PROJECT REVIEW REPORT

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

Project ID	3430
Project Name	Juruá REDD+ Project
Review Type	Registration & Verification Approval
Program(s)	VCS Program
Verification Period	31 Jul 2020 – 30 Jul 2022
Project Proponent	Biofílica Ambipar Environmental Investments S/A e Ambiental Amazônia - Engenharia & Consultoria
Methodology	VM0015 AVOIDED UNPLANNED DEFORESTATION, v.1.1
VVB	Earthood Services Private Limited
Assessment Criteria	VCS Standard, v.4.4
Date of First Issue	11 September 2024
Date of Second Issue	9 May 2025
Review Conclusion	Approved
Date of Final Issue	4 August 2025

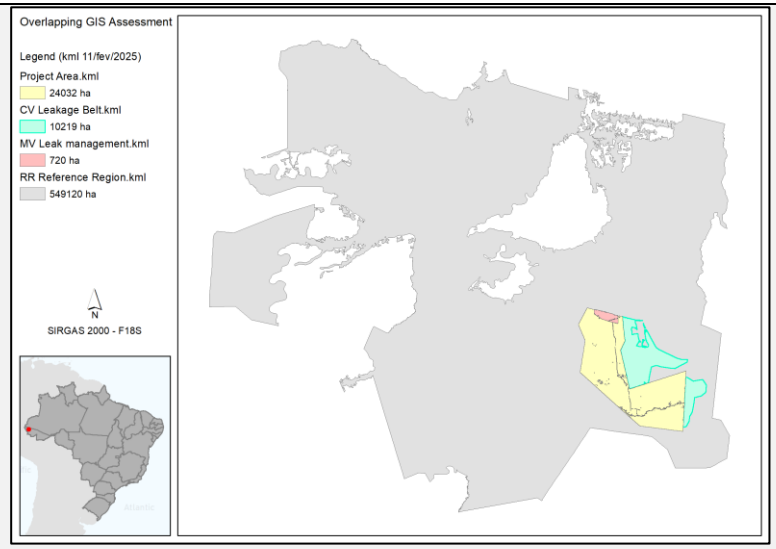
FINDINGS

#	Finding Description	VVB Response	Status
1	Incomplete description of the project activity		
	Issue 1. Section 1.11 of the joint PD/MR does not include a description of the structure and governance of the project. 2. Section 1.11 of the joint PD/MR does not include a clear description of how the various organizations, communities and other entities are or will be involved in the project activities. Action Required 1. The VVB must ensure that Section 1.11 of the joint PD/MR is updated to provide: a) A clear description of the structure and governance of the project. b) A clear description of how the various organizations, communities and other entities are or will be involved in the project activities. 2. The VVB must assess and update the joint V/VR accordingly. Program Rule(s) *VCS Project Description Template v4.2*, Section 1.11 VCS Standard v4.4, Sections 3.2.3 and 3.9.4.	**Round 1** VVB Response The project proponent updated Section 1.11 of PD/MR, which included a description of the structure and governance and how the various organizations, communities, and other entities are or will be involved in the project activities. 1.a) The project proponent included a subsection “Project Governance Structures” in Section 1.11 of PD/MR and described the obligations and commitments of Biofílica Ambipar and Amazônia Agroindústria EIRELI. Also, the description included the responsibilities of the other entities (Vasta Insumos da Amazônia Ltda and Gilberto Siqueira consultant) involved during the conception and development of the project. 1.b) Table 2, “Activities of Juruá REDD+ Project,” of Section 1.11 of PD/MR was updated and included three columns: Start Date, Conclusion Date, and Stakeholder Engagement. The last column indicates which stakeholders (organizations, communities, and other entities) are or will be involved in the project activities. Moreover, a section called Low-impact agricultural Management has been included which describes the planned activities within the leakage management area. IN addition, The project governance structures have been duly detailed, which detailed the participations of all stakeholders identified in section 2.5 of the PD and the grievance redress	Closed

		procedure has also been duly described. Therefore, it is concluded that the involvement of all stakeholders into the activities proposed by the project activity have been duly detailed in the section 1.11. 2. The VVB checked the updates made by the project proponent in the PD/MR v.12 and concluded that they were clear and met the requests of this finding. Sections 3.1.1 and 3.1.3 of V/VR were updated accordingly to the updates made in the PD/MR.	
		Verra Response 1. Section 1.11 of the PD/MR has been updated to provide a description of the structure and governance of the project. 2. Section 3.11 of the PD/MR has been updated to provide a description of how the various organizations, communities and other entities are or will be involved in the project activities. 3. Sections 3.1.1 and 3.1.3 of the V/VR has assessed the updated information regarding the governance of the project, and how various organizations will be involved in the project activities. No further action is required.	
		Round 2 VVB Response (Pending)	
		Verra Response (Pending)	

		Round 3 VVB Response (Pending) Verra Response (Pending)	

#	Finding Description	VVB Response	Status
2	**Missing .kml files for project zones**		
	Issue The KML file currently uploaded to the Verra Registry does not delineate the polygons of the following project zones: • Reference Region, • Leakage Belt, and • Leakage Management Area, Action Required 1. The VVB must ensure that .kml files accurately delineates the polygons of all the applicable project zones. 2. The VVB must describe how they assessed all the applicable project zones in Section 3.1.8 of the joint V/VR. Program Rule(s)	**Round 1** VVB Response The requested files have been uploaded to the F02 folder in response to the inquiry. The VVB reviewed the KML file titled *"Jurua_Project_limits_13-02-2025.kml"* and confirmed that it meets the requirements of Section 3.11.2 of the VCS Standard v4.5. The VVB also verified the project boundaries, which are consistent with those described in PD/MR v12: *Table 1. VVB cross-check of the project boundaries.* **Boundaries** | **PD/MR v12 (ha)** | **VVB assessment (ha)** | **Difference (ha)** | **Difference (%)** Project Area | 24.076,00 | 24.032,46 | - 43,54 | -0,18% Leakage Belt | 10.231,00 | 10.219,15 | - 11,85 | -0,12% Leakage management area | 721,00 | 720,32 | - 0,68 | -0,09% Reference Region | 549.600,00 | 549.120,42 | - 479,58 | -0,09%	Closed

	VCS standard v.4.5, Section 3.11.2.	 *Figure 1. VVB cross-check of the project boundaries.* The minor differences (less than 0.2%) in values between the values can be attributed to two main factors: • The process of converting rasters to shapefiles and then to KMLs can lead to changes in the areas, especially when undergoing reprojection between coordinate systems. The sequence of processing steps adopted can also contribute to discrepancies in the values. • The method used to calculate the area in the GIS: Currently, the project proponent work with a standardized geographic database in the geodetic projection SIRGAS 2000, using the "reference ellipsoid EPSG:7030" parameterization. The software used for these calculations is QGIS. Additionally, the VVB verified the request to update the project's KML file on the Verra Registry platform, as included	

		in the communication to the Verra Secretariat in the file "print Verra Registry.png", dated February 13, 2025. The VVB concludes that the corrective action complies with the requirements of the VCS Standard, section 3.11.2 as the extent of the project is clearly specified and the following information is included: Name of the project area, maps of project zone, kml file with geodetic polygons precisely delimitating the project zone at the project start date, excluding the non-eligible parts, total size of the project zone , details of ownership, overlapping analysis and demonstration of control over the entire project area. Annexes: - Jurua_Project_limits_13-02-2025.kml - VVB cross-check map.png - VVB cross-check.xlsx - print Verra Registry.png	
		Verra Response KML files of the reference region, leakage belt, and leakage management belt have been provided. The VVB has assessed the accuracy and appropriateness of the KML files. No further action is required	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	

		Verra Response (Pending)	

3	**Missing description of the grievance redress procedure**		
	Issue 1. Section 2.5 of the joint PD/MR does not describe the grievance redress procedure to address disputes with local stakeholders that may arise during project planning and implementation. Action Required 1. The VVB must ensure that a detailed description of the grievance redress procedure is included in Section 2.5 of the joint PD/MR. 2. The VVB must assess the grievance redress procedure and update the joint V/VR accordingly. Program Rule(s) *VCS standard v.4.5*, Section 3.18.4	**Round 1** VVB Response The project proponent updated Section 2.5 of PD/MR and included a detailed description of the grievance redress procedure to address disputes with communities and other stakeholders that may arise during the project's planning, implementation, and evaluation. The project proponent elaborates the Juruá REDD+ Project Communication Plan (Plano de Comunicação REDD+ Juruá - v.1.2), which contains, among other information, the feedback and grievance redress procedures, the ombudsman channel for complaints, and the management of stakeholder manifestations – information flow/handling of complaints, incorporation of suggestions/criticisms and adaptations in the project and planning of communication actions. The VVB checked the updates made by the project proponent in the PD/MR v.12 and concluded that they were clear and met the VCS Standard v.4.5, section 3.18.4. Section 3.3.5 of V/VR was updated accordingly to the updates made in the PD/MR. Annex - Plano de Comunicação REDD+ Juruá - v.1.2 Verra Response Section 2.5 of the PD/MR has been updated to include the grievance redress procedure to address disputes that may arise	Closed

		during the project implementation. Further, Section 3.3.5 of the V/VR has been updated to assess the grievance redress procedure. No further action is required	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

