

PROJECT REVIEW REPORT

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

Project ID	2929
Project Name	Bandai Hills Bamboo Reforestation Project, Ghana
Review Type	Registration Approval
Program(s)	VCS Program
Verification Period	N/A
Project Proponent	EcoPlanet Bamboo Group, LLC
Methodology	AR-ACM0003 Afforestation and reforestation of lands except wetlands, v2
VVB	TÜV NORD CERT GmbH
Assessment Criteria	VCS Standard v4.4 and AR-ACM0003
Date of First Issue	27 February 2023
Date of Second Issue	25 August 2023
Date of Third Issue	08 December 2023
Review Conclusion	Approved
Date of Final Issue	15 March 2024

FINDINGS

1	Missing Non-Permanent Risk Report	
	<p><u>Issue</u> Verra cannot efficiently review the project’s risk analysis without the Non-Permanence Risk Report.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must submit the NPRT report to Verra to facilitate the risk analysis review. 2) The VVB must, under section 3.4 of the validation report, describe the steps taken to assess the non-permanence risk rating, including the evidence cross-checked. <p><u>Background</u> Per VCS Standard Section 3.2.10, projects shall prepare a non-permanence risk report following the VCS program document AFOLU Non-Permanence Risk Tool at validation and verification.</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. The PP has uploaded the NPRR to the Verra Registry. The Registry requires all documents required to be uploaded before the PP can move a project to the next stage and request validation. The NPRR is not included in the list of required documents. We would suggest in future that the registry team requires this before allowing the PP to request validation. 2. The Non-Permanence Risk Report has been provided to the VVB. The audit team verified the statements and evidence provided during the onsite audit presented the results in section 3.4 of the VR. <p style="text-align: right;">Closed</p>

	<p><u>Program Rule(s)</u> VCS Standard, 4.4, Section 3.2.10</p>	<p><u>Verra Response</u> The NPRR has been updated on the Verra registry. The information in the NPRR is consistent with that in the Validation report. The VVB deems that the information provided in the NPRR is reliable and appropriate.</p>	
<p>2 The KML file includes ineligible areas within project polygons</p>			
	<p><u>Issue</u> The KML file polygon includes ineligible and non-forested areas, i.e., roads and settlements. It is, therefore, unclear how the VVB assessed the accuracy of the project area boundaries and the emission reduction calculations.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure the KML file accurately depicts the unique land parcels of the project area and includes only eligible areas, i.e., roads and settlements should be excluded from the polygons. 2) The VVB must ensure that the map under section 1.12 of the PD is updated accordingly. 3) The VVB must assess the updated KML file polygon and the accuracy of the related monitoring and reporting of baseline and estimated GHG ERR. 4) The VVB must update all the related and impacted sections in the validation report. <p><u>Program Rule(s)</u> VCS Standard, v4.4, 3.11.1, 3.11.2</p>	<p>Round 1</p> <p><u>VVB Response</u> General remark: The Verra Registry requires the Project Boundary KML to be uploaded – this almost always is different to the Project Area. If the Project Area KML file is instead required then this should be made clear in program changes and reflected on the registry. An updated KML file polygon referring specifically to the Project Area has been provided to the VVB and included within the PD.</p> <p>However Verra states that non forested areas such as roads and settlements have been included. Hence, there is no general standard requirement that non forested areas are not eligible for reforestation activities, neither, that roads etc. need to be excluded if not required by the methodology (VCS 3.11.2.c.ii)</p> <p>Required Actions: 1. An updated KML file has been provided that shows only eligible areas^{03a}. All areas that have been forest within the last 10</p>	<p>Closed</p>

