AGORO CARBON USA CROPLAND PROGRAM VALIDATION REPORT

Document Prepared by SCS Global Services

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Client	Agoro Carbon Alliance US

Project Title	Agoro Carbon USA Cropland Program
Project Location	United States

Summary

SCS Global Services (SCS) conducted the validation of the Agoro Carbon USA Cropland Program ("the project"), an Improved Agricultural Land Management project located throughout the United States. The purpose of the validation engagement was to conduct an independent assessment of the project to determine whether it complies with the Sustainable Development Verified Impact Standard (SD VISta) which allows the project proponent, Agoro Carbon Alliance US, to bear SD VISta claims in combination with the associated Verified Carbon Standard (VCS) project, which has been validated separately. The validation consisted of the independent third-party assessment of the implementation plan of the project and resulting Sustainable Development Goals (SDGs) claimed by the project proponent against the following criteria:

- SD VISta Program Guide, Version 1.0
- SD VISta Standard, Version 1.0
- SD VISta Program Definitions, Version 1.0

The validation engagement was carried out through a combination of document review, on-site inspections, and interviews with relevant project personnel and stakeholders. As part of the validation engagement, 26 findings were raised: 11 Non-Conformity Reports (NCRs), 14 New Information Requests (NIRs), and 1 Observation (OBS). These findings have been closed and are described in Appendix 1 of this report. During the validation assessment, SCS gained a reasonable level of assurance that the project complies with the validation criteria, and SCS holds no restrictions or uncertainties on the project's compliance with the validation criteria.

CONTENTS

1 VALIDATION PROCESS

1.1 Objective

In accordance with Section 5.2 of the Sustainable Development Verified Impact Standard (SD VISta) (see the below Section 1.2.2 for full reference), SCS conducted an independent assessment of the Agoro Carbon USA Cropland Program to determine whether the project complies with the SD VISta Program rules. The objectives of the validation engagement were to assess:

- The likelihood that implementation of the planned project will result in verifiable sustainable development benefits as stated by the project proponent.
- The project's conformance to the SD VISta rules.
- The likelihood that the methods and procedures set out in the project description will lead to the issuance of SD VISta claims, where implemented, in combination with the separately validated and verified VCS project.

1.2 Scope and Criteria

1.2.1 Scope

As defined in accordance with Section 4.3.4 of ISO 14064-3:2019, the scope included:

- The project and its activities.
- The baseline scenario(s) applicable to the project.
- The Sustainable Development Goals (SDGs) claimed by the project proponent.
- The grouped activities (see section 2.4.11).
- The crediting period.

1.2.2 Criteria

In accordance with Section 5.2.1 of the SD VISta Standard (see below for full reference), the criteria for validation were the SD VISta Version 1.0, including the following documents:

- SD VISta Program Guide, Version 1.0
- SD VISta Standard, Version 1.0
- SD VISta Program Definitions, Version 1.0

1.3 Level of Assurance

In accordance with Section 5.2.3(1) of the SD VISta Standard, the level of assurance was reasonable. Assurance was assessed with respect to material errors, omissions, or misrepresentations.

1.4 Summary Description of the Project

The project is located throughout the United States excluding the states of Alaska and Hawaii. The initial project instances are located in Washington, Texas, Iowa, Missouri, Idaho, Minnesota, Kansas, Illinois, South Dakota, North Dakota, Indiana, Nebraska, Wisconsin, Wyoming, and Oregon states. This is a grouped project consisting of 79 farms with a total of 235,204 acres enrolled for the validation. In this project, Agoro Carbon Alliance US (Agoro Carbon) aims to promote Improved Agricultural Land Management (IALM) practices as implemented by participating farmers throughout the United States that include reduced and no-tillage, cover cropping, and improved nitrogen fertilizer management. These practice changes will reduce soil disturbance and soil erosion, improve biodiversity, and improve soil health. Agoro Carbon is the sole owner of all environmental attributes generated by the implemented project activities as Agoro Carbon has established contractual agreements with all the participating farmers.

The project activity has been designed to contribute to the following six Sustainable Development Goals (SDGs):

- 2: Zero Hunger
- 4: Quality Education
- 6: Clean Water and Sanitation
- 9: Industry, Innovation, and Infrastructure
- 13: Climate Action
- 15: Life on Land

1.5 Audit Team Composition

The below table indicates how the audit team meets each of the requirements of the SD VISta Program Rules:

Area of Required Expertise	Individual(s) on Audit Team containing Required Expertise	Summary of Relevant Qualifications
Relevant sectoral expertise	Dr. Saroop Sandhu, Carolin Judd, Vanessa Mascorro	Experience with agricultural practices in applicable regions (15+ years)
Relevant social and cultural expertise in the project country or region	Dr. Saroop Sandhu, Carolin Judd, Vanessa Mascorro	Proficient English speakers; Experience with agricultural practices in applicable regions (15+ years) and with the SD VISta program (4+ years)

1.6 Method and Criteria

The validation engagement was conducted through a combination of document review, on-site inspection, and interviews with relevant personnel, as discussed in sections 1.7 through 1.9 of this report. At all times, conformance was assessed to the criteria described in section 1.2.2 of this report, and findings were issued to ensure conformance with all SD VISta Program requirements.

The audit team created an evidence-gathering plan following a proprietary evidence-gathering plan template developed by SCS. The audit team identified areas of "residual risk"—those areas where there existed risk of a material discrepancy (either in terms of non-conformance to the validation criteria or in terms of errors, omissions, and misrepresentations), in aggregate that was not prevented or detected by the controls of the project. Sampling and data testing activities were planned to address areas of residual risk. The audit team then created a validation plan that took the sampling plan into account. This approach is justified as it has been designed in accordance with Section 4.4.3 of ISO 14064-3:2019 and the guidance provided in Annex A.2.4.6 of the same document.

1.7 Document Review

The project description (3634 Agoro Carbon SD VISta_24 April_track_changes.pdf, "PD") was carefully reviewed for conformance to the validation criteria. The following additional documentation, provided by project personnel in support of the aforementioned documents, was also reviewed by the audit team:

Document	File Name	Ref.
Project Description ("PD")	3634 Agoro Carbon SD VISta_24 April_track_changes.pdf	1
VCS Project Description	VCS 3634_Cropland PDD_Version 3.2_May 2024_CLEAN.docx (1).pdf	2
VCS Validation Report	VCS ValR 3634_FINAL.pdf	3
Contracts	Contract AGORO.pdf	4
	Contract FAQ Booklet.pdf	5
	2024-V2 U.S. CCGA (5-02-24) Option A & B (1).pdf	6
	Grower Contracts (multiple)	7
Stakeholder Booklet	What-To-Expect-Booklet-Aug-2024.pdf	8
Stakeholder Consultation	IDD General Procedure.pdf	9
	IDD Questionnaire (INTERNAL confidential).pdf	10
Code of Conduct	Code_of_Conduct.pdf	11
Management Plan	VCS3634_Cropland_Agoro Adaptive Management Plan_DRAFT_final.pdf	12

GIS files	Multiple	13
Management data	Agoro_Producer_fields_for selection_management data validation by VVB.xlsx	14
Supporting literature for baseline conditions	How tillage affects soil erosion and runoff.pdf	15
	Tillage practices linked to poor soil health and reduced soil carbon.pdf	16
	Rates of Historical Anthropogenic Soil Erosion in the Midwestern United States.pdf	17
	Food system impacts on biodiversity loss.pdf	18
	Biodiversity and Agriculture.pdf	19
	Analysis of trends and agricultural drivers of farmland bird declines in North America: A review.pdf	20
Supporting literature for biodiversity	Cover crop mixtures result in a positive net biodiversity.pdf	21
	Cover Crop Effects on Songbirds and Game Birds.pdf	22
	Winter use of wild bird cover crops by passerines on farmland in northeast England.pdf	23
	Does no-till soybean farming provide any benefits for birds.pdf	24
	Environmental impact of no-tillage farming.pdf	25
Supporting literature for water use and soil health	Effects of No-tillage on available soil water, erosion and soil quality.pdf	26
	Influence of cover crop on soil water dynamics.pdf	27
	Impacts of winter cover cropping on soil moisture and evapotranspiration.pdf	28
	Conserving Soil and Water with No-till and Crop Residue.pdf	29
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Soil sampling SOP	FINAL_Simplified SOP Soil Sampling stepbystep manual Collection_edit 3_27_24 ESM Method_ Verra VM0042 V3.pdf	32
Soil sampling design	Report_Sampling_Design_V2.docx (1).pdf	33
Lab testing SOP	Simplified Agoro Lab Testing SOP VM0042V2 ESM Method 2_9_24_FINAL.pdf	34

Evidence of stakeholder consultation	February 2023 Texas engagement workshop.pdf	35
Evidence of Project Start Date	John Deere_Retail Purchase Order_20May2021.png	36

1.8 Interviews

The process used in interviewing personnel directly involved with the project was a process wherein the audit team elicited information from project personnel regarding (i) the work products provided to the audit team in support of the PD; (ii) actions undertaken to ensure conformance with various requirements and (iii) planned project activities.

The following personnel associated with the project proponent and/or implementing partner were interviewed.

Individual	Affiliation	Role	Date(s) Interviewed
Giulia Sartori	Agoro Carbon Alliance US	Head of Carbon	Throughout
Christopher Daley	Agoro Carbon Alliance US	Carbon Project Development Specialist	Throughout
Christopher Chapman	Agoro Carbon Alliance US	Value Chain Manager	Throughout
Ryan Winter	Agoro Carbon Alliance US	Grower Success Manager	Throughout
John Pullis	Agoro Carbon Alliance US	Senior Agronomist	18-19 June 2024
Mark Worner	Agoro Carbon Alliance US	Agronomist	18-19 June 2024
Lindsey Miller	Agoro Carbon Alliance US	Agronomist	18-19 June 2024
Jason Heider	Project Participant	Farmer	18 June 2024
Matt Kagele	Project Participant	Farmer	18 June 2024
Chris Raunch	Project Participant	Farmer	19 June 2024
Austin Hoff	Agoro Carbon Alliance US	Agronomist	27-28 June 2024
James Mitchell	Project Participant	Farmer	27 June 2024
Mark Foster	Project Participant	Farmer	28 June 2024
Casey Terry	Project Participant	Farmer	28 June 2024
Jennifer Arneson	Country Roads Ag.	Soil Sampler	31 July 2024

1.9 Site Inspections

The objectives of the on-site inspections were as follows:

- Perform a risk-based review of the project area and documentation to ensure that the project activities conform to the validation criteria of the SD VISta standard.
- Confirm information presented in the PD and collect evidence where necessary to meet a reasonable level of assurance.
- Confirm the boundaries of the randomly selected fields.

In fulfilment of the above objectives, the audit team performed an on-site inspection of the selected project fields in Pacific Northwest on the dates 18-19 June 2024 and in Texas state on 27-28 June 2024 for this SD VISta project. The main activities undertaken by the audit team were as follows:

The main activities undertaken by the audit team were as follows:

- Interviewed project personnel and stakeholders (see section 1.8) to gather information about the project activities and project design.
- Interviewed a sample of farmers, agronomists and soil samplers (see section 1.8) to confirm the claims of the project proponent with respect to the extent of stakeholder engagement and implementation of practice changes.
- Carried out on-site inspections of the project's monitoring methodologies through the following activities:
    - Confirmed that the project's soil sampling protocol aligns with general best practice. The audit team witnessed the project team responsible for soil sampling conduct soil sampling at a location chosen by the audit team on the Chris Raunch and James Mitchell farms.
    - Chose a representative selection of 6 out of 79 farmers to visit using a stratified random selection based upon various characteristics (type of project activities, geographic position across the region, field area). A conditional Latin hypercube algorithm[1] was used to select random points in different fields that the audit team visited. The algorithm was applied in the R statistical computing environment using the 'clhs' package[2].
    - Augured soils at random points in different fields down to 30 cm. Conducted a USDA-NRCS field soil texture test[3] to identify the soil texture class of the soil at the sampling location.
    - Took GPS measurements at field boundaries to verify physical boundaries of each visited field.
    - Observed stated tillage and other project activities for each visited field and took pictures.
- Requested signed contractual agreements for the visited farmers to verify the ownership.
- Assessed each farmer's system for gathering and recording monitoring data and assessed the farmer's procedure for sending data to project personnel during site visit interviews.

[1] Minasny, B. and McBratney, A.B. 2006. A conditioned Latin hypercube method for sampling in the presence of ancillary information. Computers and Geosciences, 32:1378-1388.

[2] https://cran.r-project.org/web/packages/clhs/clhs.pdf

[3] https://www.nrcs.usda.gov/sites/default/files/2022-11/texture-by-feel.pdf

1.10 Public Comments

A 30-day public comment period was conducted from 13 September 2023 to 13 October 2023 in accordance with Sections 5.3.1 – 5.3.2 of the SD VISta Standard.

The audit team confirmed by reviewing the Verra Registry website that no public comments were received during the consultation.