4	**Missing justification for not stratifying the Reference Region (RR) and the Project Area (PA)**		
	Issue 1. It is not clear if the RR and the PA are similar in terms of forest typology associations. 2. It is unclear if the Ecological-economical zoning of the State of Acre[1] was taken in account when defining the Reference Region (see background section). Action Required 1. The VVB must ensure that the joint PD/MR includes a clear justification for not stratifying the RR and the PA based on the different forest typology associations. 2. The VVB must ensure that the joint PD/MR includes a clear justification for not stratifying the	**Round 1** VVB Response 1. The project proponent updated the Reference Region (RR) and demonstrated its similarity to the Project Area (PA) in terms of forest typology. Despite the presence of various forest typology subclasses, the PA is composed entirely (100%) of the "Open Ombrophilous Forest" typology. Similarly, all forested areas within the RR also consist entirely (100%) of "Open Ombrophilous Forest". Regarding the lack of stratification of the RR into forest sub-typologies, the project proponent provided a clear justification in Section 5.1 of PD v12 (“*Estimation of the average carbon stocks of each LU/LC class (Step 6.1.1 VM0015)*”, “*a) Existing forest classes within the Project Area*	Closed

[1] https://ipam.org.br/bibliotecas/fase-iii-do-zoneamento-ecologico-economico-do-estado-do-acre/

	RR and the PA based on the different Enforced policies and regulations (envisaged in the Ecological-economical zoning of the State of Acre). 3. The VVB must update the joint V/VR to provide its assessment accordingly. Program Rule(s) *VM0015*, v.1.1 Background **Forest typology** The project area encompasses 4 clearly distinct forest typology associations as described in Section 1.13 of the joint PD/MR, which are used for ex-ante estimations. Section 3.3 of the joint PD/MR reports that 100% of PA is open Ombrophilous forest, while only 67.1% of the RR is constituted by this typology. **Ecological-Economic zoning** The joint PD/MR identifies territorial planning issues among the main problems facilitating the occurrence of deforestation, mentioning the "Ecological-economical zoning of the State of Acre". This document presents relevant differences in terms of spatial planning (i.e. land management zones) that seem correlated with deforestation dynamics.	*and Leakage Belt"* – page 138 of PD). The justification states that, statistically, there is no significant difference in biomass stock across these sub-typologies. The VVB reviewed and assessed the project proponent's justification and concluded that it clearly demonstrates no statistical differences in biomass and carbon stocks among the forest sub-typologies. Therefore, classifying the forest typology of both RR and PA as "Open Ombrophilous Forest" is justified. This justification aligns with the criteria for defining LU/LC classes ("Forest-land"), as specified in requirement 2.2 of VM0015 v1.1 (page 31). The VVB also verified the RR update to ensure compliance with the similarity criteria in relation to the PA. Both the PA and RR are composed entirely (100%) of "Open Ombrophilous Forest", meeting the requirements of section 1.1.1 of VM0015 v1.1 (page 19). 2. The project proponent updated Section 3.3 of PD and demonstrated that the Ecological-Economic Zoning (ZEE) was the source of all data used in the spatial analysis, including the variables applied in the deforestation risk and allocation model. The deforestation risk model incorporates a variable for land tenure status, identifying areas located on private properties, glebes, settlements, and other public lands (Table 11 of PD v12). Although the overall deforestation quantity was defined globally, the model provides a mechanism to allocate projected deforestation based on the relative importance of each tenure class (along with other factors) in shaping	

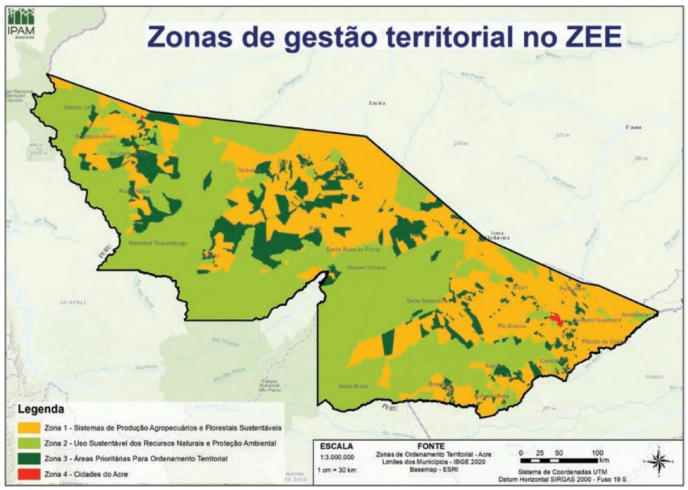


Figura 54. Mapa das zonas de gestão territorial no âmbito do Zoneamento Ecológico-Econômico do estado do Acre – Fase III.

deforestation trends over the Historical Reference Period (HRP).

The VVB verified that the project incorporated the ZEE of Acre State to define the Reference Region, as detailed in Section 3.3 of PD v12. Table 11 of PD v12 illustrates how each land tenure class contributes to deforestation within the RR, based on ZEE data. This table helps substantiate the identification of deforestation agents within the project.

3. The VVB updated Sections 3.4.3 and 3.4.6 of V/VR accordingly. The validation team concludes that the explanation provided in the PD/MR and the evidences provided (shapefiles) are reliable, based on public available data and sufficient to conclude that there is no need to stratify the RR and PA.

Evidences provided: 3. Annexes\F04
- Vegetation shapefile (vegf files).

Verra Response

1. Section 3.3 of the PD/MR has been updated to provide description clarity that 100% of the forest typology in RR and PA is the Open Ombrophilous Forest. Clarification has also been provided that the variation is from the forest subclass. Furthermore, the VVB has assessed the updated information regarding the RR and PA forest typology in Section 3.4.6 of the V/VR.
2. Section 3.3 of the PD has provided clarification that the ZEE was considered in the spatial analysis and the deforestation risk assessment.

Round 2

		VVB Response	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

5	Incomplete description of the mobility analysis		
	Issue 1. Section 3.4 of the joint PD/MR does not clarify which of the identified criteria facilitate and which ones constrain the mobility of the main deforestation agents. 2. The assumptions for the selection of the criteria are not clearly explained in the joint PD/MR. Action Required 1. The VVB must ensure that a clear description of the criteria that facilitate and constrain the mobility of the main deforestation agents is included in the joint PD/MR. 2. The VVB must ensure that the assumptions for the selection of the criteria are clearly presented in the joint PD/MR Program Rule(s) *VM0015*, v.1.1, Sections 1.1.3 and 4.2.1	**Round 1** VVB Response Section 3.3 of PD/MR was updated and included the criteria that facilitate and restrain the mobility of the main deforestation agents. Following the VM0015 v1.1, section 1.1.3, the project proponent included in section 3.3 of PD/MR, subsection "Leakage Belt", the four steps required by the methodology: a) Using spatial information and multicriteria analysis, the project proponent clarified that the criteria that facilitate deforestation are variables with positive weights of evidence (areas up to 380 meters from the nearest deforestation; areas up to 2.7 km from the nearest road, areas up to 2 km from the nearest river, and private properties. The criteria to restrain deforestation are variables with negative weights of evidence (Indigenous Land and Gleisoils and Neosoils. b) A reference region map was generated for each criterion/variable (Figure 20 of PD/MR). c) Using multicriteria analysis, the project proponent determined the boundaries of the Leakage Belt. The	Closed

		assumptions and weight assigned to the criteria were justified in Section 3.3 of PD/MR. Also, the Leakage Belt boundaries excluded the other REDD+ project area and Leakage Belt (ID 1113). Figure 21 of PD/MR shows the Leakage Belt area. d) The methods applied to perform are transparently documented in the PD/MR. Section 3.4, subsection "Preparation of factor maps (4.2.1 VM0015)" of PD/MR followed the methodology steps to analyze the variables that influence the probability of new deforestation areas (Table 31 and Figures 31 and 32). The probability map was used to allocate the project's Leakage Belt. The VVB checked the updates in Section 3.3 and ensured that the PD/MR v.12 presented a clear description of the criteria that facilitate and constrain the mobility of the main deforestation agents. The VVB ensures that Section 3.4 of PD/MR clearly explains the assumptions for the selection criteria. Moreover, evidences have been provided, with the rasters described in that explanation (which are part of the deforestation modeling procedure) and the probability map that was used to draw the leakge belt area. The plot with the weights of evidence is also included. The validation team considers that the evidences and explanation are accurate. Evidences: 3. Annexes\F05 1. COMPLETO-Resumo-Executivo-do-ZEE-Acre-Fase-III_V16_WEB 2. Distancia_desmatamento2010 3. Distancia_estradas_2019 4. Documento_Sintese_ZEE	

		5. fundiario_corrected 6. prob_2021 7. solos 8. woes Verra Response 1. Section 3.3 of the PD/MR has been updated to describe which of the criteria facilitate and which ones constrain the mobility of the main deforestation agents. Furthermore, the assumptions for the selection of the criteria have been explained in the PD/MR. 2. The VVB has assessed the updated information regarding the mobility analysis. No further action is required **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	