		<p>years and hence are not eligible to the VCS standard 3.2.4 are excluded in this view. It was a misunderstanding of which polygon to be presented in the PD rather than a new assessment. There are no settlements included (and allowed by law within the Forest Reserve) within in the Project Boundary -. Any shelters used by the PP within it as part of project activities are temporary, and therefore once removed reforestation activities can occur; Roads and/or firebreaks that the PP has designed and implemented as part of management of the reforestation activities at the time of validation have been removed from the Project Area polygon. However it should be noted that there are old cattle tracks that might be visible on google earth - these will undergo reforestation activities and therefore are left as included within the project area.</p> <ol style="list-style-type: none"> 2. An updated map has been included in section 1.2 of the PD⁰¹/ that shows only eligible planting areas. 3. No re-assessed was needed as the original assessment already covered all aspects and, as described above, only the images was adapted doe to unclear terminology 4. No changes in the VR are needed as the foreseen planting area is not changing. 	
		<p><u>Verra Response</u> An updated KML has been provided. The Map in section 1.12 of the PD has been updated accordingly.</p>	

3 Information on the project location is unclear		
<p><u>Issue</u></p> <ol style="list-style-type: none"> 1) It is unclear whether the 46.6 ha where forest loss has occurred within the last ten years, as indicated in section 1.13 of the PD, is excluded from the project area polygon in section 1.12 of the PD. 2) It is unclear whether the areas unsuitable for reforestation activities and the 278.4 ha of remnant forest patches, as indicated in section 3.3 of the PD, have been excluded from the project area polygon in section 1.12 of the PD. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure the PP clarifies whether the polygon under section 1.12 of the PD excludes the 46.6 ha where forest loss has occurred. 2) The VVB must ensure the PP clarifies whether the polygon under section 1.12 of the PD excludes the areas unsuitable for reforestation activities and the 278.4 ha of remnant forest patches. <p><u>Program Rule(s)</u> VCS Standard, v4.4, 3.11.1</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>The PP has undertaken the following actions. In addition to the below Section 3.3 has been updated accordingly.</p> <ol style="list-style-type: none"> 1. The image included in Section 1.12 was specified as the Project Boundary (representing the full project area under control of the PP). The PP has now added an additional image in Section 1.12 to show the Project Area, where net emission reductions and removals occur. 2. The ineligible areas, referring to the 46.6 ha that were still under forest 10 years at the project start date but have been cleared before the project start date, along with the 278.4 ha of standing forest at the project start date have been removed from the Project Area shape file presented under PD 1.12. The KML file for the Project Area has been updated accordingly (PD - Figure 4) <p>The updated information included in the PD have been assessed by the audit team. As noted above, all data needed have been already verified during the onsite audit and were just restructured and presented in a different way in the PD. See section 3.1.8 in the VR, FAR 1 and Shapefile Forests/07/. VR has been adapted.</p>	<p>Closed</p>
	<p><u>Verra Response</u></p> <p>The KML and PD have been updated. The VVB confirms the information provided is accurate.</p>	

4 Incomplete validation conclusion		
<p><u>Issue</u> Section 4 of the validation report does not include a positive validation statement confirming the project's total and annual ex-ante ERR estimates.</p> <p><u>Action Required</u> The VVB must update Section 4 of the Validation Report to include a positive validation statement confirming the project's total and annual ex-ante ERR estimates.</p> <p><u>Background</u> The VCS Standard v4.4 sections 4.1.19, 4.1.20, and 4.1.21 set forth specific requirements in terms of the validation opinion.</p> <p><u>Program Rule(s)</u> <i>VCS Standard v4.4 Section 4.1.19, 4.1.20, and 4.1.21</i></p>	Round 1	Closed
	<p><u>VVB Response</u> Average annual GHG emission removal of 188,926 tCO2e has been included in the statement under 4. In the VR.</p>	
	<p><u>Verra Response</u> A statement confirming the project's annual ex-ante ERR estimates has been included in the validation report.</p>	

5 Missing information on the project's longevity/lifetime		
<p><u>Issue</u> Section 1.9 of the PD does not specify the project's longevity.</p> <p><u>Action Required</u> The VVB must ensure that section 1.9 of the PD is updated to specify the project's longevity.</p> <p>The VVB must assess the updated PD and confirm whether the project passes the non-permanence risk assessment.</p>	Round 1	Closed
	<p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. The PP has updated Section 1.9 to include a statement on the project's longevity, with reference to the NPRR^{02/}. 2. The assessment of the project longevity (60 years) is already verified presented in VR. 	

