

# VERIFICATION REPORT FOR THE PROJECT CORDILLERA AZUL NATIONAL PARK REDD+ PROJECT

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### Summary

AENOR started the verification under VCS Standard version 3.7 and the CCB Standard Second Edition process in September 2017 when the Project Proponent submitted the monitoring reports for VCS/CCB and other supporting documents, such as the calculation spreadsheet, GIS package, the non-permanence risk assessment, etc.

The field visit took place from 17 to 20 October 2017, in which the auditor visited the project area, interviewed key stakeholders, staff and other related experts and verified the implemented activities.

The purpose of the verification was to determine the conformance of the project with respect to the VCS Standard version 3.7, the CCB Project Design Standards Second Edition and the validated VCS Project Description and CCB Project Design Document.

The implementation period covered by this verification reports is from 8 August 2015 to 07 August 2016.

This is the fourth verification event and the third one carried out by AENOR. The project is well managed and results are well supported. Monitoring plans are effective and CIMA developed enough procedures and tools to manage data. As a result of the CIMA experience with the VCS and CCB requirements, documents are well detailed. In this regard, the auditor submitted to the PP the findings in which 1 CAR and 1 CL was reported for VCS and no findings were detected for CCB. These issues raised during the verification process where appropriately closed.

Thus, once all issued detected were appropriate solved, AENOR has carried out this final verification report and deems with reasonable level of assurance that the project implementation complies with all verification requirements of the VCS+CCB Standard. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria; hence, the audit team concludes that the net GHG emissions reductions or removals 4,074,606 tonnes CO2 equivalent over the monitoring period has been quantified in accordance with VCS rules.

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## **1 INTRODUCTION**

### **1.1 Objective**

The objective of the verification audit was to conduct an independent assessment of the project to determine:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description, including the monitoring plan.
- The extent to which GHG emission reductions and removals reported in the monitoring report are materially accurate.

### **1.2 Scope and Criteria**

Verification Scope: The scope of the verification audit is to verify the emissions reductions and/or removals of the project, against the Verified Carbon Standard, the identified methodology and the validated PD throughout the monitoring period from 1 April 2012 to 31 December 2016.

The objectives of this audit included a verification of the projects calculated removals with the Verified Carbon Standard requirements and any additional requirements of VCS AFOLU projects. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the PD and the fulfilment of the Climate, community and biodiversity criteria against the CCB Standard.

Standard criteria: Criteria from the following documents were used to assess this project:

- VCS Program Guide v.3.7
- VCS Standard v.3.7
- CCB Rules v 3.1
- Second edition CCB Standard
- VCS AFOLU Requirements v.3.6
- VCS AFOLU Non-Permanence Risk Tool v.3.3

Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document. Describe the scope and criteria of the verification

### **1.3 Level of Assurance**

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement reasonably assures that the project GHG assertion is materially correct and is a fair representation of the GHG data and information.

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

#### **1.4 Summary Description of the Project**

The Cordillera Azul National Park (PNCAZ) REDD Project protects a large, intact expanse of lower-montane forest remaining in Peru. PNCAZ is the easternmost outlier of the Andes at this latitude and covers portions of seven provinces in four departments in Peru: San Martín, Ucayali, Huánuco, and Loreto. The project area is 1,351,963.85 hectares within the boundaries of PNCAZ owned by the government of Peru, by order of its designation as a national park.

The park's buffer zone was provisionally delineated by the Peruvian government in the Resolución Jefatural No 314-2001-INRENA on 13 December 2001, covering 2,061,259.79 hectares. In June of 2007, INRENA passed a resolution (Resolución Jefatural No 144-2007-INRENA) amplifying the buffer zone to more than 2.3 million hectares and making official the limits proposed in the Plan Maestro 2003-2008 (Resolución Jefatural No 245-2004-INRENA). Finally, in 2011, through the Resolución Presidencial No 064-2011-SERNANP that approved the Plan Maestro 2011–2016 (SERNANP 2012), the buffer zone limits were adjusted once more, now to 2,303,414.75 hectares.

The possibility of non-contacted indigenous people from the Cacataibo group living in the southeast region of the park led to the establishment of a "strict protection zone" in the region that permits zero outside entry.

There are no organized human communities within the project area. The one known dweller inside the park – a cattle rancher – does not have legal land tenure but has an agreement with SERNANP and CIMA allowing him to remain on his land. He violated this agreement shortly before the project began.

The total population in the districts around and including the park in 2008 was 321,000. This population has access to the park for subsistence hunting and fishing. The population in the actual buffer zone was estimated at 180,000, with the remaining population residing beyond the buffer zone. Most of the park-neighboring communities are on the west, along the Huallaga valley.

Upon its formation in 2002, Centro de Conservación, Investigación, y Manejo de Áreas Naturales– (CIMA-Cordillera Azul) voluntarily signed an agreement with the Peruvian government to support the management of the park. The agreement was renewed for one-to-two year terms until August 8, 2008 when CIMA and the Peruvian government signed a 20-year, full management contract. The 2008 management contract includes legal authorization for CIMA to use revenues from the sale of carbon credits from avoided deforestation for park activities for the 20-year term. CIMA is the only NGO with a contract with the Peruvian government for full management of the entire national park and buffer zone.

The project's primary objective is to prevent deforestation in PNCAZ by focusing on three main types of project activities:

- Protecting the park.

- Building local capacity for sustainable land use and improving the quality of life in the buffer zone communities.
- Strengthening relationships with local, regional and national government agencies.

The PP of the project is Centro de Conservación, Investigación y Manejo de Áreas Naturales-Cordillera Azul (CIMA-Cordillera Azul). Other entities involved are TerraCarbon LLC. This information is gathered in sections 2.1.3 and 2.1.4 of the monitoring report,

## 2 VERIFICATION PROCESS

### 1.5 Audit Team Composition (*Rules 4.3.1*)

Name	Position in the team
Jose Luis Fuentes Perez	Lead Verifier
Richard Gonzales	Verifier
Mercedes García Madero	Technical reviewer

Both auditors have the Spanish as mother language which is the official language in Peru where the project is located. Both auditors have experience in social and cultural issues. They have been auditing CDM projects in AENOR for more than 5 years all around the world.

Jose Luis Fuentes has participated in all VCS+CCB projects carried out by AENOR and has experience in biodiversity and ecological matters and Richard Gonzales is also qualified to validate and verify CDM/VCS projects in several sectoral scopes being expertise in climate, community and biodiversity.

Jose Luis Fuentes is Forestry engineer with an MBA and Post grade in Environment with experience in LULUCF activities in VCS, CDM and GS schemes from more than 10 years.

Richard Gonzales is also engineer specialized in Mechanical and Electrical issues with high experience in CDM for more than 7 years. Richard Gonzales has participated as verifier in previous verification events of Cordillera Azul and other VCS+CCB projects in Peru such as the REDD project in Piura and Lambayeque.

Mercedes García Madero is biologist and she has more than 10 years of experience in Sustainable development projects having worked as lead validator/verifier in CDM and other voluntary schemes. She is expert in Climate, Community and Biodiversity aspects.

### 1.6 Method and Criteria

The verification was performed through a combination of document review, interviews and communications with relevant personnel and on-site inspections. The project was assessed for

conformance to the criteria described in Section 1.2 of this report. As discussed in this report, findings were issued to ensure that the project was in full conformance to all requirements.

AENOR carried out this final verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria.

The verification has been performed through a deep desk review and on-site inspection including interviews with relevant personnel.

The verification activities in which risks were assessed were the evaluations of the monitoring system (data flow, data control procedures, etc) but mainly the quality of raw data as well as sources and the spreadsheet calculations.

AENOR reproduced and verified 100% of sheets in the VM0007 spreadsheet calculations and 100% of the data/calculations carried out in those sheets for the monitoring period 8 August 2015 – 7 August 2016 for the project area and leakage belt.

The project boundary and deforested areas in the project area and L.B for the monitoring period were 100% checked using the GIS database.

The carbon stock changes, forest classes in the project area and L.B were also 100% verified and crosschecked with validated values. For data provided for the reference region, AENOR carried out samples of at least 5% of data since they had already been previously validated and posed a lower risk to the emissions reductions achieved by the project.

AENOR decided to carry out a deep and meticulous review of the sheets due to the following reasons:

To verify the correct application of the methodology (formulae, equations..) and checked that data required to calculate the GHG removals are appropriately provided. The samplings carried out were possible since the monitoring data only included 1 year. Moreover, the AENOR verification team was familiar with the set of spreadsheet calculations since it had the previous verification events.

Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed emission reductions are free from material errors, omissions or misstatements.

In addition, AENOR confirms that sufficient evidence were presented for the reported net anthropogenic GHG emission reductions and that there is a clear audit trail that contains the evidence and records that validate the stated figure in this verification report since:

- Sufficient evidence available: The project participant has provided the 100% of data used in the calculations to achieve the final amount of GHG emission reductions reported.
- Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team and the most relevant are appropriately detailed in the appendix 1.
- Cross-checked evidence: AENOR cross-checked the collected information through an on-site inspection to the project area and reproducing calculations.

Hence, AENOR confirms that the stated figures in the monitoring report are correct and confirms that is able to certify net anthropogenic GHG removals based on verifiable and reliable evidence.

### 1.7 Document Review

The monitoring report, project description, and supporting documentation were carefully reviewed for conformance to the verification criteria and consistency with the Project Description. The audit team examined the baseline data gathered from the baseline determined for this Region, spreadsheets used to enter and compile information required by the methodology and reproduced the GHG emissions reductions calculations presented in the spreadsheet models to obtain same results than those appearing in the Monitoring report. The Non-Permanence Risks Reports for this monitoring period were assessed, as well.

Appendix 1 to this report details the list of documents provided by PP and reviewed by AENOR during the process.

### 1.8 Interviews

The list of the interviewed people is following detailed. The people interviewed were those directly affected or involved in the project activity, and in some cases were just indirectly affected.

Day	Place	Activity	Interviewed
17/10/2017	Aguaytia - CIMA Office	Initial verification meeting ✓ Presentation of the verification team ✓ Review of the plan of activities to be developed  Review and analysis of available documentation: <ul style="list-style-type: none"> <li>• Internal Procedures</li> <li>• Monitoring Report</li> <li>• Different monitored data</li> </ul> Verification of project benefits <ul style="list-style-type: none"> <li>• Records of Technical Assistance to the Communities: Yamino, Mariscal Cáceres and Santa Rosa de Aguaytia.</li> <li>• Training records for local people</li> <li>• Life Quality Plans of the communities in the project area</li> </ul>	<ul style="list-style-type: none"> <li>• Juan Flores- Coordinator CIMA- Aguaytia</li> <li>• Lily Rodriguez- President of CIMA</li> <li>• Tatiana Pequeño- Director of Institutional Development CIMA</li> </ul>
	Pucayacu – Park guard center nº 63	Performance of monitoring activities: <ul style="list-style-type: none"> <li>• Completeness of the monitoring plan</li> <li>• Established controls</li> <li>• Activities for data collection</li> </ul>	<ul style="list-style-type: none"> <li>• Consuelo Augusto Garrido – Coordinator CIMA</li> <li>• Dean Ruvina- Field</li> </ul>

		<p>Verification of project benefits</p> <ul style="list-style-type: none"> <li>• Training records on Climate change</li> <li>• Quality of life of the communities</li> <li>• Coexistence rules implemented in the communities</li> <li>✓ Identification of threats to the park and mitigation activities.</li> </ul>	<p>Technician CIMA</p> <ul style="list-style-type: none"> <li>• Jose Hilario – Support CIMA</li> <li>• Lily Rodriguez- President of CIMA</li> <li>• Tatiana Pequeño- Director of Institutional Development CIMA</li> <li>• Elimio Flores – Guard Park SERNAMP</li> <li>• Sosimo Carrion – Guard Park SERNAM</li> </ul>
18/10/2017	<p>Maronilla, Nuevo San Martin - Educational Center Los Tacarpos</p>	<p>Meeting with local authorities</p> <ul style="list-style-type: none"> <li>✓ Project benefits</li> <li>✓ Verification of activities developed by CIMA</li> <li>✓ Development of quality of life plans</li> <li>✓ Agreements between CIMA and the Community (Acuerdos Azules)</li> <li>✓ Environmental action plans: Reforestation and school forest</li> <li>✓ Environmental talks to the students of the educational center</li> </ul>	<ul style="list-style-type: none"> <li>• Feliciano Valencia – Tourism President</li> <li>• Gonzalo Padilla – Municipality Agent</li> <li>• Alfonso Cheglli – Manager of the school</li> <li>• Lily Rodriguez- President of CIMA</li> <li>• Tatiana Pequeño</li> </ul>
	<p>Maronilla, Alto Marona</p>	<p>Meeting with local authorities</p> <ul style="list-style-type: none"> <li>✓ Project benefits</li> <li>✓ Verification of activities developed by CIMA</li> <li>✓ Development of quality of life plans</li> </ul>	<ul style="list-style-type: none"> <li>• Hermogenes Verrospi. Lieutenant Governor</li> <li>• Lily Rodriguez</li> <li>• Tatiana Pequeño</li> </ul>
	<p>Nuevo Progreso – Educational</p>	<p>Meeting with local actors (stakeholders)</p> <ul style="list-style-type: none"> <li>✓ Project benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Daniel de la Cruz – President of Tornillal</li> </ul>