6	**Missing comparison of different deforestation risk maps**		
	Issue Only one deforestation risk map has been produced and presented in Section 3.4 of the joint PD/MR (figure 31). Action Required 1. The VVB must ensure that several Risk Maps are produced using different combinations of Factor Maps and modeling assumptions to allow comparison and select the most accurate map. 2. The VVB must update the joint V/VR to provide its	**Round 1** PP Response Multiple risk maps have been produced to show that the full model is the most accurate, having the highest FOM Value. Results of that analysis are shown in the Validation section in the new PDD, with scripts and data provided in the evidence folder (supports/F06). The root level of folder “validation” contains the simulations (lulc_sim1_aaaa.tif and prob_sim1_aaaa.tif) for the full model, and subfolders (sub1 - sub5) contain the same for	Closed

	assessment of the risk maps, and the approach followed for selecting the most accurate. Program Rule(s) *VM0015*, v.1.1, Sections 4.2.2 and 4.2.3 Background VM0015, Section 4.2.2: "*Several Risk Maps should be produced using different combinations of Factor Maps and modeling assumptions to allow comparison and select the most accurate map. A list of Factor Maps, including the maps used to produce them and the corresponding sources shall be presented in the PD (table 10) together with a flow-chart diagram illustrating how the Risk Map is generated*"	the sub models. The F06 also contain the spreadsheet with the same results provided in the PDD. Please, also check responses to *F09* and *F11*. VVB Response The VVB verified that the project proponent complied with the VM0015 v1.1 guidelines and provided a comprehensive list of maps, variables, and factor maps, as detailed in Table 31 of PD/MR v12. In accordance with the methodology, the project proponent described in Section 3.4 of PD/MR v12 the process for selecting the most accurate deforestation risk map using the Figure of Merit (FOM) approach. Table 32 of PD/MR v12 demonstrates that six risk maps were generated using different combinations of factor maps, as listed in Table 31. The FOM value for each model was presented, and the final selection was based on the highest FOM value (0.0579). This corresponds to the model incorporating all six factor maps: accessibility to roads, rivers, deforested areas, municipal settlements, land tenure status, and soil type classifications. Based on this thorough analysis provided by the project proponent and included as Annexes of this finding, the VVB concluded that the project proponent selected the most accurate deforestation risk map after systematically evaluating and comparing multiple risk maps generated with different factor map combinations and modelling assumptions. The VVB updated Section 3.4.4 of V/VR accordingly. Annexes	

		- scripts.zip - validation.zip - F9 folder - F11 folder	
		Verra Response Several risk maps with different combination of risk factors based on the figure of merit values have been tested, provided and assessed by the VVB. However, this finding remains open Issues 1. Section 3.4 of the PD/MR has not provided a copy of each factor maps listed in Table 31 and used in the deforestation model with the highest FOM. Action required 1. The VVB must ensure that Section 3.4 of the PD/MR is updated to include all of the factor maps used the selected deforestation model. 2. The VVB must assess the appropriateness of the factor maps in Section 3.4.4 of the V/VR. Program Rule(s) *VM0015*, v.1.1, Sections 4.2.1 Background Some of the maps are shown in the annex of Finding#05. However, it has not been discussed and shown in the PD/MR.	
		Round 2	
		VVB Response 1. The VVB checked that the PP has already included a figure	

		with such maps in section 3.3 (Figure 20) of the PDD to explain the delineation of the leakage belt's boundaries using the mobility analysis. The information has been included also in the section 3.4 of the PD as required (Figure 32), which is consistent with table 29 of the same section. 2. The VVB had accessed the appropriateness of the factor maps in the section 3.4.4 of the V/VR. It is concluded that the factor maps were duly appropriate. Evidence included: factor_maps.pdf	
		Verra Response The updates to the project documents are sufficient to close this finding. No further action is required.	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

7	**Incomplete additionality analysis**		
	Issue 1. It is unclear why the sustainable forest management for timber product has not been considered among the credible Land Use Scenarios (LUSs). 2. The choice to restrict the geographical area for the common practice analysis only to the reference region (RR) has not been justified. 3. It is unclear how the VVB assessed – against which evidence – the credibility of the LUSs and the accuracy of the sensitivity and common	**Round 1** VVB Response 1. The project proponent updated Section 3.5 of PD/MR and provided a well-substantiated justification for why sustainable forest management for timber production was not considered a credible land-use scenario. The analysis demonstrated that sustainable forest management is neither a realistic nor a plausible scenario for the project region, considering economic, social, and environmental factors. The project proponent referenced	Closed

	practice analyses. <u>Action Required</u> 1. The VVB must ensure that <u>all</u> credible LUSs are clearly identified and described in the joint PD/MR. 2. The VVB must explain how the selection of the RR as geographical area for the common practices analysis fulfils the requirements of the applied tool. 3. The VVB must provide a detailed description of the steps taken and supporting evidence analyzed to assess the sensitivity and common practices analyses. <u>Program Rule(s)</u> *VT0001*, v.3.0, Sections 2.1, 2.4 and 2.2.6. <u>Background</u> The VVB stated, in section 3.4.5 of the joint V/VR that there is no common practice for REDD+ Project in the analysed geographic region, while according to the applied tool (VT001) "other registered VCS AFOLU project activities shall not be included in this analysis".	Barreto et al. (2006) and Schneider et al. (2002), which highlight significant barriers to implementing this practice, including high transportation and infrastructure costs, regulatory challenges related to environmental licensing, and substantial financial investments required for machinery, training, and specialized labor. These factors could limit community involvement and reduce opportunities for social inclusion within farm activities. Additionally, the timber market in Brazil is highly unstable, with fluctuating prices and demand. The prevalence of illegal logging creates unfair competition, further impacting the financial viability of legal timber operations. While sustainable forest management is theoretically possible, the project proponent provided strong evidence (supported by references included in the Annexes) that the high implementation costs and unstable legal timber market render this scenario unfeasible. The VVB thoroughly reviewed the justification and supporting documentation and concluded that sustainable forest management for timber production is not a viable, realistic, or feasible scenario for the project. Therefore, the VVB confirms that all land-use scenarios described in Section 3.5 of PD/MR v12 are credible and fully comply with the requirements of VT0001 v3.0. 2. VT0001 v3.0 states that: - Section 2.1.1.a): "*Identify realistic and credible land-use scenarios that would have occurred on the land within the* ***proposed project boundary*** *in the absence of the AFOLU project activity under the VCS (…)*"; - Section 2.1.1.b): "*All identified land use scenarios must be*	

		credible. All land-uses ***within the boundary of the proposed VCS AFOLU project*** *that are currently existing or that existed at some time in the period beginning ten years prior to the project start date but no longer exist, may be deemed realistic and credible*"; - Section 2.4.1: "*The previous steps shall be complemented with an analysis of the extent to which similar activities have already diffused* ***in the geographical area of the proposed VCS AFOLU project activity****."* - Section 2.4.2: "*Provide an analysis to which extent similar activities to the one proposed as the VCS AFOLU project activity have been implemented previously or are currently underway. Similar activities are defined as that which are of similar scale, take place in a comparable environment, inter alia, with respect to the regulatory framework and* ***are undertaken in the relevant geographical area****, subject to further guidance by the underlying methodology.*" According to the Tool citations above, it is not specified what should be considered a "proposed project boundary" or a "relevant geographical area". The project adopted the Reference Region as the geographically relevant area of the project, as it was this geographical region that supported all other analyses in the construction of the PD/MR. The VVB checked the orientations described in the VT0001 v3.0 and concluded that using the Reference Region as a project boundary/relevant geographical area to construct and demonstrate the project's additionality is coherent and reliable with the other analysis described throughout the PD/MR. 3. The VVB assessed the sensitivity and common practice	

		analysis during the on-site visit, with the project team during the desk review. The VVB checked the "*Adicionalidade Juruá_v19*" spreadsheet (please see the Annex), which contains the cash flow of scenarios presented in Section 3.5 of PD/MR. Table 34 of PD/MR summarized the calculation made in the "*Adicionalidade Juruá_v19*" spreadsheet and presented the critical assumptions and variations considered reasonable and used in the sensitivity analysis. The value used for comparison between each scenario was NPV and all the assumptions were registered in the spreadsheet. In conclusion, as described in the V/VR, "*The VVB confirm the credibility of investment and sensitivity analysis, through the review of the determination of the appropriate method of analysis, the investment comparison analysis application, calculation, comparison of financial indexes, and sensitivity analysis. The conclusion was that the VCS AFOLU Project without the financial benefits of the credits recorded in the VCS cannot be considered the most financially attractive scenario, even with reasonable variations in critical assumptions* *the VCS AFOLU Project isn't the most financially attractive scenario without the financial benefits from the carbon credits, even with reasonable variations in critical assumptions*." Regarding the common practice analysis, the project proponent used the project's Reference Region and, according to section 3.5 of PD/MR states, "*The similarity analysis applied had the basic premises of land tenure category and situation, size of area, main economic activities, environmental context and action of deforestation*	

		drives." The ZEE land base, hydrography and road network were used for the analysis, and Table 35 of PD/MR v.12 presented the results. Although the project proponent found identical land tenure situations to the project area, essential distinctions in scale and scope of activities, management of non-timber forest products, and territory focus make them not similar to the proposed project activities. These distinctions are duly described in Section 3.5 of PD/MR. Also, the interviews described in Section 2.3 of V/VR evidenced common practice activities developed in the Reference Region. All data, rationales, assumptions, justifications, and documentation used for the sensitivity and common practice analysis were provided for the VVB during the audit process to support the selection of the baseline and demonstration of additionality and are included in the Annex of this finding. The VVB checked all the documentation provided by the project proponent and concluded that the description of the PD/MR is duly supported. The VVB updated Section 3.4.5 of V/VR, clarifying the assessment made during the audit process of the common practice analysis. Annexes: - ACRE, 2017.pdf - ACRE_2018.pdf - ACRE_2021.pdf - Adicionalidade Juruá_v19.xlsx - Barreto, P.; Amaral, P.; Veríssimo, A. (2006).pdf - CABIESE_1997.pdf	

