

# PROJECT REVIEW REPORT

This project review report includes findings raised during Verra’s review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

<b>Project ID</b>	2367
<b>Project Name</b>	Afforestation in Eucalyptus and Acacia plantations for Burapha Agroforestry Co., Ltd.
<b>Review Type</b>	Verification
<b>Program(s)</b>	VCS
<b>Verification Period</b>	23 December 2020 – 31 December 2022
<b>Project Proponent</b>	Burapha Agro-Forestry Co. Ltd.
<b>Methodology</b>	AR-ACM0003, Afforestation and reforestation of lands except wetlands, version 2.0
<b>VVB</b>	Earthood Services Private Limited
<b>Assessment Criteria</b>	VCS <i>Standard</i> , version 4.5
<b>Date of First Issue</b>	05 August 2024
<b>Date of Second Issue</b>	01 November 2024
<b>Date of Third Issue</b>	04 February 2025
<b>Review Conclusion</b>	Approved
<b>Date of Final Issue</b>	27 April 2024

## FINDINGS

#	Finding Description	VVB Response	Status
<b>1</b>	<b>Unreported project description deviation (1): Other entities</b>		
	<p><u>Issue</u> The change in other entities involved in the project is not reported as a project description (PD) deviation.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure the change in other entities is reported and assessed as a PD deviation.</li> <li>2. The VVB must ensure the monitoring report (MR) and verification report (VR) are updated accordingly.</li> </ol> <p><u>Program Rule(s)</u> VCS Standard, v4.5, Section 3.21.2 (2) VCS Monitoring Report, v4.2, Section 3.1</p>	<p><b>Round 1</b></p> <p><u>VVB Response</u> VVB has verified that PP has updated Section 3.2.1 of the revised MR to report the change in the names of other entities as a project description (PD) deviation. VVB has updated the VR to report the PD deviation changes.</p> <p><u>Verra Response</u> Section 3.2.1 of the MR and Section 3.3 of the VR have been updated with sufficient information and assessment, respectively, on the changes of other entities involved in the project. This finding is closed, and no further action is required.</p>	Closed
<b>2</b>	<b>Unreported project description deviation (2): Change in harvesting practice</b>		
	<p><u>Issue</u> The change to machine harvesting during the monitoring period may have implications on the applicability conditions of the methodology, specifically the “Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities”, version 01.1.0.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure this change in harvesting practice is reported and assessed as a project description deviation.</li> <li>2. The VVB must assess if soil disturbance from machine</li> </ol>	<p><b>Round 1</b></p> <p><u>VVB Response</u> In response to this comment, it is to be clarified that section 1.11, Plantation management and planting, of the registered PD states: “Burapha establishes its plantations on degraded lands of former shifting cultivation, using mainly Eucalyptus (<i>Eucalyptus spp.</i>) and Acacia (<i>Acacia auriculiformis</i>). Before plantation establishment, Burapha selects suitable sites for protection, such as any areas with high conservation value, slopes &gt;35°, strategic areas for fire protection or areas targeted for habitat enhancement. Areas suitable for plantation</p>	Closed