	Center N° 0724	<ul style="list-style-type: none"> <li>✓ Verification of activities developed by CIMA</li> <li>✓ Development of quality of life plans</li> <li>✓ Environmental management of the community</li> <li>✓ Environmental talks to the students of the educational center</li> </ul>	<p>Association</p> <ul style="list-style-type: none"> <li>• Leonilla Pedraza – Associate</li> <li>• Sabina Verrosapi - Associate</li> <li>• Lily Rodriguez- President of CIMA</li> <li>• Tatiana Pequeño-</li> </ul>
19/10/1017	Inca Roca de Cahuide – Municipality Office	<p>Meeting with local authorities</p> <ul style="list-style-type: none"> <li>✓ Project benefits</li> <li>✓ Verification of activities developed by CIMA</li> <li>✓ Development of quality of life plans</li> <li>✓ Reforestation and conservation project</li> </ul>	<ul style="list-style-type: none"> <li>• Renelmo Culquicondor – Liutenant Governor</li> <li>• Florentino Muños – Municipality Agent</li> <li>• Alipio Rivera – Municipality Treasurer</li> <li>• Elí Marin – Field technician CIMA</li> <li>• Lily Rodriguez</li> <li>• Tatiana Pequeño</li> </ul>
	Shapaja – Park guard center nº 53	<p>Performance of monitoring activities</p> <ul style="list-style-type: none"> <li>✓ Sufficiency of the monitoring plan</li> <li>✓ Established controls</li> <li>✓ Activities for data collection</li> <li>✓ Verification of project benefits</li> <li>✓ Training records on Climate change</li> <li>✓ Quality of life of the communities</li> <li>✓ Coexistence rules implemented in the communities</li> <li>✓ Identification of threats</li> </ul>	<ul style="list-style-type: none"> <li>• Roque Vasques – Major</li> <li>• Jhon Quinchuya – Guard Park CERNAMP</li> <li>• Consuelo Garrido – CIMA Coordinator</li> <li>• Lily Rodriguez</li> <li>• Tatiana Pequeño</li> </ul>

20/10/2017	Yamino Community	<p>Meeting with local authorities and actors</p> <ul style="list-style-type: none"> <li>✓ Project benefits</li> <li>✓ Verification of activities developed by CIMA</li> <li>✓ Development of quality of life plans</li> <li>✓ Environmental management of the community</li> <li>✓ Environmental projects</li> </ul>	<ul style="list-style-type: none"> <li>• Marcelo Angulo – Community Leader</li> <li>• Claudio Perez – Lieutenant Governor</li> <li>• Belnira Perez – Municipality Agent</li> <li>• Juan Flores – CIMA Coordinator</li> <li>• Lily Rodriguez</li> <li>• Tatiana Pequeño</li> </ul>
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## 1.9 Site Inspections

Site inspections were conducted from 17 October to 20 October. The objectives of the site visit were to assess the accuracy of the Monitoring Report including project implementation status, to assess conformance to the monitoring plan, to assess whether project activities are being implemented according to the project description, and to assess the quality of field data collection techniques.

## 1.10 Resolution of Findings

All findings issued by the AENOR audit team during the verification process have been closed for both VCS and CCB Standards. In accordance with Section 5.3.6 of the VCS Standard, all findings issued during the validation process, and the inputs for their closure, are described in Appendix 2 of this report.

One CAR and one CL were raised to the PPs. Both CAR 1 and CL1 were appropriately closed since corrections and clarifications were provided. CAR 1 was related to update the contents of the risk report according to information required by the template and to provide evidence to cross-check natural risks. The CL1 was requested to provide further clarifications about some monitored parameters such as AdistPA, the leakage belt and data about the forest cover map.

### 1.10.1 Forward Action Requests

No FARs were raised to the PP during the verification process.

## 1.11 Eligibility for Validation Activities

AENOR holds accreditation for validation for the relevant sectoral scope 14 under which this project activity is classified.

### 3 VALIDATION FINDINGS

#### 1.12 Participation under Other GHG Programs

The project was not validated under another GHG program; therefore there are no Gap Validation findings to report. The Project Description was subject to validation under VCS Standard and was found to conform to the VCS requirements.

#### 1.13 Methodology Deviations

In accordance with the PIR 2008-2012 (section 2.2 and appendix 1) a new classification technique used to overcome sensor errors had been done. This procedure is also justified and explained in the appendix 1 of the PIR 2014-2015. Section 2.2.1 of PIR 2014-2015 reiterates and describes the applied deviation in accordance with the VCS Standards requirements. The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals.

In addition, a methodology deviation occurred at validation stage. The project has deviated from the methodology using an allometric equation instead of a root to shoot ratio, as described in the PDD and the validation report. This deviation has no further implications beyond those described in the validation report and PD and does not negatively impact the conservativeness of the project's quantification of greenhouse gas emissions reductions and removals

#### 1.14 Project Description Deviations (*Rules 3.5.7 – 3.5.10*)

No deviations to the project description were applied

#### 1.15 Minor Changes to Project Description (*Rules 3.5.6*)

No minor changes applied to the community and biodiversity elements of the project design.

#### 1.16 Monitoring Plans (*CL3.2, CM3.3, B3.3*)

This is the fourth CCB verification. The Climate, Community and Biodiversity monitoring plans are implemented and they were correctly validated in 2013. At the present moment, they project is operating appropriately.

### 4 VERIFICATION FINDINGS

#### 1.17 Public Comments (*Rules 4.6*)

No comments were received during the public comment period..

#### 1.18 Summary of Project Benefits

Section 1 of the monitoring report provides information about the project benefits. Achievements for the current monitoring period and for the project lifetime are detailed with specific data per categories.

Data are supported with evidence and records checked during the on-site visit and desk review. The section has been completed appropriately with data from the sources provided such as GIS package, records of trainings activities, employees etc.

As specific and remarkable achievements for the current monitoring period the monitoring report in its section 1.2 states the net emission reduction of 4,074,606 tn CO<sub>2</sub>e for the monitoring period basically as a result of reducing the forest loss from 9,533.5 ha in the baseline scenario to 1.1 ha in the project scenario. Other benefits in community and biodiversity components are the number of training actions for local people and employments generated as a result of the project implementation affecting both output to disadvantaged groups such as women. The climate targets directly affect to the biodiversity due to the conservation of forests. The project activities are implemented around the 1.3 millions of hectares of the National Park where 10 species IUCN live and 120 species of importance for CITES I and II have been identified.

In opinion of AENOR, the project benefits are credible based on the supporting documents provided by PPs and evidence received during the AENOR on site visit from stakeholders interviewed, records checked and field records.

## **1.19 General**

### **1.19.1 Implementation Status (G3.4, CL1.5)**

Section 2.2 of the monitoring report provides to understand the implementation status of the project a few relevant milestones occurred during the last years in the project area related to the management and development of the project. These milestones are directly linked with the success to implement and achieve the goals established by the project in the community and biodiversity areas such as the Blue Agreements or Communal Conservation Agreements or the Quality of Life Plans, etc.

Tables in sections 1.1 and 1.2 of the monitoring report provide complete information of activities carried out and impacts of these activities for the five goals of the project. Project objectives and activities to reach them are analyzed with their outputs and outcomes for the present monitoring period.

During this verification process, AENOR has not detected project changes in regards of the project title, its purposes and objectives. As such, the project activity accurately reflects the proposed project which mainly consists of protecting the park, to improve the quality of life of population in the area and strengthen relationships with government agencies to insure the proper long term management of PNCAZ. Through interviews with key staff and evidence provided, the auditor's team ratified the main objectives of the project activity.

AENOR checked the monitoring plans contained in the project documents and supporting documents and compared it with the monitoring report to verify whether there was any difference that would cause an increase in estimates of the GHG emission reductions in the current monitoring period or that would prevent the implementation of any project activity to achieve the goals for the community and biodiversity. AENOR has confirmed that there are no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology. The project implementation is in accordance with the project description, there's no discrepancies.

Also, as required by the monitoring plan, the applicable methodology and the VCS and CCB requirements the project proponent effectively monitors the required parameters to determine the project's removals by sinks and emissions by sources and parameters for biodiversity and community monitoring, hence, AENOR deems monitoring plan is complete and suitability.

The parameters reported, including source, frequency and review criteria as indicated in the monitoring plan were verified to be correct and in line with the validated monitoring plan. Necessary management system procedures including responsibility and authority of monitoring activities have been verified to be consistent with the PD. Knowledge of personnel associated with the project activity was also found to be satisfactory. For this monitoring period there are no remaining issues from the previous verification.

The project has not participated nor been rejected under any other GHG programs. GHG emission reductions or removals generated by the project are not included in an emission trading program or any other mechanism that includes GHG allowance trading. The project has not received or sought any other form of environmental credit.

The sustainable development contributions of the project are intrinsically related to the design of the project. As states the monitoring report in its section 2.1.10 the project was designed to create positive impacts on reducing emissions but also to enhance and maintain the ecosystems services and livelihood of local communities and to take part of the country reduction efforts.

Regarding methodology deviations to highlight that the project implantation report "PIR 2008-2012" in its section 2.2 and appendix 1 mentioned a new classification technique used to overcome sensor errors. This procedure was also justified and explained in the appendix 1 of the PIR 2014-2015. Section 2.2.1 of PIR 2014-2015 reiterates and describes the applied deviation in accordance with the VCS Standards requirements. The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals.

In addition, a methodology deviation occurred at validation stage. The project deviated from the methodology using an allometric equation instead of a root to shoot ratio, as described in the PDD and the validation report. This deviation has no further implications beyond those described in the validation report and PD and does not negatively impact the conservativeness of the project's quantification of greenhouse gas emissions reductions and removals.

On the other hand, no minor changes or project deviations were applied.

Hence, after a complete review of the different documents provided and the on-site visit, AENOR is able to confirm that the project implementation is in accordance with the project description contained in the PD. There are not material discrepancies between project implementation and the project description.

### **1.19.2 Risks to the Project (G3.5)**

Section 2.2.5 of the monitoring report addresses the natural and human induced risks and how the project considered several initiatives to diminish these risks to the project benefits.

Related natural risks the Climate Change is identified as the more relevant factor. The project establishes a mitigation strategy based on a study carried out to detect potential impacts due to the climate change

such as the conversion of some tropical humid forests to dry forest inside the PNCAZ or a reduce of the number of living areas in the region.

The first mitigation activity is to conserve the project area as forest but working with the same goal in the buffer zone. To achieve this, the project is focused in sensitization processes with communities and planning the land changes to search the sustainability.

Related to the human induced risks, the most important ones detected were the natural resource concessions, the lack of land tenure and illegal activities in the buffer zone and conflicts between communities in the region.

For those risks, CIMA has established different mitigation activities such as monitoring the concessions, increase the patrolling with people from communities, increase the training sessions with communities about land tenure or sustainability practices or strengthening the communication between institutions and communities and to assemble a strong procedure to receive priorities from communities, to attend them on time and to resolve conflicts.

AENOR deems that CIMA identified correctly the risks to the project benefits but the most important is that created and it is implementing actions to reduce or diminish the negative impacts of these risks in the benefits on the Climate, community and biodiversity.