		- JONG, W._1999.pdf - KUHN, I.N. E LAMPERT, A.L_2012.pdf - MIRANDA_2001.pdf - Ometto, J.P., Dutra Aguiar, A.P., Martinelli, L.A.,_2011.pdf - SANDOVAL, M. et al_2002.pdf - Schneider, R. et al. (2002).pdf - SOUZA, A. L. de; CIMERMAN, S._2010.pdf - VALDIONES, A.P_2021.pdf - WILLIAMS, J. E._2001.pdf	
		Verra Response 1. The PD has been updated to provide a justification for why SFM is not part of the alternative land use scenario. This has been assessed by the VVB accordingly. 2. The VVB has provided an explanation how the selection of the RR as geographical area for the common practices analysis fulfils the requirements of the applied tool. 3. The VVB must provide a detailed description of the steps taken and supporting evidence analyzed to assess the sensitivity and common practices analyses. No further action is required	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

8	Unclear definition and justification of leakage prevention measures		
	Issue 1. The activities proposed in Section 5.3 of the joint PD/MR to leak prevention measures (strengthening the management of non-timber forest products and updating and supplementary studies) are the same or very similar to those included as a project activity to avoid deforestation (Section 1.11 of the joint PD/MR). Therefore, it is not clear the rationality on how these leak prevention measures will incentivise agents of deforestation to abandon their deforestation practices instead of displacing it outside of the project area. 2. It is not clear what leakage prevention measures will be proposed to deforestation agents as alternative revenues to those obtained through deforestation, since Section 5.3 of the joint PD/MR states that "no activities to improve agricultural or pasture management, or forage production [...] are planned". 3. It is not clear if existing management plans or other plans related to the proposed AUD project activity have been considered to define the boundaries of the Leakage Management Areas. 4. The joint PD/MR does not present a justification for the adoption of a displacement factor of 10%. Action Required 1. The VVB must ensure section 1.18 of the Joint PD	**Round 1** VVB Response 1. The project proponent updated Sections 1.18.1 and 3.3 – Leakage Management Areas (LMA) of PD/MR, describing that the LMA was established in areas deforested up to 2020, covering 721 hectares. These areas consist of planned pastures, regenerating secondary vegetation, and infrastructure. To reduce the risk of activity displacement leakage, the project proponent has proposed Low-Impact Agricultural Management and the implementation of Updates and Complementary Studies. These activities were specifically designed to the deforestation agents, including family producers in settlement projects, settlers, and medium- to large-scale producers. As per the PD/MR, workshops and capacity-building activities on sustainable low-impact agricultural management updates and complementary studies to promote good conservation practices will be conducted using the existing infrastructure at the property headquarters, which is strategically located near some of the key deforestation agents (family producers from settlements). Additionally, this headquarters will serve as a support center for surveillance and monitoring activities within the project area. Section 1.18.1 of PD/MR v12 now includes a detailed rationale for the leakage prevention measures—Low-Impact Agricultural Management and Updates and Complementary Studies, along with a summary of their implementation plan. The project proponent has clearly explained how these	Closed

	& MR is updated with: a) A detailed description of leakage prevention measures that will be implemented within the Leakage Management Area, including a summary of their implementation plan. b) The explanation of the rationality on how the activities proposed in Section 1.18 are expected to efficiently reduce the risk of activity displacement leakage. 2. The VVB must clarify which and how existing management plans or other plans related to the proposed AUD project activity have been considered to define the boundaries of the Leakage Management Areas. 3. The VVB must ensure that a clear justification for adopting a 10% displacement factor is included in the joint PD/MR. 4. The VVB must assess the revised Joint PD & MR and update the Joint V & VR accordingly. Program Rule(s) *VM0015*, v.1.1, Section 1.1.4 Background: • The Leakage Management Areas (LMA) by definition, is a non-forest area. Therefore, it is unclear the rationality for include "Strengthening the management of non-timber forest products "as a leakage prevention measure.	activities are expected to effectively reduce the risk of activity displacement leakage. The VVB has verified that the project proponent has updated Sections 1.18.1 and 3.3 of PD/MR and confirms that the project proponent is in compliance with VM0015 v1.1, Section 1.1.4 regarding the definition of the LMA. The proposed activities aim to provide the stakeholders the necessary skills to implement sustainable practices on their own properties, thereby reducing pressure on new deforestation areas. In this way, these measures serve as effective leakage prevention strategies, ensuring that deforestation agents abandon their deforestation practices rather than displacing them outside the project area. The VVB updated Section 3.1.13 of V/VR accordingly. 2. The project proponent provided the "LMA-Management-Plan", a document detailing the Management Plan for the LMA of the Juruá REDD Project and demonstrating that the management plan has been considered to define the LMA boundaries. The definition prioritized the deforested areas until 2020 (approximately 721 hectares). The VVB verified that the "LMA-Management-Plan" has been considered to define the boundaries of the LMA. 3. The project proponent updated Section 5.3 ("Calculation of the Leakage Displacement Factor (DLF)") of PD/MR, incorporating a justification for defining the displacement factor. The VVB verified that, for each deforestation agent - (1) family farmers in settlement projects, (2) medium and large	

		producers, and (3) land occupiers, the project proponent provided a clear justification for the measures designed to prevent deforestation within the project area and to mitigate the displacement of deforestation to the Leakage Belt. Additionally, the project proponent outlined the expected outcomes of these actions for each agent. Considering the deforestation dynamics in the Reference Area, the characteristics of potential deforestation agents, and the leakage prevention measures implemented by the project, the Juruá REDD+ Project conservatively estimates that up to 29.79% of the deforestation that would have occurred within the Project Area could be displaced to the Leakage Belt. The VVB updated Section 3.4.6 of V/VR accordingly. <u>Annexes</u> - LMA-Management-Plan.pdf - MP-RED-JURUA-RR-LIM-00-EN - Leakage Management Areas.jpeg - MP-RED-JURUA-RR-LIM-00-EN - Leakage Management Areas.pdf	
		<u>Verra Response</u> 1. Section 1.18 of the PD has been updated to explain how the LMA has been designed for the deforestation agents disincentivise deforestation practices thus preventing deforestation outside of the project area. 2. Section 1.18 of the PD has been updated to describe the prevention measures to deforestation agents in the LMA. 3. The PD has provided explanation and justification for the displace leakage factor	

		4. All updated matters related to leakage and leakage management activities have been assessed in Section 3.4.6 of the V/VR. No further action is required **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	

9	Unclear quantitative projection of future deforestation		
	Issue 1. It is unclear how the project proponent calculated baseline deforestation in the reference region (i.e., $ABLSRR_{i,t}$) values reported in Table 20 of the joint PD/MR (see background section). 2. The calculation of the area of "optimal" forest land suitable for conversion to non-forest land (Aoptimal) and the area of "average" forest land suitable for conversion to non-forest land (Aaverage) have not been included in the joint PD-MR nor in the ER spreadsheet. Action Required 1. The VVB must ensure that the Joint PD & MR is updated with: a. Clarification on how $ABLSRR_{i,t}$ values reported in Table 20 were calculated, b. Justification on why $ABLSRR_{i,t}$ values are different from the output of the linear	**Round 1** VVB Response 1- . a. After close examination, it is concluded that the values presented were indeed erroneous and were unfortunately used to allocate deforestation values across the RR. the project participants have made the necessary corrections and clarifications on how ABLSRR values reported have been calculated is duly mentioned in the PDD and the emissions spreadsheet. Please refer to the updated sections "Step 4 of VM0015 – Projection of the Quantity of Future Deforestation" and 5.1 "Baseline Emissions" and "Project Emissions" in the revised PDD. b. Error in the calculations was observed and has now being corrected in the ER calculations spreadsheet. Now, the values of $ABLSRR_{i,t}$ coincide with linear increasing trend from joint PD. Information also	Closed