1.11 Resolution of Findings

Any potential or actual discrepancies identified during the audit process were resolved through the issuance of findings. The types of findings typically issued by SCS during this type of validation engagement are characterized as follows:

- Non-Conformity Report (NCR): An NCR signified a discrepancy with respect to a specific requirement. This type of finding could only be closed upon receipt by SCS of evidence indicating that the identified discrepancy had been corrected. Resolution of all open NCRs was a prerequisite for issuance of a validation statement. Note that the Verra equivalent is a Corrective Action Request (CAR).
- New Information Request (NIR): An NIR signified a need for supplementary information to determine whether a material discrepancy existed with respect to a specific requirement. Receipt of an NIR did not necessarily indicate that the project was not in compliance with a specific requirement. However, resolution of all open NIRs was a prerequisite for issuance of a validation statement. Note that the Verra equivalent is a Clarification Request (CR).
- Observation (OBS): An OBS indicates an area where immaterial discrepancies exist between the observations, data testing results or professional judgment of the audit team and the information reported or utilized (or the methods used to acquire such information) within the greenhouse gas (GHG) assertion. A root cause analysis and corrective action plan are not required, but highly recommended. Observations are considered by the audit team to be closed upon issuance, and a response to this type of finding is not necessary.

As part of the audit process, 11 NCRs, 14 NIRs, and 1 Observation (OBS) were issued. All findings issued by the audit team during the audit process have been closed. In accordance with Section 5.4 of the SD VISta requirements, all findings issued during the audit process, and the impetus for the closure of each such finding, are described in Appendix 1 of this report.

1.12 Forward Action Requests

This section is not applicable, as no forward action requests have been issued.

2 VALIDATION FINDINGS

2.1 Summary of SDG Contributions

The project aims to accomplish eight contributions to six SDGs (2, 4, 6, 9, 13, and 15) via implementation of IALM practices (see section 2.2.2 below). Details are laid out in Table 1 of the project description which has been completed in accordance with SD VISta requirements. It should be noted that the audit team has issued one finding (NCR 1) related to Table 1 which has been sufficiently addressed by the project proponent and closed prior to drafting this report. The audit team concluded that each column of Table 1 in the PD is complete with the information required by the SD Vista PD template and the information provided in the body of the PD substantiates the claims made in Table 1.

2.2 Project Design

2.2.1 Project Objectives

The audit team concluded that the project proponent has clearly stated their main objectives in section 2.1.1 of the PD. These objectives focus on (1) the generation of emission reductions and removals, (2) the establishment of ecosystem resiliency, and (3) the improvement of farmer livelihoods. These objectives are directly related to the SDGs claimed by the project proponent in Table 1 of the PD.

2.2.2 Project Activities

The project proponent has described and illustrated the following three types of project activities, i.e., practice changes, in section 2.1.2 of the PD:

(1) Implementation of reduced tillage or no tillage

(2) Implementation of cover cropping

(3) Implementation of improved nitrogen fertilizer management

The table below summarizes respective SDG contributions of which three relate to People and Their Prosperity and FIVE relate to the Planet.

	SDG Target[4]	How SDG is Achieved	Validation Conclusion
PEOPLE AND PROSPERITY	2.3	Increase in value chain and revenue sources for 500 farmers over the project lifetime	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to diversify and/or increase revenue streams for farmers. The

[4] https://unstats.un.org/sdgs/metadata/

			audit team confirmed during the interviews with the farmers that each farmer received an upfront payment upon signing the contract. Additionally, they expect to receive further payments upon the issuance of credits.
	4.4	Enrollment of 500 farmers over the project lifetime	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to increase the proportion of farmers with the knowledge and skills to implement more sustainable agricultural practices. The audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to confirm that 79 farmers have already been enrolled at the time of this initial validation. Additionally, the audit team confirmed that farmers have access to the Knowledge Hub and other informational booklets regarding project activities (Ref. 8). These resources are designed to enhance their understanding of the project, and farmers maintain close communication with the agronomist, allowing them to seek clarification and ask questions related to ongoing project activities.
	9.4	2% average decrease in CO2 emissions per value added for participating growers	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to increase CO_2 emission per unit of value added. The audit team reviewed the VCS project description (Ref. 2) and VCS validation report (Ref. 3) of the project to confirm that the project activities will lead to emission reductions and removals compared to the baseline scenario.
PLANET	2.4	Enrollment of 2,000,000 acres to implement sustainable agricultural practices	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to increase the

			proportion of agricultural areas under productive and sustainable agriculture. The audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to confirm that 235,204 acres have already been enrolled at the time of this initial validation.
	6.4	2 % increase in soil organic carbon stocks across project area over the project lifetime	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) and (2) to increase water withdrawals from areas that are dependent on irrigation. The audit team reviewed relevant literature (Ref. 26-31) provided by the project proponent to confirm that implementing reduced or no tillage practices along with cover crops enhances soil organic matter, improves soil water retention, and reduces erosion, thereby contributing to overall soil quality improvement.
	13.0	6,130,133 tCO_2e reduced and sequestered over the project lifetime	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to increase tonnes of greenhouse gas emissions avoided or removed. The audit team reviewed the VCS project description (Ref. 2) and VCS validation report (Ref. 3) of the project to confirm that the project activities will lead to emission reductions and removals of 6,130,133 tCO2e over project lifetime compared to the baseline scenario.
	13.1	Enrollment of 2,000,000 acres to implement sustainable agricultural practices	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) and (2) to increase the number of acres enrolled in sustainable agricultural practices and to increase resiliency. The audit team reviewed relevant literature (Ref. 26-31) provided by the project proponent to confirm that implementing reduced or no tillage

			practices along with cover crops enhances soil organic matter, improves soil water retention, and reduces erosion, thereby contributing to increased resilience to drought and fire hazards. Furthermore, the audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to confirm that 235,204 acres have already been enrolled at the time of this initial validation.
	15.3	Enrollment of 2,000,000 acres to implement sustainable agricultural practices	The project activity will likely achieve the sustainable development objectives of the project over the project lifetime via project activities (1) through (3) to increase the number of acres enrolled in sustainable agricultural practices. The audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to confirm that 235,204 acres have already been enrolled at the time of this initial validation.

The audit team concluded that the project will reasonably achieve the stated sustainable development objectives per the project activities operated by the project proponent.

2.2.3 Implementation Schedule

The audit team reviewed section 2.1.3 of the PD and supporting documentation (Refs. 2-3) to confirm the project start date of 20 May 2021 which coincides with the purchase of equipment (Ref. 36). Further, the audit team conducted interviews with the project proponent and project participants during the on-site inspection to confirm that the implementation schedule began with the project start date, and that the project's implementation milestones occurred as presented in section 2.1.3 of the PD. Moreover, the crediting period will last 20 years, from 20 May 2021 to 19 May 2041. Overall, the audit team concluded that the project implementation is in accordance with SD VISta requirements.

2.2.4 Project Proponent and Other Entities Involved in the Project

The project proponent is Agoro Carbon Alliance US ("Agoro Carbon") as listed in section 2.1.4 of the PD. As outlined in the contractual agreements with farmers (Refs. 4-7), Agoro Carbon has been given authority to monitor this SD VISta project for all enrolled fields. Further, Agoro Carbon collaborates with other entities through contracts, including soil sampling groups that are responsible for conducting soil sampling on enrolled fields and regional channel partners that assist with communication with participating farmers. The audit team conducted interviews with the project proponent, a representative of a soil sampling group and participating farmers to confirm the involvement of other entities, as described in the PD, and that Agoro Carbon is the sole responsible party for project development. Lastly, it is noted that the audit team reviewed section 2.1.5 of the PD to confirm that the exclusion of contact details for other entities in the public version of the PD meets the definition of commercially sensitive information as outlined in the SD VISta Program Definitions.

2.2.5 Project Type

The audit team concluded that this Improved Agricultural Land Management (IALM) project impacts Agricultural Land Management (ALM) sector #14 via the Improved Cropland Management (ICM) project activity type. Further, the audit team determined that the project is a grouped project with multiple project activity instance, as described in sections 2.1.6 and 2.3.11 of the PD.

2.2.6 Project Location

The audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to conclude that project is located in the United States excluding the states of Alaska and Hawaii, with the initial project instances located in Washington, Texas, Iowa, Missouri, Idaho, Minnesota, Kansas, Illinois, South Dakota, North Dakota, Indiana, Nebraska, Wisconsin, Wyoming, and Oregon states, as described in section 2.1.7 of the PD.

2.2.7 Baseline Scenario

Steps taken to assess the project's baseline scenario included the review of the PD and supporting literature, documentation for the validation of the associated VCS project (Refs. 2-3) and interviews with the project proponent and farmers (see section 1.8).

The audit team concluded that the baseline scenario consists of the continuation of business-as-usual practices related to agricultural land management, as described in section 2.1.8 of the PD.

2.2.8 Causal Chain(s)

The project includes one causal chain that corresponds to eight impacts as outlined in section 2.1.9 and appendix 1 of the PD. The causal chain established by the project proponent includes impacts to People and Their Prosperity and the Planet.

The audit team assessed the stated causal chains against the project and confirmed suitability per the SD VISta requirements via review of all provided documentation and interviews. The audit team concluded that the project has included all reasonable effects of the project activities in the causal chains and appropriately assigned them to each category. It should be noted that the audit team issued a finding (NCR 2) regarding causal chains which has been sufficiently addressed by the project proponent.

2.2.9 Threats to the Project

Steps taken to assess the likely natural and human-induced threats identified by the project to the expected sustainable development benefits during the project lifetime included the review of the PD (see section 2.1.10), documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8), and interviews with the project proponent and stakeholders (see section 1.8).

The audit team reviewed the adaptive management plan (Ref. 12) provided by the project proponent, which outlines strategies to address potential threats to the project. Additionally, through interviews with farmers, the audit team confirmed that Agoro Carbon provided an upfront payment upon contract signing to help offset costs associated with transitioning to new practices and to compensate for any initial yield reductions that may arise from this transition. The audit team concluded that the risk of natural and human-induced threats to Agoro Carbon's group activities is limited, and that Agoro Carbon has adaptive measures in place to address any potential threats to the project.

2.2.10 Benefit Permanence

The audit team reviewed section 2.1.11 of the PD and supporting documentation (Refs. 2-8) to assess measures planned by the project proponent to maintain and enhance the project's benefits after project activities cease, i.e., in the absence of a contract renewal between the project proponent and the project participant. The contract (Refs. 6-7) that is signed by the project participant upon enrollment in the project allows the project proponent to continue monitoring of the enrolled fields in the event of contract cancellation. Further, the project proponent may utilize remote sensing techniques to continue monitoring of those fields, as described in the PD. In addition

The audit team concluded that this SD VISta project, in combination with the separately validated VCS project, has a high likelihood of benefit permanence and the achievement of the objectives stated in section 2.1.

2.3 Stakeholder Engagement

2.3.1 Stakeholder Identification

Steps taken to assess the process of stakeholder identification and analysis used to identify stakeholders and stakeholder groups included the review of section 2.2.1 in the PD, documentation for the validation of the associated VCS project (Refs. 2-3), and supporting documentation (Ref. 8-10). In addition, the audit team conducted interviews with the project proponent and stakeholders during the on-site inspection (see section 1.8) to confirm the project proponent's description of upstream and downstream stakeholders.

Overall, the audit team concluded that the stakeholder identification is thorough, comprehensive, and inclusive of all interested parties directly or indirectly affected by the project activities, as described in section 2.2.1 of the PD, and discussed during interviews with the project proponent.

2.3.2 Stakeholder Description

Steps taken to assess that all stakeholders and stakeholder groups that are included in the project, or may be included through the group project approach at a later time, were identified and described appropriately included the review of the PD and cited literature therein, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 8-10), and interviews with the project proponent (see section 1.8).

The audit team concluded that the project proponent's categorization of three stakeholder groups, as outlined in section 2.2.2. of the PD, is adequate and that each group has been described appropriately.

2.3.3 Stakeholder Consultation

Agoro Carbon began the stakeholder consultation process on 20 May 2021 via both face-to-face and online meetings or phone calls and continued communication with selected stakeholder groups until the project start date under both the SD VISta and VCS programs, as described in section 2.2.3 of the PD.

Through review of the PD and supporting documentation (Refs. 8-10, 35), the audit team assessed the design and effectiveness of the project proponent's stakeholder consultation practices. In addition, the audit team interviewed the project proponent, including members of Agoro's 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. The audit team determined that this process was appropriate for the stakeholder groups and interested stakeholders identified in section 2.2.2 of the PD, and that relevant information, including the notification about potential risks and costs to the project participants, was sufficiently relayed by the project proponent. However, the audit team notes that the distinction between the SD VISta and VCS projects was not clear to project proponent as observed during site visit interviews. Thus, the audit team issued a finding (NCR 19) which has been sufficiently addressed by the project proponent and closed prior to the drafting of this report.

The project proponent's consultation process aimed to gain a comprehensive overview on the level of support for the ongoing development and implementation of the SD VISta project among farmers throughout the project area. It is noted that the project proponent did not identify marginalized and/or vulnerable groups.