#### **1.19.3 Enhancement of High Conservation Values (G3.6)**

This project will result in the long-term protection of Cordillera Azul National Park. Given the vast size of the park, protection activities inside the park, and land-use stabilization efforts in the buffer zone, no change in the abundance and diversity of the rich biota inside the park is expected to occur due to the project, thus maintaining the high conservation values associated with biodiversity. Also, high conservation values for the project relating to the communities will be protected. Project activities will ensure the continuation of the ecosystem services provided to the communities by the project area, allow communities to meet their basic needs in a sustainable manner and allow for the project area to continue providing the ecosystem services needed for communities to retain their traditional cultural identities.

In opinion of the AENOR the project has implemented enough measures to maintain the HCVs in the project area and the results of the deforested areas during the monitoring period confirm the success of the strategies proposed. These measures are planned with reasonableness to be consistent with the precautionary principles.

#### **1.19.4 Benefit Permanence (G3.7)**

Related to the precautionary principles and searching the viability of implemented activities on long terms, CIMA and the government have agreed that a portion of the revenue obtained from the sale of carbon credits will be used to establish an endowment for the park's protection as outlined in one of the activities for achieving the goal 3. This endowment will fund CIMA's or any other future management contract holder's park protection activities on long terms.

### **1.19.5 Stakeholder Engagement (G3.8 – G3.9)**

The stakeholder involvement in project design as well as the stakeholder communication system is described in the PDD. During the site visit the audit team was able to verify the stakeholder's involvement through the different interviews and meetings conducted and through records of different meetings and workshops. Community members demonstrated awareness and consent of the project's activities. In opinion of AENOR, the communication and consultation plan is being implemented as described in the project design document.

Customized letters were submitted to local authorities using the communal assemblies and to regional authorities, as well as indigenous grassroots organizations and SERNANP in order to publicize the CCBA public comment period for present verification. AENOR saw during the assistance to the community areas, educational centers and other facilities that project communications and other issues related to the project were in the bulletin boards. Anyway, as commented by PPs, considering the specific characteristics of the local stakeholders, the communal assemblies and meetings of these events are the main evidence to check this matter along with the testimonial evidence gathered during site visit.

On the other hand, CIMA has available a website to publicize news about the project. This website is used by CIMA to inform to stakeholders about milestones of the project such as the verification events. This was checked during the site visit to Aguaytia CIMA offices.

The PNCAZ REDD Project was kept on the web for at least one month, as required by the CCB, waiting for public comments. In this period, no comments were received as commented in other sections of this report, neither by technical institutions, academics, or institutions involved with human / community rights. CIMA has high field experience as members of several inter-institutional working groups and based on that experience they know that it is difficult to get comments on documents (not only posted on the web, but even delivered / sent directly), hence, that its work input with local population (training, decision making, news, coordination, awareness, etc.) at the community level, are given in the space of community assemblies, as the main space for citizen participation. This was checked by AENOR during the meetings with stakeholders and interviews with them.

In the case of the native communities and local population in the ZA of PNCAZ and according to comments from PPs, it would be a lack of courtesy (disrespect for their culture) to inform the population and local authorities (either from CIMA website or by letters) that they are expected to make public comments on the standard website, with documents based on English guides; being in addition that none of these populations counts on service of Internet, and a very low percentage counts on telephony and electrical light.

Another issue to be taken into account is that the technical details of the PNCAZ REDD Project are very complex, so it is very difficult to explain beyond the basic principles of Climate Change, generalities of REDD and details of the program at the local level (main components of work in the ZA ), making it as simple as possible. The technical details are very difficult to explain at a level of everyday language, especially in the case of the Shipibo communities (where CIMA has a technician of that ethnic origin) since many words of the PDD and the PIR do not have translation to this language, even when people understand very well the relationship between the forest, the climate and other benefits that must be maintained.

### **1.19.6 Stakeholder Grievance Redress Procedure (G3.10)**

This indicator was addressed in the validated PDD. During the on-site visit, according to the information provided by the communities, the audit team was able to verify the project proponent maintains constant dialogue with the communities located in the buffer zone and clear channels for identifying and handling any potential conflicts and grievances. This indicator has not changed regarding the before verification. The grievance redress procedure is implemented as PDD states.

### **1.19.7 Worker Relations (G4.3 – G4.6)**

Project Proponent reiterates that the plan to provide orientation and training for the project's employees and relevant people from the communities included in the PDD is still valid in this monitoring period.

Several activities were developed in this period and evidence was provided to the audit team. In interviews with technicians the audit team verified that they receive ongoing training, some of them are engaged in specific courses. Similarly park rangers participate in joint training events with the staff of CIMA. The project is implementing the FOCAL model, which is designed for intervention in neighboring local populations to a conservation area in order to contribute to improving the environmental management capacity of citizens to ensure the conservation of resources and improve their living conditions.

During the present monitoring period to training courses were carried out as the monitoring report states in bullet 2.4.2. Evidence were provided. Likewise, equal opportunities are provided for local communities as they received training programs to be ready for working. The monitoring report provided stats about employment generated thanks to the project with people from local communities. They evidence the implementation of activities for improving options to them.

Bullet 2.4.4 of the monitoring report states the main laws and regulations related to worker's right. AENOR did not detect incompliances with them checking the documents provided and interviewing to the workers. They have been informed about risks of the works and they received training about safety matters. Then, the project fulfils with CCB requirements related to worker relations.

### **1.19.8 Technical and Management Capacity (G4.2, G4.7)**

The monitoring report states in its section 2.4 skills and capacities of the key personnel for implementing and monitoring the project. These people have been maintained. AENOR has worked with them in the previous verification events. Then, they have the suitable and appropriate technical and management capacity to develop the project. Curriculas were provided but the most important is the knowledge

evidenced during the verification event by CIMA team about the VCS and CCB requirements and how implement the project activities.

On the other hand, the project has a suitable financial health to implement the project as the activities implemented year by year demonstrate. CIMA's financial plan since 2010 - as part of the Master Plan 2011-2016 included different strategies to achieve financial sustainability and ensure sufficient funds for the management of the PNCAZ; although the master plan has already been updated, this document was in force in the 2015 - 2016 verification period. The financial plan has been used successfully to manage the project and reach objectives.

In November 2014, CIMA signed an agreement with Althelia Climate Fund (ACF) that ensures funding based on the guarantee of the carbon credits generated by PNCAZ's REDD project. Table 2 of the monitoring report lists CIMA's funding sources for the period 2012-2016, all of which have contributed to finance the PNCAZ REDD project management prior to the sale of carbon credits. A financial package was provided to AENOR to check information provided in the monitoring report but also CIMA keeps internal measures to control the financial health such as internal audits or others.

In opinion of AENOR, CIMA keeps the capacity to implement the project in accordance with the validated project design.

#### **1.19.9 Legal Status (G5.1)**

In the PDD was listed all the relevant national and local laws and regulations. In addition, the monitoring report detailed updated information regarding new laws and regulation. They are detailed in bullet 2.5.1. Evidence of its fulfilment is considered complete. AENOR did not detect during the onsite visit or desk review incompliances related to laws and regulations.

#### **1.19.10 Rights Protection and Free, Prior and Informed Consent (G5.3-G5.5)**

This indicator was discussed in the PDD and has not changed since the before verification event. This is the third verification carried out by AENOR for this project activity. The project area is a national park owned by the Peruvian government. There is no private property within the park.

There are no human residents in the project area except for the possibility that an uncontacted group of Kakataibo resides in the south-eastern area of the Park. For this reason, this section of the park was declared as intangible zone that permits no entry or use by anyone other than the Kakataibo in voluntary isolation. Any attempts to locate these people in voluntary isolation, or to ask them for permission to develop a REDD project, would directly violate their right to remain uncontacted under Peruvian laws and the international agreements signed by Peru. In this context, CIMA and SERNANP (parkguards) activities in this region are designed specifically to allow the uncontacted peoples to conduct their lives as they wish, with zero interference from outsiders. AENOR interviewed during these three verifications with people of CIMA and SERNANP to confirm this situation.

On August 9, 2017, the Kakataibo people in isolation obtained their recognition of existence (Supreme Decree No 0 -2017-MC). Now, requires the second stage of categorization, which will end in the delimitation of the perimeter and area of the indigenous reserve. Indigenous reserves acquire such status by supreme decree, based on an Additional Categorization Study (EAC).

According to information provided in the monitoring report and gathered from authorities and CIMA AENOR can confirm that the project protects the rights of Indigenous Peoples, communities and other stakeholders in accordance to the Climate, Community & Biodiversity Standards and the validated project design.

#### **1.19.11 Identification of Illegal Activities (G5.5)**

The illegal activities that could affect the project's climate, community or biodiversity benefits were correctly identified in the validated PDD.

Illegal activities in the buffer zone may include logging, hunting, and mining, which place additional deforestation pressure on the park by increasing deforestation in the buffer zone and pushing immigrants closer to and eventually into the park. Threats to the park may result from illegal operations in the concessions located in the buffer zone, resulting in deforestation or contamination within the park and displacement of immigrants who move closer to or into the park, increasing pressure in the area. Furthermore, CIMA has detailed how the project activities help to reduce these activities. As mitigation strategy the following activities are in place: build relationships and work closely with local, regional, and national government entities to monitor concession activities; raising awareness of laws and regulations in the communities to enable communities members also to monitor and report illegal activities to the proper authorities; training local communities in sustainable land-use practices; facilitation of land-tenure processes; ensuring constant communication with as many communities as possible; and to strengthen and improve the quality of life in the communities. Site visit observations and interview with participants further confirms that project benefits are not derived from illegal activities.

According to information provided during the site visit and also detailed in bullet 2.5.4 of the monitoring report one illegal cattle ranch is within the project area. When the project began in 2008, only one area inside the park continued to be incompatible with conservation: an estimated 220 ha cattle ranch on the southwest corner of the park that had not been detected when the park was established. Once it was detected, the cattle rancher was asked to leave the park since he did not own the land. In his response, the rancher offered not to expand his operations and to help keep watch for illegal uses of land within the park since he was there prior to its establishment. SERNANP and CIMA agreed to this and allowed the rancher to remain under these terms. Just prior to the start of the project, monitoring demonstrated that the cattle rancher had expanded his operations in violation of his agreement. This resulted in legal proceedings that are ongoing.

### **1.20 Climate**

#### **1.20.1 Accuracy of GHG Emission Reduction and Removal Calculations**

All calculations of greenhouse gas emission reductions and removals were checked by the verifier. No errors were discovered that materially affect the stated greenhouse gas emission reductions and removals of the project. The methods used to estimate greenhouse gas benefits of the project were consistent with the methodology and the validated project document.

#### **4.2.1 Baseline Scenario Emissions.**

Section 3.2.1 of the Monitoring Report and the calculation spreadsheet submitted to AENOR provide information related to the baseline emissions calculations.

AENOR has checked the calculations provided and confirmed that this amount of baseline emissions are in conformance and have followed the methodology in the validated P.D.

Net baseline emissions for the project area and the present monitoring period 2016 account as follows as PD details: 4,075,362.8 t CO<sub>2</sub>-e.

#### 4.2.2 Calculation of Project Emissions.

Calculation of emissions from project activities has been determined following identified methodology and validated PDD. The deforestation in the project area was defined in accordance with the module M-MON and through the application of image interpretation done using geographical information systems. The proponent submitted calculations of emissions in the project scenario (ex-post).