	increasing trend presented in the joint PD/MR, and clarifies how these differences affects the derived parameters (i.e., $ABLSPA_t$ and $ABLSLK_t$). 2. The VVB must ensure that: a. Any changes made to the baseline are reflected in the ER spreadsheet and in all impacted sections of the Joint PD & MR. b. The calculation of Aoptimal and Aaverage are included in the joint PD/MR and that the ER spreadsheet is updated accordingly. 3. The VVB must update the joint V/VR to describe the steps taken to: a. Asses the assumptions and data used calculate $ABLSRR_{i,t}$, $ABLSPA_t$ and $ABLSLK_t$ b. Cross-check the data used to estimate $ABLSRR_{i,t}$ and replicate the calculations. 4. The VVB must update the joint V/VR to provide its assessment accordingly. <u>Program Rule(s)</u> *VM0015*, v.1.1, Section 4.1.2.1 <u>Background section</u> Table 20 of the joint PD/MR includes $ABLSRR_{i,t}$ values that are not consistent with the values the review team reproduced using the linear increasing trend reported in Figure 28 (linear trend = 230.27(x) + 1427), built on historical data shown in Figure 26. Baseline year | Linear trend (ha) | $ABLSRR_{i,t}$ (ha)	provided in tab "projection" in the ER calculations v.10. 2- a. The validation team observed that the baseline scenario has been recalculated. Now the project participants have changed the approach to historical average. It is confirmed by VVB that all changes made to the baseline are now reflected in the ER spreadsheet and in all impacted sections of the Joint PD and MR. b. As the project developer has change its approach to historical average, Aoptimal and Aaverage are not applicable. Considering that historical average does not apply these parameters, the correction is considered accurate. Due corrections have been carried out in the PD/MR, section 3.4 and all tables from this section and from section 5.1 have been duly updated, incorporating the change in the baseline approach. The tables are in accordance with ER calculation. 3. the validation team confirms that all assumptions and data used to calculate the $ABLSRR_{i,t}$, $ABLSPA_t$ and $ABLSLK_t$. The values corresponds for the reference region (ABLSRR) refer to the average deforestation values achieved in the period 2011-2020. Values applied are from Prodes (https://basedosdados.org/) and therefore, they are considered accurate. For the project area and leakage belt, the spatially projected deforestation has been used, in accordance with step 4.2.4 of the VM0015. The GIS analysis has been carried out in parallel by the validation team regarding the deforestation area in the reference region. The historical average has been used for determining the	

	(Figure 26 and Figure 28)	(Table 20)	
Historical analysis			
1 (2010)	1,690		
2 (2011)	1,689		
3 (2012)	1,690		
4 (2013)	3,436		
5 (2014)	1,556		
6 (2015)	1,774		
7 (2016)	2,355		
8 (2017)	3,022		
9 (2018)	2,704		
10 (2019)	4,619		
Baseline scenario			
11 (2020-2021)	3,959.97	7,264	
12 (2021-2022)	4,190.24	7,173	
13 (2022-2023)	4,420.51	7,068	
14 (2023-2024)	4,650.78	6,966	
15 (2024-2025)	4,881.05	6,864	
16 (2025-2026)	5,111.32	6,764	

annual deforestation rate. The validation team considers the approach applied by the project developers accurate and conservative.

4. The V/V report has been updated in its section 3.4.4 and 3.4.8. The project proponent provided the baseline analysis (Annexes\F09) which included all data used for the baseline assessment. The validation team checked the information and concluded that the baseline analysis has been carried out accurately and conservatively.

Evidences: Folder: Baseline procedure – Jurua. Set of maps and data used for baseline determination.

Verra Response

The projection of the annual areas of baseline deforestation in the reference region has been updated to the historical average approach. However, the new estimations are not in compliance with the methodology.
This finding remains open.

Issues

The project has not applied Equation 3 of VM0015, v1.1, to calculate baseline deforestation rate in the reference region (*ABSLRR,i,t*) (see background section)

Action required

1. The VVB must ensure that the project applies equation (3) of VM0015 to calculate ABSLRRi,t throughout the crediting period.
2. The VVB must ensure that Section 3.4 of the PD is

		updated to indicate the historical rate of deforestation in the reference region (*RBSLRRi,t)*. 3. The VVB must ensure that the any changes made to the baseline are reflected in the ER spreadsheet and in all relevant sections of the Joint PD & MR. 4. The VVB must assess the appropriateness of the updated information and calculation related with the historical deforestation rate and baseline deforestation in the RR throughout the crediting period. Program Rule(s) *VM0015*, v.1.1, Section 4.1.2.1 Background The new values of *ABSLRRi,t* are estimated using a fixed deforestation quantity (i.e., 2,057 ha) instead of using an average deforestation rate. Following Equation 3 in Section 4.1.2.1 of VM0015, v1.1, the project must estimate the total deforestation surface (ha) for the entire historical reference period, then calculate an average deforestation rate based on deforestation transitions (as per Puyravaud 2003). **Round 2** VVB Response (Pending) 1. It is confirmed that the PP has applied Equation 3 of VM0015, v1.1, to calculate baseline deforestation rate in the reference region (*ABSLRR,i,t*). The calculations can be observed in the tab “Projections” of the VM0015_planilha de calculo_jurua-v11.1 throughout the crediting period, which is in accordance with methodology requirements. All the subsequent calculations have been updated in the spreadsheet v11.1 and PDD&MR v14, section 3.4, and consequently, sections 5 and 7	

		2. The VVB confirms that the PD has been updated with inclusion of the historical rate of deforestation in the reference region (*RBSLRRi,t) in section 3.4, table 22.* 3. The VVB confirms that all changes carried out in the PD have been duly reflected in the ER calculations spreadsheet and vice-versa. 4. The VVB confirms that the conservative and accurate approach has been used for determining the historical rate of deforestation in the reference area throughout the crediting period. The calculation is in accordance with requirements of applied methodology equation 3. Information has been duly updated in the VR sections 3.4.4, 3.4.6, 4.1 and 5. Evidence included: - vcs-monitreport-jurua-2021-v11.1.xlsx - VM0015_planilha de calculo_jurua-v11.1.xlsx - factor_maps	
		Verra Response The PP has applied Equation 3 to calculate deforestation rate. The updates to the project documents are sufficient to close this finding. No further action is required.	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

10	Incomplete calculation of average carbon of post-deforestation LU/LC classes		
	Issue The joint PD/MR does not include the following parameters: 1. The long-term average (20-years) carbon stocks per hectare of post-deforestation LU/LC classes, and 2. The long-term area weighted average carbon stock per zone. Action Required 1. The VVB must ensure that Joint PD & MR is updated to include the long-term average carbon stocks per hectare of post-deforestation LU/LC classes and the long-term area weighted average carbon stock per zone. 2. The VVB must assess the update and revise the Joint V & VR accordingly. More specifically, the VVB must assess how these averages can be considered conservative. Program Rule(s) *VM0015*, v.1.1, Section 6.1.1.	**Round 1** VVB Response 1. Section 5.1 of the PD, table 51 has been updated to include the long-term average carbon stocks per hectare of post-deforestation LU/LC classes and the long-term area weighted average carbon stock per zone and to clarify how the estimates were made. 2. VVB has assessed calculation of long-term average and the long-term area weighted average carbon stock per zone in the section 3.4.6 of the VR. The validation team considers that the calculations are conservative. Verra Response 3. The PD/MR and the GHG calculations sheet have included the long-term average carbon stocks of post deforestation classes, and the long-term area weighted average carbon stock per zone. No further action is required **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	Closed

11	Incorrect estimation of post-deforestation classes carbon stock		
	Issue 1. The data used for the estimations are not location specific and do not describe the required age	**Round 1** VVB Response 1. Section 5.1 has been updated to clarify how the	Closed

	range. 2. The uncertainty assessment of carbon stocks is not presented in the joint PD/MR. Action Required 1. The VVB must ensure that location specific data spanning at least across 20 years are used for the estimation. 2. The VVB must ensure that an uncertainty assessment of carbon stocks is included in the joint PD/MR. 3. The VVB must assess the update and revise the Joint V & VR accordingly. Program Rule(s) *VM0015*, v.1.1, Section 6.1.1. Background The scientific article used as reference[2] presents data from another State and includes secondary vegetation in an age range of 1-15 years.	estimates were made, using appropriate references that satisfy the methodology. Additionally, the " VM0015_planilha de calculo_jurua-v11 " spreadsheet has been adjusted to include the new estimations and the uncertainty assessment. It is confirmed that the estimations are location specific (State of Acre, Brazil) and that the estimations were carried out between 6 and 30 years, therefore with significant age range for the secondary vegetation. For the pasture, the estimated data is also obtained from Acre. No age range is applicable considering that low variation on biomass occur. This assumption is considered reasonable by the validation team. 2. Uncertainty assessment has been calculated based on the same peer-review articles which estimated 20% uncertainty and duly presented in the PD section 5.1. Therefore, methodology has been followed and the calculations have been conservatively carried out. 3. Assessment carried out in the section 3.4.6 of the VR. Evidences have been provided such as annual historical deforestation spreadsheets, land use and land cover spreadsheets from MapBiomas and land cover change analysis. Moreover, shapefiles and peer reviewed articles, which have been duly checked by the validation team, who concluded that the analysis provided by the project proponents is correct. Evidences	

[2] Wandelli, E. V., & Fearnside, P. M. (2015). Secondary vegetation in central Amazonia: Land-use history effects on aboveground biomass. *Forest Ecology and Management*, *347*, 140-148.

