

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	934
Project Name	The Mai Ndombe REDD+ Project
Review Type	Fourth Verification Approval
Program(s)	CCB Program and VCS Program
Verification Period	1 Jan 2021 – 31 Dec 2021 (1 year)
Project Proponent	Wildlife Works Carbon LLC
Methodology	VM0009: Methodology for Avoided Ecosystem Conversion, v2.0
VVB	Earthood Services Private Limited
Assessment Criteria	<i>CCB Standards, v2.0 and VCS Standard, v4.4</i>
Date of First Issue	26 June 2023
Date of Second Issue	08 Sep 2023
Date of Third Issue	15 January 2024
Review Conclusion	Approved
Date of Final Issue	4 March 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	<p>Insufficient explanation regarding the closure of the FAR from the preceding monitoring period</p> <p><u>Issue</u> In Section 2.6.1 of the CCB& VCS validation report (VR), it is not clear why the VVB closed FAR 1 while the issue has not been addressed, as demonstrated by FAR 2.</p> <p><u>Action Required</u> The VVB must ensure that Section 2.6.1 of CCB & VCS VR clearly explains the reasons for closing the FAR of the previous monitoring period and opening an almost identical finding.</p> <p><u>Program Rule(s)</u> <i>CCB & VCS Verification Report Template CCB v2.0, VCS v3.4, Section 2.6.1.</i></p> <p><u>Background</u> Closing FAR 1 is misleading as it gives the impression that the issue has been addressed, while it has not, despite the drastic reduction of minimum plots.</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>VVB has provided the revised details of the FAR in section 2.6.1 of the VR and the findings raised in the VR Appendix IV: Clarification Requests, Corrective Action Requests and Forward Action Requests.</p> <p>During the initial assessment, the FAR was closed following the responses provided by PP. FAR 1 was raised during the last verification period (M3) to ensure that the PP conducts the re-inventory of 20% of the sampled plots every year in accordance with the monitoring plan which stipulates remeasurement of 20% of the plots annually with 100% remeasurement over a period of 5-years. As per the MP4 monitoring report, the total number of biomass plots in the project has been reduced to 163 plots, with only 110 plots requiring remeasurement to complete all plots within 5-years. In the current MP (M4), 55 plots were measured leaving only 55 plots to be remeasured by the end of the next monitoring period. The VVB found that complete remeasurement can easily be achieved within 5-years so considered the FAR closed. However, since, 55 plots still required remeasurement before the next verification (MP5), the VVB raised FAR 2 in the verification report to ensure this is completed and checked during the next verification.</p>	Closed

		<p>During Verra’s accuracy review, the Proponent provided evidence of the project’s forest inventory plots that were remeasured for the project’s fifth monitoring period (M5) in advance of the next verification. An excel file showing the total number of inventory plots (163), and the years in which they were measured demonstrates the project has now completed the remeasurement of 100% of the project’s biomass plots within 5-years in accordance with the monitoring plan.</p> <p><u>Verra Response:</u> The VVB response provided additional information clarifying the reason for closing FAR1. However, the finding cannot be close.</p> <p><u>Issue</u> Further checks are needed to ensure the PP completed the measurement of 100% of the project’s biomass plots. Since the next monitoring period is out of this verification request, the VVB should reintroduce FAR #2.</p> <p><u>Action Required</u> 1. FAR 2 should be reintroduced to ensure compliance with the monitoring schedule will be properly evaluated at the next verification. 2. The VVB must adjust the VR accordingly.</p> <p>Round 2</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> VVB has revised the verification report and reintroduced the FAR 2. The FAR 2 added in the verification report is as follows. “In continuation to FAR#01, the verification team has raised one FAR to be addressed by the next VVB in the fifth monitoring period. It is in line with the requirement of methodology 	
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		<p>applied in this project VM0009 section 9.3.1, “carbon stocks must be estimated for the first monitoring period by sampling all plots in all strata in the project, activity-shifting leakage and proxy areas. After the first monitoring period, all plots and all strata in the project and the activity-shifting leakage areas must be re-measured at least every five years, a process which may be accomplished on an intermittently rotating basis”. Project Proponent provided evidence of the project’s forest inventory plots that were re-measured for the project’s fifth monitoring period (M5) in advance of the next verification. An excel file showing the total number of inventory plots (163), and the years in which they were measured demonstrates the project has now completed the re-measurement of 100% of the project’s biomass plots within 5-years in accordance with the monitoring plan.</p> <p>Since the re-measurement of plots did not come under this verification period, the assessment of the re-measured plots needs to be checked at the time of next verification to ensure the PP completed the measurement of 100% of the project’s biomass plots.”</p> <p>2. The revised verification report has been submitted with this PRR file for review. The FAR has been reintroduced in the appendix IV of the verification report.</p>	
		<p><u>Verra Response</u> The VVB reintroduced FAR#2 in the verification report. The verification report has been updated accordingly. No further action is needed.</p>	
		<p>Round 3</p>	
		<p><u>VVB Response</u></p>	