The audit team concluded that the project proponent has demonstrated an inclusive stakeholder consultation process through their broad scope of stakeholder groups across several communities which includes the Cheyenne River Indian Reservation in South Dakota and the Coeur d'Alene Reservation in Idaho, which will greatly benefit from the project activities and its positive impacts to People and Their Prosperity, and the Planet. Moreover, the audit team confirmed that the project proponent has facilitated and will continue to facilitate communication between the project participants, or their representatives, and the audit team related to the on-site inspection in a timely manner, as outlined in section 2.2.13 of the PD.

Overall, the audit team determined that the project's process for conducting stakeholder consultations was sufficient.

2.3.4 Continued Consultation and Adaptive Management

Steps taken to assess the project's plan for continuing communication and consultation with all stakeholder groups included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 8-10), and interviews with the project proponent and stakeholders (see section 1.8).

Agoro Carbon will offer ongoing and transparent communication via in-person support on site, phone calls and emails throughout the lifetime of the project. Overall, the audit team concluded that the project proponent's plan for continued stakeholder consultation and adaptive management is sufficient.

2.3.5 Anti-Discrimination

All group activities will be implemented in accordance with relevant local, state, and federal requirements including employment and consumer law requirements, as described in section 2.2.5 of the PD. In addition, the project proponent has incorporated an internal New Business Partner Code of Conduct (see Ref. 11).

The audit team concluded that the anti-discrimination measures put in place by the project proponent to prevent any form of discrimination or sexual harassment for all parties involved in project design or implementation are sufficient.

2.3.6 Worker Training

Through review of the PD and through interviews with project personnel, the audit team assessed that the project proponent provides customized training for project personnel such as agronomists on the Grower Success Team. The audit team concluded that the project proponent ensures that substantial protections regarding appropriate training, technical competence, and worker safety will be followed according to local rules and regulations of jurisdictions in which project activities will be implemented, as described in section 2.2.6 of the PD.

Overall, the audit team determined that the project's worker training provided is sufficient.

2.3.7 Equal Work Opportunities

Steps taken to assess whether the project's hiring practices provide equal employment opportunities (including management opportunities) to all stakeholders, including women and marginalized and vulnerable people, included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), and interviews with the project proponent (see section 1.8). As described in section 2.2.7 of the PD, Agoro Carbon serves as a third party to monitor practice changes and yields for participating farmers and does not influence the decision-making processes with regards to employment on individual farms. In addition, the project proponent has incorporated an internal New Business Partner Code of Conduct (see Ref. 11) and all work opportunities are posted publicly with respective requirements and responsibilities.

The audit team concluded that equal work opportunities for all interested parties are provided and sufficient.

2.3.8 Workers' Rights

All project activities will be implemented in accordance with relevant local, state, and federal requirements including employment and consumer law requirements, as described in section 2.2.8 of the PD. In addition, the project proponent has incorporated an internal New Business Partner Code of Conduct (see Ref. 11) and all work opportunities are posted publicly with respective requirements and responsibilities.

The audit team determined that the workers' rights to allow equal opportunity employment and a work environment free of harassment are provided and sufficient.

2.3.9 Occupational Safety Assessment

Steps taken to assess the occupational safety assessment performed by the project and the measures planned to mitigate the risks identified in the assessment and to determine whether the project adequately informed stakeholders about risks and how to minimize such risks included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 8, 11), and interviews with the project proponent and stakeholders (see section 1.8).

Risks related to work carried out due to any of the project activities are directly comparable to risks associated with the baseline scenario. As confirmed during interviews with project personnel, the audit team concluded that the project proponent ensures that occupational health and safety regulations are being followed according to local rules and regulations of jurisdictions in which project activities are implemented, as described in section 2.2.9 of the PD, and that sufficient occupational safety is provided through ongoing job training.

2.3.10 Feedback and Grievance Redress Procedure

Steps taken to assess the project's feedback and grievance redress procedure included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8), and interviews with the project proponent and stakeholders (see section 1.8).

The project proponent has established a standard operating procedure to address feedback and grievance redress processes as discussed during interviews and described in section 2.2.10 of the PD. Overall, the audit team determined that sufficient steps have been taken by the project proponent to allow for transparent and resolution-oriented program management.

2.3.11 Feedback and Grievance Redress Procedure Accessibility

Steps taken to assess the project's efforts to publicize its grievance redress procedure and how the project proponent will document, and make publicly available, grievances included the review of the PD and cited literature therein, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8), and interviews with the project proponent and stakeholders (see section 1.8).

The project proponent provides access to feedback and grievance redress processes to participating farmers and channel partners via the 'What to Expect' document (Ref. 8), as outlined in section 2.2.16 of the PD and discussed during interviews. Specifically, participating farmers confirmed during interviews with the audit team that the project proponent is available upon request via email, phone, or in person, and that they feel adequately supported in terms of feedback and grievance procedure accessibility. Overall, the audit team determined that sufficient steps have been taken by the project proponent to allow for transparent and resolution-oriented program management. In addition, the audit team concluded that sufficient access is provided to stakeholders to provide feedback and to review dispute resolution processes throughout the length of their program participation.

2.3.12 Stakeholder Access to Project Documentation

Steps taken to assess the project's plan for making full project documentation accessible to all stakeholders as it becomes available through the project lifetime included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8), and interviews with the project proponent (see section 1.8).

The project proponent provides access to the initial project documentation via the Verra registry, as outlined in section 2.2.12 of the PD and discussed during interviews. Overall, the audit team concluded that sufficient access is provided to stakeholders to access project documentation throughout the length of their program participation.

2.3.13 Information to Stakeholders on Validation and Verification Process

Steps taken to assess the measures implemented and communication methods used by the project to inform stakeholders of the validation process included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8), and interviews with the project proponent and stakeholders (see section 1.8).

However, the audit team notes that the distinction between the SD VISta and VCS projects was not clear to project proponent as observed during site visit interviews. Thus, the audit team issued a finding (NCR 19) which has been sufficiently addressed by the project proponent and closed prior to the drafting of this report. Overall, the audit team concluded that the project proponent has established sufficient means of communication with all participating stakeholders to provide transparency throughout their program management.

2.4 Project Management

2.4.1 Avoidance of Corruption

Steps taken to assess whether the project proponent or any other entities involved with project design or implementation are involved in any form of corruption included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3) and interviews with the project proponent and stakeholders (see section 1.8). In addition, the project proponent has incorporated an internal New Business Partner Code of Conduct (see Ref. 11). The audit team concluded that the anti-discrimination measures put in place by the project proponent to avoid corruption are sufficient.

2.4.2 Statutory and Customary Rights

Steps taken to assess the project's description and map of tenure, use, access and management rights to lands, territories and resources directly affected by project activities included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), and interviews with the project proponent (see section 1.8).

All project activities will be implemented in accordance with relevant local, state, and federal requirements including employment and consumer law requirements, as described in section 2.3.2 of the PD and discussed during interviews. Overall, the audit team determined that the project's mapping of statutory and customary rights is sufficient.

2.4.3 Recognition of Property Rights

Steps taken to assess whether all property rights are recognized, respected, and supported and to assess the measures designed and implemented by the project to help secure statutory rights included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 4-7), and interviews with the project proponent and stakeholders (see section 1.8). Specifically, the project proponent has implemented the "Carbon Credit Generation Agreement" (Ref. 4) that participating farmers must sign upon enrollment. Overall, the audit team determined that the project proponent recognizes, respects, and supports all property rights and that the project is helping to secure statutory rights.

2.4.4 Free, Prior and Informed Consent

Steps taken to assess the process by which free, prior, and informed consent will be or has been obtained from those whose property rights will be or are affected by the project included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 4-8), and interviews with the project proponent and stakeholders (see section 1.8).

Project activities take place on land owned or leased by farmers who voluntarily participate in the project activities (Refs. 4,7). It is noted that the audit team issues three findings (NIR 7, NIR 8 and NIR 9) related to consent forms which have been sufficiently addressed and closed prior to drafting this report. Thus, the audit team determined that the project has respected property rights and obtained free, prior, and informed consent of those whose property will be or has been affected by the project activity.

2.4.5 Restitution and/or Compensation for Affected Resources

This section is not applicable as net negative impacts because of this project implementation are unlikely over the project lifetime, and restitution or compensation does not apply.

2.4.6 Property Rights Removal/Relocation of Property Rights Holders

This section is not applicable as no removal or relocation will occur because of this project.

2.4.7 Identification of Illegal Activities

Steps taken to assess any illegal activities identified by the project that could affect the project's impacts and the measures planned to reduce such activities included the review of the PD and cited literature therein, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 11) and interviews with the project proponent and stakeholders (see section 1.8).

Overall, the audit team determined that sufficient measures have been taken by the project proponent to prevent illegal activities throughout the course of the project activities.

2.4.8 Ongoing Conflicts or Disputes

Upon enrollment, participating farmers must declare the uncontested property interest and title to the land, as outlined in section 2.3.8 of the PD, and discussed during interviews.

The audit team determined that no measures must be taken by the project proponent due to lack of ongoing conflicts or disputes.

2.4.9 National and Local Laws and Regulations

All project activities will be implemented in accordance with relevant local, state, and federal requirements including employment and consumer law requirements, as described in section 2.3.9 of the PD, and discussed during interviews with project personnel and stakeholders. However, during the site visit, the audit team observed that the project proponent had not yet integrated sufficient conformance checks related to relevant labor laws. Thus, the audit team issued a finding (NIR 6) which has been sufficiently addressed by the project proponent and closed prior to the drafting this report. Ultimately, the audit team determined that the project proponent has provided sufficient evidence to demonstrate compliance with national and local laws and regulations.

2.4.10 Project Ownership

Project ownership has been established through contractual agreements signed by participating farmers (Refs. 4, 7), as described in section 2.3.10 of the PD, and discussed during interviews with the project proponent and stakeholders (see section 1.8). Agoro Carbon has been given authority to conduct monitoring activities related to practice changes and crop yields.

The audit team determined that the project proponent has sufficiently demonstrated sole ownership of this project operation.

2.4.11 Grouped Projects

This is a grouped project with multiple project activity instance as described in sections 2.1.6 and 2.3.11 of the PD. The audit team reviewed the GIS files (Ref. 13) and management data (Ref. 14) to confirm that 79 farmers and 1301 fields have been enrolled in the project at the time of this initial validation. Furthermore, section 2.3.11 of the PD includes the criteria for the inclusion of future project activity instances in the project.

3 BENEFITS FOR PEOPLE AND PROSPERITY

3.1.1 Condition of Stakeholders at Project Start

Stakeholder groups affected by this project include 1) Farmers and their families, 2) Chanel partners, and 3) Soil samplers, as described in section 3.1 of the PD.

Stakeholder Group	Condition at Project Start Date
Farmers and their families	• Found in small to medium size tight-knit agricultural communities throughout the United States • Strong emphasis is put on family and community bonds • Often lack the budget and capacity to fully aide in the transition to new practices • Acreage and land ownership patterns of farmer land vary greatly • The financial baseline can be characterized by small profit margins and great fluctuations in income
Channel partners	• Live and work in the communities they serve • They all have experience working in agriculture, largely agricultural retail and services • Have limited networks
Soil samplers	• Typically, work and live in the communities they serve • They are familiar with the soil composition, flora and fauna, and geological makeup of the area they work in • They interact with farmers in the baseline scenario

Steps taken to assess the condition for each stakeholder group at project start included the review of the PD and documentation for the validation of the associated VCS project (Refs. 2-3), and supporting documentation (Ref. 8-10). Moreover, during the site visit, the audit team conducted interviews with stakeholders to confirm the conditions at the project start date as outlined in the PD, as well as to understand any historical changes, diversity and interactions between stakeholder groups. Through these discussions, the audit team learned that channel partners and soil samplers collaborate closely with farmers, maintaining regular communication to support project activities. Furthermore, the audit team reviewed the references (Ref. 9-10) provided by the project proponent in response to finding #16. The audit team also issued findings 11 & 12 and reviewed the project proponent's response regarding the conditions of stakeholders at the project start.

The audit team concluded that the project proponent has provided accurate descriptions of the conditions at the project start date for each stakeholder group, their interactions, and that a diverse set of groups has been identified.

3.1.2 Expected Stakeholder Impacts

Stakeholder impacts that are expected because of this project are described in section 3.2 of the PD and listed in section 3.1.4 of this report.

Steps taken to assess expected stakeholder impacts for each SDG included the review of the PD and cited literature therein, supporting documentation for the validation of the project activities (Ref. 8), and interviews with the project proponent and stakeholders (see section 1.8). Furthermore, the audit team issued finding 13 and reviewed the project proponent's response regarding the impact of this project on all stakeholder groups.

Expected Stakeholder Impacts	Audit Team Assessment
Increased agricultural knowledge	The audit team confirmed that farmers have access to the knowledge hub and other informational booklets regarding project activities (Ref. 8). These resources are designed to enhance their understanding of the project, and farmers maintain close communication with the agronomist, allowing them to seek clarification and ask questions related to ongoing project activities
Diversified income	The audit team interviewed the stakeholders to confirm that each farmer received an upfront payment upon signing the contract, whereas soil samplers and channel partners are contracted for their services.
Improved access to market	The audit team interviewed the farmers to confirm that they have broadened their network to connect with other farmers practicing similar project activities.
Possible changes in yields	The audit team interviewed the farmers to confirm that no negative changes in the yields are observed so far. Although there may be an initial reduction in yield, positive changes in crop yields are expected over the long term as a result of the implemented project activities.