In accordance with the module M-MON, for the project area the net greenhouse gas emissions in the project case is equal to the sum of stock changes due to deforestation and degradation plus the total greenhouse gas emissions minus any eligible forest carbon stock enhancement:

$$\Delta C_p = \sum (\Delta C_p, \text{DefPA}, i, t + \Delta C_p, \text{Deg}, i, t + \Delta C_p, \text{DistPA}, i, t + \text{GHGP-E}, i, t - \Delta C_p, \text{Enh}, i, t)$$

Where:

$\Delta C_p$	Net greenhouse gas emissions within the project area under the project scenario; t CO <sub>2</sub> -e	The proponent has provided the spreadsheet. It is completely traceable and contained all the relevant formula in accordance with the methodology and applied modules.
$\Delta C_p, \text{DefPA}, i, t$	Net carbon stock change as a result of deforestation in the project area in the project case in stratum <i>i</i> at time <i>t</i> ; t CO <sub>2</sub> -e	<p>The proponent has provided the spreadsheet. This contained the deforestation areas per stratum for the monitoring period.</p> <p>Alluvial Forests 0 Ha</p> <p>Hill Forests 0,4 Ha</p> <p>Mountain Forests 0,6 Ha</p> <p>Wetlands 0 Ha</p> <p>Total all classes 1,1 Ha</p> <p>Landslides have occurred in the project area and have been delineated in the image classification from other deforestation. This determination was based on distinguishing deforestation</p>

		<p>that occurred on very steep slopes in areas of known susceptibility to landslides based on previous landslide events and expert knowledge. PP provided GIS package along with calculations to check the results.</p>
<p><math>\Delta C_p</math>, Deg, i, t</p>	<p>Net carbon stock change as a result of degradation in the project area in the project case in stratum i at time t; t CO<sub>2</sub>-e</p>	<p>Degradation has been considered zero for the present monitoring period although two minor incidents were detected representing 0.55 ha but resolved by the park guards.</p> <p>This value is the result from data gathered by PP from the survey carried out by CIMA during 2015-2016 in communities in the buffer zone of PNCAZ. This survey was used to determine the degradation occurring in the project area as a result of illegal logging of fuel wood and lumber for construction. This information is supported by reports from the PNCAZ park guards during the monitoring period in their patrolling activities.</p> <p>The methodology module M-MON requires that “If 10% of those interviewed or surveyed believe that degradation may be occurring within the project boundary then the limited on-the ground degradation survey shall be triggered.” Likewise, the depth of penetration of degradation pressure shall be evaluated by the PRA.</p> <p>Among respondents giving information on the maximum distance travelled to collect wood, the average maximum distance stated was 1.2 km for fuel wood (min: 0 km, max: 8 km) and 2.9 km for lumber (min: 0.1 km, max: 10 km). There are only 20 communities located within 2 km of the project area (Figure 12), thus the potential for degradation from fuel wood and lumber</p>

		<p>collection is small. Further, many respondents to the degradation surveys noted the lack of a local commercial market for fuel wood or timber.</p> <p>Therefore, AENOR deems reasonable the followed approach and final consideration for degradation.</p>
$\Delta C_p, DistPA, i, t$	<p>Net carbon stock change as a result of natural disturbance in the project area in the project case in stratum <math>i</math> at time <math>t</math>, t CO<sub>2</sub>e.</p>	<p>PP used the module M-MON. Taking into account the module, “for unplanned deforestation the sum of <math>\Delta DistPA, q, i, t</math> shall be equal to the area of overlap between the delineated area of the disturbance and the summed area of unplanned deforestation in the project area (<math>ABSL, PA, unplanned, t</math>), summed to the year in which the disturbance occurred.”</p> <p>Thus, PP only accounted for emissions from natural disturbance that took place in the area of projected deforestation in the baseline. The overlapping area accounts for 0.4 ha over the whole monitoring period and they are located in the Hill forest strata.</p> <p>The GIS package was provided to AENOR in order to check the value applied to this parameter as well as spreadsheet calculation.</p>
$GHGP-E, i, t$	<p>Greenhouse gas emissions as a result of deforestation and degradation activities within the project area in the project case in stratum <math>i</math> in year <math>t</math>, t CO<sub>2</sub>-e</p>	<p>The assigned value to the parameter Aburn is zero for the present monitoring period. This value is based on reports from park guards. According to these reports for 2015-2016, no fires scars were detected. Nevertheless, the PP used another source to monitor the fires. This is the Firecast, a MODIS-based fire monitoring system developed by Conservation International, NASA and ESRI, with</p>

		highly precise detection of fires >50m2. According to information from this system for the monitoring period no fires were detected.  Thus, it is reasonable to think likely no slash and burn took place.
$\Delta CP, Enh, i, t$	Net carbon stock change as a result of forest growth and sequestration during the project in areas projected to be deforested in the baseline in stratum $i$ at time $t$ ; t CO2-e.	This parameter has been considered as zero in accordance with the PD and in a conservative manner.

Hence, the net project emissions with the project area result as follows in tn CO2-e.

	$\Delta CP, DefPA, i, t$	$\Delta CP, Deg, i, t$	$\Delta CP, DistPA, i, t$	GHGP-E, i, t	$\Delta CP, Enh, i, t$	$\Delta CP$
Total 2016	588.5	0	168.0	0	0	756.5

Calculation of emissions from project activities has been determined following monitoring plan in the methodology and validated PDD. The deforestation in the project area was defined in accordance with the methodology.

Regarding monitoring changes in carbon stocks, the average carbon stock estimates for LU/LC classes do not change during the period established of the baseline and therefore monitoring of carbon stocks is not necessary for this monitoring period. This is in compliance with the methodology.

#### 4.2.3 Calculation of Leakage

Leakage monitored in the project case is related to activity shifting of local and immigrant agents. Activity shifting from local agents (in the leakage belt) was tracked by monitoring deforestation and stock changes in the leakage belt for the monitoring period.

PP provided the GIS package generated for the monitoring period to cross-check data in monitoring report, as well as calculations.

For the present monitoring period, the deforested area in the leakage belt ( $A_{DefLB, u, i, t}$ ) resulted to be 14,200.7 ha. Taking into account this deforested area, the net emissions in the L.B in the project case are calculated as the difference between stocks before and after deforestation. Net emissions results for the period  $\Delta CP, DefLB, i, t$  (tCO2)= 6,227,947.4 t CO2.

The next step is to calculate the Net CO2 emissions due to unplanned deforestation displaced from the project area to the leakage belt ( $\Delta CLK-ASU-LB$ ) as  $\Delta CLK-ASU-LB = \Delta CP, LB - \Delta CBSL, LK, unplanned$ .

$\Delta CBSL, LK, unplanned$  for the present monitoring period accounts 18,451,176.86 t CO2, thus:

$$\Delta CLK-ASU-LB = 6,227,947.4 \text{ t CO}_2 - 18,451,176.86 \text{ t CO}_2 = -12,223,229.49 \text{ t CO}_2.$$

According to the LK-ASU module, If  $\Delta\text{CLK-ASU-LB}$  is  $<0$  then  $\Delta\text{CLK-ASU-LB}$  shall be set equal to 0 (to prevent positive leakage).

On the other hand, the PP has to calculate the activity shifting leakage outside the leakage belt considering the above module. For ex-post purposes as it is case, PP has to calculate the area deforested by immigrants outside the leakage belt and project area:  $\text{ALK-OLB},t = \text{ALK-IMM},t - \text{ALK-ACT-IMM},t$ .

This is done by monitoring the deforestation both in the project area ( $A_{\text{DefPA},i,t}$ ) and leakage belt ( $A_{\text{DefLB},i,t}$ ) in the project scenario and carrying out community surveys to update information on the proportion of recent immigrants in the population within the proximity of the project area bounds to calculate the parameter (PROPIMM) defined as “the proportion of area deforested by population that has migrated into the area in the last 5 years”. Results from the survey allow calculating  $\text{PROPIMM} = 19.7\%$ .

Year	$\text{PROPIMM}$	$A_{\text{BSL},PA,\text{unplanned},t}$ (ha)	$A_{\text{LK-IMM},t}$ (ha)	$A_{\text{DefPA},i,t}$ (ha)	$A_{\text{DefLB},i,t}$ (ha)	$A_{\text{LK-ACT-IMM},t}$ (ha)	$A_{\text{LK-OLB},t}$ (ha)	$\Delta\text{CLK-ASU,OLB}$ (tn CO2)	$\Delta\text{CLK-ASU,OLB}$ (tn CO2)
2016	19.70%	9,533.5	1,878.1	1.1	14,200.7	2,797.8	-919.7	1.049	0

As stated in module LK-ASU if parameter  $\text{ALK-OLB},t < 0$  then leakage outside the Leakage Belt has not occurred. If leakage outside the Leakage Belt has not occurred, then Net CO2 emissions due to unplanned deforestation displaced outside the leakage belt (t CO2e):  $\Delta\text{C}_{\text{LK-ASU,OLB}}=0$ .

#### 4.2.4 Calculation of emissions reductions or avoided emissions due to the project

Calculation of emission reductions has been provided. Audit team has found the calculation traceable and in accordance with the applied methodology.

The net GHG emissions reductions or removals were as follows:

Years	Estimated baseline emissions or removals (t CO2)	Estimated project emissions or removals (t CO2)	Estimated Leakage emissions (t CO2)	Risk buffer (%)	Deductions for AFOLU pooled buffer account	Estimated net GHG emissions reductions or removals (t CO2)
Total 2016	4,075,363	756	0	10%	407,461	4,074,606

As required by the applied methodology, the X-UNC Module has been applied. The allowable uncertainty under this methodology is +/- 15% of  $\text{CREDD},t$  at the 95% confidence level. Where this precision level is met then no deduction should result for uncertainty. Where uncertainty exceeds 15% of  $\text{CREDD},t$  at the 95% confidence level then the deduction shall be equal to the amount that the uncertainty exceeds the allowable level.

For the present monitoring period, the uncertainty was determined to be 12% of CREDD,t, then, does not exceed 15% and then no deduction were applied.

AENOR reproduced the calculations to achieve the same results and deems they are depicted clearly and correctly in the provided sheets. The AENOR verification team was able to trace calculations directly from the data sources of inventory's field measurements. Formulae used are in compliance with monitoring plan, P.D and methodology like the default values used to determine the parameters, they are appropriate. Thus, the net amount of VCUs to be issued is accurate and realistic.

In order to calculate the above terms, the monitoring report details the data and parameters used during the verification process in section 3. Data and parameters available at validation were:  $\Delta$ CBSL,PA,unplanned;  $\Delta$ CBSL,LK,unplanned; COLB; CLB;CF; D:RAD; fj(X,Y); R; DDWdc; Regional Forest Cover / Non-Forest Cover Benchmark Map; Project Forest Cover Benchmark Map; Leakage Belt Forest Cover Benchmark Map; COMFi; Ggi.

AENOR verified for the above parameters available at validation the values reported or the references to the documents where they are used or explained by reviewing, reproducing and crosschecking the evidence provided by PP. AENOR checked the values of these parameters to be appropriate and correctly used in equations

On the other hand, the data and parameters monitored to calculate the VCUs to be issued were:  $\Delta$ CP,Def,i,t;  $\Delta$ CP,DefLB,i,t;  $\Delta$ CP,DistPA,i,t; ADefPA,u,i,t; ADefLB,u,i,t; ADistPA,q,i,t; CBSL,i; CP,post,u,i; CP,Dist,q,i; ADegW,i,t; CDegW,i,t; APi;  $\Delta$ CP,DegW,i,t; PROPimm; MANFOR; PROTFOR; TOTFOR; PROPres; N;DBH; Dian,i,t; BDia; TDsdw; Hsdw; Project Forest Cover Monitoring Map; Leakage Belt Forest Cover Monitoring Map; Aburn,i,t.. AENOR checked that the list of parameters to be monitored was complete and consistent with information in the monitoring plan of the P.D.

Regarding the accuracy of spreadsheet, formulae, conversions and aggregations and consistent use of data and parameters, CIMA elaborated a complete procedure to assure the accuracy and appropriateness of data. During the verification process, AENOR not only verified the spreadsheet calculation, data and parameters but also the AENOR team could verify that CIMA conducted a rigorous QC/QA procedure of its field measurements and an assessment of uncertainty. Thus, AENOR deems CIMA performed good practices in this assessment and concludes that GHG removals were quantified correctly in accordance with the project description and applied methodology.

In order to calculate the above terms, the monitoring report details the data and parameters used during the verification process. For each of them, AENOR checked its accuracy, consistency and reliability by reproducing the spreadsheets calculations, verifying the correctness of formulae and methods used and crosschecking the data values with sources (Appendix 1).

AENOR carried out a deep review of the monitoring report and the calculations.

AENOR verified the consistency and accuracy of each parameter detailed in its section 3 by crosschecking the information in the M.R with the information in PDD as well as checking values and reproducing the calculations in the spreadsheets calculation package (see appendix 1) and did not find inconsistencies between them after the closing of CARs and CLs requested. Therefore, AENOR deems that values reported for the parameters are accuracy and consistent.

Moreover, AENOR also verified a complete GIS package provided to cross check the information with data values used in calculations and monitoring report. Other default values used are from sources well accredited and validated at validation stage.

For all these parameters reported in the monitoring report, AENOR cross-checked with the revised PDD and the spreadsheet calculations that values/calculations/methods match and are free of mistakes and errors.

AENOR did not find inconsistencies between the revised PDD, technical annex, monitoring report and spreadsheet calculation.