		<u>Verra Response</u>	
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2	Missing assessment of the methodology deviation		
	<p><u>Issue</u></p> <p>1. Section 3.2 of CCB & VCS VR does not contain any information, discussion nor assessment of the two methodology deviations described in Section 2.2.2 of the CCB & VCS MR.</p> <p>2. In Section 3.2 of CCB & VCS VR it is unclear whether methodology deviations have been validated in previous verifications reports.</p> <p><u>Action Required</u></p> <p>1. The VVB must ensure that Section 3.2 of CCB & VCS VR is updated with the description, discussion, and VVB's assessment of any methodological deviations that occurred during the monitoring period.</p> <p>2. If methodology deviations have previously been validated, the VVB must ensure that Section 3.2 of the CCB & VCS VR is updated to include a summary of these deviations.</p> <p><u>Program Rule(s)</u> CCB & VCS Verification Report Template CCB v2.0, VCS v3.4, Section 3.2.</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>1. The methodology deviation given in the MR section 2.2.2 is related to the section 9 of the applied methodology. The methodology also allows deviation, and it is given in the same section that "Project proponents may deviate from the procedures detailed in Appendix B per current VCS requirement, including a description of the deviation and justification for the deviation." The deviation has already been assessed in the previous monitoring period (MP3). VVB had also checked the impact of deviation on the ERs and it was found that there is no material negative impact on the emission reduction calculations.</p> <p>2. It has been confirmed that the methodology deviations have previously been validated, and the summary assessment of this has been updated in the section 3.2 of the CCB & VCS VR.</p> <p><u>Verra Response</u></p> <p>While the VVB included a short paragraph about the 1st methodology deviation, the response is incomplete and the finding remains open.</p> <p><u>Issue</u></p> <p>1. The paragraph related to the 1st methodology deviation does not report the consequences of the deviation for this verification period while it is a requirement of the VCS Standard, v4.4 even for deviations that were assessed during previous verification report (see Section 3.19.3).</p>	Closed

		<ol style="list-style-type: none"> 2. The VVB did not assess the other methodology deviations described in Section 2.2.2 of the CCB & VCS MR. 3. The updated Section 3.2 of the CCB & VCS VR does not include a summary of all methodology deviations applied to the project to date. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure that Section 3.2 of CCB & VCS VR is updated with the description, discussion, and VVB's assessment of all methodology deviations that occurred during the monitoring period. 2. The VVB must ensure that Section 3.2 of CCB & VCS VR is updated with a list of all previously validated or verified methodology deviations. 	
		<p>Round 2</p>	
		<p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. Section 3.2 of the verification report has been updated to include details and assessment of all methodology deviations. <p>There is only one methodology deviation that has been included and assessed in the last verification (MP 3). The deviation is as follows:</p> <p>Deviation from biomass monitoring as defined in section 9 of the methodology. Section 9 of the methodology requires that “all plots and all strata in the project and the activity-shifting leakage areas shall be re-measured at least every five years, a process which may be accomplished on an intermittently rotating basis.” Only 38% percent of all plots were re-measured during the monitoring period. The audit team performed data checks, both in the field and through the re-calculation of on-site carbon stocks and the associated uncertainty and confirmed the claims in the</p>	