<p>harvesters impacts the applicability of the methodological tool.</p> <p><u>Program Rule(s)</u>          CDM “Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities”, version 01.1.0.</p>	<p>however are prepared by clearing the fallow vegetation. All work is conducted maximizing the labor input and reducing mechanical work, to guarantee employment for the villagers. However, harvesting activities are conducted mainly by harvesting machines.</p> <p>The trees are planted in a 3x3m or 4.5x2m and sometimes in a 9x1m planting scheme, adding up to approximately 1,111 trees/ha. The forest stands itself are thinned during year 3 and 4 in a 9x1m planting scheme and all plantations are harvested after 1.5 years (rotation cycle). The trees are cut to the stump during the first harvesting event, from which they re-sprout for the second rotation. After two rotations the trees will be replanted.</p> <p>Maintenance of the plantations during their growth cycle involves periodic weeding, thinning and addition of fertilizer. Additional fire breaks are established.”</p> <p>The use of harvesting machines is not a change within the project and therefore does not require a project description deviation.</p> <p>The “Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities”, version 01.1.0. states that:</p> <p>(b) The A/R CDM project activity meets the following conditions:          (i) Litter remains on site and is not removed in the A/R CDM project activity; and          (ii) Soil disturbance attributable to the A/R CDM project activity, if any, is:</p> <ul style="list-style-type: none"> <li>• In accordance with appropriate soil conservation practices, e.g. follows the land contours;</li> </ul>	
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		<ul style="list-style-type: none"> <li>Limited to soil disturbance for site preparation before planting and such disturbance is not repeated in less than twenty years.</li> </ul> <p>“Soil disturbance” is an anthropogenic activity that results in release of soil organic carbon into the atmosphere, e.g. ploughing, ripping, scarification, digging of pits and trenches, stump removal, drainage of soil, etc.</p> <p>The PP has confirmed that stumps are left in situ. Pits are dug by hand before planting, with each pit no larger than 20 cm in diameter and depth, ensuring minimal soil disturbance. Pits are dug approximately every 14 years, based on the practice of replanting every second rotation. These practices are confirmed in “BAFCO_WI03_V02_Manual site preparation 230220”.</p> <p>Replanting does not include ploughing, ripping, scarification, digging of pits and trenches, stump removal or drainage of soil and soil disturbance is minimised and follows appropriate soil conservation practices. Therefore the project remains in compliance with the requirements of “Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities”, version 01.1.0.</p> <p><u>Verra Response</u> The VVB response is sufficient to confirm that no harvesting activities have changed during this monitoring period. The justification for the harvesting practice is consistent in the registered PD and the MR. This finding is closed, and no further action is required.</p>	
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3	Unreported project description deviation (3): Change in a fixed parameter
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<p><u>Issue</u> The change in value applied for the carbon fraction of tree biomass (CF<sub>TREE</sub>) differs between the MR (0.49) and the validated project description (0.47) and is not reported as a PD deviation.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must assess why a fixed parameter (CF<sub>TREE</sub>) differs from the validated project description and conclude the appropriateness and conservativeness in Section 4.4 of the VR.</li> <li>2. The VVB must ensure the change in a fixed parameter is reported and assessed as a PD deviation.</li> </ol> <p><u>Program Rule(s)</u> CDM “Tool for estimation of change in soil organic carbon stocks due to the implementation of A/R CDM project activities”, version 01.1.0.</p>	<p><b>Round 1</b></p>	<p>Closed</p>
	<p><u>VVB Response</u> VVB has verified that PP has corrected and updated the value of CF<sub>TREE</sub> to 0.49 in Section 4.1 of the revised MR and confirmed that the value of the parameter is consistently applied in the ER sheet and in section 4.4 of the VR.</p>	
	<p><u>Verra Response</u> The carbon fraction has been updated to be the same in the validated project description (0.47). However, this finding cannot be closed.</p>	
	<p><u>Issue</u> The carbon fraction value between Section 4.1 of the MR (0.47) and Section 4.4 of the VR (0.49) is inconsistent.</p>	
	<p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the carbon fraction value is consistent in the project documents and update the VR accordingly.</li> </ol>	
	<p><b>Round 2</b></p>	
	<p><u>VVB Response (Pending)</u> VVB has updated the carbon fraction value in Section 4.4 of the VR to align with the value mentioned in Section 4.1 of the MR. The carbon fraction value in Section 4.4 of the VR has been changed to 0.47 as per the MR in Section 4.1 and the ER calculations “Burapha_Second_Monitoring_Calculation_v2 07082024.xls”</p>	
	<p><u>Verra Response</u> The carbon fraction value of 0.47 is consistent in project</p>	

		documents. This finding is closed, and no further action is required.	
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<b>4</b>	<b>SDG project contributions do not match the indicator</b>		
	<u>Issue</u>	<b>Round 1</b>	
	<ol style="list-style-type: none"> <li>1. The SDG contributions described in Table 2 of the MR do not fit the indicator as follows:             <ol style="list-style-type: none"> <li>a. SDG 8 (current): The number of staff hired does not necessarily result in a decreased proportion of the population below the international poverty line. For example, the contribution might also compare the annual income of the workers to the international poverty line to demonstrate the implemented activities will decrease the indicator.</li> <li>b. SDG 8 (lifetime): The “contributions over the project lifetime” column does not report a cumulative quantifiable impact.</li> <li>c. SDG 13: The current project contribution and contributions over the project lifetime present inaccurate total credits to date (plus buffer credits).</li> <li>d. SDG 15 (lifetime): The “contributions over the project lifetime” column does not report a cumulative quantifiable impact (i.e., total number of hectares of sustainably managed forest).</li> </ol> </li> <li>2. There is no demonstration of how the project activities are consistent with Laos’s SDG objectives.</li> <li>3. The VVB refers to the wrong sections of sustainable development contributions in Section 4.1 of the VR.</li> <li>4. The VVB does not describe the evidence used to assess the reported SDG contributions in Section 4.1 of the VR.</li> </ol>	<u>VVB Response</u>  <p>In response to this findings, Table 2 in the MR has been updated to reflect the requested changes and aligned with the SDGs of Laos. SDG Indicators has been specified in the Table. MR has been updated with a new section in 1.11 to show how the project activities are consistent with the Lao Government’s SDG objectives, national policies and strategy.</p> <p>SDG contributions and progress: Burapha closely follows the socioeconomic and livelihood status on partner villages and undertakes Village Benefits Assessments to quantify the impact of the project on villages at a regularly interval. The 2018 Village Benefits Assessment also confirms that Burapha activities have “created a concentrated, beneficial, and transformative improvement in household incomes and assets in villages”.</p> <p>Labor rates are reviewed periodically and communicated to all partner villages. Triggers for review are based on local economic factors such as inflation and competitive industries. VVB assessed the project documentation and record keeping and found it sufficient to justify the SDG contributions.</p>	Closed
		<u>Verra Response</u> <p>Table 2 under the MR is updated to match the SDGs’ indicators. However, this finding cannot be closed.</p>	
		<u>Issue</u> <p>The current project contributions for SDG 13 are inconsistent between Table 2 of the MR and ERR calculation spreadsheet.</p>	