In order to verify the accuracy and consistency of parameters monitored and used to calculate the removals achieved for the monitoring period, the AENOR verification team reproduced the calculations checking the correctness of the formulae applied and assumptions used, when applicable and that values used matched with data sources.

After a deep and thorough review and reproduction of calculations and the corresponding tracks to the other spreadsheets, AENOR deems the parameters monitored and available at validation are correct, reliable and consistent. Information in the monitoring report is in compliance with the revised PDD, the calculations provided and the applicable methodology. Then, the results showed in the monitoring report are reliable, consistency and accuracy.

AENOR checked that the list of parameters to be monitored was complete and consistent with information in the monitoring plan of the P.D.

By crosschecking samples of original data sources from PP and taken by AENOR from the on site visit with data in the spreadsheet calculation and other supporting documents such as the GIS package , AENOR verified the consistent between data and did not detect manual transposition errors between data sets.

### **1.20.2 Quality of Evidence to Determine GHG Emission Reductions and Removals**

The data and parameters used to determine greenhouse gas emission reductions and removals are listed in section 3 of the monitoring report.

In accordance with the validated PD and applied methodology, carbon stocks/ha in the different strata are considered fixed, thus the proponent did not carry out new forest inventory during the monitoring period. On the other hand, PP has implemented standard operative procedures to monitoring degradation, deforestation, fires and to information storage.

PP was responsible for analyzing the existence of forest and non-forest in the project area and leakage belt during project verification. They used a GIS information package. Section 3 of the monitoring report describes the steps followed to analyze the information. This information is deeper treated in the appendix 2 of the monitoring report.

AENOR has verified that CIMA monitoring crews implemented the monitoring plan as it is established in the validated P.D. AENOR also found evidence during the on site visit that key workers are fully involved

in monitoring events (training, measuring, archiving, reporting, quality control, etc). QA/QC procedures are considered strict at identifying, reviewing, and handling inconsistencies found. These procedures were developed by PP for maintaining consistency and quality of data over time.

In this regard, AENOR paid close attention to the knowledge of field teams about procedures for measuring, the frequency of measurements and the quality of metering equipment including maintenance/calibration requirements, if applicable. In general, the measuring instruments used in the forest inventories are checked according to protocols based on standard forest management and operating procedures for inventories. Due to the measuring instruments are elementary, they are replaced by new ones (diameter tapes, metric tapes, calipers, GPS..) when they do not work appropriately.

Roles and responsibilities along with data management and archival system are also detailed in the monitoring report. AENOR confirms this is the common practice in forest inventories carried out for forestry projects.

Interviews with project proponents and inspection of data and results demonstrated that the project proponents possess all of the competencies required for reporting of GHG emissions reductions in an accurate way.

Data presented to the audit team was clear and coherent and processing steps could be traced to the corresponding sections of the methodology and monitoring plan with transparency.

The monitoring plan provides means for internal data review and quality control, and the data presented by the project proponent included the results of these internal assessments. AENOR considers that information provided is sufficient and the quality of that information is appropriate to determine the GHG removals.

The appendix 3 of the monitoring report lists some references used by CIMA to support approaches, assumptions etc. They are well documented and they are by recognized sources and they were used in the before verification periods. Likewise, the spreadsheet calculation and the GIS package were developed in the same way that previous monitoring period, then AENOR deems they are reliable and appropriate. AENOR deems that evidence are enough to reproduce calculations in quantity and quality.

### 1.20.3 Non-Permanence Risk Analysis

PP has elaborated the project VCS Non permanence Risk Report version 01, dated on 15 November 2016, for the monitoring event according to the latest AFOLU Non Permanence Risk Tool.

Below, it is explained the assessment of the non-permanence risk rating determined by the project participant and issues raised to them in the assessment.

Risk factor	Risk Rating	Findings and mitigation activities	Corrective Actions/Clarifications
Internal Risks			

<p>Project Management: It is assessed using table 1 of the VCS AFOLU Risk Tool.</p>	<p>-2 (total may be less than zero)</p>	<p>a) This criteria is not applicable since this is not a reforestation or forestation project. Risk rating=0 is justified.</p> <p>b) There are agents and drivers of deforestation such as immigration, advancing agricultural frontier, development of new roads, logging, oil, etc that threaten the entire project area. PP has given the maximum risk, 2, to this factor, then, correct.</p> <p>c) In accordance with the evidence provided, CIMA management team includes individuals with significant experience in sustainable forest management and community management. Risk rating=0 is justified.</p> <p>d) CIMA's headquarters in Lima oversees the activities of all field offices and coordinates directly with the relevant offices of the national government. Decentralizing activities into the field offices allows CIMA to hire individuals from the different regions that surround the project area, promoting greater knowledge of, and better, interactions with, local and regional communities and governments. Decentralization also allows CIMA to tailor programs and communications to the needs of the communities and reduce travel times. Risk rating=0 is justified.</p> <p>e) In accordance with the evidence provided, CIMA management team includes individuals with significant experience in AFOLU projects design and implementation, carbon accounting and reporting Then, it is well justified the rating=-2.</p> <p>f) Adaptive management plan is developed. CIMA has developed a monitoring system based in different tools that allow them to react to new circumstances and learn and correct situations to improve the system.</p>	<p>No corrective actions or clarifications were requested.</p>
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		Risk rating=-2 is justified.	
Financial viability: It is assessed using table 2 of the VCS AFOLU Risk Tool.	0(total may not be less than zero)	<p>a)-d) The project proponent provided the investment analysis of the project that shows that the breakeven point is reached in less than 4 years. Thus, the rating chosen=0 is correct.</p> <p>e)- h) Project has secured more than 80% of the funding needed as evidence provided demonstrate.  Thus, the rating chosen=0 is correct.</p> <p>i) There are not callable financial resources at least 50% of total cash out before project reaches breakeven The rating assigned (0) is correct.</p>	No corrective actions or clarifications were requested.
Opportunity Cost: It is assessed using table 3 of the VCS AFOLU Risk Tool.	-2(total may be less than zero)	<p>a)-f) As explained in the baseline determination, activities are subsistence practices. Then, rating chosen =0 is correct.</p> <p>g) CIMA which is the PP and a non-profit organization. Then, rating chosen =-2 is correct.</p> <p>h) CIMA's management contract is a binding legal agreement for a 20 year period which covers the length of the crediting period. Contract was provided to AENOR. Then,rating=0 is conservative.</p> <p>i) No 100 year legally binding commitment has been demonstrated. Then, rating chosen = 0 is correct.</p>	No corrective actions or clarifications were requested.
Project Longevity: It is assessed using table 4 of the VCS AFOLU Risk Tool.	0(total may not be less than zero)	a)-b) The project lifetime is likely greater than 60 years because the project area is a legally recognized as a national park and the government has shown a commitment to ensuring it continues to be privately managed and protected. Then option b) is eligible. CIMA has been able to renew its	No corrective actions or clarifications were requested.

		<p>management contract each renewal period to date since 2002 as described in PD Section 1.11. CIMA expects to be able to renew its contract when the current one expires. Both CIMA and the government have agreed that a portion of the revenue obtained from the sale of carbon credits will be used to establish an endowment for the park's protection. This endowment will fund CIMA's or any other future management contract holder's park protection activities and will also ensure the longevity of the park protection activities.</p> <p>While the project longevity is likely much greater than 60 years, this represents two renewals of the contract which is quite conservative. Then rating=0 is correct.</p>	
<p>Total internal risk=0 (total may not be less than zero)</p>			
<p>External Risks</p>			
<p>Land Tenure and resources access/impact: It shall be assessed using table 6 of the Risk Tool.</p>	<p>3(total may not be less than zero)</p>	<p>a)-b) The government of Peru owns the land in the project area and has signed a 20 year management contract with CIMA. Then, rating chosen = 2 is correct.</p> <p>c)-d) There are disputes over land tenure or ownership but they depict less than 1% of the project area. Then, rating chosen = 5 is correct.</p> <p>e) Not applicable. Then, rating chosen =0 is correct.</p> <p>f) Management practices will be kept during the crediting period. Then rating=-2 is correct.</p> <p>g) For the existed dispute in the project area, both CIMA and SERNANP have carried out the initiative to communicate with affected ranch in order to resolve the dispute. The rancher offered not to expand his operations and to help keep watch for illegal uses of land within the park since he was there prior to its establishment. This solution was accepted by</p>	<p>No Corrective Actions or Clarifications were requested.</p>

		CIMA and SERNANP. Then rating =-2 is correct.	
Community engagement: It shall be assessed using table 7 of the Risk Tool.	-5 (total may be less than zero)	<p>a) There are no legal households living within the project area reliant on the project area so this criterion is not applicable. Thus, rating =0 is correct.</p> <p>b) More than 20 percent of the households living within 20km of the project boundary outside the project area who are reliant on the project area have been consulted to determine what project activities will be most beneficial and how the project impacts them. Thus, rating =0 is correct.</p> <p>c) Mitigation: The project generates net positive impacts on the social and economic well-being of the local communities who derive livelihoods from the project area. Then the rating=- 5 is correct.</p>	No Corrective Actions or Clarifications were requested
Political Risks: It shall be assessed using table 8 of the Risk Tool.	0(total may not be less than zero)	<p>a)-e) Peru governance score is -0.17 for the most five recent years, although the PP provided the average for the most recent years= -0.21, then conservative. However the risk rating is the same=2 due to the both values are included in the same interval, i.e, between -0.32 and 0.19, then rating=2 is correct. AENOR verified the value and reliability of source.</p> <p>f) Mitigation: Country is implementing REDD+ Readiness or other activities, as set out in this Section 2.3.3. Peru is participating in the REDD program. In addition, the country has an established Designated National Authority under the CDM and has one registered CDM Reforestation project. Then, rating= -2 is correct.</p>	No Corrective Actions or Clarifications were requested.
Total external risks=0 (Total may not be less than zero)			
Natural risks			
Fire Risk: It shall be assessed using table 10 of the Risk Tool.	LS*M=0	Significance and likelihood (LS): Fire risk is "insignificant" meaning it would impact less than 5% of carbon stocks or would be a transient impact. The likelihood to occur is every 50 to less than 100	No Corrective Actions or Clarifications were requested

		<p>years. To support this approach, CIMA used the GIS package with no evidence of fires along with other sources such as the firecast report for the monitoring period showing no fires.</p> <p>Thus, rating LS=0 is correct. Mitigation (M) measures.</p> <p>None, Then, M=1 is correct.</p>	
Pest and disease outbreaks: It shall be assessed using table 10 of the Risk tool.	LS*M=0	<p>Significance and Likelihood (LS): Risk significance is considered "insignificant" or transient and likely is assessed to be every 50 to less than 100 years. There is little documented evidence of pest or disease outbreaks in the region. The forests of the project area have a high diversity of tree species, and like other diverse tropical forests, are not known to be subject to catastrophic disturbance by insect pests or forest diseases. Thus LS=0 is assigned. Mitigation (M) measures. None, Then, M=1 is correct.</p>	No Corrective Actions or Clarifications were requested.
Extreme weather: It shall be assessed using table 10 of the Risk tool.	LS*M=2	<p>Significance and Likelihood (LS). Significance is catalogued as "minor" and likelihood is every 10 to less than 25 years. Then, LS=2.</p> <p>PP provided a study led by CIMA with SENAMHI meteorological stations. According to this analysis, the Regional Index of Climate Change (IRCC) that is projected shows: (1) for the year 2030 two warning lights, one in the south and another in the northwest of the country, (2) in the year 2050, these outbreaks intensify and expand their reach to the central and eastern zone, and (3) by the year 2080, the impacts are widely disseminated throughout the country.</p> <p>CIMA performs in 2016, with SERNANP and SENAMHI the project: "Regional Climate Observing Network for the Monitoring of Climate Change and its Impacts on the Ucayali Ecosystems"; thanks to Fondo de las Américas (FONDAM).</p> <p>Mitigation (M) measures. None, value= 1 is correct.</p>	No Corrective Actions or Clarifications were requested
Geological risks: It shall be	LS*M=1	Significant and Likelihood	No Corrective Actions or

assessed using table 10 of the Risk Tool.		(LS). Geological risks are insignificant and likelihood is every 10 to less than 25 years. Thus, it is reasonable the value LS=1. Mitigation (M) measures. None, then rating=1.	Clarifications were requested
Total natural risks=3			
<p>OVERALL RISK RATING: It shall be calculated according to table 11 of the Risk Tool.</p> <p>OVERALL RISK RATING=0+0+3=3, then the minimum risk value of 10% is applied.</p>			

AENOR has checked that information provided in the Non Permanence Risk Report version 01, for the monitoring period is consistent with supporting documents provided. The assumptions and justifications provided to determine the risk rating of each risk factor are developed and they are based on provided documents using conservative assessments. AENOR deems that information provided is reliable and appropriate from official sources, thus, the overall risk rating is credible and realistic.