		<p>Project Implementation Report (PIR) regarding conservatism. Therefore, the audit team concludes that the deviation applied is valid. This deviation has been identified, reported, and assessed in the last monitoring report and verification. The same methodology deviation has been described in the monitoring report of this monitoring period.</p> <p>The methodology deviation given in MR section 2.2.2 is related to section 9 of the applied methodology. It was found that the deviation only required revisions in the monitoring section of the MR and was considered in line to the section 9 of the applied methodology VM0009 version 3.0. The deviation has been sought because there was an error in the equation [F.10] of the VM0009 version 2.1. The error in version 2.1 has been corrected and the revisions made in version 3.0 of the methodology pertaining to the equation [F.10] needed to be considered in the project. PP sought the deviation from the monitoring criteria. Since the deviation was found to be conservation and does not affect the project negatively, the deviation was found acceptable.</p> <p>The methodology also allows deviation, and it is given in the same section that "Project proponents may deviate from the procedures detailed in Appendix B per current VCS requirement, including a description of the deviation and justification for the deviation." The deviation has already been assessed in the previous monitoring period (MP3). VVB had also checked the impact of deviation in the ERs, and it was found that there is no material negative impact on the emission reduction calculations.</p> <p>2. The revised verification report has been submitted with this PRR file for review.</p>	
		<p><u>Verra Response</u></p>	

		<p>Section 3.2 of CCB & VCS VR has been updated with adequate description, discussion, and VVB's assessment of the methodology deviation that occurred during the monitoring period. It lists all previously validated deviations. No further action is needed.</p>	
		Round 3	
		<u>VVB Response</u>	
		<u>Verra Response</u>	

3	Insufficient assessment of the project description deviation		
	<p><u>Issue</u></p> <p>1. Section 3.3 of CCB & VCS VR does not include a complete assessment of the project description deviation detailed in Section 2.2.4 of the CCB & VCS MR.</p> <p>2. In Section 3.3 of CCB & VCS VR it is unclear whether project description deviations have been validated in previous verifications reports.</p> <p><u>Action Required</u></p> <p>1. The VVB must ensure that Section 3.3 of CCB & VCS VR is updated to provide an assessment of whether the proposed deviation impacts any of the following, documenting the assessment of each separately:</p> <ul style="list-style-type: none"> • The applicability of the methodology. • Additionality. • The appropriateness of the baseline/without-project scenario. • The project remains in compliance with the <i>CCB Standards, v2.0</i> and VCS Program rules. 	<p style="background-color: #2c3e50; color: white;">Round 1</p> <p><u>VVB Response</u></p> <p>Section 3.3 of the CCB & VCS VR has been revised to include a complete assessment of the project description deviation. It is informed in MR section 2.2.4 that total number of biomass plots have been reduced from 449 to 163 in the current monitoring period.</p> <p>The reason behind reducing the number of biomass plots from 449 to 163 was demonstrated as the resource burden of measuring 449 plots far outweighing the benefits from achieving an extremely low standard error, which can be easily achieved using the lower number of plots. The project had an excess of plots over what is needed to achieve the requirements on accuracy and uncertainty. The verification team found this acceptable, as this approach did not affect the conservativeness of GHG ER calculations. PP has earlier planned to measure sample plots for academic research and cover the geographic locations evenly within the project area. However, in due course, with the aid of remote sensing and analyzing the standard error value of field measurement, plot</p>	Closed

<p>2. If project description deviations have previously been validated, the VVB must ensure that Section 3.3 of the CCB & VCS VR is updated to include a summary of these deviations.</p> <p><u>Program Rule(s)</u> <i>CCB & VCS Verification Report Template CCB v2.0, VCS v3.4, Section 3.3.</i></p>	<p>numbers were reduced and finalized to 163. This has been randomly carried out to keep a check on biasness on selecting the sample plots.</p> <p>VVB assessed and concluded that the total plots were not measured during this monitoring period and VVB found that this can be achieved in the coming years given the requirement of applied methodology VM0009 section 9. Also, this deviation does not negatively impact the emission reductions calculations, Moreover, the monitoring period spans from 01/01/2021 to 31/12/2021 for which the data has been checked.</p> <p>During Verra’s accuracy review, the Proponent provided evidence of the project’s forest inventory plots that were remeasured for the project’s fifth monitoring period (M5) in advance of the next verification. An excel file showing the total number of inventory plots (163), and the years in which they were measured demonstrates the project has now completed the remeasurement of 100% of the project’s biomass plots within 5-years in accordance with the monitoring plan.</p> <p><u>Verra Response</u> While poorly reported in Section 3.3 of the CCB & VCS VR, information provided in CL#02 clarifies that reducing the number of biomass monitoring plots does not impact the applicability of the methodology (since the VM0009 does not stipulate a required number of plots or sampling intensity). It is also understood by Verra that such deviation does not impact the project additionality or appropriateness of the baseline scenario. However, the finding cannot be close.</p> <p><u>Issue</u> 1. The updated Section 3.3 of CCB & VCS VR does not to</p>	
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		<p>include a summary of all project description deviations previously validated.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure that Section 3.3 of CCB & VCS VR is updated with a list any previously validated project description deviations. 	
		<p>Round 2</p>	
		<p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. Section 3.3 of the verification report has been updated to include details and assessment of all project description deviations. <p>The monitoring report consists of the following project description deviations that have been assessed and accepted. In the second monitoring period, PP has sought the deviation in related to CCB monitoring indicators. The revisions have been made to modify the reporting frequencies for those indicators where the frequency was observed to be inappropriate; modify the reporting units for those indicators where the units were previously observed to be difficult to quantify and remove those indicators that were observed as difficult / impossible to quantify. VVB has checked the deviation sought and found it acceptable and completely included in the verification report of second monitoring period, therefore, not further assessment has been provided.</p> <p>Another PD deviation has been sought by PP in the second monitoring period was related to the status of PP. It has been given and further checked that the Wildlife Works Carbon bought out ERA's share of the project and has become the sole Project Proponent.</p> <p>The PD deviation sought in this monitoring period is related</p>	