<p><u>Background</u> Per section 2.2.4 (6) of the AFOLU Non-Permanence Risk Tool, v4.0, where AFOLU project longevity is less than 30 years, the project fails the risk assessment and is not eligible for crediting.</p> <p><u>Program Rule(s)</u> VCS Standard v4.4 Section 3.2.14, AFOLU Non-Permanence Risk Tool, v4.0, Section 2.2.4 (6)</p>	<p><u>Verra Response</u> Information on the project’s longevity has been included in the PD.</p>	
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6 Missing information on the impact of thinning on carbon stock loss		
<p><u>Issue</u> Per sections 1.2 and 1.11 of the PD, selective thinning of the bamboo will be carried out. However, the percentage reduction in carbon stock resulting from this is not specified.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure that Sections 1.2 and 1.11 of the PD specify the percentage reduction in carbon stock resulting from thinning for each project activity instance. 2) If the reduction is more than 20% of carbon stocks for each project instance over five years, the VVB must ensure that the long-term average GHG benefit is calculated. 	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. Sections 1.2 has been updated to refer to additional details with regards to thinning in Section 1.11. 2. Section 1.11 have been updated to describe the percentage reduction in carbon stock resulting from thinning activities. 3. The VVB assessed the described thinning activities. Due to the nature of the Bamboo no loss of biomass is expected to occur over a 5-year period. Hence, the selective thinning does not meet the harvesting activity definition. No changes in the VR are needed. 	<p>Closed</p>

	<p>3) The VVB must assess the impact of the proposed thinning on the carbon stock and update the validation report as needed.</p> <p><u>Background</u> Per the VCS Standard, v4.4 section 3.2.23, where ARR projects meet or exceed the harvesting activity definition, the long-term average shall be applied.</p> <p>Per the VCS Program definitions v4.3, a harvesting activity involves the harvest of trees, vegetation, or other biomass, which results in a reduction by more than 20% of carbon stocks in each project activity instance over a five-year period that starts when a reduction of carbon stocks occurs.</p> <p><u>Program Rule(s)</u> VCS Standard v4.4 Section 3.2.23, 3.2.25 (2)</p>	<p><u>Verra Response</u> The PD has been updated to describe the percentage reduction in carbon stock resulting from thinning activities. The VVB confirms that no biomass loss is expected to occur over 5 years.</p>	
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7	Buffer credits are not quantified		
	<p><u>Issue</u> The buffer GHG credits have not been quantified under Section 4.4 of the PD.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure that the buffer credits are quantified for each project activity instance under section 4.4 of the PD. 2) The VVB must assess the updated PD and update section 3.3.6 of the validation report as needed. 	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. The PP has updated Section 4.4 of the PD to include a table showing the Net GHG credits after buffer stock allocation as well as a summary. 2. The VVB assessed the updated PD and found it in compliance with the requirements. The buffer percentage has been already assessed during the audit. Section 3.3.6 of the VR has been updated to reflect the quantification of the buffer credits. 	<p>Closed</p>

