the "*Application of methodology*" headland of the PD have not been completed properly: 1. The link of the CDM methodology in the section 3.1 does not work. 2. Links 19 and 20 of section 3.1 are the same. 3. In the section 3.2 of the PD, the number of the methodology "AR-ACM0003 "A/R Large-scale Methodology: Afforestation" is not correctly stated. 4. Section 3.3 does not provide a "diagram or map of the locations of where the various measures are taking place, any reference areas and leakage belts", in accordance with template. 5. In the section 3.5 of the PD step 3 is missing.		
Project Participant response		**Date:** 08/10/2021
1. The link has now been fixed, according to the finding. 2. Footnote number 20 was a mistake, it has now been removed 3. The number of the methodology has now been fixed, according to the finding. 4. Reference region and leakage belt are not applicable in this project. Regarding project areas, please see Figure 2. 5. The "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities" (Version 01) states that the "STEP 3. Investment analysis" has to be carried out only if needed. *3)* Indeed, this step is used to determine which of the remaining land use scenarios identified in the "Sub-step 2b" is the most economically or financially attractive. *4)* In this case the only alternative scenario identified is the Scenario 1 "Continuation of the pre-project land use". Therefore, step 3 is not applicable.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 18/11/2021
The PD has been modified and the corrections are correct. The CAR 03 is closed		

CAR ID:	04	Date: 31/08/2021
Description of CAR		
Regarding spreadsheet calculations some inconsistencies have been detected: 1. In the "*RawData* tab", the number of pine trees and the plantation calculations are not the same than the reported on the PD. 2. In the "*Strata* tab", the area of plantation of different trees, and the number of trees planted are not the same than the area shown in "Rawdata tab". 3. In the "*Er estimation* tab" the project starting date is the 18th of January, but this date corresponds to the seed purchasing date, which does not implement the GHG removal or reduction. 4. In the "Er estimation tab" C_Tree data is calculated different than in the PD.		
Project Participant response		**Date:** 08/10/2021
1. The reason of this error is still the same typo described in CAR ID 01 point nr. 1. The section has now been fixed, according to the finding. 2. The section has now been fixed, according to the finding. 3. The section has now been fixed, according to the finding, and the new starting date is 19th of January 2021. 4. The spreadsheet has now been fixed, according to the findings. Moreover, the number of trees has been linked to formulas, according to the observations		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 23/12/2021
The spreadsheet has been corrected and the calculations are considered correct. CAR 4 is closed.		

CAR ID:	05	Date: 31/08/2021
Description of CAR		
Regarding Non-Permanence risk report some errors have been identified: 1. The project ID is missing. 2. In the section 1.4 “Project longevity”, the project longevity in years is not determined properly according to the PD. 3. In the section 3 “Natural Risks” the risks categorized are insignificant, however, on the PD is stated that “environmental extreme events occurred in the past”. 4. The total number of credits to be deposited in the AFOLU Pooled is stated as zero, although the overall risk rating is 10%.		
Project Participant response		**Date:** 08/10/2021
1. Project ID 2547 has now been added. 2. Project longevity is the number of years beginning from the project start date that project activities will be maintained, which may be longer than the project crediting period, which is defined as the number of years for which the project is eligible to receive credits. 3. Fire in the project area it is historically human-induced, and with the implementation of human activities, phenomena like this are expected not to happen anymore. Hence it is categorized as insignificant. There is no historic record of pest and diseases outbreaks in the area, hence, it is categorized as insignificant. According to EM-DAT international disasters public database (https://public.emdat.be/), from 2005 until today, only one windstorm, categorized as extreme, happened in Vlore area. Hence, it is categorized as insignificant. The Non-Permanence risk report will be reviewed and validated during the verification phase. *4.* Yes, it looks like something does not work properly in the spreadsheet because formulas are automatic. Anyway, this issue will be checked again during the verification phase and properly adjusted.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 23/12/2021
The non-permanent risk has been modified and CAR 5 is solved.		

CAR ID:	06	Date: 18/11/2021
Description of CAR		
Section 3.5. of the PD, additionality has to be specific for the project activity and documented with supporting evidence. In accordance with the: “Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities”, the additionality shall be demonstrated and assessed in accordance with the requirements set out in the methodology applied to the project.		
Project Participant response		**Date:** 23/12/2021
The section has now been fixed, according to the finding.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 25/01/2022
Section of the PD has been modified and documented evidence has been provided. CAR 6 is solved.		