The audit team concluded that the expected stakeholder impacts identified by the project proponent are likely to occur for each stakeholder group.

3.1.3 Mitigation of Negative Impacts on Stakeholders

Mitigation of negative impacts on stakeholders related to economic opportunity because of this project are described in section 3.2 of the PD and listed in section 3.1.4 of this report.

Steps taken to assess mitigation of negative impacts included the review of the PD and cited literature therein, and interviews with the project proponent (see section 1.8).

The audit team concluded that through the provision of increased agricultural knowledge, diversified income, and improved access to market mitigation, the project will mitigate the negative impact of possible negative changes in the farmers yields, and that these measures are consistent with the precautionary principle.

3.1.4 Stakeholder Monitoring Plan

Project impacts on people and their prosperity, and associated monitoring parameters are described in section 3.3 of the PD and listed below:

#	Expected Impacts on Natural Capital and Ecosystem Services	Monitoring Parameters
1	Increase in Agricultural Knowledge	• Farmers will be given access to Agoro Carbon's Knowledge Hub, a set of online and in person tools on rolling basis, to provide interactions with other experts on the field and build agricultural knowledge. The click rate and email open rate statistics will be used to measure the impact on agricultural knowledge. • Agoro Carbon will provide practice implementation advice and guidance through its staff. The yield data gathered from the farmers will be used to measure the impact on agricultural knowledge. • Agoro Carbon will host annual "Grower appreciation events with guest speakers. The number of farmers attending these events will be used to measure the impact on agricultural knowledge. • Agoro Carbon will provide access to a social media network where agronomists and farmers alike can share questions and experiences, and they will monitor the content and the posts on rolling basis. The content and the posts will be used to measure the impact on agricultural knowledge. • In addition, Agoro Carbon will meet at a minimum annually, or as requested/needed by the stakeholders to check-in about their grower success. These check-ins will be used to measure the impact on agricultural knowledge.

2	Diversified Revenue Stream	• Agoro Carbon will provide carbon payments to the farmers and their families at the onset of their participation, and in year 5 & 10. The payment amount (in USD) to farmers will be used to measure the impact on revenue stream. • Agoro Carbon will provide regular payments to the service providers based on completion of contractual obligations. The payment amount (in USD) to farmers will be used to measure the impact on revenue stream.
3	Improved Access to Market	• Agoro Carbon will keep track of interactions between stakeholders facilitated by the project to expand their network. These discrete check-ins will be used to measure the impact on access to market.
4	Possible Changes in Yields	• Agoro Carbon will conduct annual check-ins with the farmers and get yield data to monitor the project activity impacts. The yield data gathered from the farmers will be used to measure the impact on yields.

Steps taken to assess the stakeholder monitoring plan included the review of the PD and cited literature therein, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref 8-10), and interviews with the project proponent and stakeholders. Furthermore, the audit team issued finding #14 and reviewed project proponents' response regarding the stakeholder monitoring plan.

The audit team concluded that the variables selected by the project proponent are directly linked to the project objectives (see section 2.2.1) and predicted effects identified in the project's causal chain related to stakeholder wellbeing (see section 2.2.8). Furthermore, the audit team confirmed that the impacts listed in the above table are related to each stakeholder group identified in section 3.1.1 of the PD and listed in section 3.1.2 of this report. These impacts support all the claims expected to be generated, as described in section 3.1.2 of the PD and section 3.1.2 of this report.

The audit team determined that the monitoring plan will allow the project to monitor impacts on all stakeholders effectively.

3.1.5 Net Positive Stakeholder Wellbeing Impacts

Anticipated changes to the wellbeing of stakeholder groups affected by this project are described in section 3.4 of the PD.

Steps taken to assess the net positive stakeholder wellbeing impacts due to the project activities included the review of the PD and cited literature therein, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Ref. 8-10), and interviews with the project proponent and stakeholders (see section 1.8). Furthermore, the audit team issued finding 15 and reviewed project proponents' response regarding the anticipated net impacts.

Overall, the audit team concluded that the anticipated net impacts of the project activities are likely to be positive for each stakeholder group.

4 BENEFITS FOR THE PLANET

4.1.1 Condition of Natural Capital and Ecosystem Services at Project Start

Natural capital and ecosystem services affected by this project include soil and biodiversity, as described in section 4.1 of the PD.

Natural Capital and Ecosystem	Condition at Project Start Date
Soil	• Depleted soils due to years or decades of tilling and over fertilization • Depleted levels of soil organic matter • Less capacity to hold nutrients and water • More prone to erosion from wind and rain
Biodiversity	• Low biodiversity due to the use of single species and removal of crop residue • Low animal biodiversity • Low plant biodiversity • Low soil microbial biodiversity

Steps taken to assess the conditions of natural capital and ecosystem services at project start included the review of the PD and documentation for the validation of the associated VCS project (Refs. 2-3), and interviews with the project proponent and farmers (see section 1.8). Furthermore, the audit team reviewed the references (Ref. 15-20) provided by the project proponent in response to finding #16. The audit team concluded that the soil conditions at the start of the project are considered depleted and more prone to erosion due to years of conventional tillage and overuse of fertilizers, which has shown to degrade the soil due to increased decomposition of organic matter (Ref. 16) and decreased nutrient holding capacity (Ref. 15). Furthermore, the audit team concluded that baseline practices (conventional tillage, overuse of fertilizers, mono-cropping etc.) led to decrease in above and below ground biodiversity (Ref. 18-20). Overall, the project proponent has provided accurate descriptions of the conditions at the project start date for each natural capital and ecosystem likely to be impacted by the project activities.

4.1.2 Expected Impacts on Natural Capital and Ecosystem Services

Impacts on natural capital and ecosystem services that are expected because of this project are described in section 4.3 of the PD and listed in section 4.1.4 of this report.

Steps taken to assess expected impacts on natural capital and ecosystem services for each SDG included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), and interviews with the project proponent and farmers (see section 1.8). Furthermore, the audit team reviewed the literature references (Ref. 21-31) provided by the project proponent in response to finding #18.

Expected Impacts on Natural Capital and Ecosystem Services	Audit Team Assessment
Increased biodiversity	The audit team reviewed the literature (Ref. 21-25) provided by the project proponent to confirm that implementation of cover cropping and reduced/no tillage improves plant, animal, and microbial biodiversity.
Reduced soil disturbance and soil erosion	The audit team reviewed the literature (Ref. 26-31) provided by the project proponent to confirm that implementation of cover cropping and reduced/no tillage increases soil organic carbon, improves soil water retention and reduces soil erosion.
Improved Soil Health	The audit team reviewed the literature (Ref. 26-31) provided by the project proponent to confirm that implementation of cover cropping and reduced/no tillage increases soil organic carbon, improves soil water retention and reduces soil erosion, ultimately leading to improved soil health. Furthermore, the audit team reviewed the soil sampling SOP (Ref. 32), sampling design (Ref. 33) and lab testing SOP (Ref. 34) provided by the project proponent to confirm the soil sampling collection and analysis methods. The soil organic carbon analyzed from the soil samples will be used to quantify the impact of project activities on soil health.
Emission reductions and or removals	The audit team reviewed the VCS project description (Ref. 2), and VCS project validation report (Ref. 3) to confirm that the implementation of cover crops, reduced or no tillage and improved fertilizer management will result in reduced emissions and increased soil organic carbon removals.

The audit team concluded that the expected impacts on natural capital and ecosystem services identified by the project proponent are likely to occur .

4.1.3 Mitigation of Negative Impacts on Natural Capital and Ecosystem Services

This section is not applicable as no mitigation of negative impacts on natural capital and ecosystem services are expected because of this project (see also section 4.2 of the PD).

4.1.4 Natural Capital and Ecosystem Services Monitoring Plan

Project impacts on the planet and associated monitoring parameters are described in section 4.3 of the PD and listed below:

#	Expected Impacts on Natural Capital and Ecosystem Services	Monitoring Parameters

1	Increased biodiversity	• Agoro Carbon will monitor the enrolled project areas where cover crops and reduced or no tillage practices are being implemented. This monitoring will occur at each project activity instance. • Agoro Carbon will collect data annually through annual check-ins with the participating farmers to evaluate the efficacy of the project activities. • The number of acres implementing cover cropping and reduced tillage practices will be used to measure the impact on biodiversity.
2	Reduced soil disturbance and soil erosion	• Agoro Carbon will monitor the enrolled project areas where cover crops and reduced or no tillage practices are being implemented. This monitoring will occur at each project activity instance. • Agoro Carbon will collect data annually through annual check-ins with the participating farmers to evaluate the efficacy of the project activities. • The number of acres implementing cover cropping and reduced tillage practices will be used to measure the impact on soil disturbance and soil erosion.
3	Improved soil health	• Agoro Carbon will monitor the enrolled project areas where cover crops and reduced or no tillage practices are being implemented. This monitoring will occur at each project activity instance. • Agoro Carbon will collect data annually through annual check-ins with the participating farmers to evaluate the efficacy of the project activities. • Agoro Carbon has conducted soil samples at the start of the project and soil samples will be collected every 5 years to directly quantify the increase in soil organic carbon. • The number of acres implementing regenerative practices and an increase in soil organic carbon will be used to measure the impact on soil health.
4	Emission Reductions and or Removals	• Agoro Carbon has conducted soil samples at the start of the project and soil samples will be collected every 5 years to directly quantify the increase in soil organic carbon. • The increase in soil organic carbon (Mg/ha) will be used to measure the impact on emission reductions and/or removals.

Steps taken to assess the natural capital and ecosystem services monitoring plan included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 32-34), and interviews with the project proponent and stakeholders (see section

1.8). Furthermore, the audit team reviewed the literature references (Ref. 21-31) provided by the project proponent in response to finding #18.

The audit team concluded that the variables selected by the project proponent are directly linked to the project objectives (see section 2.2.1) and predicted effects identified in the project's causal chain related to natural capital and ecosystem services (see section 2.2.8). Furthermore, the audit team confirmed that the impacts listed in the above table relate to natural capital and ecosystem identified in section 4.1.1 of the PD and listed in section 4.1.2 of this report and can support all impact claims expected that are described in section 3.2 of the PD and section 3.1.2 of this report.

The audit team determined that the monitoring plan will allow the project to monitor impacts on natural capital and ecosystem services effectively.

4.1.5 Net Positive Natural Capital and Ecosystem Services Impacts

Anticipated changes to natural capital and ecosystem services affected by this project are described in section 4.4 of the PD.

Steps taken to assess the net positive natural capital and ecosystem services impacts included the review of the PD, documentation for the validation of the associated VCS project (Refs. 2-3), supporting documentation (Refs. 21-31), and interviews with the project proponent and farmers (see section 1.8).

Overall, the audit team concluded that the anticipated net impacts of the project activities will be positive and contribute to significant environmental benefits.

5 VALIDATION CONCLUSION

The project proponent has demonstrated that it has the technical and operational skillsets to implement, manage, and monitor this SD VISta project in combination with the separately validated VCS project.

The audit team concluded with a reasonable level of assurance that the objectives (see section 1.1) of this validation have been met and that the project is likely to acquire SD VISta claims for SDG goals listed in section 1.4 of this report.

The data and information supporting the project's compliance with the SD VISta rules were hypothetical, projected, and historical in nature. Overall, the audit team asserts that the project complies with the validation criteria for projects as set out in the Sustainable Development Verified Impact Standard, Version 1.0, and the SD VISta Program Guide, Version 1.0, including any qualifications or limitations.

APPENDIX 1: LIST OF FINDINGS

NCR 1 Dated 30 May 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 1 of the SD VISta PD template states: "Using Table 1 below, provide an estimate of the project's quantifiable contributions to specific targets of the Sustainable Development Goals (SDGs) over the project lifetime, identifying those that will be used as SD VISta claims, those that will be used as assets and those that will be added as labels to units issued under other programs."

The audit team notes the following items regarding table 1 in the PD provided by the project proponent:
- Row 1: Information on the number of farmers enrolled at the time of validation should be removed as it refers to the monitoring period. Instead, the table in the PD should state the estimated number of farmers that will be enrolled over the project lifetime.
- Row 2: This contribution has not been quantified, i.e. the measurement unit is missing.
- Row 4: Information on the number of acres enrolled at time of validation should be removed as it refers to the monitoring period. Instead, the table in the PD should state the estimated number of acres that will be enrolled over the project lifetime.
- Row 5: This contribution has not been quantified, i.e. the measurement unit is missing.
- Row 6: This contribution has not been quantified, i.e. the measurement unit is missing.
- Row 7: The contribution has been quantified but it is unclear if the value of 2% refers to an increase on an annual basis or over the project lifetime.
- Row 8: The contribution has been quantified but it is unclear if the value of 2% refers to an increase on an annual basis or over the project lifetime.
- Row 9: This contribution has not been quantified, i.e. the measurement unit is missing.