<p><u>Background</u> Per the AFOLU Non-Permanence Risk Tool, v4.0, Section 1.1.1, the non-permanence risk rating shall be used to determine the number of buffer credits that an AFOLU project shall deposit into the AFOLU pooled buffer account.</p> <p><u>Program Rule(s)</u> VCS Standard v4.4 Section 2.4.1, 3.2.15, AFOLU Non-Permanence Risk Tool, v4.0, Section 1.1.1 VCS Standard v4.4 Section 2.4.1, 3.2.10</p>	<p><u>Verra Response</u> Section 4.4 of the PD has been updated to include a table showing the Net GHG credits after buffer stock allocation.</p>	
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8 Allometric equations not selected following methodology requirements		
<p><u>Issue</u></p> <p>The procedures in paragraph 14 of the tool “Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities” have not been followed to select the allometric equation to estimate the sampled tree's aboveground biomass. Instead, species-specific allometric equations developed by the PP have been used.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure that under section 4.2 of the PD the allometric equation for estimating the sampled tree's aboveground biomass is selected following the procedures in paragraph 14 of the tool for estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities. 2) Alternatively, the VVB must ensure that the PP includes using an independently developed species-specific allometric equation as a methodology deviation. 3) The VVB must assess the revised PD and if a methodology deviation is applied, demonstrate how the 	<p>Round 1</p> <p><u>VVB Response</u> The VVB does not follow the argumentation provided by Verra. This is demonstrated by the following steps: The PD in section 4.2 follows the applied CDM methodology AR-ACM0003 in the following steps:</p> <ol style="list-style-type: none"> 1. The methodology reveres to CDM AR-TOOL 14, stating in 1. “For ex-ante (projected) estimation of tree biomass it applies tree growth and stand development models.” 2. 14 (a) Difference of two independent stock estimations; 3. 17. Carbon stock in trees at a point of time is estimated by using one of the applicable methods provided in section 8. 4. 30 (b) Estimation by modelling of tree growth and stand development; 5. 45. This method is used for ex-ante estimation (projection) of carbon stock in tree biomass. Under this method existing data are used in combination with tree growth models to predict the growth of trees and the development of the tree stand over time. 6. Annex 1, 6 For ex-ante estimation the allometric equation, or volume table or volume equation applied to a tree species is 	<p>Closed</p>

	<p>conservativeness and accuracy of the ERR estimates was confirmed.</p> <p><u>Background</u></p> <p>Per the tool for estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities, the allometric equation applicable to a tree species must be selected from: (a) Existing data applicable to local situation (e.g., represented by similar ecological conditions); (b) National data (e.g., from national forest inventory or national GHG inventory); (c) Data from neighbouring countries with similar conditions; (d) Globally applicable data.</p> <p><u>Program Rule(s)</u></p> <p><i>Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities, v2.1.0, Paragraph 17, VCS Standard v4.4 Section 3.19.2</i></p>	<p>selected from the following sources (the most preferred source being listed first):</p> <ol style="list-style-type: none"> 7. a) Existing data applicable to local situation (e.g. represented by similar ecological conditions); PP collected own data, hence used existing local data to develop a species-specific allometric equation. This is the most accurate way. 8. Annex 1, 7 reverts to CDM AR-TOOL 17 for allometric equations - ex post estimation. 9. CDM AR-TOOL 17 states: 5. For ex ante estimation of aboveground tree biomass in project scenario any allometric equation can be used. 10. Nevertheless, the PP followed the CDM AR-TOOL 17 and develop a species specific allometric equation^{/25/26/}. <p>The VVB concludes that the PP followed the applied Methodology and the applicable tool as described above. QED: No deviation from the methodology is detected.</p>	
		<p><u>Verra Response:</u></p> <p>A justification for an independently developed species-specific allometric equation has been provided. However, this finding cannot be closed.</p> <p><u>Issue:</u></p> <p>The referenced Annex 1,7 of the AR-TOOL 14, v4.2 is only applicable for selecting allometric equations for ex-post estimation of carbon stocks in woody biomass. Allometric equations for ex-ante estimation must be selected following Annex 1,6 of the AR-TOOL 14, v.4.2.</p> <p><u>Action Required:</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the project proponent follows the methodology provisions to select the allometric equation for ex-ante estimation of carbon stocks, i.e., follow Annex 1,6 of the AR-TOOL 14, v.4.2, or apply a methodology deviation. 2. If carbon stocks are estimated using an independently 	