**1.20.4 Dissemination of Climate Monitoring Plan and Results (CL3.2)**

CIMA reports to SERNANP in quarterly and annual reports the result about the deforestation in the project area as was cross-checked with SERNANP during the site visit. This information is shared with the PNCAZ’s Management Committee, the Engineer David Morales Flores and across the San Martin Region through meetings. Some of these meetings were shown to the AENOR team. CIMA also includes information in its website. The monitoring report provides a list in its bullet 3.1.4 of project’s news uploaded in the CIMA website.

AENOR confirmed during the visit to the different communities the awareness about the results of the projects, its implementation, monitoring, etc. Results of the climate benefits were provided in a spreadsheet calculation where emission reductions are determined. AENOR reproduced the calculation to achieve the same results, checked baseline and project emissions and leakage. Further information on the process and data checks is provided in sections above.

**1.20.5 Optional Gold Level: Climate Change Adaptation Benefits (GL1.4)**

Not applicable

**1.21 Community**

**1.21.1 Community Impacts (CM1.1)**

The expected impacts on community well-being due to project activities were described in the validated PD. The project is expected to ensure that there is no contact with the indigenous people in isolation who live inside the park, as well as to protect the area they use. This is a net positive impact. In addition, CIMA supported a research conducted by anthropologists to update the diagnosis of the Kakataibo population in isolation that exists in the southeastern part of PNCAZ and its buffer zone. This is intended to

contribute to the process of recognition of Indigenous Peoples in Isolation (PIA). According to information received during the site visit in August 2017 the Ministry of Culture recognized the Kakataibo people.

Regarding other benefits in communities in the project zone, CIMA is providing capacities to local people for sustainable land use, diversifying the incomes to families, developing Quality of Life Plans and other project activities. AENOR planned its visit to check with local authorities of communities the project benefits and watch in place some of them like the educational centers, the participation of women in project activities, etc. CIMA focused its efforts on those communities and sector with the most direct access to the park, strategically concentrating first on these critical areas to stabilize land-use and prevent intrusion into the park. The aim is to ensure park protection and safeguard ecosystem services and natural resources. To improve the selection process for the intervention with local communities and populations, CIMA has developed a methodology to prioritize communities, considering variables of closeness to park, governance, threats, among others, as part of a toolkit that is being constructed.

In opinion of AENOR, the assessment of impacts is accurate and reflects faithfully the project benefits in communities.

#### **1.21.2 Net Positive Community Well-being (CM1.1)**

Section 4.1.2 of the monitoring report includes a table with the different indicators used by CIMA to assess the net positive community well-being impacts in subjects such as natural capital, social capital, human capital, physical capital and economic capital and how the results have evolved since the baseline situation. This information is further detailed in the appendix 1 where the outputs, outcomes, and impacts of the project activities on Climate, Community and Biodiversity are broken down per goals and objectives. AENOR could verify during the site visit and desk review records of technical assistance to the communities Yamino, Mariscal Cáceres and Santa Rosa de Auguatya, records of training sessions, the Quality of Life Plans, records of agreements between CIMA and Communities, Environmental Action Plans, etc. In section 2.4 above are detailed the activities the main activities carried out by AENOR during the site visit.

It is clearly that project activities are providing net positive impacts on community groups.

#### **1.21.3 Protection of High Conservation Values (CM1.2)**

The ecosystem services provided by the PNCAZ to the communities are several. They are described in the monitoring report, but the most important are the supply of clean water to the local communities in the project zone, the reduction of erosion and sedimentation, protection of some species overhunted, and the conservation or protection of some landscapes important due to its culture such as traditional walks and other sides of the PNCAZ with special interest for communities such as Muchuk Llacta community of the Chazuta. AENOR confirmed that the PNCAZ Headquarters and CIMA worked on updating the PNCAZ Master Plan with the active participation of local stakeholders as some interviewers and the record showed to AENOR "Acta del Quinto taller" carried out on 14 June 2016 confirmed. Lastly, AENOR confirm that project activities are not negatively affecting to the HCVs.

#### **1.21.4 Other Stakeholder Impacts (CM2.2-CM2.3)**

In accordance with the reported information, the project doesn't result in net negative impacts on the wellbeing of other stakeholder groups. Assessment by the audit team concluded that the likelihood of net negative impacts on the well-being of other stakeholder groups is adequately addressed in the monitoring report. The project zone has a natural barrier (Huallaga and Ucayali Rivers) that help to avoid negative impacts to offsite stakeholders.

#### **1.21.5 Community Monitoring Plan (CM3.1, CM3.2, GL2.5)**

Community impact monitoring was described in the 2012 monitoring report. Community monitoring comprises five indicators corresponding to five aspects of life quality: natural, social, human, physical (infrastructure) and economics. These aspects are constantly reviewed together with the local actors.

Information relevant to these indicators is raised through two essential components/variables: The Strengths and uses mapping. This is the main tool to establish community and family profiles, implemented every 3-4 years. The last MUF was in 2016 including 64 villages and communities. Results of the last surveys carried out in 2016 are detailed in the monitoring report section 4.3.2. They are quite positive and the same feedback was received by AENOR from interviewers.

CIMA also uses its personnel in park guards and CIMA field staff to monitor on real time allowing for adaptive management of the project area. Trends, changes, and suggestions or complaints guide the development and improve program strategies. This infrastructure was verified by AENOR in place.

AENOR confirms dates, frequency and sampling methods used are in accordance with the validated project design and with the procedures and systematics used in the previous verification events. AENOR confirms that community monitoring plan is implemented as previous verification events and the validated PDD.

The project is not requesting the Gold Level for exceptional community benefits.

#### **1.21.6 Community Monitoring Plan Dissemination (CM3.3)**

The AENOR verification team kept meetings in the headquarter offices of CIMA in the project area with people in charge of the project, but also with local authorities of some communities involved. In these meetings AENOR verified how the information about the project is disseminated. The main media is the webpage of CIMA where tools and strategies of the project are public. In addition, CIMA carried out during the years of implementation since the start date a lot of training sessions or printed information to be provided to the stakeholders. Some of these strategies are dedicated to improve the conservation of the PNCAZ and the quality of life of communities such as the FOCAL process or FOTP process, Blue agreements. They are explained in the monitoring report.

In regard to Community issues, the tool used is the MUF. It is explained in the CIMA website. Results from the implementation of these tools are after disseminated to the communities through presentations, brochures and others. In opinion of AENOR the results of community monitoring were disseminated in accordance with the validated project design.

**1.21.7 Optional Gold Level: Barriers to Benefits (GL2.3)**

Not applicable

**1.21.8 Optional Gold Level: Protections for Poorer and the more Vulnerable (GL2.4)**

Not applicable

**1.22 Biodiversity****1.22.1 Biodiversity Changes (B1.1)**

The results of the project activities on biodiversity are positive in general, not affecting to the HCVs.

The results of the indicators to monitor impacts on biodiversity are provided in table 26 of the monitoring report for the current monitoring period. In addition, the table provides the results of the indicators for the parameters for the different years since the baseline in 2008, then, it is possible to compare them, even, there is an index evolution and results confirm a positive progress of implemented activities on biodiversity.

The most positive impact on biodiversity is the avoided deforestation in the project area that it is possible to cross-check with the GIS package. This affect to other multiples issues related to the improvement, conservation and sustainable use of natural resources. The monitoring report for every parameter listed in table 26 a complete information of results achieved with the evidence that confirm them such as record of patrolling, pictures from trap cameras, etc. Data provided are from reliable and consistent sources, then, accurate and appropriate to the parameters monitored. To clearly identify the benefits to the project activities, CIMA provided an assessment of the without project scenario. It is clear that under this scenario the deforestation would increase, then increasing the risks and threats to endemic and rare species as well as affect to the population sizes.

In opinion of AENOR, information about benefits on biodiversity from project activities is accurate since is based on record taken from project stakeholders and project proponents, based on sources reliable and appropriate.

**1.22.2 High Conservation Values Protected (B1.2)**

Park guard patrol routes are used to collect the monitoring data and these routes encompass large areas both in the park and in the buffer zone, resulting in monitoring of the entire project zone. As commented above, results of these monitoring activities shows a net positive impact on biodiversity as a result of the project activities.

Forest cover inside the park remained about the same, but the overall Index Score jumped from a 1 in 2008 to 11 in 2015 and 10 in 2016 which means a substantial improvement. The main cause is the reduction of deforestation, along with a slight increase in number of species and average abundance, but a significant reduction in the number of infractions for illegal use of the park area and exotic species.

Communities did not report any new isolated negative biodiversity issues during the monitoring period and the scientific research provided supplemental data for use in project activities and monitoring. MUF

data demonstrated a perception that flora and fauna both thrived when the park is protected and sustainable community activities are implemented.

CIMA provided some research working at place such as Alvarez et al. 2014 or Hörnes 2016. Records of researchers show good populations of birds and large mammals as well as amphibians endangered and sensitive to diseases such as those believed to occur by changes in weather conditions. In conclusion, the biodiversity conditions remain in similar conditions to the monitoring period 2014-2015 with a significant decrease in the number of infractions for illegal use of the park area. These results are consistent with a successful conservation project and indicate that the project has had a net positive impact on biodiversity over the without project scenario and maintained the HCVs relating to biodiversity.

### **1.22.3 Invasive Species (B1.3)**

As previous verification events, the project is not using invasive or exotic species.

### **1.22.4 Impacts of Non-native Species (B1.4)**

Project activities are using native species.

### **1.22.5 GMO Exclusion (B1.5)**

No GMOs were used in the project activities. The PDD describes species to be used in some project activities. When project activities involving the use of agroforestry species have been implemented the verification team checked documents (certificates) to trace the source of the plant and their characteristics. Anyway, it is not the case for the present monitoring period.

### **1.22.6 Negative Offsite Biodiversity Impacts and Mitigation (B2.2)**

As described in the monitoring report and other section of this verification report one of the key relevant actions carried out by CIMA is to carry out a lot of training and/or information sessions to explain the benefits for communities from managing the wildlife or the land use in sustainable ways. Activities as these ones generate benefits for communities but biodiversity, as well in the project area and the project zones since they are accomplished in the buffer zone. However, many of improvements affect to offsite areas like the quality of water, the control over the erosion, etc.

As the monitoring report states in the worst-case scenario, the project's efforts will result in unchanged conditions for biodiversity outside the project zone, but it is very likely that results from project activities will greatly improve conditions for native biodiversity in the buffer zone, in accordance with the Source and Sink Model (Pulliam 1988) that was described in the first Master Plan for PNCAZ (INRENA 2006), which in turn will positively impact the off-site biodiversity. Combined with the positive benefits for biodiversity in the park, the overall effect of project activities for biodiversity conservation will be extremely positive.

The protection and conservation measures in the project area will likely increase the population of some species in the project zone, as well which can migrate to other offsite areas. Avoiding illegal activities, raising awareness to the local communities about sustainable practices, etc generate a positive environment in all areas (project area, project zone and offsite).

According to CIMA, no negative impacts for offsite biodiversity are expected from project activities, the project is not implementing mitigation actions. In opinion of AENOR after visiting the project region several times, the project benefits are positive in all aspects in the project area and project zone but also offsite because actions implemented are affecting to local communities and people move and migrate in the region, then good practices are moving as well.

### **1.22.7 Net Biodiversity Benefits (B2.3)**

As commented in sections above, the project is generating net positive benefits on biodiversity in the project area and project zone. In addition, no negative impacts are expected offsite due to the project activities, then, there are not likely unmitigated negative offsite biodiversity impacts.