Provide a revised PD.
Project Personnel Response: Multiple changes have been made to Section 1- Summary of SDG Contributions, Table 1 -Summary of Project SDG Contributions. These changes are listed below:

Row 1: The total number of growers at time of validation has been omitted and a broader statement has replaced it. At this time, Agoro Carbon does not have an estimate of how many growers will be enrolled in the project over its lifetime. This number is highly variable and dependent on a number of factors outside of our control.
Row 2: the measurable currency, the US Dollar, has been added as a unit of measurement.
Row 3: The exact number of acres has been omitted and a broader statement has replaced it. At this time, Agoro Carbon does not have an estimate of how many acres will be enrolled in the project over its lifetime. This number is highly variable
Rows 5 : These rows will be measured by the number of acres as stated in the table.
Rows 6: These rows will be measured by the number of acres as stated in the table.
Row 7: "in the project lifetime" has been added to be more specific of the timeline for project contribution.
Row 8:"in the project lifetime" has been added to be more specific of the timeline for project contribution.
Row 9: the measurable currency, the US Dollar, has been added as a unit of measurement.

Auditor Response: Thank you for your response. The audit team reviewed the updated PD to confirm revisions and notes the following:

Section 1 of the PD Template, v1.0, states: "Contributions should be aligned with the SDGs, as follows: 1) Where possible, relate all contributions to official SDG targets and indicators. Refer to the SDG metadata repository (available at https://unstats.un.org/SDGs/metadata/) for guidance on the definitions and concepts included in the SDG indicators (see the examples in rows 1 and 2 in the table below). 2) Where a project's self-defined measure for tracking a benefits does not align with an official SDG indicator, do not provide an indicator number. Instead, write a project-specific indicator that relates to the most appropriate SDG target (see the examples in row 3, 4 and 5 in the table below)."

The information presented in the SDG indicator column for rows 5-9 in Table 1 of the PD reflects the SDG target rather than an SDG indicator as listed in the SDG metadata repository or self-defined by the project proponent to allow for project-specific tracking of benefits. Overall, it is unclear how the benefits of the project activity will be tracked and quantified, i.e., the unit of measure is missing.

Provide a revised PD.
Project Personnel Response 2: Thank you raising this finding. We have ammended rows 5-9 under the "SDG Indicator Tab" per the SD VISta PD Template version 1.
Auditor Response 2: Thank you for your response. However, the following item remains:

• Row 1: Information on the number of farmers enrolled at the time of validation has not been removed.

Provide a revised PD.
Project Personnel Response 3: Thank you for pointing this out in the PD. The sentence stating that there are 79 farmers enrolled at time of validation has been removed and replaced with a broader statement on how many farmers we wish to enroll over the project lifetime.
Auditor Response 3: Thank you for your response. Please refer to NCR 23 for a continuation of this finding.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 1 Dated 22 Aug 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: SD VISta- Cropland Project.docx
Finding: This finding is a continuation of finding #1.
Section 1 in the SD VISta template, v1.0, state the following: "Where a project's impacts can be directly attributed to a quantifiable change in the indicator, write 'increase' or 'decrease' in the Net Impact on SDG Indicator column. Where this is not feasible, or the project does not have the resources or desire to monitor the parameters necessary to directly attribute a project's impacts to a quantifiable change in the indicator, write 'implemented activities to increase' or 'implemented activities to decrease'. The Section Reference column should be used to direct the reader to the sections in this document which substantiate the estimates in Table 1. Where the contribution is issued as an SD VISta-labelled unit under a different program, the section reference column should refer to the validation report under the relevant program."

The column 'Net Impact on SDG Indicator' lists 'Increase' for rows 1-9 which indicates that the project's impacts that are listed in sections 3.2 and 4.2 of the PD can be directly attributed to a quantifiable change in the indicator. However, the audit team notes the following items:

- The column 'Section Reference' for row 1 lists a reference to section 2.2.11 of the PD, but it is unclear how the section 'Feedback and Grievance Redress Procedure Accessibility' relates to an increase in agronomic knowledge and experience of all project participants in a quantifiable manner. Further, relevant impacts have not been referenced.
- The column 'Section Reference' for row 2 lists a reference to section 9.2, but the PD does not contain a section 9.2. Further, relevant impacts have not been referenced.
- The column 'Section Reference' for row 3 lists a reference to section 2.1.2 of the PD, but it is unclear how the section 'Description of the Project Activity' relates to the enrolment of 2,000,000 acres to implement sustainable agricultural practices in a quantifiable manner. Further, relevant impacts have not been referenced.
- The column 'Section Reference' for rows 4-9 lists a reference to the VCS Project Description, but the finalized VCS PD has not been provided as supporting evidence. Further, relevant impacts have not been referenced.

Please revise column 'Section Reference' in table 1 to meet the template requirements. Further, please provide supporting documentation where referenced. If needed, relevant reference sections in the PD may also be revised to improve clarity related to the project's contribution to Sustainable Development Goals (SDGs). Lastly, please ensure that all relationships between SDG contributions and impacts as listed in table 1 are reflected in the causal chain.

Note: Please refer to the columns 'Net Impact on SDG Indicator' and 'Section Reference' in rows 2 and 3 of table 1 in the template for examples. Further, regarding item (4), please note that per the template instructions, the project proponent must provide the VCS Validation Report if the SDG contribution results in an SD VISta 'Label' per the column 'Claim, Asset or Label'. Since the project proponent has selected the option 'Claim', it is not required to provide the VCS Validation Report. However, the VCS Validation Report may serve as supporting documentation.
Project Personnel Response:
Section 2.2.4 and 2.2.6 have been amended to add additional information pertaining to the project contribution to SDG Target 4.4. The section reference has been updated to reflect where the reader can find how the project contributes to this SDG Target. Additionally, with the added context, language in the causal chain, as well as in section 3.2 and 3.3 has been updated.
Section reference for row 2 is now 2.1.10. This is the first place in the document where payments are mentioned in detail.
Section reference for row 3 is now 2.2.4- Continued Consultation and Adaptive Management. This section highlights the rolling basis of adding new instances in this grouped project.
Section references for rows 4-9 pertain to the associated VCS PD

Auditor Response: Thank you for your response and revisions. However, the audit team still notes the following:
- Section reference for row 1 of the SDG table is 3.2 #1 and does not include 2.1.10. Similarly, Section reference for row 2 of the SDG table is 3.2 #2 and does not include 2.2.4.
- Section references for rows 4-9 do not pertain to VCS PD except for row 4 and 9.
- Row 8 (SDG target # 6.4) states "Increase in soil organic stocks within the project area by 2% over the project lifetime." with a reference to section 4.2 #2. However, section 4.2 #2 pertains to the impact of tillage and cover crops on soil disturbance and erosion and not to the increase in soil organic stocks.
- Row 4 (SDG target 13.0) states "1,157,694 ERRs over project lifetime by implementing new sustainable agricultural practices." However, this number does not match with the ERR table in section 4.4 of the VCS PD.
- Sections 3.2 and 4.2 of the PD list four impacts each. However, the following impacts have not been referenced in table 1: 3.2 #3 | 3.2 #4 | 4.2 #1 | 4.2 #3 | 4.2 #4
- Row 2 states "90% of growers' yields remain within a historic 5% range." It is unclear how the indication that 90% of the growers' yield does not deviate more than 5% from historic yields ties to diversified income/revenue streams. Further, it is unclear what the "historic 5% range" is based on - does this refer to the baseline scenario as presented in the VCS project? This first sentence adds confusion.
- Row 3 includes a reference to section 4.3 rather than 4.2
- Row 7 is blank

Please clarify the above-mentioned items and revise the PD accordingly.

Project Personnel Response 2: Section reference for row 1 of the SDG table now lists sections 3.2 #1 and 2.1.10.
Section reference for row 2 of the SDG table lists sections 3.2 #2 as well as 2.2.4.
Section references for rows 4-9, besides row numbers 4 and 9, do not reference the VCS PD and mentions of it have been deleted as seen on the track changes version of the document.
Row 8 (SDG target # 6.4) now lists section 4.2 #2 and section 1.1.2. Section 1.1.2 is the first time in the document where activities that lead to an increase in SOC is brought up and discussed.
Row 4 has been updated to reflect the accurate reading of ERRs for our Cropland project, as found in the VCS PD which is 6,130,133.
Sections 3.2 #3 | 3.2 #4 | 4.2 #1 | 4.2 #3 | 4.2 #4 are now references in the SDG table
In the Google Doc/ Google Word version we are sharing, you will see row 7 has been deleted and its former contents made viewable in the track changes feature.
Row 2 language has been amended for clarity. The point we are trying to get across, is that the vast majority of our growers will not see negative yield changes due to project intervention, when done correctly, and this is something we monitor looking at their historic yield data.

Auditor Response 2: Thank you for your response and the revised PD. However, the following items are noted:

- Section 4.2 #1 (Increased biodiversity) is referenced for SDG target 13.1 (Increase resilience to drought and fire hazards of agricultural ecosystems), but it is unclear how increased biodiversity relates to drought and fire hazards.
- Row 3 of the SDG table still references section 4.3 instead of 4.2.
- Section 4.2 #2 (Reduced soil disturbance and soil erosion) is referenced for SDG target 6.4 (Increase in soil organic stocks within the project area by 2%), but it is unclear how reduced soil disturbance and soil erosion relate to the increase in SOC stocks.
- The revision to the SDG contribution in row 2 is confusing and it remains unclear how the farmers' yield relates to the diversification/increase in revenue.
- The content in row 7 has been removed, but the blank row still appears in the table. Further, since row 7 has been removed, the numbering of rows 8 and 9 should be updated.

Provide a revised PD.

Project Personnel Response 3: Thank you for raising this issue SCS and for taking the time to further elaborate on it over the phone. We really appreciate the effort. In section 4.2 we have further elaborated on the points you have raised, thus making the connection to the SDG table more clear. We have also ammended the SDG table verbage to be more clear and concise. **Auditor Response 3**: Thank you for the revisions. This finding is closed. **Bearing on Material Misstatement or Conformance (M/C/NA):** C

NCR 2 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.5.1.1 of the SD VISta Standard, v1.0, states: "The causal chain shall include all direct positive and negative, intended and unintended consequences of project activities. It may include indirect consequences." Further, section 2.5.1.2 of the same document states: "A project's causal chain(s) shall clearly document which impacts of project activities relate to People and their Prosperity and which relate to Planet. Where a project's causal chain(s) do not indicate any direct negative or positive impacts of project activities on stakeholders' well-being, projects are exempted from the criteria of Section 3.1 below. Where its causal chain(s) do not indicate any direct negative or positive impacts of project activities for natural capital and ecosystem services, a project is exempted from the criteria of Section 3.2 below. See Box 1 below for examples."

The causal chain depicted in section 2.1.9 of the PD provided by the project proponent does not show direct positive and negative, intended and unintended consequences of project activities. Further, it is unclear which impacts relate to People and their Prosperity and which relate to the Planet. Specifically, the causal chain includes boxes in different colors, but no legend has been provided and thus the color coding is unclear. Further, the content provided in the causal chain does not reflect the language used to define impacts in sections 3.2 and 4.2 of the PD.

Provide a revised PD.
Project Personnel Response: A new causal chain has been uploaded for your review into DropBox folder Finding Evidence sub folder Cropland Casual Chain
Auditor Response: Thank you for your response. The audit team reviewed the revised causal chain and notes the following items:

- The legend reflects that a blue outline depicts components of the project activity, a green outline depicts intended consequences, and a dotted outline reflects mitigation measures. However, the causal chain includes green, blue, yellow and red outlines, but no dotted outline. Further, the arrows that connect components of the causal chain are presented in different colors that do not match the information listed in the legend and thus add confusion.
- Causal chain components with yellow outlines appear to reflect positive impacts and red outlines appear to reflect negative impacts. Specifically, "Decrease in profitability due to possible yield decline or increased transition cost" is outlined in red, indicating a negative impact. However, impact #4 "possible changes in yield" in section 3.2 of the PD is categorized as positive. Overall, all impacts listed in sections 3.2 and 4.2 of the PD are categorized as positive.
- Causal chain components with green outlines, i.e., "GHG reduction" and "Carbon Sequestration", have not been listed as impacts in section 4.2 of the PD.
- The difference between yellow and green outlines is unclear.
- People and Prosperity Impact #3 "Improved access to market" is missing.
- Planet Impact #2 "Reduced soil disturbance and soil erosion" is missing.
- Planet Impact #3 "Improved soil health" is missing.

Provide a revised causal chain that addresses the above-listed items. In addition, provide the causal chain in the appendix of the PD.