		1. Spreadsheets Shapefiles Article “Estimating state-wide biomass carbon stocks for a REDD plan in Acre, Brazil” Article: “SECONDARY FORESTS IN WESTERN AMAZONIA”	
		Verra Response 1. The PD/MR and the GHG calculation sheets have been updated clarifying that the data that are used for carbon stocks are relevant to the RR. Further, the PD/MR has clarified what the age range of the data. 2. The PD/MR and the GHG calculation sheets have provided the uncertainty assessment for the carbon stock values. 3. The VVB has assessed all of the updated information related with the carbon stock values. No further action is required	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

12	Insufficient description of process for obtaining, recording, compiling and analyzing the monitored data and parameters		
	Issue 1. The joint PD/MR does not provide sufficient information on the following: a. Organizational structure and	**Round 1** VVB Response a) The validation team confirms that adjustment were made in section 6.3, item f) "Organization and	Closed

	responsibilities or personnel b. Policies for oversight and accountability c. Procedures for handling non-conformances with validated monitoring plan d. Sampling approaches <u>Action Required</u> 1. The VVB must ensure that the joint PD/MR includes a detailed description of: a. Organizational structure and responsibilities or personnel b. Policies for oversight and accountability c. Procedures for handling non-conformances with validated monitoring plan d. Sampling approaches 2. The VVB must assess the provided information and update the joint V/VR accordingly. <u>Program Rule(s)</u> *VCS standard*, v.4.5, Sections 3.16.2 and 3.16.4	responsibilities of the parties involved in all of the above." The governance structure has been referenced in this section and duly detailed in section 1.11 of the PD. b) It is confirmed that adjustments were made in section 2.5, under the item “Oversight and Accountability Policies.” information is coherent with VCS requirements. c) The validation team confirms that adjustment was made in section 6.3, item g) "Procedures for handling non-conformances with the validated monitoring plan." information is coherent with VCS requirements d) It is confirmed that, in section 6.3.1 of the PD, all sampling approaches have been duly detailed. It also has been observed that, additionally, sections 4.1, 6.3, 6.3, 7.1, 7.3 and 7.4 of the PD were revised due to the improvements made in the GIS methodology used by the project to monitor ex-post deforestations. Improved geographic data and a document providing technical justification were provided to the VVB in the file Supports\F12\ rev-monitoramento-geo-MapBiomas_Alerta.pdf 2. Information has been duly assessed in the VR section 3.4.8 of the VR. Evidences have been provided and were duly checked by the validation team who considered them accurate and conservative. Evidences: 1. Accuracy review PRODES_MBalerta (Folder)	

		2. 09_MP_RED_PJURUA_AP_LIM_00_PT_Analise_Acuracia_Projeto_REDD_Jurua 3. rev-monitoramento-geo-MapBiomas_Alerta	
		Verra Response 1. The monitoring plan has been updated sufficiently to include all of the necessary information in Section 6.3 of the PD/MR. Further, the VVB has assessed all of the updated information in Section 3.4.8 of the V/VR. No further action is required.	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

13	**Insufficient justification for the time function approach**		
	Issue 1. The analysis of agents and drivers does not **conclusively** establish an increasing trend in deforestation rate; therefore, the time function approach is not applicable (see background section). 2. Section 3.4 of the joint PD/MR has not demonstrated that the linear model meets statistical good practice (see background section). 3. It is unclear how the VVB concluded that the linear trend is significant given the statistical results presented in the calculation spreadsheet and PD/MR	**Round 1** 1. The analysis of deforestation agents was updated in section 3.4 of the PD. The evidence was provided, and some texts in the PD were updated to clarify the gaps identified. Main point: the data show that there is a forecast for continued population growth of the defined agents. Additionally, it is highlighted that there is an expectation of increased agricultural activity in the region. 2 and 3. The R2 is reduced by large residuals due to spikes	Closed

13	Insufficient justification for the time function approach		
	(R^2 = 0.39). Action required: 1. The VVB must ensure that future deforestation is projected using the historical average approach unless it can be clearly demonstrated that conclusive evidence emerges from the analysis of agents and drivers explaining the increasing trend and making it likely that this trend will continue in the future. The VVB must ensure that any changes made to the baseline are reflected in the calculations and in all impacted sections. 2. The VVB must ensure that Section 3.4 of the joint PD/MR us updated to include: a. A demonstration that the linear model adopted by the project meets statistical good practice; or b. Conclusive evidence to confirm the increase in deforestation rate in the RR during the current monitoring report (see background section). 3. The VVB must assess the revised joint PD/MR and update the joint V/VR accordingly, including the steps taken and the evidence used to conclude that the linear trend adopted by the project is significant and meet statistical good practice. Program rules *VM0015, v1.1*, Part 2, Steps 4.1.1, 4.1.2 Background	in deforestation rates and the lack of detailed annual data in the beginning of the series. Nevertheless, the trend is significant and evident from the time series plot, showing increasing annual deforestation rates through time, persisting even after the next few years after the project start date. Also, the methodology does not specify reference values for an R^2 to be used as thresholds, and good statistical practice has been applied when fitting the regression line. Despite the above, the project developer has changed the approach to historical average. This required heavy changes in the entire baseline section including emissions results. Such changes have been applied throughout the new version of the PDD. New data is provided in the evidences folder. The evidence folder (supports/13) contains all data, scripts and results to obtain the new deforestation rates, as well as the resulting new projections. UCEGEO deforestation data for the HRP in the RR, as well as additional data for the State of Acre in 2021-2022 are provided in the evidence folder, for conference. The validation team confirms that now the historical average has been applied for determination of baseline calculations and therefore it is confirmed that the calculations are now conclusive and conservative. Assessment has been carried out in section 3.4.4 of the V/VR. Evidences have been provided and were duly checked by the validation team who considered them accurate and conservative.	

13	Insufficient justification for the time function approach		
	Conclusive evidence "**Conclusive**" evidence in VM0015 means that the hypothesized relationships between agent groups, driver variables, underlying causes and historical levels of deforestation can be verified at hand of statistical tests, literature studies, or other verifiable sources of information, such as documented information provided by local experts, communities, deforestation agents and other groups with good knowledge about the project area and the reference region. To arrive at an overall "conclusive" conclusion when multiple agents and drivers are present, the evidence obtained for each of them must lead to a "conclusive" decision for all. **Statistical good practices** The project description has not demonstrated that the linear model meets statistical good practice, considering that the statistical results given in the joint PD/MR show that R^2 = 0.39. Therefore, additional evidence must be provided by the PP to confirm the increase in deforestation rate in the RR during the current monitoring report (i.e. ex-post deforestation data in the RR to perform a reality check of the baseline).	Evidences: 1. deforestation maps from Acre State from UCEGEO (see folder 3. Annexes\F13 Verra Response The project has updated the PD to adopt the historical average approach, therefore all of the issues identified in this finding are not applicable. However, this finding cannot be closed until finding #9 remains open. **Round 2** VVB Response Answers to finding #9 have been duly provided in the respective field. Verra Response Finding 9 has been closed. No further action is required. **Round 3** VVB Response (Pending) Verra Response (Pending)	

14	Insufficient evidence and assessment of analysis of agents and drivers of deforestation		
	Issue 1. The joint PD/MR does not provide clear verifiable evidence to justify the following: a. Agents of deforestation identified in the RR b. Historical deforestation attributable to each	**Round 1** 1. The validation team observed that the evidence was provided, and some texts in section 3.4 of the joint PD/MR were updated to clarify the gaps identified.	Closed

	agent group (i.e. relative importance) 2. The joint V/VR does not include an adequate description of the steps taken to validate that the documentary evidence used in the analysis of agents and drivers is relevant and correctly interpreted. <u>Action Required</u> 1. The VVB must ensure that the joint PD/MR is updated to include clear verifiable evidence used to define agents of deforestation and their relative importance. 2. The VVB must update the joint V/VR to include a description of the steps taken to: a. Assess the documentary evidence used in the analysis of agents of deforestation and their relative importance. b. Confirm the documentary evidence used is relevant, correctly quoted and interpreted. <u>Program Rule(s)</u> *VM0015, v1.1, Section 3.1*	Evidence has been provided and the following information has been detailed in the PD: For the analysis of deforestation agents, the deforestation dynamics within each land category were evaluated, according to the Acre Ecological-Economic Zoning (ZEE)[1]. According to the ZEE, in Acre, the highest deforestation rates occur in land categories involving explicit land ownership, such as settlements and private plots. Comparing the relationship between deforestation and land tenure status for 2005, the base year for the ZEE-AC Phase II data, and 2018, the base year for the ZEE-AC Phase III data, it is found that private plots, together with settlements, play a significant role in deforestation, accounting for more than 60% of all deforestation that occurred in Acre. Moreover, the ZEE mentions that changes related to land tenure or land ownership can influence deforestation rates in two ways: (1) the increase in deforestation rates is proportional to the probability of expropriation; or (2) the increase in deforestation rates is associated with the decrease in the expectation of tenure duration on the property (CATTANEO, 2001)[2]. In this context, the figure of the squatter is another important agent influencing deforestation, as the official ownership of the land is uncertain. 2. a. Assessment has been duly carried out in the V/VR section 3.4.4 indicating the documentary evidence used in the analysis of agents of deforestation and their relative importance. b. It has also been confirmed the documentary evidence used is relevant, correctly quoted and interpreted. Evidences: 1. Shape files from deforestation	