		<p>developed species-specific allometric equation, the VVB must ensure that the PP compares it to existing allometric equations to ensure it leads to realistic estimates and must assess the deviation as such.</p>	
		<p>Round 2</p>	
		<p><u>VVB Response</u></p>	
		<p>1. The PP updated the PD to Version 1.7 and included a description of the Methodology deviation in section 3.6. and more detailed in section 4.2. The only applicable data existing is the data selected by the PP. None of the sources listed in the AR-TOOL 14 under Annex 1 point 6 were seen as adequate, as the Bamboo Project is the first of its kind concerning the planted species, provenance, technology and ecological conditions.</p>	
		<p>2. The PD had been updated and includes now a section where the independently developed species-specific allometric equation is compared with data form an article published in the BAMBOO JOURNAL, No. 29 March 2015/41/ that shows the identical value for 5 year old Dendrocalamus asper propagated by rhizome cutting in tC/ha as calculated by the PP /04/: 41 tC. However, number of clumps/ha and culms/clump differ. The audit team assessed the provided information and reference and confirms the realistic estimate of the developed equation in the context of the sparce availability of available data. The FVR has been updated accordingly.</p>	
		<p><u>Verra Response</u></p>	
		<p>A methodology deviation has been added concerning the use of an the independently developed species-specific allometric equation. However, this is not sufficient to close the finding.</p>	
		<p><u>Issue</u></p>	
		<p>1. It is not clear how the study referred to is considered strong enough evidence that the developed allometric equation is giving realistic estimates and an appropriate</p>	

		<p>methodology deviation.</p> <ul style="list-style-type: none"> a. It is not clear if the propagation method (by rhizome vs. culm cutting) has been considered when selecting a value from the paper. Per the referenced article, <i>Dendrocalamus asper</i> propagated by culm cutting has a much lower biomass value at year 5 (i.e., 19.2 tC/ha) than the reported value for the same species propagated by rhizome cutting (i.e., 41.7 tC/ha). b. More explanation is needed to demonstrate why a study from 2015, based on measurements made in the Bali botanical garden is considered the better available data source for comparison (e.g., compared to IPCC, 2019, biomass growth default values for Bamboo in Africa). c. Additionally, the study does not constitute evidence for <i>Bambusa texilis</i> as no value is provided for this bamboo species. <p><u>Action Required:</u></p> <ul style="list-style-type: none"> 1. The VVB must ensure that sufficient evidence is provided to demonstrate the species specific allometric equation that was developed is resulting in realistic ex-ante GHG estimates. 2. The VVB must raise a FAR to ensure the developed allometric equations will be assessed by the VVB at verification. <p><u>Background</u></p> <p>While it is understood that ex-ante estimates will not impact the volume of VCUs to be issued ex-post, realistic or conservative estimates are needed ex-ante to mitigate the non-permanence risk (i.e., to ensure the project is designed based on realistic assumptions and activities implementation will not stopped post-issuance because the carbon revenues are not as important as projected ex-ante).</p>	
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VVB Response:

Availability of literature data is sparse and not sufficient reliable to compare. Hence, the Audit team verified the realistic and conservative data input for the development of the species specific allometric equation and the carbon calculation by comparing it with unmanaged 5 year old trial plantings of bamboo (Asper and Textilis) established by the PP next to the project area.

- Asper: Field Data: No of Clumps >20 versus 8 in the cc, and Diameter of 8 cm at full growth (8 years and up)
- Textilis: Field data: No of Clumps >50 versus 10 in the cc, and Diameter of 7cm





- The ex-ante estimations are confirmed by the above field data to be conservative.
- The VERPA includes a further conservative approach as it deducts abt. 20% from the calculated number of VERs in the PD.
- The risk for non-continuation is rated low as the project is pre-financed and Bamboo once established is difficult to remove and shows a high resistance to natural risks like fire and drought.

FAR 2023-03 has been raised to ensure that the developed allometric equations are assessed and verified at 1st verification.

The FVR has been updated accordingly.