Project Personnel Response 2: Thank you for raising this finding. The following changes have been made to address the aforementioned issues:

The legend now more accurately reflects the causal chain.
1.) Section 3.2 has been updated to reflect the fact that potential changes in yield is in fact a possible negative outcome. This statement was made in error in the PD itself.
2.)Section 4.2 of the PD has been updated to add the impacts of "GHG reductions" and "carbon sequestration" which is now impact number 4 tilted "Emission reductions and or removals". The causal chain has been updated to reflect this as well.
3.)People and Prosperity impact #3 and Planet Impacts 2 & 3 have been added to the causal chain.
Auditor Response 2: Thank you for your response. The audit team reviewed the revised causal chain to confirm revisions.

However, the following items remain:
• Section 2.1.9 in the PD includes a reference to appendix 1, but appendix 1 has been labeled as 'Appendix 2' although only one appendix exists.
• The font color in section 4.2 related to impact #4 is white rather than black as required by the template instructions.

Provide a revised PD.
Project Personnel Response 3: Thank you for raising this finding. We have transfered the contents of the PD into the SD VISta PD Template and remedied all formatting issues that have arisen during editing.
Auditor Response 3: Thank you for the response. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 3 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.2.2 of the SD VISta Standard, v1.0, states: "Stakeholder groups shall be identified in the project description and updated as necessary in the monitoring report. All stakeholders shall be part of at least one stakeholder group."

Section 2.2.2 of the PD provided by the project proponent described five stakeholder groups. Regarding the stakeholder group 'Chanel – Partners', the PD states "Agoro Carbon conducts an Integrity Due Diligence (IDD) report before working with all business partners as a standard operating procedure. These IDD reports cover the following areas: ● Corruption, ● Financial crime, ● Sanctions, ● Human rights, ● Commercial failures".

Please provide the Integrity Due Diligence (IDD) report.
Project Personnel Response: While Agoro Carbon cannot provide the completed IDDs for each Channel Partner for confidentiality reasons, we can provide the IDD Questionnaire itself as well as a presentation on the general procedure. This document and presentation can be found in the DropBox Folder Findings Evidence in the sub folder titeled Finding Number 3.
Auditor Response: Thank you for your response. The audit team reviewed the supporting evidence. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 4 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.2.7 of the SD VISta Standard, v1.0, states: "Project proponents shall document consultations in the project description and indicate whether and how the project design and implementation has been revised based on such input. Special attention paid to marginalized and/or vulnerable groups shall be mutually acknowledged and agreed upon by both project proponents and marginalized and/or vulnerable groups."

Sections 2.2.2 and 2.2.4 of the PD provided by the project proponent include information on the stakeholder groups and continued consultation practices. However, the PD currently does not include information on whether and how the project design was affected by stakeholder feedback.

Please provide a revised PD.
Project Personnel Response: Ongoing feedback is integral to our project design. The PD has been updated and this is outlined further in section 2.2.4- Continued Consultation and Adaptive Management.
Auditor Response: Thank you for your response. The audit team reviewed the updated PD to confirm revisions. In addition, the audit team conducted interviews with a sample of farmers during the on-site inspection to confirm the information provided in section 2.2.4 of the PD related to integration of stakeholder feedback in the project design. This issue is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 5 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.2.8 of the SD VISta Standard, v1.0, states: "A plan shall be developed, described in the project description and implemented to continue communication and consultation between project proponents and all stakeholder groups about the project and its impacts. This information exchange should facilitate adaptive management throughout the life of the project. This plan shall include measures to enable the meaningful influence of all stakeholder groups that want and need to be involved in evolving project design, implementation, monitoring and assessment throughout a project lifetime."

The supporting "What to Expect" document contains contact information (phone number and email address), but section 2.2.4 of the PD does not describe these communication channels in sufficient detail.

Please provide a revised PD.
Project Personnel Response: Section 2.2.4 of the Project Description has been amended to further elaborate on the "What to Expect" document. This includes additional details about the email contained within the document, the general contact form, and the procedure for when the document is provided to the grower.
Auditor Response: Thank you for your response. The audit team reviewed the updated PD to confirm revisions. This issue is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 6 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.2.12 of the SD VISta Standard, v1.0, states: “Project proponents shall provide assurance in the project description and monitoring report that a project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate in the project description and monitoring report how compliance is achieved. Measures shall be taken and documented in the project description and monitoring report to inform workers about their rights.” Further, section 2.4.9 of the SD VISta Standard, v1.0, states: “In the project description, project proponents shall identify and demonstrate compliance of the project with all and any relevant local, regional and national laws, statutes and regulatory frameworks. Updates to compliance obligations shall be captured in the monitoring report.”

Section 2.3.9 includes a list of relevant laws related to agricultural practices, however, this section does not include information on workers' rights or labor laws. In addition, it is unclear how the project proponent ensures compliance with relevant laws and regulations.

Please clarify the above-listed items and provide a revised PD.
Project Personnel Response: Section 2.3.9 has been reveised to clarify compliance issues surrounding labor laws in Agoro Carbon and our project participants.
Auditor Response: Thank you for your response. The audit team reviewed the updated PD to confirm revisions. However, during the audit team's on-site inspection, several farmers confirmed that Washington state requires a chemical license ("Pesticide and Structural Pest Inspector License") to apply pesticides on their fields. Further, the audit team observed that the project proponent has not yet implemented an internal check to confirm whether participating farmers in Washington state are compliant with relevant state laws such as this one.

Please justify and demonstrate how the project meets the standard requirement.
Project Personnel Response 2: The regulation of pesticides in the U.S. is governed by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which mandates that the Environmental Protection Agency (EPA) oversees the distribution, sale, and application of pesticides. As a result, purchasing restricted-use pesticides (RUPs) without a proper certification or license is difficult because vendors are legally required to verify the buyer's credentials before completing the sale. This ensures that only trained and certified individuals handle potentially hazardous chemicals, safeguarding public health and the environment. Moving forward, Agoro Carbon will ask in our contract if growers have this particular license, amongst others, in order to ensure full compliance with SD VISta Standard rules and requirements which require compliance with local and federal laws and regulations. This requirement will periodically be checked for compliance with existing contracted growers.
Auditor Response 2: Thank you for the response. The audit team will issue a forward action request related to section 2.3.9 of the PD to request that the checks put in place for enrolled farmers to confirm compliance with applicable laws are verified during the next verification period.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 7 Dated 30 May 2024 **Standard Reference**: SD VISta Standard, v1.0 **Document Reference**: Agoro Carbon Cropland 3634.pdf **Finding**: Section 2.4.2 of the SD VISta Standard, v1.0, states: "All property rights shall be recognized, respected and supported. Projects shall not encroach uninvited on private property, community property (including lands, territories and resources to which communities have collective rights, either customary or statutory), or government property." Section 2.3.3 of the PD provided by the project proponent states: "Farmers enrolled in our program that are living within the boundaries of a Federal Indian Reservation must demonstrate that they have consent from relevant tribal authorities to carry out project activities and receive payment from the Agoro Carbon Alliance for doing so." At the time of validation, several initial project activity instances are located on Federal Indian Reservations in Idaho and South Dakota. However, it is unclear how respective farmers have demonstrated that they have consent from relevant tribal authorities. Please clarify how farmers located on Federal Indian Reservations can demonstrate to Agoro Carbon that they have consent from relevant tribal authorities and participate in the project. **Project Personnel Response**: At time of this response, there are 326 federal Indian reservations in the United States according to the Bureau of Indian Affairs. This leads to a patchwork of land ownership patterns across the United States on tribal land. Agoro chooses only to include growers who declare ownership to be in our project scenario. The right to work the land on their own land or leased land is a standard requirement as well. In our DropBox under "Evidence of Ownership" sub folder "Contracts" you will find our contract between Agoro Carbon and our enrolled growers. Specifically ANNEX 2 – SELLER CERTIFICATION OF PROPERTY RIGHTS demonstrates our procedure for working with growers on public and or tribal land. Also in the same contract you will find our language pertaining to environmental attributes (GHG credit transfer/ownership). **Auditor Response**: Thank you for your response. The audit team reviewed the supporting evidence. This finding is closed. **Bearing on Material Misstatement or Conformance (M/C/NA):** NA

NIR 8 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.4.3 of the SD VISta Standard, v1.0, state: "The free, prior and informed consent shall be obtained of those whose property rights are affected by a project through a transparent, agreed process. See Box 4 below for more information on free, prior and informed consent."

Section 2.3.4 of the PD provided by the project proponent states: "Agoro Carbon does not implement the project activities directly, instead relies on participating farmers. All farmers have to sign the "Carbon Credit Generator Agreement" and therefore all activities implemented on the land are agreed to through the agreement. As stated above, Agoro Carbon only works with (has agreements with) farmers who can demonstrate rights to the land. Farmers are required to produce information pertaining to these rights, which includes the length of the agreement. This is done in writing or verbally. Therefore, the free prior and informed consent was obtained from all participating farmers."

Please provide an example of a consent form. In addition, please clarify if and how Agoro Carbon records a farmer's consent if it is obtained verbally.
Project Personnel Response: Growers often will show written agreements in the form of contracts made between themselves and their landlord. This may include a formal lease agreement. More often than not, the right to live and work on the land is more of a "handshake" type agreement where terms are agreed upon verbally between the parties. This specific verbal interaction is recorded by our growers in the contract signing process and recorded by our Sales Team.
Auditor Response: Thank you for your response. The audit team conducted interviews with a sample of farmers to confirm this information. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 9 Dated 30 May 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 2.4.7 of the SD VISta Standard, v1.0, states: "Any illegal activities taking place (e.g., illegal logging) that could affect a project's sustainable development impacts shall be monitored and, as appropriate, measures shall be taken to mitigate or reduce these activities so that project benefits are not derived from illegal activities."

Section 2.3.7 of the PD provided by the project proponent states: "Producers are also required to comply with all applicable laws, rules, regulations, codes, and sanctions relating to this Agreement, and in particular relating to human rights, bribery, corruption, money laundering, accounting and financial controls, and anti-terrorism, including the aforementioned Agoro Carbon´s Code of Conduct for Business Partners. A mandatory Standards of Business Conduct questionnaire needs to be answered and signed by producers as part of the "Carbon Credit Generation Agreement", to ensure that both parties will be operating ethically and within the law. The aim of this document is to identify any potential risks before entering into the contract."

Please provide 'Code of Conduct for Business Partners' and the 'Standard of Business Conduct questionnaire'.
Project Personnel Response: Evidence for this finding can be found in the folder titeled "finding evidence" sub folder "finding 9". "The Agoro Code of Conduct for Bussiness Partners" can be found here. This code of conduct informs our questionare.
Auditor Response: Thank you for your response. The audit team reviewed the supporting evidence. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NCR 10 Dated 30 May 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.1 of the template requirements states that "For each stakeholder group, describe the social, economic and cultural conditions at the project start date..."

In section 3.1 of the PD, the audit team found that only 2 (Farmers and their families, and Service Providers) of the 5 stakeholder groups identified in section 2.2.2 of the PD were included.

Please update the PD accordingly.
Project Personnel Response: Section 3.1 of the PD has been ammended to include the social, economic, and cultural conditions of each listed stakeholder group. Please note that Section 2.2.2- Stakeholder Description , has been amended to be more representative of our stakeholder groups. The groups "service providers" and "local agronomist" have been omitted. "Service Providers" was a combination of "Soil Samplers" and "Channel Partners". Their contributions cannot and should not be understated, therefore they are considered two separate stakeholder groups. The stakeholder group "Local Agronomist" has been omitted as they do not meet the definition of a stakeholder per Verra Program Definitions v4.4; "Any person or entity who can potentially affect or be affected by the project activities". Agronomic advice on practice change can be sought by local agronomists through the USDA Extension agency but this would not be out of the ordinary/ outside of the business as usual scenario for the agent and their role in the growers life.

Auditor Response: Thank you for your response. The audit team was able to confirm the changes provided in section 3.1. However, section 2.2.2 of the Cropland PD still includes the stakeholders "Service providers" and "local agronomist". Please update accordingly so we can close this finding.
Project Personnel Response 2: Thank you for bringing this to our attetion. The new PD now omits "Service Providers" and "Local Agronomist" in section 2.2.2 as stated in a previous finding response.
Auditor Response 2: Thank you for your response. The audit team confirmed the changes provided. This finding is closed
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 11 Dated 30 May 2024
Standard Reference: SDVista-Standard-v1.0.pdf
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.1.1 of the standard states "The following shall be included in the PD for each of the stakeholder groups identified in Section 2.2.2 above: 1) Conditions at the project start date with respect to social, economic and cultural diversity within and between the stakeholder groups and the interactions between stakeholder groups...".

Section 3.1 of the PD states that "Due to the nature of the relationship between channel partners, soil samplers and the Agoro Carbon Program the conditions at the project start are largely irrelevant".

Please revise the PD to provide sufficient information on the initial conditions for all the stakeholders at the start date.
Project Personnel Response: Section 3.1 of the PD has been ammended to include the social, economic, and cultural conditions of each listed stakeholder group.
Auditor Response: Thank you for your response. The audit team reviewed the supporting evidence. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NCR 12 Dated 30 May 2024
Standard Reference: SDVista-Standard-v1.0.pdf
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.1.1 of the standard states "The following shall be included in the project description for each of the stakeholder groups identified in Section 2.2.2 above... 3.1.1(2) Significant changes in these elements the past."