CAR ID:	07	Date: 18/11/2021
Description of CAR		
In accordance with section of the 3.15.3 of VCS Standard, the project proponent shall establish a GHG information system for obtaining, recording, compiling and analyzing data and information important for quantifying and reporting GHG emissions and/or removals relevant for the project (including leakage) and baseline scenario. For section 5.2. and section 5.3. of the PD, ex-post (actual) estimation of tree biomass it uses data from measurements conducted in sample plots. Remote sensing data may also be used in conjunction with data from measurements conducted in sample plots. The main parameter for monitoring the trees is missing.		
Project Participant response		**Date:** 23/12/2021
The section has now been fixed, according to the finding.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 25/01/2022
The PD have been reinforced and this issue is considered correct. CAR 7 is solved.		

Clarification requests (CLs)

CL ID	**01**	**Date: 31/08/2021**
Description of CL		
Please, provide evidence of the following aspects of the PD: 1. The ownership stated on section 1.6. 2. The section 1.10 of the PD states that 9,302 trees were planted by hand with non-invasive techniques. Please provide evidence of this process. 3. The section 2.2 of the PD states that a second meeting with four restaurant owners was carried out. Provide evidence of the meeting and the invitation of the second meeting. 4. On the section 2.5 of the PD, and according to the VCS requirements, for AFOLU projects with no impacts on local stakeholders, provide evidence of such. 5. In the spreadsheet the VCUs are shown but not in the PD.		
Project Participant response		**Date:** 22/10/2021
1. Please, find evidence in the attachments 2. Please, find evidence in the attachments *3.* The invitation of the four restaurant owners was made via telephone because of lack of email address. As evidence, please consider the four evaluation forms they filled out at the end of the second meeting (names: Malko Tahiri, Robert Salaj, Bordin Troka, Liazar Lamo) 4. All the stakeholders in the project area have been identified and consulted during local stakeholder consultation, they were provided with forms and they gave no negative feedbacks. Moreover, no negative and possible impacts were found likely to occur. *5.* VCUs will be added after monitoring and verification phase.		
Documentation provided by the Project Participant		
VVB Assessment		**Date:** 18/11/2021
Documented evidence has been provided and CL1 is solved.		

CL ID	02	Date: 31/08/2021
Description of CL		
Please, provide evidence of the following aspects of the non-Permanence risk report: 1. In the section 1.1 “project management table” is stated that management team includes experienced and competent forestry figures. 2. In the section 1.2 “financial viability” provide evidence of the following affirmations: 1. Project cash flow breakeven point is less than 4 years from the current risk assessment. 2. Project has secured 80% or more of funding needed to cover the total cash out before the project reaches breakeven. 3. In the section 3.3.1 “Mitigation” provide evidence of the following affirmations: 1. Project proponent includes, in its management plan, activities (forest cleaning, etc..) to prevent fire outbreaks 2. Project proponent will implement irrigation activities to prevent high mortality rates during the first hot season, when seedlings are more vulnerable to high temperatures		
Project Participant response		**Date:** 04/11/2021
1. Please, find evidence in the attachments 2. Please, find evidence in the attachments 3. Please, find evidence in the attachments		
Documentation provided by the Project Participant		
VVB Assessment		**Date: 18/11/2021**
The correct evidence has been provided and it is considered correct. CL 2 is closed.		

CL ID	03	Date: 31/08/2021
Description of CL		
Further information, clarification is requested regarding to the following issues: 1. In the PD, section 1.12, talks about *Pinus maritima*, but this specie (scientific name) does not exist. 2. The section 5.1 of the PD talks about *Laurus canariensis*, but now, the specie has a different scientific name. 3. The section 5.3 of the PD reports the way to measure the trees but does not use any tool to measure the height.		
Project participant response		**Date:** 08/10/2021
1. Section 1.12 has now been fixed, according to the finding. 2. Section 5.1 has now been fixed, according to the finding. 3. A tool to measure the height has not yet been selected because the allometric equations that will be used to model the biomass are likely to be only DBH-dependent. In case of allometric equations that include height-dependent parameters, an appropriate tool will be selected and described in section 5.3.		
Documentation provided by the Project Participant		
VVB assessment		**Date:** 18/11/2021
Documented evidence has been provided. This CL 3 has been closed.		

Forward Actions Requests (FARs)

FAR ID	**01**	**Date:** 18/11/2021
Description of FAR		
For the first verification, the monitoring plan has to be reinforced with specific information, such as allometric equations and the sampling method to measure the trees.		