Verra response:

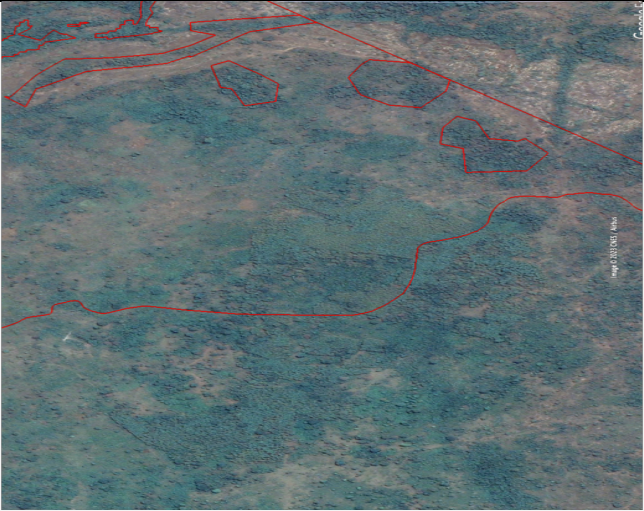
The VVB has clarified how conservative estimates have been ensured using species-specific allometric equations.

9 Missing information on how exclusion of ERR from plantings before the project start date has been assessed		
<p><u>Issue</u></p> <p>Per Section 1.4 of the PD, there was planting before the project start date of 1st June 2021, which has been excluded from GHG ERR estimates. However, the VVB does not describe how this was assessed and confirmed.</p> <p><u>Action Required</u></p> <p>The VVB must under section 3.3.6 of the validation report, describe how they assessed and confirmed that the plantings before the project start date (i.e., 01/06/2022) have been excluded from the GHG ERR estimates.</p> <p><u>Program Rule(s)</u> VCS Standard v4.4 Section 3.8</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>This finding has been incorrectly raised with reference to the project. There was no planting in the Bandai Hills Reforestation Area prior to the project start date.</p>	Closed
	<p><u>Verra Response</u></p> <p>A clarification has been provided by the VVB.</p>	

10 The tool for baseline determination and additionality demonstration is incorrect		
<p><u>Issue</u></p> <p>The project does not apply the methodology's required tool for baseline determination and the additionality demonstration. The tool for the demonstration and assessment of additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) project activities (VT0001), v3.0 has been applied instead of the combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities, v1.0</p> <p><u>Action Required</u></p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>Explanation: The VCS tool has been developed in 2012, a long time before any VSC AR Methodology existed in order to better fit into the wording of the VCS. The only commonly used AR methodology that existed at that time was the CDM AR -ACM0003 This Methodology does not provide for a stepwise approach justifying the determination of the most plausible baseline scenario. Nevertheless, it was commonly used and accepted by Verra before as can be seen in the history of VCS AR projects. The audit team assessed and verified the baseline of the project</p>	Closed
	<p><u>Verra Response</u></p>	