	<p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure each “current” SDG contribution is relevant to the respective indicator and that each “lifetime” contribution presents the respective cumulative quantifiable impact of the project.</li> <li>2. The VVB must ensure that the project proponent demonstrates how the project activities are consistent with the host country’s SDG objectives in Section 1.11 of the MR.</li> <li>3. The VVB must ensure that Section 4.1 of the VR correctly refers to sections of sustainable development contributions.</li> <li>4. The VVB must provide the steps taken to assess each SDG target, official indicator, and evidence of current project contributions to each SDG.</li> </ol> <p><u>Program Rule(s)</u> VCS Standard, v4.5, Section 3.17.1</p> <p><u>Background</u> Issue #2: VVB confirmed that the project had met the requirement of <b>VCS Standard version 4.5 section 3.10.2.</b></p>	<p>(see Background)</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the current project contributions for this monitoring period are consistent between project documents.</li> </ol> <p><u>Background</u> Sections 1.1 and Table 2 of the MR show that the GHG credits eligible to be issued as VCUs are 178,737 tCO<sub>2</sub>e, while the ERR calculation spreadsheet shows that the VCUs eligible for issuance are 171,310 tCO<sub>2</sub>e.</p> <p><b>Round 2</b></p> <p><u>VVB Response (Pending)</u> The VVB has assessed the updates made by the PP in the MR and found that the PP has updated the eligible issuance of the VCUs for this project. Section 1.11 and Table 2 of the MR has been updated with correct ERR values. 171,310 tCO<sub>2</sub>e is the total ERR in accordance with the ERR calculation spreadsheet and now consistently updated in MR and VR.</p> <p><u>Verra Response</u> The current project contributions for SDG 13 are consistent in the project documents. This finding is closed, and no further action is required.</p>	
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<p><b>5</b></p>	<p><b>Inconsistent values of data and parameters</b></p> <p><u>Issue</u></p> <ol style="list-style-type: none"> <li>1. The value applied for wood density for <i>Acacia auriculiformis</i> differs between the MR (0.51 t dm./m<sup>3</sup>) and emission reductions/removals (ERR) calculation spreadsheet (0.68 t dm./m<sup>3</sup>)</li> <li>2. The value applied of the ratio of the area of stratum I to the sum of areas of biomass estimation strata (W<sub>i</sub>) at the monitoring period differs between Section 4.2</li> </ol>	<p><b>Round 1</b></p> <p><u>VVB Response:</u> VVB has verified that the PP has updated and corrected the wood density for <i>Acacia auriculiformis</i> to 0.51 t dm./m<sup>3</sup> in the ER sheet, see tab TSP+PSP_all, L2 and confirmed that the value of the parameter is consistently applied in MR and ERR sheet. The MR values match with those in the ER sheet. See tab Total Carbon Stock, J15:J24. For Tree Spacing, see the ER sheet, tab</p>	<p>Closed</p>
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	<p>of the MR and ERR calculation spreadsheet.</p> <p>3. Section 4.4 of the VR does not provide an assessment of the data/parameter of “Tree Spacing.”</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the value applied for wood density for <i>Acacia auriculiformis</i> is consistent in the MR and ERR calculation spreadsheet.</li> <li>2. The VVB must ensure that the correct <math>W_i</math> values have been applied to the ERR calculation spreadsheet and are consistently presented in Section 4.2 of the MR and Section 4.4 of the VR.</li> <li>3. The VVB must assess all data and parameters monitored in Section 4.4 of the VR.</li> <li>4. The VVB must assess the revised ERR calculation spreadsheet and update the VR accordingly if the values applied are changed.</li> </ol> <p><u>Program Rule(s)</u>  VCS Standard, v4.5, Sections 3.16.1 - 3.16.2  VCS Monitoring Report, v4.2, Section 4.1  VCS Verification Report, v4.2, Section 4.4</p>	<p>TSP+PSP_all, Column J.</p> <p><u>Verra Response</u>  All data values and parameters are updated and consistent in the project documents. Section 4.4 of the VR is updated with sufficient assessment. This finding is closed, and no further action is required.</p>	
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6 Unclear justification for zero leakage			
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>1. It is unclear how the intercropping in the first and second years of the rotation cycle justifies zero leakage for the entire project crediting period.</li> <li>2. It is unclear if there is any shifting of grazing activities (i.e., livestock).</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must clarify how the intercropping in the first and second years of the rotation cycle justifies zero</li> </ol>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> <li>1. In response to this finding and provide revisions, a new Section 8, Leakage Assessment, has been added to the MR providing additional justification for the application of zero leakage in this monitoring period. Note the potential for leakage has been identified by the project as a risk and leakage will be assessed in every monitoring period. There is no assumption that leakage will automatically be zero of the entire crediting period.</li> </ol>	<p>Closed</p>