		2. deforestatoin analsys spreadsheet 3. Acre Zonning (COMPLETO Resumo Executivo do ZEE-Acre Fase III_V16_WEB) 4. Deforestation_in_the_Brazilian_Amazon_Comparing_th 5. desmate+fundiario 6. Fundiario 7. SAD-agosto-2020 8. TOTAL_analise_desmatamento_base_fundiaria_zee	
		Verra Response 1. The PD/MR has been updated providing sufficient evidence and justification of deforestation agents identified in the RR and historical deforestation attributable to each agent group. 2. The VVB has assessed the appropriateness of deforestation agents in Section 3.4 of the V/VR. No further action is required	
		Round 2	
		VVB Response (Pending)	
		Verra Response (Pending)	
		Round 3	
		VVB Response (Pending)	
		Verra Response (Pending)	

15	Inconsistencies between the description of the project activities and their implementation status		
	Issue 1. Section 1.11 of the joint PD/MR does not provide clear description of the start date of the project activities. 2. Furthermore, in Section 4 of the	**Round 1** VVB Response 1) The validation team confirms that the date of each activity related to the Juruá REDD+ Project has been duly described, as well as their start date and current status. Section 1.11 has been adjusted	Closed

	joint PD/MR, the implementation status of the project activities is not clear and is not consistent with a project start date on July 1, 2020, and a 100% efficiency in reducing deforestation for the first verification period (see also finding #15). Action Required 3. The VVB must ensure that the Section 4.1 of the joint PD/MR is updated to specify the implementation status of each project activity listed in Section 1.11 and describe their impact during the first monitoring period. The description should include information on: a. How the activity implementation was monitored, b. How each activity impacted the GHG emission reductions or removals during the monitoring period. c. When the project activity started being implemented and whether project activities that commenced prior to the monitoring	according to the requests made. 2) It has been observed that Section 4.1 has been adjusted according to the requests made. 3) It is ensured by validation team that due description of all activities carried out during the current monitoring period have been included in section 4.1 of the PD. For each activity, information on: a. how the activities have been implemented and currently monitored has been described, as well as the evidences presented to the validation team. b. Impact of each activity on GHG contributions c. information on start date of the activity and whether it will remain active during the monitoring period. 4) The implementation of activities has been confirmed during the on-site inspection. Several activities have been listed in section 4.1 with their starting dates, which contributed to the GHG emission reductions. The following activities started in the first year of the project implementation and therefore contributed to achieving 100% of deforestation reduction during the 1st monitoring period, 5) The assessment of implementation of project activities have been carried out in section 3.1.1 of the V/VR, where a table of all activities implemented has been assessed. During the on-site inspection, it was possible to observe some of the activities carried out, and evidence such as photos, map analysis, interviews have been used for conclusion. Verra Response 1. Section 4.1 of the PD/MR has been updated to provide qualitative information on the implementation status of project activity in the current monitoring period, specifically which activities that were conducted in the monitoring period. 2. The VVB has assessed how they have conducted their assessment regarding the project start date, and the implementation status of	

	period continued to be implemented during the monitoring period. 4. The VVB must explain how they confirmed that activities have started being implemented since the project start date, with a sufficient level of implementation to achieve 100% of deforestation reduction during the 1st monitoring period. 5. The VVB must provide it assessment and update the Section 3.1 of Joint V & VR accordingly. Program Rule(s) *VCS Standard 4.4, Section 3.2.6* *VCS Project Description Template, v4.2* *VCS Validation Report Template, v4.2* Background All project activities described in Section 1.11 of the joint PD/MR have an estimated implementation start date in 2022. However, the project start date is 1st July 2020. During the current monitoring period, the only activity described in Section 4 is "monitoring through satellite images", which alone is not sufficient to justify 100% efficiency in reducing deforestation.	project activities in Section 3.1.1 of the joint V/VR. However, this finding remains open. Issues 1. Section 1.11 (Table 2) of the joint PD/MR does not include the goals, expected impact in terms of reduction of deforestation and indicators of each project activity to support a robust plan for managing and implementing the project over the project crediting period. 2. Section 4.1 of the joint PD/MR does not include details on the outputs and indicators used to measure and monitor performance of the activities implemented during this monitoring period. Action Required 1. The VVB must ensure that Section 1.11 of the joint PD/MR is updated to provide a robust plan for managing and implementing the project over the project crediting period, including the goals, expected impact in terms of reduction of deforestation and indicators of each project activity. 2. The VVB must ensure that Section 4.1 of the joint PD/MR are updated to include details on the outputs and indicators used to measure and monitor performance of the activities implemented during this monitoring period, consistent with Section 1.11 (see background). 3. The VVB must provide it assessment and update the Section 3.1 of the joint V/VR. Program rules(s) VCS Standard v4.4, Sections 3.9.4, 3.14 and 3.2.6.	

		Background During the current monitoring period, the PP has not provided sufficient details (quantitative information) on the implementation of activities such as "interaction with stakeholders" and "property surveillance intensified with physical presence" of the project area and did not justify 100% efficiency in reducing deforestation. For example, the joint PD/MR does not include any measurable indicator, results and outputs of the project activities implemented during this monitoring period, based on Section 1.1, for example: number and effectiveness of patrolling or surveillance events, outputs of interaction with stakeholders, outputs of monitoring deforestation using satellite images, outputs of initial studies, etc. **Round 2** VVB Response (Pending) 1. The PP has now included in section 1.11 of the PD, table 2A, the objectives, expected impacts in terms of reduction of deforestation and indicators of each project activity to support a robust plan for managing and implementing the project over the project crediting period. The validation team considers that the indicators are well designed for this purpose and that the goals are achievable. Assessment has been carried out in section 3.1 of the VR. 2. The validation team confirms that the section 4.1 of the PD is updated and included all achieved activities during the monitoring period (tables 35 and 35A). It worth mentioning that it was already mentioned in section 4.1, community engagement was also key for deforestation reduction during the first monitoring period. Please check the paragraphs: "Thus, due to the activities implemented since 2020, such as community engagement and initial remote monitoring, it is concluded that the project achieved 100% deforestation reduction during the first monitoring period, even before the intensification of specific measures in 2022. These	

		measures ensured that, during the monitoring period, the project achieved the goal of 100% reduction in unauthorized deforestation, significantly contributing to the conservation of carbon stocks in the region and ensuring the environmental integrity of the project area. The positive outcome reflects the Juruá REDD+ Project's commitment to climate change mitigation and forest protection, providing a solid foundation for the continuity of activities and the generation of high-quality carbon credits." 3. Information has been duly assessed in section 3.1.1 of the VR Evidences provided Updated PD/MR Updated VR	
		Verra Response 1. Section 1.11 of the PD/MR has been updated to include plan for managing and implementing the project over the project crediting period, including the goals, expected impact in terms of reduction of deforestation and indicators of each project activity. 2. Section 4.1 of the PD/MR has been updated to include details on the outputs and indicators used to measure and monitor performance of the activities implemented during this monitoring period 3. The VVB has provided assessments of the project activities and its implementation in Section 3.1 of the V/VR. The updates to the project documents are sufficient to close this finding. No further action is required	
		Round 3	
		VVB Response (Pending)	

		Verra Response (Pending)	

16	Incorrect determination of ex-ante project effectiveness index		
	Issue The joint PD/MR does not provide a clear explanation to support the estimation of the ex-ante effectiveness index (EI) of the proposed project activities. Action Required 1. The VVB must ensure that the EI is estimated based on proposed project activities, and that a clear explanation is included in the joint PD/MR to support such assumption. 2. The VVB must review the updated joint PD/MR and revise the joint V/VR to describe how they reach the conclusion that the EI is realistic (see background section). Program Rule(s) *VM0015, v1.1, Section 7.1.2* Background Ex-ante effectiveness index does not impact the ERRs but should be realistic to mitigate the risk of non-permanence, i.e., to ensure the project activities will be maintained over time and not abandoned because carbon revenues are not as high as projected. The ex-ante effectiveness index must be estimated in relation to the specific activities proposed by this project and the expected impact on the deforestation reduction, rather than using an estimation of the history of deforestation that occurred in the area prior to the project	**Round 1** VVB Response 1. The validation team confirms that the PP applied an strategy for defining the EI has been adjusted and the estimated value is now based on the project's initial non-permanence risk (11%), as this parameter takes into account the possibility of losses in carbon stocks over time, whether due to climate change, social pressures, or changes in local governance. Thus, with each verification event, scheduled to occur every 3 years, the project's effectiveness increases by 1%. It is understood that with the implementation of activities and the overall maturity of the project, it is expected that the project will become increasingly effective in preventing deforestation throughout its crediting period. Information has been duly included in section 5.2 of the PD. The project activities have been mentioned and used to justify the index chosen. Therefore, the validation team has concluded that the *EI has been estimated in relation to the specific activities proposed by this project and the expected impact on the deforestation reduction.* Considering that the applied methodology does not set a procedure for determining the EI, the applied rational is considered reliable, considering that the non-permanence risk is based on specific activities proposed by the project activity and their impact on the deforestation reduction.	Closed

	start.	2. Information duly assessed in the V/VR section 3.4.6. Verra Response The PD/MR has provide justification for the effectiveness index, which is taken based on the NPRR. The VVB found such EI to be appropriate and realistic. No further action is required **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	