### **1.22.8 Biodiversity Monitoring Results (B3.1, B3.2)**

As the Monitoring Report states, the plan and its implementation remain unchanged from description in the validated PDD. This was checked with CIMA during the site visit. The indicators and all its components (methods, sources, and frequency) have remained the same between the PDD and the monitoring report. However, some clarifications were required. They are detailed in section 5.3.2 of the M.R. Some of them are:

- As commented below, the control point and patrolling activities are essential to achieve information about the results of project activities. Then, they represent a key source of information.
- The quantitative analysis has not changed, this allows comparing results. An index has been created based on indicator species to receive a total value to assess the performance of project activities. This index is not based on all the PNCAZ biodiversity because of its size and large biodiversity it would be unlikely to assess at that level. This clarification and the improvement of work with the rangers have been coordinated with SERNANP.
- Threatened species (both flora and fauna) from PNCAZ are well monitored in the component/indicator "breaches" or illegal actions.
- A new research was carried out during the present monitoring period. Information for research and communities is used to enrich the management of the project area.
- Protocols to monitor wildlife were shared with SERNANP staff, the Director of the PNCAZ and park guards. The park rangers conduct the survey of wildlife information in the field, along its patrol routes from at least 18 control points.
- Trainings activities are carried out with park guard to guarantee good quality of data collected by park guard. AENOR checked the records of the training session carried out by CIMA in February 2016.

The monitoring report provides in its table 27 comparative information from 2008 to 2016 of the results achieved for the monitored parameters and indicators measured. The index evolution from 1 to 10 confirms the positive benefits of the project activities over the PNCAZ.

This information is further detailed in the appendix 1 where the outputs, outcomes, and impacts of the project activities on Climate, Community and Biodiversity are broken down per goals and objectives.

At the landscape level, CIMA analyzes the forest cover with satellite images and aerial overflights when feasible, to confirm that there is no deforestation inside the park; during the last year the availability of satellite images is better, so the analysis could be more frequently than annual. Deforestation in the park is the best indicator readily available to the project, of any negative impact to biodiversity. Results for the current monitoring period show a minimum deforestation in the project area, then, very positive on biodiversity. One of the most important activities of CIMA staff is to prevent and quickly stop any potential illegal activity detected inside the park.

At the biological community level CIMA will focus on organisms that indicate habitat health and are easy to sight and identify. CIMA will specifically focus on sensitive game animals (tapir, deer, curassow, monkeys and big carnivores). Since the project began, regular observations (sightings and tracks) by park guards have occurred monthly inside the park, along the regular patrol routes (in PNCAZ and buffer zone) around 18 control posts and park guards' centers that include a good sample of the habitat heterogeneity of the landscape. AENOR considering the relevance of patrolling activities to achieve the success of many project activities scheduled during the site visit the inspection of some control points to interview the guard park and to reproduce some of their activities and checked with them their records. These inspections provided AENOR interesting information about how these practices are planned, the knowledge about the project of guards and the results of their mission. They are an important source to detect new threats, to check the success of some implemented activities. Most of park guards are from local communities, then, they know people, their customs and they know the flora and fauna in the area, so then can detect anomalies regarding principles and objectives of the project such as the use of non-native species, etc.

In addition, CIMA evaluates forest and biological communities' integrity at the landscape level using park guards information based on records of specific threats (violation of rules of use). This information will further assist in defining threats or possible impacts to biodiversity.

There are several benefits to using park guards to record information about flora and fauna, especially the species used by local villagers. Park guards routinely patrol large portions of the park and already have a system of reporting back to CIMA. Because most of the guards are from local communities, they usually have good knowledge of local flora and fauna and they receive additional training.

The results as commented above are detailed in the monitoring report and supported by credible sources such as park guards. Many of them were provided during the site visit and others checked in the office. The monitoring plan did not changed regarding previous verification events and it is in compliance with the validated PDD. In opinion of AENOR the monitoring plan is effective to have a real idea of the situation. Measures scheduled and designed by CIMA to maintain or enhance the HCVs are correct and results confirm their effectiveness.

#### **1.22.9 Biodiversity Monitoring Plan Dissemination (B3.3)**

The monitoring plan remains unchanged from validation. Nevertheless, the results gathered during the implemented years and experiences allow to CIMA improves their monitoring plan and with information from technician of SERNANP as well as to enrich the databases on species in the PNCAZ.

The AENOR verification team kept meetings in the headquarter offices of CIMA in the project area with people in charge of the project, but also with local authorities of some communities involved. In these meetings AENOR verified how the information about the project is disseminated. The main media is the webpage of CIMA where tools and strategies of the project are public. In addition, CIMA carried out during the years of implementation since the start date a lot of training sessions. The monitoring report states in section 5.3.3 some of the actions carried out to disseminate the results of the monitoring plan and the own plan such as workshops, posters about camera traps, brochures....etc.

AENOR visited a representative number of places and interviewed many people affected by the project and the feedback from all of them along with evidence and records provided allows to AENOR confirms that results of biodiversity monitoring were disseminated in accordance with the validated project design.

### **1.23 Additional Project Implementation Information**

No additional information is provided by CIMA.

### **1.24 Additional Project Impact Information**

The project has the CCB Gold Level for Biodiversity. Information about the fulfillment of the project with CCB requirements in this regard is provided in section 7 of the monitoring report. At validation stage, the project reached the Gold Level of Exceptional Biodiversity Benefits (vulnerability and Irreplaceability).

As a result, CIMA has implemented protection and monitoring actions to maintain this status. The Park harboring and protecting a variety of Critically Endangered (CR) and Endangered (EN) species, like Amphibious (*Atelopus pulcher*), birds (*Heliangelus regalis*) and Mammals (*Pteronura brasiliensis*), and healthy populations of more than 13 vulnerable species. Also protects more than 91 species of big and medium size mammals, 617 species of birds, 59 species of reptiles, 71 species of amphibians, 176 species of fishes and more than 1,600 species of plants. In recent years, 9 new species for science have been described. Those exceptional biodiversity benefits are based on the huge area of the park, intact montane forests and other vegetation types of high conservation priority, and the broad altitudinal gradient within the park that permits migration of species adapting to a changing climate. During the monitoring period, the PNCAZ qualified as one of the protected areas exhibiting the best conservation rate in Peru's national system of protected areas. In fact, researchers working into the PNCAZ are still finding new records and new species for science.

Information above is developed in section 7 of the M.R. Appendix 2 of the PD lists all Critically Endangered (CR) and Endangered (EN) species. Species in appendix 2 are not negatively impacted by project activities since it is illegal to hunt them (Amphibia: *Atelopus pulcher* (CR); Bird: *Heliangelus regalis* (EN); Mammal: *Pteronura brasiliensis* (EN) and patrolling actions are focused to monitor and detect illegal actions. Just species traditionally hunted such as peccaries, deers etc could be affected since they can be hunted due to traditional issues (subsistence activity) however, records from park guard allow monitoring and controlling the population of these species just for subsistence, no business.

Related to vulnerable species (presence of at least 30 individuals or 10 pairs), the species catalogued are Amphibia: *Epipedobates cainarachi*; Reptile: *Podocnemis unifilis*, *Podocnemis sextuberculata*, *Geochelone denticulata*; Bird: *Ara militaris*, *Capito wallacei*; Mammal: *Priodontes maximus*, *Calimico goeldii*, *Ateles chamek*, *Ateles belzebuth*, *Speothos venaticus*, *Tremarctos ornatus*, *Tapirus terrestris*.

Like occurs with endangered species, patrolling activities are planned to avoid negative impacts on them and species hunted are controlled to check that number of individuals are for subsistence. In addition, the hunt practices are carried out just in areas traditionally used for these activities even before the implementation of the project, representing a little area of the PNCAZ (6%) and records from park guard evidence that some data are collected by them regarding the species hunted, number of individuals, sector of hunting, etc. Moreover, it is important to highlight that sustainable manage of these resources (hunt and fishing) provide to local inhabitants benefits and this is relevant to demonstrate them the benefits of project strategies and then, its success.

The monitoring report also provides information about areas of high biodiversity conservation priority. Table 19 of the M.R provides data and evolution from 2008 to 2012 of plants, fishes, amphibians, reptiles, birds and mammals in the project zone including the number of new species detected. For each category, the M.R a complete set of information about species detected and expeditions carried out or researching. This information confirms PNCAZ as the protected area that exhibits the best conservation rate in the national system of protected areas (SINANPE).

## 5 VERIFICATION CONCLUSION

AENOR has verified that the project is in compliance with the verification criteria of Verified Carbon Standard version 3.7 and the CCB Standards Second Edition without qualifications or limitations.

The project has been implemented in accordance with the validated project description and its validated variations.

The present verification event did not include validation activities.

AENOR is able to issue a positive verification opinion for the 4,074,606 tonnes CO<sub>2</sub>e of verified emissions reductions, as reported in the monitoring report version 2.0 dated on 15 November 2017. The verification assessment covered the monitoring period from 08 August 2015 to 07 August 2016 and verified that calculated emission reductions and/or removals were achieved during the monitoring period with a reasonable level of assurance. The overall risk rating was 10 %. Therefore, the total number of credits to be deposited in the buffer account is 407,461 VCUs and the total VCUs to be issued are 3,667,145 tCO<sub>2</sub>e. It is not applicable any conclusion about adaptive activities and resilience for this project. Likewise, AENOR confirms the project benefits on community and biodiversity for the current monitoring period as described in the monitoring report version 2.0 dated on 15 November 2017. In opinion of the AENOR verification team the project is achieving their community and biodiversity objectives.

Verification/monitoring period: From 8 August 2015 to 7 August 2016

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO <sub>2</sub> e)	Project emissions or removals (tCO <sub>2</sub> e)	Leakage emissions (tCO <sub>2</sub> e)	Net GHG emission reductions or removals (tCO <sub>2</sub> e)

Year 2016	4,075,363	756	0	4,074,606
<b>Total</b>	<b>4,075,363</b>	<b>756</b>	<b>0</b>	<b>4,074,606</b>

Overall risk rating: 10%

VCUs buffer to be deposited: 407,461 tn CO<sub>2</sub>e.

**Total VCUs to be issued: 3,667,145 tn CO<sub>2</sub>e.**

28 December 2017

LEAD AUDITOR: José Luis Fuentes Pérez.



## APPENDIX 1: LIST OF EVIDENCE PROVIDED

Final M.R version 2, dated on November 15, 2017
First version of the M.R
Registered VCS PD
Non Permanence Risk Report
Package of calculations
CVs of management team
USAID report
GIS package
Financial information
Survey report
Operative procedures for monitoring activities.
World Bank's Worldwide Governance Indicators (WGI) 2017
Evidence of the implementation status of the project
Infraction reports from SERNANP
Administration agenda and addenda
Five Year Plan
Community meetings minutes
The Firecast report 2002-2012 and 2013. <a href="http://firecast.conservation.org/">http://firecast.conservation.org/</a>
San Martin Risk Assessment (WFP-PREDES-MIMDES 2007) and the Micro – ZEE Shamboyacu proposal (CIMA 2012).
MUF (Mapeo de Usos y Fortalezas) 2016
Carta Multiple N° 002-2006-INRENA-IANP-PNCAZ/J
Monitoring reports on Community and biodiversity. Results of parameters and indicators 2016.
Records of technical assistance to Communities of Yamino, Mariscal Cáceres y Santa Rosa de Auguaytia.
Training actions records.
Plans of Quality of Life
Agreement between Communities and CIMA Maronilla, Nuevo San Martín.
Environmental actions plans: Reforestation and school forest.
Seminars to Tacarpos School and Nuevo Progeso.