<p>leakage for monitoring years 2018 – 2022.</p> <ol style="list-style-type: none"> <li>The VVB must clarify if the project activity displaces grazing activities.</li> <li>The VVB must update relevant sections in the VR accordingly.</li> </ol> <p><u>Program Rule(s)</u> AR-TOOL14, v02.0, Section 6</p> <p><u>Background</u> Section 3.1 of the MR states that Burapha avoids the shift of pre-project agriculture activities (i.e., leakage) by allowing intercropping in the first and second years of the rotation cycle.</p>	<ol style="list-style-type: none"> <li>A new Section 8.1, Impact on Grazing Activities, has been added to the MR providing additional justification that the project is unlikely to be creating leakage due to shifting of grazing activities. The assessment has been added in section 4.4 of the VR.</li> </ol>	
	<p><u>Verra Response</u> This finding cannot be closed.</p> <p><u>Issue</u></p> <ol style="list-style-type: none"> <li>Section 8.2 of the MR does not sufficiently justify why shifting of rice cultivation to new lands did not cause leakage during the monitoring period. Intercropping only occurs in the first two years; therefore, rice cultivation was displaced from the project area during the monitoring period.</li> <li>Section 8.2 of the MR does not describe the leakage monitoring plan. The MR describes conditions that reduce the risk of leakage but does not describe how the project monitored for leakage.</li> <li>Section 4.4 of the VR does not describe the evidence or supporting documents assessed to confirm no leakage from shifting rice cultivation during this monitoring period (e.g., field measurement of displaced area, remote sensing data of deforestation for rice cultivation).</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>The VVB must ensure that the PP accounts for leakage from shifting rice cultivation during the monitoring period unless the PP can demonstrate via leakage monitoring that leakage did not occur from year 3 to year 7.</li> <li>The VVB must ensure the PP describes how they monitored leakage in the MR.</li> <li>The VVB must describe the steps taken to assess evidence or supporting documents for zero leakage during this</li> </ol>	