In section 3.1 of the PD, the audit team found that there is no statement indicating whether there have been significant changes in the past for each of the stakeholder groups.

Please update the PD accordingly.
Project Personnel Response: Section 3.1 of the PD has been ammended to state that "In recent history, there has been no substantial change to this baseline scenario." for each listed stakeholder group.
Auditor Response: Thank you for your response. The audit team reviewed the changes provided. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 13 Dated 30 May 2024
Standard Reference: SDVista-Standard-v1.0.pdf, SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.2 of the template requires to "Describe the anticipated impacts of project activities on each stakeholder group". Moreover, section 3.1.2 of the standard states "Project proponents shall monitor impacts depicted in the causal chain of a project's activities on all stakeholder groups".

However, Section 3.2 of the PD only presents the impacts for one (Farmers and their Families) of the five stakeholders group identified in Section 2.2.2 of the PD. Hence, this is not in conformance with the requirements.

Please update the PD accordingly.
Project Personnel Response: Section 3.2 of the PD has been ammended to include all other stakeholder groups and the impacts this project will have on them.
Auditor Response: Thank you for your response. The audit team reviewed the changes provided. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 14 Dated 30 May 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.3 of the template requirements states "Present a monitoring plan that identifies the monitored stakeholder groups, the types of measurements, the sampling methods and the frequency of monitoring and reporting.
The monitoring plan must:
1) Be based on variables directly linked to the project's objectives for stakeholders and to predicted effects identified in the project's causal chain related to stakeholder well-being;
2) Assess differentiated impacts for each of the stakeholder groups; and
3) Be able to support all impacts, claims, and/or assets described in the project's expected and net impacts".

In Section 3.3 of the PD, the audit team found the following:
● The actions of the monitoring plan (MP) are based on the stakeholder impact, but lack details on the variables to be measured, and also do not include description of the sampling methods.
● The MP includes only impacts identified for the Farmers stakeholder group, and not for other stakeholder groups (e.g. the "Diversified revenue stream, only mentions the farmers, but not other stakeholder groups)
● Some of the actions of the MP include "rolling basis" as the frequency. Please clarify "rolling basis", is this daily, weekly or another frequency?
● The intervention "Practice implementation advice and guidance from Agoro.." states in the column "Monitoring Action" that: "Yield data is collected from ranches on a yearly basis". However, in the frequency, it is stated "Rolling basis". Please clarify.

Overall, this section needs additional information to be in conformance with the program requirements. Please update the PD accordingly.
Project Personnel Response: Section 3.3- Stakeholder Monitoring Plan has been updated per SCS Gloabl Servieces Findings and template instructions.
Auditor Response: Thank you for your response. The audit team reviewed the changes provided. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 15 Dated 30 May 2024
Standard Reference: SDVista-Standard-v1.0.pdf, SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.4 of the template states "Demonstrate that the anticipated net impacts of the project activity(s) are positive for each stakeholder group". Moreover, the section 3.1.4 of the standard states "The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including:
1) Changes in stakeholders' well-being due to project activities. This appraisal should include documentation of any activities intended to mitigate negative impacts to stakeholder groups.
2) Any SDG target(s) associated with people and their prosperity identified in Section 2.1.2 - Projects shall set out their clearly defined sustainable development objective(s) in the project description - and any stakeholders' well-being benefits that will be used as SD VISta claims or assets."

The audit team has the following observations:
● Section 3.4 of the PD does not include the anticipated net impacts description for each stakeholder group, including the type and magnitude.
● Section 3.3 of the PD does not include SDG target(s) associated with people and their prosperity and any stakeholders' well-being benefits that will be used as SD VISta claims or assets.

Please update the PD accordingly.
Project Personnel Response: Section 3.3 of the PD has been updated to include SDG targets associated with people and their prosperity. Section 3.4 has been ammended to include the anticapated net impacts for each stakeholder group in line with the SD VISta Template instructions.
Auditor Response: Thank you for your response. We reviewed the information provided, but require further clarification about one of the impacts. In Section 3.2, Impact # 4, the Resulting change states "The expected outcome is positive as implementation of new practices should lead to increased yields. There is always a risk when deviating from baseline practices of lower yields.". In Section 3.4, the "Net positive stakeholder well-being impacts" for Farmers and their families states "Inclusion into our grouped project and successful practice may in turn lead to lower than expected yields.
Please revise Section 3.4 to provide further information for consistency, as this section does not state that the expected outcome should lead to increased yields.
Project Personnel Response 2: Thank you for raising this finding. After review, it has become apparent to Agoro Carbon that this statment was initally made in error. Our apologies for the confusion. The section has since then ammended to list this possible change in yields as a negative outcome, not a positive one. Section 3.2 has been ammended to refelct this and section 3.4 remains the same.
Auditor Response 2: Thank you for your response. The audit team confirmed the changes provided. This finding is closed
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 16 Dated 30 May 2024 **Standard Reference**: SD-VISta-Project-Description-Template-v1.0.docx **Document Reference**: Agoro Carbon Cropland 3634.pdf **Finding**: Section 3.1 of the tempalte state that, "For each stakeholder group, describe the social, economic and cultural conditions at the project start date. Describe the diversity within and between the stakeholder groups and the interactions between stakeholder groups. Describe any significant changes in these elements in the past. Explain and justify key assumptions, rationale and methodological choices. Provide all references". Further, Section 4.1 of the template states: "Describe the state of natural capital and ecosystem services at the start of the project, including any possible threats, in all areas potentially affected by the project. Explain and justify key assumptions, rationale, and methodological choices. Provide all references." Section 3.1 of the PD describes the initial conditions of stakeholders at the start of the project, whereas section 4.1 of the PD describes the natural capital and ecosystem services at the start of the project.. However, relevant references for the description of initial conditions of stakeholders and initial conditions of natural capital, ecosystem services have not been provided. Please revise the PD to meet the template requirements. **Project Personnel Response**: Section 3.1 of the PD has been updated to include references to the conditions of stakeholders at the start of the project. Pease let us know if we need to make reference to notes we recoed in salesforce. However , these conversations between Agoro Carbon staff and growers are meant to be private and cannot be shared publiclly. References for section 4.1 have been uploaded into the shared DropBox under "Findings evidence" sub folder "Finding number 16" **Auditor Response**: Thank you for your response. However, the audit team notes the following and request further information: - Provided reference "Tillage practices linked to poor soil health and reduced soil carbon — Center for Sustainable Landscapes and Communities" is not accessible. We are getting the following error when trying to open this reference "There was an error opening this document. Acess denied" - References for the initial biodiversity conditions at the project start date have not been provided. **Project Personnel Response 2**: Our apologies for the error you are getting. We have deleted that file in our shared DropBox and uploaded a new version. Please let us know if that works for you. This can be found in the "Finding number 16" folder. Also in that folder you will find a sub folder titeled "References for the initial biodiversity conditions at the project start date". **Auditor Response 2**: Thank you for your response and for providing the supporting references. This finding is closed. **Bearing on Material Misstatement or Conformance (M/C/NA):** C

NIR 17 Dated 30 May 2024 **Standard Reference**: SDVista-Standard-v1.0.pdf, SD-VISta-Project-Description-Template-v1.0.docx **Document Reference**: Agoro Carbon Cropland 3634.pdf **Finding**: Section 3.2.3 of the standard states: “A monitoring plan shall be provided as part of a project description and such plan shall be followed to determine the project’s impacts.” Further, section 4.2 of the template states, “Using the table below, describe the anticipated impacts of project activities on natural capital and ecosystem services. This description should cover the anticipated impacts over the project lifetime.” In Section 4.2 of the PD, the Impact #1 table states in row 4 that “Inter-seeding of other forage species like grass or legume leads to an increase in forage base and improves soil health through biodiversification.” However, Inter-seeding of forage species is not included as a project activity in section 2.1.2 of the PD. Please clarify. **Project Personnel Response**: Section 4.2 titeled "Expected Impacts on Natural Capital and Ecosystem Services" has been edited to be more specific to Cropland project activities. Specfically, table section " Resulting Change in Condition" in Table 1 has been changed to reflect Cropland project activities that result from reduced/ no tillage and cover cropping interventions. **Auditor Response**: Thank you for your response. This finding is closed. **Bearing on Material Misstatement or Conformance (M/C/NA):** NA

NIR 18 Dated 30 May 2024
Standard Reference: SDVista-Standard-v1.0.pdf, SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634.pdf
Finding: Section 3.2.4 of the standard states, "The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including: Changes in natural capital and ecosystem services due to project activities." Further, section 4.2 of the template states "Present a monitoring plan that identifies the monitored natural capital and ecosystem services, the types of measurements, the sampling methods and the frequency of monitoring and reporting."

Section 4.3 of the PD includes the monitoring plan for three identified impacts. However, the audit team notes the following and request further clarifications:

- It's unclear how the impact "Increase in Agriculture Knowledge" is related to the impact on natural capital and ecosystem services.
- The monitoring action for all three impacts listed in the table states "A soil health assessment will be carried out that measures for, amongst other things, earthworms and root structure to monitor increases in biodiversity". However, it's unclear how the same measurements and sampling method are applicable for each impact.
- It's unclear what soil parameters are included in the soil health assessment.

Please provide clarifications and update the PD accordingly.
Project Personnel Response: For continuity sake with section 4.2- Expected Impacts on Natural Capital and Ecosystem Services, Section 4.3- Natural Capital and Ecosystem Services Monitoring Plan, has been edited to replace "Increase in Agricultural Knowledge" with "Increased Biodiversity". The monitoring action for each impact has been edited to be more specific, adding an explanation of how the monitoring action is applicable to the impact it is measuring.
Auditor Response: Thank you for your response. However, please provide references to support the monitoring action of measuring SOC on increased biodiversity, reduced erosion and improved soil health.
Project Personnel Response 2: Thank you for raising this finding. From our understanding, this information can be found in DropBox folder "Supporting Documentation" and its subsequent sub folderes. Please let us know if there is any further information that you would require to close this finding.
Auditor Response 2: Thank you for your response. However, the audit team notes the following:
- In section 4.3 of the PD, regarding Increased Biodiversity impact, it is stated that "Cover cropping and reduced/ no-tillage improve biodiversity by providing habitat for a variety of plant and animal species, enhancing soil health and microbial activity, and reducing soil erosion, which collectively create a more diverse and resilient ecosystem". However, the monitoring action only measures SOC. While an increase in SOC may support a greater diversity of soil organisms, it's unclear how this directly impacts plant and animal species. Please revise the PD accordingly and provide supporting references.
- The references for "Water use efficiency and cropland interventions" in the "supporting documents folder" are either incomplete (Baker C, et al., 2017, R.L. Blevins 1971, Chakraborty et al., 2022), or only demonstrate the direct impact of cover crops and no-till on soil moisture conservation. While the direct impact of cover crops and no-till on soil moisture conservation is demonstrated, its unclear how this ties into the monitoring action (measuring SOC) to quantify the impact. Please provide references that demonstrate how an increase in SOC postively impacts soil moisture and erosion.
- Impact #4 (Emission reductions and or removals) has been added to section 4.2 of the PD. However, information related to the monitoring of this impact has not been included in section 4.3 of the PD. Please revise the PD accordingly.

Project Personnel Response 3: Thank you for raising this point. -While an increase in SOC may support a greater diversity of soil organisms, we think it's best to change course on our stated monitoring action and replace it with "Implementation efficacy" which can be monitored by the number of enrolled farmers. Farmers successfull implementation of project practices will lead to "increased biodivesristy" per reseources cited. Support staff here at Agoro, specifically the Grower Success Team, have a yearly check in with our enrolled farmers to ensure practice adherence and give any needed guidance. Though this is slated to happen at least once a year, the cadence can vary and be more frequent at the request of the individual grower. Please see Studies 1,2, and 3 in the Cropland DropBox Folder Finding Number 18 for further supplemental information on these practices and their correlation to biodiversity. -Similar to our change in approach for monitoring "Increased Biodiversity " with regards to Cover Cropping and No Tillage, we are changing course on our stated monitoring action and replacing it with "Implementation efficacy" which can be monitored by the number of enrolled farmers. -Thank you for bringing this to our attention, the table in Section 4.3 of the PD has been updated to include Emission Reductions and or Removals. **Auditor Response 3**: Thank you for your response and revisions. Please refer to NIR 24 for a continuation of this finding. **Bearing on Material Misstatement or Conformance (M/C/NA):** NA

NIR 18 Dated 22 Aug 2024
Standard Reference: SDVista-Standard-v1.0.pdf, SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: SD VISta- Cropland Project.docx
Finding: This finding is a continuation of finding #18.
Thank you for your response and revisions. However, the audit team notes the following items:

(1) It remains unclear how the monitoring actions for each impact listed in section 4.3 of the PD relate to the SDG contributions in table 1.

Example 1: The monitoring action for the impact 'Increased Biodiversity' is described as "Implementation efficacy. Annual checks on enrolled farmers to ensure proper practice implementation". However, the column 'Estimated Project Contribution by the End of Project Lifetime' lists "Increase avian richness and abundance on enrolled acres by 2% compared to baseline counts over the project lifetime" in row 7 of table 1.

