

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.

Project ID	3634
Project Name	Agoro Carbon USA Cropland Program
Review Type	Validation Approval
Program(s)	SD VISTa Program
Project Proponent	Agoro Carbon Alliance
VVB	SCS Global Services
Assessment Criteria	SD VISTa Standard, Version 1.0
Date of First Issue	25 February 2025
Review Conclusion	Approved
Date of Final Issue	19 May 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	Other Entities involved in the project <u>Issue</u> The project description mentions that the project proponent works with other entities that are involved in the project such as Ward Labs, Deveron Labs and Channel Partners, these must be listed as other entities and/or other stakeholders. <u>Action Required</u> 1. The VVB must ensure that the project proponent provides clarification on the roles and responsibilities of the Soil Samplers (Ward Labs and Deveron Labs) and Chanel Partners in the implementation of the project a. If the aforementioned groups are considered as other entities the VVB must ensure the project proponent updates section 2.1.5 to complete the table for the additional implementing partners. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> SD VISta Project Description Template, v1.0, Section 2.1.5	Round 1 <u>VVB Response</u> (1)(a) Section 2.1.5 of the PD has been updated by the project proponent. Please note that the project proponent has selected to categorize information presented in section 2.1.5 as commercially sensitive. Thus, the project proponent has provided a public and a confidential version of the PD. (2) Section 2.2.4 of the validation report has been updated. <u>Verra Response</u> Section 2.1.5 has been updated with the relevant information; no further action is required. This finding has been closed.	Closed
2	Implementation Schedule <u>Issue</u> In the implementation schedule in Section 2.1.3 of the project description there are: I. insufficient milestones related to the local stakeholder consultations prior to the project start date (see background) II. no milestones related to worker trainings, stakeholder monitoring, and natural capital and	Round 1 <u>VVB Response</u> (1)(I) Section 2.1.3 of the SD VISta PD template, v1.0, states: <i>"Identify key dates and milestones in the project's development and implementation, including but not limited to start and end dates for each project activity (<u>the earliest of which is the project start date</u>), project activity milestones, dates of changes in project implementation, monitoring schedule and estimated</i>	Closed

	ecosystem monitoring activities III. insufficient information as to what activity warranted the project start date <u>Action Required</u> - The VVB must ensure that the project proponent updates Section 2.1.3 of the project description to include: - Milestones in the project's history related to the local stakeholder consultation prior to the project start date - Implementation milestones related to worker trainings and the monitoring activities that are planned for the stakeholder monitoring, and the natural capital and ecosystem monitoring activities - Provide clarification on what activity warranted the project start date - The VVB must provide an independent assessment of the updates to the project description and update the relevant sections of the validation report as needed. <u>Program Rule(s)</u> <i>Sustainable Development Verified Impact Standard, v1.0, Sections 2.2.4 - 2.2.6</i> <u>Background</u> Stakeholders must be involved in the project design and development process prior to the start of a project.	<i>assessment schedule. Where possible, specify the day, month and year of each, noting that this is mandatory for the project start date.</i>“ Further, the cited program rules (i.e., sections 2.2.4-2.2.6 of the SD VSta Standard, v1.0) relate to Stakeholder Consultation and Participation, and neither requirement includes a reference to consultation events <u>prior to</u> the project start date. Therefore, it is the VVB's interpretation that section 2.1.3 of the PD must not be updated with milestones related to local stakeholder consultations prior to the project start date. Further, it is noted that this project type requires ongoing stakeholder consultation to adapt the project design to the needs of program participants. (1)(II)-(III) Section 2.1.3 of the PD has been updated by the project proponent. (2) Section 2.2.3 of the validation report has been updated. <u>Verra Response</u> All required updates have been made to the PD and the validation report. No further action is required. This finding has been closed.	
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3	Benefit Permanence		
	<u>Issue</u> Section 2.1.11 of the project description lacks a concrete strategy or set of actions to ensure the benefits realized during the project's active phase continue after the contracts with the ranchers have expired.	<u>Round 1</u> <u>VVB Response</u> (1) Section 2.1.11 of the PD has been updated by the project proponent. (2) Section 2.2.10 of the validation report has been updated.	Closed

	<u>Action Required</u> 1. The VVB must ensure that the project proponent updates Section 2.1.11 of the project description to delineate a clear plan or set of actions that will guarantee ongoing benefits beyond the project's lifetime. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 2.1.7	Note to Verra: Section 2.1.11 of the SD VISta PD template requires: <i>"Describe the plan to maintain and enhance project benefits after project activities have ceased."</i> Section 2.1.7 of the SD VISta Standard, v1.0, requires: <i>"During the project lifetime, project proponents shall take appropriate measures to ensure that sustainable development benefits generated as a result of project activities are maintained or enhanced beyond the project lifetime."</i> The SD VISta Program Definitions, v1.0, defines 'Project Lifetime' as follows: <i>"The time period over which project activities are implemented; starts on the project start date; for those projects developing SD VISta assets, ends on the end date of the last crediting period."</i> Thus, the SD VISta Program Definitions do not specify an end date for the project lifetime if the project is <u>not</u> developing SD VISta assets.	
		<u>Verra Response</u> All required updates have been made to the PD and the validation report; no further actions are required. This finding has been closed.	