		<p>monitoring period, in Section 4.4 of the VR.</p> <p><b>Background</b>          Section 4.3 of the registered PD stated that “Burapha tries to avoid the shift of pre-project agricultural activities by allowing intercropping in the first and second year of the rotation cycle”. However, it did not justify the shifting of pre-project agricultural activities from year 3 to year 7 of the plantation.</p> <p><b>Round 2</b></p> <p><b>VVB Response (Pending)</b></p> <ol style="list-style-type: none"> <li>In response to the finding, PP has made appropriate changes in the MR section 3.2.1. The section now includes the description of ‘inclusion of leakage variables in monitoring plan’. Further, MR sections 4.2, 5.1 and 5.4 have been revised by PP to account the leakage. To minimize potential leakage Burapha is explicitly designed as an agroforestry model that allows the local communities to conduct agroforestry practices (intercropping and/or grazing) in between the planting rows, mirroring the traditional shifting cultivation cycle, as well as generating additional cash income through providing labour opportunities for the villagers.</li> </ol> <p>In shifting cultivation the same plots of land are returned to throughout a cycle. For example, an area planted with rice in Year 1 will then be left fallow for a number of years (typically 5 to 9 years) and then replanted with rice. An example of a typical shifting cultivation cycle is as follows:</p> <ul style="list-style-type: none"> <li>Year 1: Planting of rice/other crops</li> <li>Year 2: Area left fallow</li> <li>Year 3-7: Area left fallow</li> <li>Year 7: Restart of cycle, clearing and planting of rice/other crops.</li> </ul> <p>The Burapha agroforestry rotation mirrors this shifting cultivation</p>	
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		<p>cycle, i.e. where an area intercropped with rice in Year 1 will then be left fallow until the trees are harvested in Year 7. After harvesting the area will be re-planted with rice and the rotation cycle will re-start again:</p> <ul style="list-style-type: none"> <li>• Year 1: Planting of trees and rice</li> <li>• Year 2: Planting rice when suitable due to shade from the trees</li> <li>• Year 3-7: Cattle grazing</li> <li>• Year 4: Thinning operations</li> <li>• Year 7: Clear cut of trees and restart of cycle</li> </ul> <p>Therefore uptake of intercropping at the start of the plantation rotation has the potential to create a positive leakage impact, rather than creating leakage. This is the second monitoring period for the first PAI. No new areas are being added as part of this verification. However the areas planted in 2020 were not included in the previous verification as the trees were not old enough to be inventoried. Therefore potential for leakage impact will be considered for the 2020 planted areas only (701 ha).</p> <p>2) Section 8 of the MR has been removed and replaced with data on intercropping, and a PD deviation in the MR, as described below. Burapha’s GIS system captures information on the uptake of intercropping opportunities by villagers during the process of stand establishment. Area and type of crops planted in the first year of plantation areas established in 2020 are shown below: The fact the areas are cleared by Burapha decreases the labour required for preparing areas for growing crops. The data shows that villagers took up the opportunity for intercropping (and even planting beyond the plantation areas into buffer areas, roads, fire breaks etc that have been cleared as part of the plantation infrastructure), which creates a positive leakage impact. This information has been added to Section 5.1 and 5.4 of the MR.</p> <p>In addition a Project Description Deviation has been added to Section</p>	
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		<p>3.2.1 of the MR, describing the new variables that have been added to the monitoring plan (see Section 4.2). These new variables, and the values applied for this monitoring period, are included below:</p> <p>3. VVB has provided the assessment of project description deviation in section 3.3 and added the assessment of parameters in section 4.4 of the VR.</p>	
		<p><u>Verra Response</u></p> <p>Section 5.4 of the MR is updated with sufficient justification of leakage. Section 3.2.1 of the MR included the leakage variables in the monitoring plan. The VVB has assessed the updated and confirmed the project description deviation in Section 3.3 of the VR. This finding is closed, and no further action is required.</p>	

<b>7</b>	<b>Incomplete ERR calculation</b>		
	<p><u>Issue</u></p> <p>It is unclear how the long-term average (LTA) has been calculated in the calculation spreadsheets.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure the ERR calculation spreadsheet provides the calculation of the LTA GHG benefit.</li> <li>2. The VVB must assess the updated ERR calculation spreadsheet.</li> <li>3. The VVB must ensure the LTA is reported in the MR and Section 4.4 of the VR.</li> </ol> <p><u>Program Rule(s)</u></p> <p>VCS Standard, v4.5, Section 3.2.30 (7)</p>	<p style="text-align: center;"><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>VVB has verified that the PP has provided the updated LTA in Section 5.5 of the MR and an ERR calculation spreadsheet for the calculation of the LTA GHG benefit in Updated LTA for MR2, 2022-03-31_ Ex Ante - 1st project instances.xlsx. A table showing the updated LTA has been included in Section 5.5 of the MR. The calculation of the LTA can be found in “Updated LTA for MR2, 2022-03-31_ Ex Ante - 1st project instances.xlsx”.</p> <p><u>Verra Response</u></p> <p>This finding cannot be closed.</p> <p><u>Issue</u></p> <p>The LTA calculation spreadsheet does not allow the reader to reproduce the estimation. (see Background)</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the data and values in the LTA</li> </ol>	Closed

- calculation spreadsheet are available to reproduce the estimation.
- The VVB must assess the updated LTA calculation spreadsheet and ensure that the results are consistent between the LTA spreadsheet and Section 5.5 of the MR.

**Background**

There are #REF! error shown in the LTA calculation spreadsheet.