		<p>to measurement of biomass plots. It is informed in MR section 2.2.4 that total number of biomass plots have been reduced from 449 to 163 in the current monitoring period. The reason behind reducing the number of biomass plots from 449 to 163 was demonstrated as the resource burden of measuring 449 plots far outweighing the benefits from achieving an extremely low standard error, which can be easily achieved using the lower number of plots. More details related to reducing the no. of biomass plots from 49 to 163 and its assessment can be found in the section 3.3 of the verification report.</p> <p>2. The revised verification report has been submitted with this PRR file for review.</p> <p><u>Verra Response</u> Section 3.3 of the verification report has been updated to include details and assessment of all project description deviations. No further action is needed.</p> <p>Round 3</p> <p><u>VVB Response</u></p> <p><u>Verra Response</u></p>	
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4	Insufficient demonstration that Activity Shifting Leakages are not applicable to the project		
	<p><u>Issue</u> It is not clear how the PP determined that forest surrounding the PA is not accessible to the secondary agents living within or near the project area, while these other forested areas are within the range of the secondary agents' mobility (up to 25 km as per section 2.4.1 of the VCS PD).</p>	<p>Round 1</p> <p><u>VVB Response</u> Section 3.3.1 of the PD has been revisited and now describes why activity shifting leakage is non-applicable to the project. "Without access to the project area that would have been provided by logging infrastructure, it is possible that secondary agents could be displaced to other forested areas within the</p>	Closed