4 Stakeholder Identification			
	<u>Issue</u> Section 2.2.1 of the project description states that the stakeholder identification process entailed identifying ranchers that were interested in the project and then identifying individuals impacted by those ranchers' participation. The following issues pertain to the stakeholder	Round 1 <u>VVB Response</u> (1)(I) Section 2.2.1 and 2.3.11 of the PD have been updated by the project proponent. (2) Section 2.3.1 of the validation report has been updated.	Closed

	identification process mentioned above: I. How each project instances' management practices are assessed to determine if it has met the applicability criteria to participate in the project by the project proponent. II. Who are the identified secondary/ (upstream/downstream) stakeholders affected by the project <u>Action Required</u> 1. The VVB must ensure that the project proponent provides clarification: I. On what criteria is used to determine if the said rancher has met the applicability criteria to participate in the project by the project proponent II. Whether the project has identified any secondary stakeholders. If secondary stakeholders have been identified by the project Sections 2.2.1, 2.2.2 and 3.1 must be updated to include descriptions of all identified stakeholders. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 2.2.1	<u>Verra Response</u> All required sections of the PD and validation report have been updated. No further actions are required. This finding has been closed.	
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5	Stakeholder Consultation		
	<u>Issue</u> Section 2.2.3 of the project description does not provide sufficient details to demonstrate that the stakeholder engagement process was and will be effective. It is unclear if: I. Stakeholders have been given opportunities to	<u>Round 1</u> <u>VVB Response</u> (1)(I) Section 2.2.3 of the PD has been updated by the project proponent. (1)(II) Continued consultation and adaptive management	Closed

	influence project design II. the project proponent has taken actions for continued consultation and adaptive management, III. if the project has potential costs to stakeholders (see background) <u>Action Required</u> 1. The VVB must ensure that the project proponent provides clarification on whether: I. project design has been affected by stakeholder input II. the project proponent has taken actions for continued consultation and adaptive management, III. if the project has potential costs to stakeholders and if there are cost, clarify if and how they assessed that the project provided information to stakeholders about those potential costs, in a way they understand and in a participatory and transparent process. 2. The VVB must describe how it assessed that the project conducted an effective stakeholder engagement and consultation process. 3. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 2.2.1–2.2.8 <u>Background</u> Potential costs to the stakeholders could be affiliated with implementing new management practices.	practices have previously been described in section 2.2.4 of the PD. (1)(III) Section 2.2.3 of the PD has been updated by the project proponent. (2) The VVB reviewed section 2.2.3 of the PD along with supporting documentation (Refs. 8-10, 35) to assess the design and effectiveness of the project proponent’s stakeholder consultation practices. In addition, the VVB interviewed the project proponent, including members of the Grower Success Team, and a sample of project participants (i.e., farmers) during the on-site inspection to confirm that the stakeholder consultation mechanisms described in the PD have been followed since the implementation of project activities. (3) Section 2.3.3 of the validation report has been updated. <u>Verra Response</u> All relevant updates have been made to the PD and validation report. No further action is required. This finding has been closed.	
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6 Information to Stakeholders on Assessment Process			
	<u>Issue</u> Section 2.2.13 of the project description does not mention how Agoro carbon will ensure that direct and independent communication between stakeholders or their representatives and the assessor will be facilitated during the audit visit. <u>Action Required</u> 1. The VVB must ensure that the project proponent updates Section 2.2.13 of the project description to describe how Agoro carbon will ensure that direct and independent communication between stakeholders or their representatives and the assessor will be facilitated during the audit visit. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 2.2.17	Round 1 <u>VVB Response</u> (1) Section 2.2.17 of the SD ViSta Standard, v1.0, requires the following: <i>“Stakeholders shall receive timely information about the VVB’s site visit before the site visit occurs and the project proponent shall facilitate direct and independent communication between them or their representatives and the assessor.”</i> The VVB notes that this requirement does not explicitly refer to the facilitation of communication between the stakeholders or their representatives and the assessor <u>during</u> the site visit. Nonetheless, section 2.2.13 of the PD has been updated by the project proponent. (2) Section 2.3.3 of the validation report has been updated.	
		<u>Verra Response</u> All updates have been made to the PD and the validation report; no further action is required. This finding has been closed.	
		Closed	

7 Monitoring Plans			
	<u>Issue</u> The Stakeholder Monitoring Plan in Section 3.3 of the project description and the Natural Capital and Ecosystem Services Monitoring Plan in Section 4.3 does not make it clear as to what unit of measurement is applicable for each monitoring action/ indicator. <u>Action Required</u> 1. The VVB must ensure that the project proponent clarifies what unit of measurement is used for reporting of the	Round 1 <u>VVB Response</u> 1. Sections 3.3 and 4.3 of the PD have been updated by the project proponent. Stakeholder monitoring plans are added as an appendix, but unit of measurements are included. 2. Sections 3.1.4 and 4.1.4 of the validation report have been updated.	
		Closed	
		Closed	

	indicators provided in Section 3.3. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 3.1.3 and 3.2.3	<u>Verra Response</u> All updates have been made to the PD and the validation report; no further update is required. This finding has been closed.	
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8 Condition of Natural Capital and Ecosystem Services at Project Start			
	<u>Issue</u> 1. The information provided in Section 4.1 of the project description does not contain any intext citations/ references to justify key assumptions and rationales for the condition at the start of the project. <u>Action Required</u> 1. The VVB must ensure that the project proponent updates Section 4.1 to provide intext citations/ references to justify key assumptions and rationales for the condition at the start of the project. 2. The VVB must assess the updates to the project description and update the relevant sections of the validation report accordingly. <u>Program Rule(s)</u> Sustainable Development Verified Impact Standard, v1.0, Section 3.2.1	Round 1 <u>VVB Response</u> 1. Section 4.1 of the PD has been updated by the project proponent. 2. Section 4.1.1 of the validation report already cites references (15-20) that were reviewed in response to finding 16 to assess the conditions of natural capital and ecosystem services at project start date. <u>Verra Response</u> All updates have been made to the PD; no further action is required. This finding has been closed.	Closed