**APPENDIX 2: VCS VERIFICATION PROTOCOL**

**VCS VERIFICATION PROTOCOL**

**PROJECT:**

**CORDILLERA AZUL NATIONAL PARK REDD PROJECT:**

**Centro de Conservación, Investigación y Manejo de Áreas Naturales-Cordillera Azul (CIMA-Cordillera Azul)**

Validation Type	
<input checked="" type="checkbox"/> VCS Verification of a Project Activity	
Verification Team: José Luis Fuentes Pérez: Chief Verifier Richard Gonzales: Verifier	
Version of this Validation Protocol: 02	Date: 2017-12-28

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
<b>1. Project Details</b>				
<b>1.1 Summary Description of Project</b>				
Is a summary description of the project provided in the Monitoring Report (MR)? Is the project implementation in line with the Monitoring Plan (MP)?	D.R I	A description of the project is provided in section 2.1 of the Monitoring Report.	OK	
<b>1.2 Sectoral Scope and Project Type</b>				
Is the sectoral scope(s) applicable to the project, the AFOLU project category and activity type (if applicable) indicated? Is the project is a grouped project?	D.R I	Yes, the sectoral scope 14 "Agriculture, Forestry and Land Use" is clearly indicated in the VCS-PD. The project is REDD and non grouped project.	OK	
<b>1.3 Project Proponent</b>				
Are contact information and roles/responsibilities for the project proponent(s) provided?	D.R I	Centro de Conservación, Investigación y Manejo de Areas Naturales (CIMA-Cordillera Azul) is the project proponent for the present project activity.	OK	
Are the PP same as in the PD?	D.R I	PP in the monitoring report are the same as in the PD	OK	
<b>1.4 Other Entities Involved in the Project</b>				
Are contact information and roles/responsibilities for any other project participant(s) provide?	D.R I	Yes. TerraCarbon LLC is identified as the other entity involved in the project. Its role is provided..	OK	
<b>1.5 Project Start Date</b>				
Is the project start date, specifying the day, month and year indicated? Is the start date in line with the MP?	D.R I	According to the validated P.D the effective start date is August 8, 2008.	OK	
<b>1.6 Project Crediting Period</b>				
Is the project crediting period indicated and in line with MP? (specifying the day, month and year for the start and end dates and the total number of years)	D.R I	The crediting period runs from August 8 2008 to August 7, 2028. The crediting period is in line with the monitoring plan and correctly expressed.	OK	
<b>1.7 Project Location</b>				

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
Is the project location and geographic included in the MR and in line with MP?	D.R I	The KMZ and geographic information were provided.	OK	
Is the project area provided by the PP? Is the area of the project strata provided?	D.R I	The project area is provided as well as the area for each project strata as AENOR could check during the desk review.	OK	
Is the monitoring of project boundary carried out in line with MP and methodology?	D.R I	Section 3 of the monitoring report provides information about the monitoring of the project boundary which remains to be 1,351,963.85 Ha as the P.D states.	OK	
<b>1.8 Title and Reference of Methodology</b>				
Is the title, reference and version number of the methodology(s) applied to the project included in the MR and in line with MP?	D.R I	The methodology used to quantify the avoided emissions is the REDD methodology VM0007 REDD Methodology Modules Version 1.3 approved 20 November 2012. The framework VM0007 and its component modules, applied tools and version numbers are listed in the MR. The applied modules and tools are in line with the monitoring plan.	OK	
<b>2 IMPLEMENTATION STATUS</b>				
<b>2.1 Implementation Status of the Project Activity</b>				
Describe the implementation status of the project activity(s). Is the implementation in line with the MP? (regarding planting year and species composition) Provide information regarding the operation of the project activity(s) during this monitoring period, including any information on events that may impact the GHG emission reductions or removals and monitoring. Are project activities such as forest management activities and harvesting carried out in line with the MP? Is any project emissions described, in particular fire or any other events leading to GHG emission during the project activity?	D.R I	Implementation status is detailed in the MR. The monitoring report provides a description of activities Leading to Net GHG Emissions Reductions and activities Leading to Community and Biodiversity Benefits.	OK	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
Are all relevant licences obtained? (e.g. Environmental licenses)	D.R I	All relevant licenses were obtained.	OK	
Are land titles and carbon rights hold by the PP? In case not all land was under control at validation, is it ensured that 100% of the land is under control of the PP?	D.R I	All land in PNCAZ belongs to the Peruvian government. The branch of the government responsible for national park oversight is the Servicio Nacional de Áreas Naturales Protegidas (SERNANP). The Peruvian government gave CIMA the right to develop an avoided deforestation carbon project for the park in 2008. The 2008 management contract includes legal authorization for CIMA to use revenues from the sale of carbon credits from avoided deforestation for park activities for the 20-year term. CIMA's exclusive right to sell carbon credits from the project is further documented in a letter from the Peruvian government dated December 30, 2009. Additionally, CIMA received authorization from SERNANP for the pre-sale of more than 8 million credits to Althelia Climate Fund (Report No. 599-SERNANP-DGANP).	OK	
Is a description of leakage provided? Are leakage monitoring parameters included as per MP and methodology requirement?	D.R I	A description of leakage is provided in section 3 of the Monitoring report. They account zero for the current verification period.	OK	
Is a description of the non-permanence risk Factors included?	D.R I	Regarding the Non Permanance Risk Report a CAR 1 is raised. <b>CAR 1:</b> <ul style="list-style-type: none"> <li>• <b>Section 4.2 of the risk report shall be reported as requested by the template's instructions.</b></li> <li>• <b>Evidence to cross-check natural risks (extreme weather, pests and diseases) shall be provided.</b></li> </ul> <b>The CAR is closed.</b>  The section 4.2 was updated for including the calculation of the number of buffer credits to be deposited in the AFOLU pooled buffer account based on the change in carbon stock only and including any deductions for the AFOLU pooled buffer account, if applicable, to	CAR 1	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
		determine the number of GHG credits eligible to be issued as VCUs.  On the other hand, additional information was provided in the report in order to support Scores for Natural Risks.		
<b>2.2. Deviations</b>				
<b>2.2.1 Methodology Deviations</b>				
Has any deviations from the monitoring plan (in the MP) occurred during the monitoring period?	D.R I	No monitoring deviations have been proposed in the PD or are proposed for this monitoring period.	OK	
<b>2.2.2 Project Description Deviations.</b>				
Has any description deviation applied during this monitoring period or since the project validation? If any, is it described and explained in the MR? Has identified whether identified deviation impacts the applicability of the methodology, additionally or the appropriateness of the baseline scenario and provide an explanation of the outcome.	D.R	No new project deviations occurred during the monitoring period.	OK	
<b>2.3 Grouped Project</b>				
For a grouped project, provide relevant information about new instances of the project activity(s) and demonstrate that each new instance of the project activity(s) meets the eligibility criteria set out in the project description.	D.R I	Not applicable	OK	
<b>3 DATA AND PARAMETERS</b>				
<b>3.1 Data and Parameters Available at Validation</b>				
Are all parameters "available at validation" listed as per MP and applied methodology?	D.R I	The list of parameters available at validation is complete and in compliance with the PDD and methodology.	OK	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
Are all data and parameters “available at validation” described using the VCS table format?	D.R I	The VCS tables are appropriate. The format is correct.	OK	
<b>3.2 Data and Parameters Monitored</b>				
Are all “monitoring” parameters listed as per MP and applied methodology?	D.R I	<p>The list is complete in compliance with the monitoring plan and the methodology; however the following clarification is raised to the PP.</p> <p>Regarding the parameters monitored, the following issues shall be clarified:</p> <p><b>CL 1.</b></p> <p><b>According to the data of the forest project cover map, at the beginning of the monitoring period the data is 1,348,258.6 ha and 1,348,179.7 ha at the end. Then, 78,9 ha is the difference which is broken down in 77,83 has (landslide 2016) and 1,07 has (deforested area).</b></p> <p><b>To clarify and trace these data with values of monitored parameters provided in section 3.1.2 of the M.R.</b></p> <p><b>On the other hand, ADistPA,q,i,t = 0.4 ha is reported in M.R. The carbon stocks changes are calculated for (1,07+0,4) ha. Please, provide clarifications related to the 77,83 has do not considered.</b></p> <p><b>To clarify what code, file or whatever documents provide ADistPA,q,i,t = 0.4 in the GIS files and L.B= 14,200.7 has in the GIS files.</b></p> <p>The CL1 was closed. According to evidence and justifications provided, the 78.9 ha is the difference between the beginning and the end of the monitoring period in the area of the forest project cover map and can be spatially divided into the loss of forest that occurs inside and outside the area of deforestation projection for 2016; as follows: Antropogenic change: 1.07 ha, Natural disturbance inside the Projected deforestation area: 0.36 ha; Natural disturbance outside of the projected deforestation area: 77.46 ha and Total natural disturbance in the project area: 77.82 ha (0.36 ha + 77.46 ha)</p>	CL1	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
		<p>For the ADistPA,q,i,t = 0.4 the GIS file is the Shape: PA_2016_allclasses_pncaz in the GIS package.</p> <p>For the L.B = 14,200.7 has the GIS file is the Shape: LB_2016_Full_8917_interbanchmark in the GIS package.</p> <p>For both requested data information is consistent with data sources.</p>		
Are all data and parameters “to be monitored” described using the VCS table format?	D.R I	The VCS tables are appropriate. The format is correct.	OK	
<b>3.3 Description of the Monitoring Plan</b>				
Is the monitoring plan described?	D.R I	The monitoring report describes the monitoring plan.	OK	
Are organizational structure, responsibilities and competencies identified in the MR?	D.R I	Yes, organizational structure as well as responsibilities and competencies have been identified.	OK	
Are methods described for: Data generation (see also SOPs for each parameter)				
<ul style="list-style-type: none"> <li>Data handling, in particular transcribing field data to digital calculation sheets (see also SOPs for each parameter)</li> </ul>	D.R I	PP has developed a control system based on multiple tools to detect errors and allow for adjustments to new challenges or situations that arise during project implementation. Detailed description about organizational structure, responsibilities and competencies, methods for generating, recording and reporting data on monitored parameters is available in the Monitoring Plan. Monitoring report describes how data are managed in monitoring activities.	OK	
<ul style="list-style-type: none"> <li>Data storage, including back-up of the field sheets and digital data</li> </ul>	D.R I	The monitoring report provides the data flow in CIMA.	OK	
<ul style="list-style-type: none"> <li>QA/QC procedures (e.g. re-check of data measurement, data entry, etc – see also SOPs for each parameter)</li> </ul>	D.R	The PP used a QC/QA system to monitoring activities. Section 3.1 of the monitoring report details the system.	OK	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
<ul style="list-style-type: none"> <li>Are procedures described for handling internal auditing and non-conformities?</li> </ul>	D.R	. CIMA has a procedure for internal audits and to identify preventive and corrective action to close non conformities.	OK	
<b>Sample design</b>				
Are sample plots laid out as per Monitoring Plan in the MP?	D.R I	Monitoring report describes the sampling used for different situations.	OK	
Is the location of the sample plot selected on an unbiased basis?	D.R I	The location of sample plots has been selected on unbiased basis.	OK	
<b>Stratification</b>				
Is the ex-post stratification carried out in line with the MP (in the MP) and Methodology?	D.R I	No ex post stratification different from the PDD occurred.	OK	
<b>4. Quantification of GHG Emission Reductions and Removals</b>				
<b>4.1 Baseline GHG removals / emissions</b>				
Are baseline net GHG removals quantified correctly, and in line with the applied methodology and MP?	D.R I	The baseline emissions are calculated in line with the methodology and the monitoring plan and for sake of conservativeness and the accuracy.	OK	
<b>4.2 Project GHG rem emissions</b>				
Are project net GHG emissions quantified correctly, and in line with the applied methodology and MP?	D.R I	The project emissions were correctly calculated as per the methodology required and the monitoring plan.	OK	
Is the required precision level met for net GHG removals?	D.R I	The uncertainty is determined in calculation and net GHG removals have the required precision level	OK	
Are project net GHG emission sources listed in line with the applied methodology and MP? Are these emission sources quantified correctly and in line with the applied methodology and MP?	D.R I	The project net GHG emission sources are listed in line with the applied methodology and MP. The emission sources are quantified correctly and in line with the applied methodology and MP.	OK	
<b>4.3 Leakage</b>				
Are sources of leakage listed in line with	D.R	Sources of leakage are listed in line with the methodology and MP.	OK	

VCS Requirement	Ref	Comments	Draft conclusion	Final conclusion
the applied methodology and MP?	I	Explanations are reported in the monitoring report to assess the values assigned to each kind of leakage considered by the methodology.		
Is leakage quantified correctly, and in line with the applied methodology and MP?	D.R I	The leakage assessment is provided. No leakage is reported for the monitoring period except those due to the markets effects.	OK	
<b>4.4 Summary of GHG Emission Reductions and Removals</b>				
Are the net GHG emission reductions and removals quantified correctly and in line with the applied methodology and MP? Are net changes in carbon stocks included?		The net GHG emission reductions and removals are quantified correctly and in line with the applied methodology and MP. M.R and calculations provide net changes in carbon stocks.	OK	
Are the deductions of VCUs due to the buffer calculated correctly?	D.R I	The deductions of VCUs due to the buffer have been correctly calculated.	OK	
If applicable, is the release of VCUs from the buffer calculated correctly?	D.R I	N/A	OK	
<b>5 ADDITIONAL INFORMATION</b>				
Are any additional relevant information listed?	D.R I	N/A	OK	

DR: Desk review; I: Interview