<p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure the PP updates Section 3.2.3 of the monitoring report to demonstrate further why it has been determined that Activity Shifting Leakages are not applicable to the project. 2. The VVB must assess the updates and revise the verification report accordingly. <p><u>Program Rule(s)</u></p> <p>VM0009, v2.0, Section 8.3.2</p> <p><u>Background</u></p> <ul style="list-style-type: none"> - Section 3.2.3 of the MR refers to the VCS PD to justify that Activity Shifting Leakages are not applicable to the project because <i>“the project area represents the last remaining forest that is accessible to the secondary agents living within or near the project area”</i>. - Available remote sensing data (including the Global Forest Watch dataset that has been used to monitor disturbance in the PAA during the 4th monitoring period) shows that the PAA is surrounded by forest. - Section 8.3.2 of VM0009, v2.0 states that non-applicability of activity shifting leakages must be demonstrated <i>“using the PRA and/or expert knowledge, coupled to analysis of forested areas accessible to the agents of deforestation, those nearest to the project. In all other cases, there shall be one activity shifting leakage area for each project accounting area”</i>. 	<p>range of their mobility (up to 25 km per section 2.4.1 of this document). However, such forested areas do not exist within this range of mobility. The region already has experienced significant deforestation and conversion to agricultural land use. In other words, the project area represents the last remaining forest that is accessible to the secondary agents living within or near the project area. Because there is no forested area (except for the project area) that is accessible to the secondary agents within the range of their mobility, these agents are unable to shift their deforestation activity to nearby forests, and therefore activity-shifting leakage would not occur. Cumulative emissions from activity-shifting leakage are set to zero for carbon accounting purposes.”</p> <p>VVB has assessed PP’s response given in section 3.2.3 of the MR and also referred to the information given in section 3.3.1 of the PD. It has also been confirmed from the site visit conducted by VVB for this verification that the agents of deforestation live within villages inside the project area. The project area is bordered by Lake Mai Ndombe on the East, therefore the only forested areas are to the North, West, and South of the Project area. While there are forested areas surrounding the project area, none of these forests contain existing logging infrastructure and access afforded by logging operations. Most of these villages are already further than 25 km (mobility range) from the project area forest edge, which, therefore, limits their access to any potential leakage areas. Furthermore, the main means of transport for the agents of deforestation is by foot, which limits their range. This corroborates the information by the PP and VVB confirmed that the project does not need to account activity leakages.</p> <p><u>Verra Response</u></p> <p>The response provided by the VVB clarifies that no logging infrastructure are active surrounding the PA and that there is</p>	
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		<p>no primary agent of deforestation that could give access to the secondary agent. However, this finding cannot be closed.</p> <p><u>Issue</u></p> <ol style="list-style-type: none"> 1. Considering that secondary agents' deforestation activities are subsistence driven, it is not clear how the project can guarantee the absence of activity shifting leakage risk, despite the absence of a primary agent to facilitate accessibility to the forest. 2. Section 2.2.5 (subtitle Illegal activities) of the of CCB & VCS MR states that "community forest lands" surrounding villages have been excluded from the PAA to allow communities to expand their agricultural and small-scale timber extraction without the burden of reducing crediting. It is not clear whether deforestation has increased in these community forest lands due to the implementation of the project activities and compared to what it would be in the absence of the project implementation. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must describe how they have assessed, against which evidence, that deforestation did not increase outside of the PAA (including in the community forest lands) due to the implantation of project activities, especially in the context of subsistence-driven drivers of deforestation. 2. The VVB must assess any updates to the CCB & VCS MR and revise the verification report accordingly. 	
		Round 2	
		<u>VVB Response</u> October 4, 2023	
		<ol style="list-style-type: none"> 1. The VVB assessed the potential for activity shifting 	