Example 2: The monitoring action for the impact 'Reduced Soil Disturbance and Soil Erosion' is described as "Implementation efficacy. Annual checks on enrolled farmers to ensure proper practice implementation". However, the column 'Estimated Project Contribution by the End of Project Lifetime' lists "Increase in soil organic stocks within the project area by 2% over the project lifetime" in row 8 of table 1.

Please revise the PD to clearly describe how each impact relates to the SDG contributions in table 1.

(2) The Natural Capital and Ecosystem Services Monitoring Plan in section 4.3 of the PD does not specify which SDG target(s) are associated with each impact.

Please revise the PD accordingly.

Project Personnel Response: Thank you for raising this finding and thank you for taking the time to further explain this finding to us over a phone call. The example is also very helpful. The SDG table has been ammended and as well as subsequent supporting tables in the PD relating to monitoring actions related to our calimed SDGs.
Auditor Response: Thank you for your response and revisions. However, the audit team still notes the following:

- Section 4.2 #1 and row 1 of the table in section 4.3 of the PD include the impact of cover crop and reduced tillage on increased biodiversity. However, this impact is not tied to any SDGs as row 7 of the SDG table has been removed. Please ensure all impacts are tied back to the SDG table, otherwise the intent of an SD VISta impact is unclear.

Project Personnel Response 2: Thank you for raising this point. We have ommited row 7 in the SDG table for now as the efficacy of monitoring this point is still up for discussion. Section 4.2 #1 has been added to SDG table row 5 as it broadly pertains to regenerative agriculture.
Auditor Response 2: Thank you for the response. However, considering the first bulletin in NCR 23 and the removal of row 7, it is unclear which SDG impact #1 in section 4.2 contributes to.

Please clarify.
Project Personnel Response 3: Thank you for raising this issue, we have ammended the SDG table and associated impacts to be more clear.
Auditor Response 3: Thank you for the revisions. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NCR 19 Dated 25 Jun 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: N/A - Site Visit
Finding: Section 2.2.4 of the SD VISta Standard, v1.0, states: "Stakeholders identified in Section 2.2.1 above shall be notified of the project development process."

During the on-site inspection, the audit team observed that participating farmers have been informed of the associated VCS project but that awareness of the SD VISta project is lacking.

Demonstrate that participating farmers and all other stakeholder groups have been informed about the SD VISta project.
Project Personnel Response:
Auditor Response:
Project Personnel Response 2: When growers are first introduced to our program by members of our sales team, they are told about the program design. This includes an overview of the standards (VCS and SD VISta) the project is being assessed against, as well as the methodology (VM0042). After growers sign a contract and join our program, this information is reiterated by their Grower Success Team member. It has become apparent that further steps need to be taken in order to ensure there is an understanding of the difference between VCS and SD VISta and what their involvement means in both standards. Agoro Carbon will be distributing content to all enrolled growers, this includes those already in our project and future additions to this grouped project, about SD VISta. This will include "Knowledge Hub" articles, an update to the "What to Expect Document" and the creation of podcasts that will be sent to our growers. Additionally, Grower Success Team members will be discussing this matter further with their assigned growers and handing out literature about it along with Sales Team members as well.
Auditor Response 2: Thank you for your response. Please provide evidence to demonstrate that farmers who are currently enrolled have been made aware of the SD VISta project.
Project Personnel Response 3: Cropland DropBox Folder Finding Number 19 contains the latest "What to Expect Document" which has been updated to include an explanation of SD VISta, VCS, and the difference between the both. This has been sent to all current growers and our Grower Success Team is speaking with each grower about this in their upcoming check-ins.
Auditor Response 3: Thank you for the supporting evidence. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 20 Dated 27 Jun 2024
Standard Reference: SD Vista Program Guide, v1.0
Document Reference: Agoro Carbon Cropland 3634 Word Version (1) (1).docx
Finding: The SD Vista Program Guide, section 3.1, parenthesis 1) states "The Verra website provides the template for all representations. The template shall not be altered other than to fill in project-specific details."
The numbering in some subsections of section 2 in the new version of the PD "Agoro Carbon Cropland 3634 Word Version (1) (1).docx", have changed and do not correspond to the original sections numbering provided in the SD Vista PD Template. Also, the PD does not include page numbers and some of the text font (e.g. Section 3.1) is not consistent with the font style established by the Verra template. Please review and update accordingly.
Project Personnel Response: Thank you for raising this issue. We have changed some of the fonts as well as section numbers to match the PD Template. We have also added page numbers. Please do let us know if the problem still persists. Going back and forth between google docs and MS word has proven to be problematic. The newest edition of the PD will be uploaded in Google Doc Format this time for continuity sake.
Auditor Response: Thank you for your response and for revising the PD. However, the audit team still notes the following:
- The numbering in many subsections of section 2 still do not correspond to the original sections numbering provided in the template (e.g. the stakeholder identification section number in the template is 2.2.1, but it's 2.2.2.1 in the PD). Please review and update accordingly.
Project Personnel Response 2: Thank you for raising this finding. We have transfered the contents of the PD into the SD VISta PD Template and remedied all formatting issues that have arisen during editing.
Auditor Response 2: Thank you for your response and revisions. However, the PD shows that template instructions have not been removed on page 1. This finding is still open.
Project Personnel Response 3: Thank you for raising this point and your patience in the matter. We have removed the instructions on page 1 of the PD.
Auditor Response 3: Thank you for your response and revisions. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NIR 21 Dated 10 Jul 2024
Standard Reference: SD VISta Standard, v1.0
Document Reference: Agoro Carbon Cropland 3634 Word Version (1) (1).docx
Contract AGORO.pdf
Finding: Section 2.4 of the SD VISta Standard, v1.0, states, "Project proponents shall have the necessary approvals from appropriate authorities to claim ownership of the project's benefits as represented in SD VISta project documentation." and section 2.4.10 states "The project description shall be accompanied with evidence establishing project ownership accorded to project proponent(s)."
Section 2.3.10 of the PD states, "Agoro Carbon has the ownership and legal right of the project activities. The project ownership consists of a "Carbon Credit Generation Agreement" whereby each farmer transfers title to the credits and its environmental attributes to Agoro Carbon. " The project proponent has provided a copy of the Carbon credit generation agreement. However, the signed agreements by the farmers have not been provided.
Furthermore, during the site visit, all the selected farmers confirmed that they have signed agreements with the project proponent.
Therefore, the audit team requests copies of the signed agreements for all the farmers selected for the PNW and Texas site visits to confirm the ownership.
Project Personnel Response : These contracts can be found in the DropBox folder "Evidence of Ownership" and then under the sub folder "Contracts" and finally housed in the folder "Grower Contracts from Site Visit".
Auditor Response : Thank you for your response and for providing the requested contracts. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NIR 22 Dated 5 Aug 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon Cropland 3634 Word Version (1) (1) (1).docx
Finding: Section 4.3 of the template states, "Present a monitoring plan that identifies the monitored natural capital and ecosystem services, the types of measurements, the sampling methods and the frequency of monitoring and reporting."
In the table in section 4.3 of the PD, the monitoring action is listed as "measuring SOC" with a monitoring frequency of "Annually". However, during the call with the soil sampler, the audit team learned that the Agoro team has communicated to collect soil samples every 4 to 5 years from the same field.
Please clarify the frequency of soil sample collection and monitroing of SOC changes, and revise the PD accordingly.
Project Personnel Response: Thank you for raising this finding, section 4.3 of the PD has been amended to reflect the accurate frequency of our soil sampling.
Auditor Response: Thank you for your response and revisions. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): NA

NCR 23 Dated 08 Nov 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon USA Cropland Program (1).docx
Finding: Page 1 of the SD Vista Project description template provides instructions for completing the proejct description, including the formatting and font requirements. Our technical reviewer has noted numerous errors in the formatting of the PDD. Below is a non-exhaustive list of what the technical reviewer found during the review.
- In the navigation bar, section 1.1.5 is followed by 2.1.6
- In the navigation bar, “1 Summary of SDG Contributions” needs to be added
- The image in the Appendix is double pasted and offset
- Page 1 of the template states, "Unless deviations are merited, complete all sections using Arial 10 point or Century Gothic 10.5-point, black, regular (non-italic) font. There are inconsistencies in font size, color and style. For example, multiple sections use a 12-point font, Table 1 uses Libre Franklin font style, and several tables use a light black/gray font rather than regular black.
- Section 4.2 of the PDD includes in-text citations that are not properly formatted. It is unclear where these citations are referenced within section 4.2. Although the template does not specify reference formatting, all citations should be referenced in the body of the text and may be included as footnotes.

Please revise the PD accordingly.
Project Personnel Response: The document has been reformatted. It is not clear what happened but I would assume the conversion between word doc to google doc and back to word doc left some formatting bugs.
Auditor Response: Thank you for all the revisions. Overall, the formatting has improved significantly. However, the audit team just notes one minor item:
- The section numbers for "Project Objectives, Context and Long-term Viability", "Stakeholder Engagement", and "Project Management" are listed as 4.1, 4.2 and 4.3, respectively instead of 2.1, 2.2, and 2.3. Please revise the PDD accordingly.
Project Personnel Response 2: PD Corrected.
Auditor Response 2: Thank you. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 24 Dated 08 Nov 2024
Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx
Document Reference: Agoro Carbon USA Cropland Program (1).docx
Finding: Section 2.1.3 of the template states, "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 (the earliest of which is the project start date), project activity milestones, dates of changes in project implementation, monitoring schedule and estimated assessment schedule."
The Implementation Schedule section of the PDD outlines dates for various milestones in the project development and implementation. However, the technical reviewer has noted the following issues
- A tentative site visit date of June 2024 is listed for SD Vista validation. Since the site visit has already occurred, please update this date to reflect the actual timing.
- In the "Expected Future Assessment Schedule" section on the title page of the PDD, it is stated, "The initial SD-VISta verification is happening concurrently with VCS validation." This wording is unclear and potentially inaccurate, as the implementation schedule indicates that VCS and SD Vista verification are estimated to occur in 2024-2025." Please clarify and revise the PDD accordingly.
Project Personnel Response: Section 2.1.3 Implementation Schedule, has been updated to reflect that the SD VISta site visit occured between the 17th and 28th of June 2024 and that the estimated verification is for April of 2025.
Auditor Response: Thank you for the revisions. However, the "Expected Future Assessment Schedule" section on the PDD title page still states, "The initial SD-VISta verification is happening concurrently with VCS validation." This wording is inconsistent with the updates made to the implementation schedule. Please revise it to align with the wording in Section 2.1.3 of the PDD for clarity and consistency.
Project Personnel Response 2: The title page of the PD has been updated to read, "The initial SD VISta verification is expected to begin in April of 2025.
Auditor Response 2: Thank you. This finding is closed.
Bearing on Material Misstatement or Conformance (M/C/NA): C

NCR 25 Dated 08 Nov 2024 Standard Reference: SD-VISta-Project-Description-Template-v1.0.docx Document Reference: Agoro Carbon USA Cropland Program (1).docx Finding: Section 1 of the template states, "Using Table 1 below, provide an estimate of the project's quantifiable contributions to specific targets of the Sustainable Development Goals (SDGs) over the project lifetime, identifying those that will be used as SD VISta claims, those that will be used as assets and those that will be added as labels to units issued under other programs." Row 2 of table 1 of the PDD states, "Diversified revenue of all ranchers through carbon payments, while maintaining their existing revenue, as monitored by overall yields." However, It is unclear how this is 'quantifiable.' Please clarify revise the PDD accordingly. Project Personnel Response: Row 2 of Table 1 in Section 1 has been updated to clarify that the quanifiable impact will be an increase in the number of revenue sources for all farmers. We will be quantifying both the number of farmers with increased revenue streams and the number of revenue streams that have been increased. Auditor Response: Thank you for the revisions. While the language has been updated to clarify that the project proponent will quantify the revenue stream and farmers with increased revenue streams, the estimates for these numbers over the crediting period are still missing, unlike other SDG targets. Please provide the estimated increased revenue streams and the estimated number of farmers expected to be enrolled over the crediting period. Project Personnel Response 2: Row 2 of Table 1 in Section 1 of the PD has been updated to read, "Add at least one additional revenue source for 500 farmers, through carbon payments, while maintaining their existing revenue capacity, as monitored by overall yields. Auditor Response 2: Thank you. This finding is closed. Bearing on Material Misstatement or Conformance (M/C/NA): C

OBS 26 Dated 08 Nov 2024 Standard Reference: N/A Document Reference: Agoro Carbon USA Cropland Program (1).docx Finding: The name of the project's PDD document is not informative. While the technical reviewer doesn't see any specific instructions in SDVISta standard or template on how to name the PDD for this specific scheme, a title with "PDD" or "SDVISta" or "VAL", as well as a date, would be more informative. Project Personnel Response: The document has been updated to include the project ID, that it is for the SD VISta Program, that it is a project description, it is written in English, and the date of the document. Auditor Response: Thank you. Bearing on Material Misstatement or Conformance (M/C/NA): C