	<p>1. The VVB must ensure that combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities, v1.0, is applied to determine the baseline and demonstrate additionality.</p> <p>2. The VVB must assess the revised PD and update the validation report as needed.</p> <p><u>Program Rule(s)</u> AR-ACM0003, v02.0, Para 6(b), VT0001, v3.0, Section 1.2 (b)</p> <p><u>Background</u> VT0001, v 3.0, Section 1.2 (b): Using this tool to determine additionality requires the baseline methodology to provide for a stepwise approach justifying the determination of the most plausible baseline scenario.</p> <p>However, the methodology AR-ACM0003, v02.0, does not provide for a stepwise approach justifying the determination of the most plausible baseline scenario.</p>	<p>without using the stepwise approach during the onsite audit.</p> <p>Notwithstanding, to solve this finding the PP used the required CDM tool instead and updated the PD accordingly.</p> <p>The Audit team confirms the correct use of the tool and the appropriateness of the conclusion for the most plausible baseline scenario, which is the same as identified before without using the stepwise approach.</p> <p>The FVR has been updated accordingly.</p> <p><u>Verra Response</u> The PD has been updated accordingly.</p>	
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11	Insufficient evidence to demonstrate eligibility of the project area		
	<p><u>Issue</u> It is unclear whether the project area is eligible for ARR plantation i.e., has not been cleared of native ecosystems to create GHG credits.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure that sufficient evidence is provided to demonstrate that the project area has not been cleared of native ecosystems to create GHG credits. 2. The VVB must assess the evidence provided and update the validation report as needed. <p><u>Program Rule(s)</u> <i>VCS Standard, v4.4, Sections 3.2.4</i></p> <p><u>Background</u> Satellite images show that trees covered a substantial portion of the project area less than ten years before the project start date. E.g., see Google Earth Pro image on 12/17/2017 Coordinates: 6°46'34.13"N; 0°55'30.88"W.</p>	<p>Round 1</p>	<p>Closed</p>
<p><u>VVB Response</u> Visual assessment of satellite images is recognised as a good indication whether areas are covered by forests or other types of vegetation. It was also used by the auditor for pre assessing the project area. That visual assessment is not sufficient to clearly define whether there is a forest or a non-forest cover neither in the history nor at present. A systematic remote sensing analysis of the forest cover is therefore state-of-the-art. As there is no possibility to do ground truthing for the historical forest cover the audit team assessed the appropriateness of the remote sensing analysis based on the actual existing forest cover. Therefore, the area was inspected, and the results of the remote sensing analysis compared to the situation as experienced in the field. Forest threshold in the project area was assessed by expert judgement based on a high level of forestry knowledge, long term audit experience and country expertise in the project region. Results from the field assessment were matched with information gathered in interviews with differ levels of the Ghana forestry authority, local communities and staff. Moreover, the exploitation of the forestry reserve started decades ago by the timber industry. Neither was the PP active during these decades nor was there any indication that the project area was cleared of native ecosystems to create GHG credits. Hence, the audit team collected sufficient evidence to demonstrate that the project area has not been</p>			

		<p>cleared of native ecosystems to create GHG credits. To provide further clarification the PP conducted an additional assessment using stronger forest threshold criteria to ensure the most conservative assessment of the forest cover. The audit team assessed this information and confirms it conservativeness.</p>	
		<p><u>Verra Response</u> The VVB clarified that a systematic remote sensing analysis has been performed, with ground-truthing points collected, to demonstrate the area did not qualify as forest. The VVB detailed how this information has been assessed and cross-checked. This response is deemed sufficient, and the finding is closed.</p>	

12	Clarification is needed on monitoring negative impacts on existing trees		
	<p><u>Issue</u> It is unclear how the existing trees will be monitored to ensure the bamboo plantation does not negatively impact them.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure Section 2.1 of the PD is revised to clarify how the existing trees will be monitored to ensure the bamboo plantation does not negatively impact them. 2. The VVB must assess the revised PD and update the validation report as needed. <p><u>Program Rule(s)</u> VCS Standard v4.4 Section 3.18.2</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>The consideration of the most plausible baseline scenario is missing in the argumentation – under the without project scenario the fire regime and the other drivers described in the PD will cause ongoing deforestation of remaining forest patches and general degradation of existing natural vegetation and ends up at the final stage of non-native invasive Congo grass grassland. The project does not foresee the harvesting or cutting of any existing trees or natural vegetation nor was any observed during the field visit. It rather protects existing trees by protecting the entire area through their internal fire management. Field visits confirmed the planting method of the PP whereby any individual trees were left standing. Field visits also confirmed from the pilot plantings that individual standing trees were still existing and healthy inbetween the bamboo plantings.</p>	<p>Closed</p>

		<p>Hence, monitoring has not been seen as a requirement as potential negative environmental impacts as stated in VCS Standard v4.1 Section 3.16.1 in relation to the without project scenario were not identified.</p> <p>Nevertheless, the PP included now the monitoring of existing trees in the general monitoring concept.</p> <p>The PD section 2.1 and 5 and the FVR have been updated to reflect this action.</p>	
		<p><u>Verra Response</u></p> <p>The monitoring plan has been updated accordingly.</p>	