		<p>leakage risk based on the on-site visit observations, interviews with the PP, and through cross-verification in discussions with the local communities during site inspections. It has been confirmed from the site visit conducted for this verification that the agents of deforestation living within the villages inside the project area that there has been no incidence of deforestation. The project area is bordered by Lake Mai Ndombe on the East, therefore the only available forested areas outside of the project are to the North, West, and South of the Project area. The potential of deforestation in the community areas was assessed primarily through discussions with community members in the villages, and observation of the forest/non-forest conditions in the buffer areas. Additionally, the project activities focused on reducing the deforestation threat including livelihood improvements for the community members were assessed. While there are forested areas surrounding the project area, none of these forests contain existing logging infrastructure and access afforded by logging operations. The VVB further conducted the desk review to understand the scope of logging in the protected area of DRC. The protected forests in DRC are the forests subject to restrictive legal controls. This category includes uses for community forestry, small-scale concession contracts and subsistence farming operations¹. As per the forest laws, Decree No. 011/25 of May 20, 2011 amending Decree No. 08/09 of April 8, 2008 establishing the</p>	
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		<p>procedure for awarding forest concessions, it was noted that the concession of area is only possible once for the allowed activities which are related to environmental services, ecotourism, bioprospecting and conservation of biological diversity.²³ It was found through independent desk review, Global Forest Watch data for the current monitoring period that there is considerable decrease in the deforestation rate in the project region as well as in surrounding regions⁴⁵. Though there is no clear evidence from desk review as well as site visit related to deforestation, VVB concluded that there is no potential increase in deforestation in these community forest lands due to the implementation of the project activities based on the site visit inspection.</p> <p>2. The assessment of the leakage analysis has been made in consideration of following aspects. It is to be noted that during the field visit for the scope of this 4th verification audit, VVB discussed with communities about logging in project areas and thoroughly cross-checked the site visit observations with the existing information in the MR and registered PD. Further to this, VVB, PP and VERRA discussed the concern around</p>	
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		<p>the assessment of leakage analysis. Upon submission of the VVB response to Verra’s Round 2 findings, follow-up calls were arranged by the Proponent with Verra to seek clarity on the intent and expectations behind this finding. In these calls, Verra communicated their concern that the project had not assessed potential leakage into the community management areas. To address this concern, Verra required the proponent to assess any activity-shifting leakage that may have occurred during the year 2021 associated with the project’s fourth monitoring period (M4).</p> <p>Though the leakage aspect is not part of validation project design and needs to be accounted in this verification, the assessment files including the calculation of activity shifting leakage for the project’s fourth monitoring period (MP4) were submitted and checked for this PRR comment.</p> <p>A remote sensing analysis was performed to determine the potential leakage from the Mai Ndombe REDD+ Project. The analysis looked at the forested areas within the Project Area (PA), but outside of the Project Accounting Area (PAA), and therefore not eligible for project crediting. These community buffer areas were excluded from the PAA due to agreements in the Cahier de Charge allocating them to communities for their management use and directing that they should not be part of the forest conservation project. The leakage “baseline” was created by observing deforestation (‘lossyear’ product) from Global Forest Change for a ten-year period prior to the project start date (2001-2010). The average annual emissions from this analysis was then set as the leakage baseline from deforestation. The emissions from deforestation in this same area for the year 2021 was then calculated using the same Global Forest Change landcover data and methods. To</p>	
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		<p>calculate leakage, if any, for the year 2021, the leakage baseline was subtracted from the measured deforestation emissions for 2021, using the equation: 2021 emissions from deforestation – leakage baseline = 2021 Emissions from activity shifting leakage.</p> <p>The emissions calculated from leakage was subsequently accounted for in the NER calculations and included as project emissions. PP has submitted the revised NER calculation sheet, revised MR that now includes summary of the leakage analysis performed. Measurement of leakage was documented as a methodology deviation in section 2.2.2, a Minor Change to the Project Description in section 2.2.3. The verification report section 3.3 and 3.4 has also been updated accordingly and all the revised documents are submitted with this PRR document for VERRA review. Further to this, VVB has identified the need to check the leakage at the time of baseline reassessment and therefore has raised the FAR to be addressed by next VVB. “PP is required to identify and demonstrate the leakages in this project. Following the requirement of applied methodology VM0009 section 8.3 which requires apply activity-shifting leakage results from the activities of the agent of conversion due to the project activities and applies to all projects; and requirements of section 6.20 of baseline re-evaluation. VVB in the next verification shall assess the leakages in the project.”</p>	
		<p><u>Verra Response</u></p> <p>The PP has monitored leakages in areas excluded from the PAA but inside the PA. The approach used was assessed by the VVB and deemed acceptable by Verra given the absence of an initial Leakage Emission Model. Estimated leakages were discounted from the GHG ERRs and the VVB has raised a FAR to ensure activity-shifting leakages will be reconsidered at baseline</p>	

		reassessment. No further action is needed.	
		Round 3	
		<u>VVB Response</u>	
		<u>Verra Response</u>	

5	Need for updated demonstration of methodology applicability		
	<p><u>Issue</u> A substantial portion of the project accounting area falls within the central Congo Basin peatland complex as mapped by Dargie <i>et al.</i> 2017 and confirmed by more recent publications. It is not clear how this information impacts the applicability of VM0009, v2.0 to the project.</p> <p><u>Action Required</u> 1. The VVB must ensure the PP explains if and how this new scientific information has been considered and how the project confirmed that the project meets applicability condition number 7 of VM0009, v2.0 (Section 4), taking into consideration the most recent science on the Central Congo Basin peatland complex. 2. The VVB must assess the demonstration and describe the steps taken to assess, against which evidence, the implications for the project.</p> <p><u>Program Rule(s)</u> VM0009, v2.0, Section 4, Applicability condition 7</p> <p><u>Background</u></p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>The reference paper Dargie <i>et al.</i> 2017 has been checked and it was found that the paper does not include ground truthing results. Until the results of the in-situ peat sampling and mapping exercise are complete, the project defaults to the widely cited FAO-UNESCO world soil map that shows that the dominant soils in the project area are non-peat. Moreover, VVB has confirmed from the site visit the presence of 5 species <i>Diospyros</i> spp, <i>Baphia dewevrei</i>, <i>Sapium xylocarpum</i>, <i>Guibourtia demeusei</i>, and <i>Symphonia globulifera</i>, of the top ten species in the 4 plots that was remeasured. The habitat of these species is indicative of non-peat areas. This assessment has been considered to confirm the absence of peat within the project area. In addition to that, the paper referred has an extrapolated values that requires to be validated with the in-situ measurements. Therefore, this confirmed that PP has sufficiently justified the condition number 7 of VM0009, v2.0 in regard to project applicability in the MR and the assessment of the same has been provided above.</p> <p><u>Verra Response:</u></p>	Closed