Ch. 4.2 Project Emissions - Table 12: Overview of project emissions

Year	Stock (m <sup>3</sup> /ha)	Total AGB (tCO <sub>2</sub> e/ha)	Total BGB (tCO <sub>2</sub> e/ha)	Total DW_Litter (tCO <sub>2</sub> e/ha)	Total Biomass (tCO <sub>2</sub> e/ha)
1	0.0	#REF!	#REF!	0.0	#REF!
2	0.0	#REF!	#REF!	0.0	#REF!
3	0.0	#REF!	#REF!	0.0	#REF!
4	0.0	#REF!	#REF!	0.0	#REF!
5	0.0	#REF!	#REF!	0.0	#REF!
6	0.0	#REF!	#REF!	0.0	#REF!
7	0.0	#REF!	#REF!	0.0	#REF!
8	0.0	#REF!	#REF!	0.0	#REF!
9	0.0	#REF!	#REF!	0.0	#REF!
10	0.0	#REF!	#REF!	0.0	#REF!
11	0.0	#REF!	#REF!	0.0	#REF!
12	0.0	#REF!	#REF!	0.0	#REF!
13	0.0	#REF!	#REF!	0.0	#REF!
14	0.0	#REF!	#REF!	0.0	#REF!
15	0.0	#REF!	#REF!	0.0	#REF!
16	0.0	#REF!	#REF!	0.0	#REF!
17	0.0	#REF!	#REF!	0.0	#REF!
18	0.0	#REF!	#REF!	0.0	#REF!
19	0.0	#REF!	#REF!	0.0	#REF!
20	0.0	#REF!	#REF!	0.0	#REF!
21	0.0	#REF!	#REF!	0.0	#REF!
22	0.0	#REF!	#REF!	0.0	#REF!
23	0.0	#REF!	#REF!	0.0	#REF!
24	0.0	#REF!	#REF!	0.0	#REF!
25	0.0	#REF!	#REF!	0.0	#REF!
26	0.0	#REF!	#REF!	0.0	#REF!
27	0.0	#REF!	#REF!	0.0	#REF!
28	0.0	#REF!	#REF!	0.0	#REF!
29	0.0	#REF!	#REF!	0.0	#REF!
30	0.0	#REF!	#REF!	0.0	#REF!
Long-Term Average		#REF!	#REF!	0.0	#REF!

Instructions Settings Carbon Stock Biomass growth Biomass Output PDD Tables +

**Round 2**

VVB Response (Pending)

VVB has assessed the updated LTA Calculation Spreadsheet v2 and concluded that the PP has provided the updated LTA calculations under the "Carbon Stock" sheet, allowing the reader to reproduce the estimations. Additionally, the VVB has reviewed Section 5.5 of the MR and confirmed that the LTA estimations presented in Table 15 of the MR are consistent with those given in

		<p>the LTA Calculation Spreadsheet. The LTA calculation is on the tab 'Carbon Stock', column AA in the file 24082024 Updated LTA for MR2 v2.xlsx. The LTA calculations in the spreadsheet are the same as presented in Section 5.5 of the MR. Section 4.4 of the VR has also been updated with LTA calculations assessment.</p>	
		<p><u>Verra Response</u> The LTA spreadsheet is available to reproduce the calculation. However, this finding cannot be closed.</p> <p><u>Issue</u> The baseline and project emissions used to calculate the LTA do not align with the monitored data. For example, the LTA calculation reports 174,578 tCO<sub>2</sub>e of CDRs in 2020, while the ex-post project removals (i.e., CDRs) are 60,300 tCO<sub>2</sub>e in 2020.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure the LTA calculation is updated based on ex-post monitored data (i.e., for the years that have been monitored thus far).</li> <li>2. The VVB must provide steps taken to assess the updated LTA and include details on their process for confirming the appropriateness of the LTA calculation in the VR.</li> </ol> <p><u>Background</u> Section 3.2.30(7) of the VCS standard states, "The long-term average GHG benefit shall be calculated at each verification event, meaning the long-term average GHG benefit may change over time based on monitored data".</p> <p>Figure 1 shows the baseline emissions from the previous verification and the current ex-post calculation (found in the "Total Carbon Stock" tab of the file Burapha_Second_Monitoring_Calculation_v2 07082024).</p>	

Calculation of pre-existing baseline carbon stocks in trees and shrubs					
Year	Areas planted/restored year (ha)	CTREE_BSL		CSHRUB_BSL	CBSL_TOTAL Total biomass baseline (t CO2e)
		Pre-existing biomass of trees (t CO2-e)	Dead wood pre-existing trees (t CO2-e)	Pre-existing shrub biomass (t CO2-e)	
2016	947	36,792			36,792
2017	601	23,415			23,415
2018	369	16,754			16,754
2019	158	8,846			8,846
2020	701	28,600	0	0	28,600
Total	2774	114,406	0	0	114,406

Figure 2 presents the baseline emissions for the updated LTA in columns Z, rows 11-14 of the "Carbon Stock" tab in the 24082024 Updated LTA for MR2 v2 file.