17	No information on the possible risk of overlap with private and public lands in Brazil		
	Issue(s) It is not clear if the VVB has assessed the risk of overlap between the project area and private land, other CARs plots, public lands, indigenous territories or quilombo lands. Action Required 1. The VVB must update Section 3.1 of the joint V/VR to describe how they confirmed – using which evidence – that the project area does not overlap with private land, other CARs plots, public land, indigenous territory or quilombos land. 2. The updated joint V/VR should include a map to easily visualize the outcomes of this assessment. The evidence must include the most up-to-date national and state level GIS information available. Program Rule(s)	**Round 1** VVB Response Section 3.1.8 of V/VR was updated and included the VVB assessment to demonstrate that the project area does not overlap conservation units, settlements, Indigenous lands, Quilombola lands, CAR declarations, and private lands. All the references and sources were described in the V/VR and included in the Annex of this finding (please see the Finding17 folder). The Juruá REDD+ Project did not carry out activities on private properties, lands belonging to indigenous or traditional communities, or government lands, but only on the Seringal Valparaíso property. Additionally, it is important to highlight that there are no traditional peoples or communities in the	Closed

	VCS Standard 4.4, Section 3.18.12-2.	project area, as presented in Section 2.5 of the PD/MR v.10, and there are no Quilombola lands in the Reference Region. To ensure there were no significant overlaps with public and private areas surrounding the project area, an analysis was conducted by the project proponent using georeferenced data from Conservation Units, settlements, Indigenous lands, Quilombola lands, CAR declarations, and private properties. These shapefiles were compared with the boundaries of the Seringal Valparaíso property to calculate possible overlaps. Regarding the analysis based on the Rural Environmental Registry (CAR) of neighboring properties, overlaps were found with 5 properties (“car_ap_jurua.shp” shapefile). The CAR, being a self-declaration system where landowners input information about their lands without immediate verification by authorities, becomes a fragile document for detailed analysis. The data may contain errors, be manipulated, or not reflect reality. The lack of rigorous validation compromises the reliability of the CAR, creating space for incorrect declaration of areas and the omission of illegal deforestation. For this reason, the CAR must be supplemented with other documents and checks for an accurate analysis, as was done using SIGEF data. In the analysis of SIGEF data, two overlaps were found (2), which are because the Project Area (PA) corresponds to the forested area on the Seringal Valparaíso farm, obtained through raster processing. Due to the resolution of the raster's pixels, the outer limits of the project area have "jagged" edges instead of smooth ones, which do not align with the official boundaries of the farm. Thus, in the geoprocessing of the intersection between private properties and the project area, overlaps occurred with properties	

		identified by the codes 320c0af1-487c-45c0-8310-2b04353d5e61 and b3023a81-0636-4da3-a051-5a1afb27eac9. However, these overlaps do not exist in reality, as the project area is entirely within the boundaries of the Seringal Valparaíso farm. The VVB team assessed the project proponent's data and cross-checked the overlapping analysis ("Overlapping GIS Assessment" report). The VVB team checked all the database sources to confirm that they were Brazil's official database, and they were updated data since these databases are dynamic and updated periodically. The consultation date used was 27/10/2024. All sources of information are duly detailed in this report. Therefore, it is confirmed by this analysis that, in accordance with VCS Standard V, 4.4, section 3.18.12-2 (which is section 3.18.1-2 of the VCS standard V 4.5, applied to the project), there is no any legal or customary tenure/access rights to the territories and resources, including collective or conflicting rights held by local stakeholders. Annexes: - Folder "VVB cross-check": Overlapping GIS assessment.pdf, which contains the assessment report made by the VVB to demonstrate the no-overlap of the project area with conservation units, settlements, Indigenous lands, Quilombola lands, CAR declarations, and private lands - Folders: "shp", "planilha" and "maps", which contain GIS information, maps, and shapefiles - Folder "shp", which contains the "car_ap_jurua.shp" shapefile.	
		Verra Response The VVB has sufficiently assessed and confirmed that the PA does	

		not overlaps with other private land, other CARs plots, public lands, indigenous territories or quilombo lands. No further action is required. **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	

18	**Disclosure of the use of armed patrols in project activities and associated security risks**		
	Issue(s) It is understood that deforestation agents include illegal armed gangs doing illegal activities and that armed patrols may are used by the project as part of the property surveillance activity. 1. It is unclear if the armed patrols are implemented by the landowners or PP staff during patrolling routine as part of the property surveillance activity. 2. It is unclear: a) What measures are in place to ensure personnel patrolling with arms have been properly trained on the use of weapons in the	**Round 1** VVB Response 1. Among the deforestation agents mentioned in Section 3.4 "Baseline Scenario - Stage 3," which deals with the "Identification of Deforestation Agents," the project does not cite or assert the presence of "illegal armed gangs" as deforestation agents in the Project area.s It has been observed in Section 1.11 of the PD, that the document mentions "enhancing property surveillance" as one of the project's proposed activities, aimed at "mitigating and preventing unplanned deforestation in the Project area." Property surveillance will be conducted safely and in compliance with the Biofílica Ambipar Environmental Investments S/A code of conduct (2). The project has no intention of using armed patrols, as the deforestation agents identified in the area do not correspond to	Closed

	field. b) Under what circumstances project personnel are permitted to use deadly force. c) Whether the use of weapons in patrols was communicated to stakeholders during the project's stakeholder engagement process. d) Whether the project has considered and the VVB has assessed the potential risks or negative impacts of armed patrols on stakeholders. <u>Action Required</u> 1. The VVB must ensure that Section 1.11 of the Joint PD & MR is updated to provide clarity on whether armed patrols are included as part of the project activities, by whom and under which circumstances. 2. The VVB must ensure that Section 2.1 of the Joint PD & MR is updated to provide disclosure of the potential risks or negative impacts of armed patrols on stakeholders. 3. The VVB must ensure that Section 3.3 of the Joint V & VR is updated to provide an assessment of all training and guidance provided by the project to its rangers regarding the proper use of weapons during patrols. The VVB must confirm whether the following has been provided to rangers: a. Basic training on and regular practice with using firearms in the field; b. Training and resources on engaging with armed individuals while on patrol; c. Incident reporting procedures for when	illegal armed gangs. It is clear to the validation team that the Project is committed to implementing a Property Surveillance Plan (1), which will be continuously improved to ensure the safety and integrity of all stakeholders. This plan will include clear protocols and specific training for employees, ensuring that surveillance activities are carried out according to safety and ethical standards. In addition, appropriate measures will be taken to address any illegal activities identified. As part of its monitoring activities, the project will promote the use of remote monitoring technologies, such as satellite imagery, to complement field actions. Surveillance teams will use these images to identify areas of deforestation pressure and adjust prevention strategies, strengthening local partnerships, especially with law enforcement agencies, when necessary, to combat illegal activities and ensure the security of the area and all those involved, as referenced in Section 1.11. The Project prioritizes the safety of those involved and does not foresee the use of armed force or armed patrols as part of its surveillance activities. 2. Considering that no armed patrols will be engaged for area surveillance, the validation team sees no need of including such risk in the no-net harm section. 3. No reference to armed patrols have been made in the PD and therefore the validation team sees no need of assessing the application of armed patrols in the project activity. 4. Not applicable as armed patrols will not be part of the project activity 5. In section 3.1.1 of the V/VR, information on improvement surveillance activity, it has been duly	

	firearms are discharged outside of a regulated training; d. Use and storage protocols for weapons while rangers are off-duty; e. Under what circumstances project personnel are permitted to use deadly force and how this intention is enforced. 4. The VVB must confirm whether the project's engagement with local communities includes the disclosure of armed patrols within the PA. 5. The VVB must update Section 3.3 of the Joint V & VR to provide an assessment of the potential risks and mitigation of negative impacts of armed patrols on stakeholders. Program Rule(s) *VCS Program, v4.4,* Section 3.18.2 and 3.18.3 Background Several potential risks and negative impacts must be considered and evaluated when armed patrols are part of the project activities: • Risks that security staff could face if confrontations with armed individuals or groups occur. • Safety risks to the employees when working in project areas. • Possible retaliation against the neighbours, including communities that are part of the project's network of informants to warn about deforestation, invasions, and fires. Other applicable risks or negative impacts.	detailed that no armed patrol is applied. Documents analysed were also detailed. The information is considered accurate. Evidences: available in 3. Annex\F18 1. Codigo-de-Conduta-e-Compliance-2023 (code of conduct and compliance) 2. Plano de Vigilância Patrimonial REDD+ Juruá (surveillance plan) Verra Response The VVB has sufficiently assessed and confirmed that armed patrols are not involved in the project activities. No further action is required. **Round 2** VVB Response (Pending) Verra Response (Pending) **Round 3** VVB Response (Pending) Verra Response (Pending)	