		<p>GHG benefit in "Updated LTA for MR2, 2022-03-31_Ex Ante - 1st project instances.xlsx." A table displaying the updated LTA is included in Section 5.5 of the MR. The calculation of the LTA can be found in the aforementioned spreadsheet, offering a comprehensive quantification approach for the current monitoring period. This approach aligns with VCS Standard v4.7, Section 3.2.30(7), which requires that the long-term average GHG benefit be calculated at each verification event and may change over time based on monitored data.</p> <p>2. Section 4.4 of the VR has been updated to provide a detailed assessment of the LTA calculations. The results are consistent across the updated LTA spreadsheet (07022025 Updated LTA for MR2 v3.xlsx) and the Monitoring Report (MR).</p> <p>The assessment team confirms that the actual ex-post monitoring data and its alignment with the corresponding values in the updated LTA spreadsheet.</p> <p>The LTA recalculation was examined to ensure that it employed a conservative Mean Annual Increment (MAI) of 18, consistent with the ex-ante forecast.</p> <p>The updated LTA was recalculated at 486,847 tCO<sub>2</sub>e, as recorded in Column AB of the "Carbon Stock" tab in "07022025 Updated LTA for MR2 v3.xlsx."</p> <p>The justification for zero leakage in the second monitoring period was verified against Table 13 of the MR, ensuring that the project implementation does not contribute to leakage.</p> <p>The deviation sought for the inclusion of leakage variables (intercropping area, year, and crop type) was confirmed to be conservative and compliant with VCS Standard v4.7, Section 3.21.2.</p> <p><u>Verra Response</u></p>	
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		<p>The LTA calculation has been updated based on previously monitored ex-post data. Section 5.5 of the MR and Section 4.4 of the VR have been updated accordingly. This finding is closed, and no further action is required.</p>	
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8 Insufficient VVB assessment of Non-Permanence Risk Report (NPRR)			
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>3. There is inconsistency in risk rating scores between Section 4.6 of the VR and NPRR v1.0 dated 28 July 2023, i.e., Project Management, Land and Resource Tenure, and Political Risk.</li> <li>4. <i>Natural Risks</i>: The NPRR does not provide the natural risks assessment for Acacia plantations (i.e., only eucalyptus is cited in the natural risk assessments).</li> <li>5. <i>Pest and Disease outbreaks</i>: It is unclear which evidence or historical data the VVB assessed to verify the risk rating score as 1.</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that the risk rating scores between the VR and NPRR are consistent.</li> <li>2. The VVB must ensure the project proponent assesses the natural risks for Acacia plantations in the NPRR, and the VVB must verify the outcome.</li> <li>3. The VVB must describe the evidence or historical data assessed to verify the pest and disease outbreaks' rating score Section 4.6 of the VR.</li> </ol> <p><u>Program Rule(s)</u>  <i>AFOLU Non-Permanence Risk Tool, v4.0, Section 2.4</i>  <i>VCS Verification Report Template, v4.2, Section 4.6</i></p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>Action 1:  <b>The VR report under Section 4.6 state the following:</b>          Internal Risk / Project management 0. Score to be adjusted to -4 as per the NPRR Report          External risk/Land Tenure 2. This score to be adjusted to 0 as per the NPRR Report.          External risk/Political Risk 4. This score to be adjusted to 2 as per the NPRR Report</p> <p>Action 2:          The NPRR v1.0 dated 28 July 2023 has been updated under Natural Risks to include Acacia plantations.</p> <p>Action 3:          Burapha has a tree improvement R&amp;D strategy and plans to develop genetic material with improved pest and disease resistance. The progress in executing the R&amp;D Strategy and plans is formulated in an Activity Plan for execution.</p> <p>The genetics and silviculture Plans are comprised of several work programs and provide the structure from which Annual Action Plans can be developed. These annual plans are to be developed and reviewed with management to coordinate the establishment of trial networks that will provide data required to evaluate the impact of changes in germ plasm and silvicultural systems on</p>	<p>Closed</p>

		<p>estate value.</p> <p>Continuous testing of new species and provenances will identify material that could be useful in hybrid taxa or serve as insurance species against pests and diseases.</p> <p>Burapha commit to evaluating alternative species to mitigate risks posed by pests and market changes.</p> <p>Burapha conducts internal and external monitoring of the plantations for pest and diseases. Monitoring records are recorded in a database. Data includes stand health monitoring, monitoring of all stands after establishment and monitoring of failed plantations. All datasets include a record of the pest, and diseases identified.</p> <p><u>References:</u> Monitoring data 2024-08-20, Field Report_8 March2023 Checked (by NAFRI), Burapha R&amp;D Strategy, KPI Burapha Strategy Activity Plan</p> <p><u>Verra Response</u> This finding cannot be closed.</p> <p><u>Issue</u></p> <ol style="list-style-type: none"> <li>1. There are inconsistency risk rating scores between Section 4.6 of the VR version 3.0 dated 04 October 2024 and NPRR v3.0 dated 21 August 2023. (see Background)</li> <li>2. <i>Natural Risks</i>: The NPRR version 3.0 does not provide the fire, and pest and disease outbreaks assessment for Acacia plantations (i.e., only eucalyptus is cited in the natural risk assessments).</li> </ol> <p><u>Action Required</u></p>	
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		<ol style="list-style-type: none"> <li>1. The VVB must ensure that the risk rating scores in Section 4.6 of the VR are consistent with the updated NPRR.</li> <li>2. The VVB must ensure that the project proponent assesses the natural risk, i.e. fire, and pest and disease outbreaks, for the Acacia species.</li> <li>3. The VVB must assess the updated NPRR and its evidence/supporting documents and discuss it in Section 4.6 of the VR accordingly.</li> </ol> <p><u>Background</u>  The NPRR version 3.0, dated 21 August 2024, presents the total risk rating for Project Management as -4, Land and Resource Tenure as 0, and Political Risk as 2.</p> <p>Section 4.6 of the VR version 3.0, dated 04 October 2024, presents the total risk rating for Project Management as 0, Land and Resource Tenure as 2, and Political Risk as 4.</p> <p><b>Round 2</b></p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> <li>1. VVB has updated the NPRR version to 3.1, dated 13-December-2024, in Section 4.6 of the VR, in accordance with the latest NPRR provided by the PP.</li> <li>2. VVB has assessed the updated NPRR provided by the PP and concluded that the PP has included Acacia under the Natural Risk including the Fire and Pest Disease Outbreaks.</li> <li>3. VVB has assessed the updated NPRR provided by the PP and, based on these changes, has updated the details related to Fire, Pest, and Disease Outbreaks under the Natural Risk pf section 4.6 of the MR.</li> </ol> <p>The NPR Report has been updated with information included on acacia in terms of Fire and Pest and Disease Outbreaks. Please refer to submitted file “Burapha_Risk-Report_MR2 v3.1 20241213.doc”</p>	
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		<p>and disease attacks is considered transient, as these events are expected to occur less than every 10 years. Extreme weather events have also been evaluated with a significance score of 2, given their occurrence is expected at least once every 10 years. These assessments ensure that the NPR scoring aligns with the expected recovery potential and impact duration of each risk factor.</p> <ol style="list-style-type: none"> <li>The mitigation measures assessment is provided in the relevant section of the VR and references are provided in the Appendix 4 of the VR as well.</li> </ol>	
		<p><u>Verra Response</u> Section 4.6 of the VR has been updated with a sufficient assessment of the significance of natural risks and their mitigation. This finding is closed, and no further action is required.</p>	

<b>9</b>	<b>Insufficient conclusion in verification opinion</b>		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>In Section 5 of the VR, the VVB incorrectly states that the project activity is in accordance with all relevant host country criteria (Myanmar).</li> <li>Section 5 of the VR does not provide a comparison of the estimated ex-ante GHG ERRs and actual GHG ERRs in Section 5 of the VR.</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>The VVB must update the statement and provide the correct host country name in Section 5 of the VR.</li> <li>The VVB must provide the statement comparing the estimated ex-ante GHG ERRs and actual GHG ERRs in Section 5 of the VR.</li> </ol> <p><u>Program Rule(s)</u> VCS Standard, v4.5, Section 3.5.4 (3) VCS Verification Report Template, v4.2, Section 5</p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> <li>VVB has corrected and updated the host country name in section 5 of the VR.</li> <li>Assessment statement comparing the estimated ex-ante GHG ERRs and actual GHG ERRs has now been added in Section 5 of the VR.</li> </ol> <p><u>Verra Response</u> Section 5 of the VR is updated with the correct host country name and sufficient comparison of the estimated ex-ante GHG ERRs and actual GHG ERRs. This finding is closed, and no further action is required.</p>	Closed

10	Value for $V_{tree,j}$ is not reported in the project documents	
	<p><u>Issue</u> The value for <math>V_{tree,j}</math> is not reported in the MR or the ERR calculations sheet.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure the value for <math>V_{tree,j}</math> is transparently reported in the project documents.</li> <li>2. The VVB must assess the appropriateness of the value applied against other reliable sources.</li> </ol> <p><u>Program Rule(s)</u> <i>VCS Monitoring Report Template v4.2, Section 5.2</i></p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <p>It is to be clarified that the Stem volume per hectare of trees of species <math>j</math> in sample plot <math>p</math> of stratum <math>i</math> estimated by using the basal area of the plot as entry data into a volume table or volume equation; <math>m^3\ ha^{-1}</math>. VVB has submitted Excel inventory data 2016 along with the PRR response. The assessment of the appropriateness of the value applied has been provided in the verification report section</p> <p><u>Verra Response</u></p> <p>The value for <math>V_{tree,j}</math> is provided in the ERR calculation spreadsheet. This finding is closed, and no further action is required.</p>
	Closed	