<p>Dargie, G.C., Lewis, S.L., Lawson, I.T., Mitchard, E.T.A., Bocko, Y.E., Ifo, S.A. 2017. <i>Age, extend and carbon storage of the central Congo Basin peatland complex</i>. Nature. 542(7639, pp.86-90. is available here: https://congopeat.net/wp-content/uploads/sites/49/2020/11/Dargie-et-al.-2017.pdf</p> <p>Most recent publications are listed here: https://congopeat.net/publications/</p>	<p>The demonstration provided by the PP and assessment made by the VVB clarify that Dargie et al. peat probability map has been developed using field measurements that are located far away from the Mai Ndombe project area. Given more recent updates that highlight the high uncertainty of peat predictions surrounding the Lake Mai Ndombe (Crezee et al 2022), it is understood that these publications are not sufficient to affirm the presence of peat in the project area. In addition, the PP and VVB observations on the field do not confirm the presence of peat.</p> <p>It is understood that the PP set out ground-based peat sampling procedure to determine the presence/absence of peat in the project area. To ensure future progressions are assessed, the finding remains open.</p> <p><u>Issue:</u></p> <ol style="list-style-type: none"> 1. There is not action in the CCB & VCS MR to ensure that future field works in the PA or surrounding the Mai Ndombe Lake (from scientists and/or the PP) are taken into consideration and their implications assessed by future VVBs. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must open a FAR so that the in-situ peat sampling and mapping exercise results will be properly evaluated in the next verification period. <p>Round 2</p> <p><u>VVB Response</u></p> <p>The FAR has been added in the verification report in the appendix IV. The context of the FAR is as follows, In this monitoring period, studies such as Dargie et al. 2017</p>	
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		<p>has come out that says the project accounting area falls within the central Congo Basin peatland complex. However, PP has demonstrated the absence of peat within the project area by giving list of species that are habitat of non-peat areas. The research paper does not include ground truthing data to confirm the presence of peat in the PAA. PP has identified the gap and highlighted that the paper included peat probability map has been developed using field measurements that are located far away from the Mai Ndombe project area.</p> <p>PP shall be producing results of ground-based peat sampling procedure to determine the presence/absence of peat in the project area. The results of this assessment shall be assessed by VVB in the next monitoring period.</p>	
		<p><u>Verra Response</u> A FAR was raised by the VVB as requested. No further action is needed.</p>	
		<p>Round 3</p>	
		<p><u>VVB Response</u></p>	
		<p><u>Verra Response</u></p>	

6	<p>Additional information needed on stakeholders' consultation</p> <p><u>Issue</u></p> <ol style="list-style-type: none"> Per Section 2.4 of the Verification report, community members were interviewed by the auditors during the site visit in Ikita, Nkondi, Lombe, Manga, Nselenge, Mbwenzey, and Mpotambalu villages. However, insufficient details are provided on these interviews to confirm they are representative of the communities 	<p style="background-color: #1a3d4d; color: white; padding: 2px;">Round 1</p> <p><u>VVB Response</u></p> <p>The responses to listed two issues are provided below. VVB has now provided the detailed approach for selection of villages for the site visit for the current monitoring period in section 2.4 of the revised verification report. The references for the reports provided in the comments'</p>	<p>Closed</p>
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<p>impacted by the project.</p> <p>2. Several reports were available at the time of verification that raised concerns about stakeholders' consultation, information dissemination, as well as about accessibility and function of the project's grievance mechanism. See Background Section below.</p> <p>It is not clear whether these reports were considered by the VVB and how - despite the allegations - the VVB has confirmed the project complies with VCS and CCB requirements in terms of stakeholder consultation.</p> <p><u>Action Required</u></p> <p>1. The VVB must ensure the PP provides further details about:</p> <ul style="list-style-type: none"> a. Stakeholders' consultation that was conducted since the project start date. b. How the PP responded to and addressed the consultation-related comments made by the 2 reports listed in the background section. c. The strategy and mechanisms in place for a continuous, meaningful, and effective consultation process, including: <ul style="list-style-type: none"> i. Whether the consultation material and communications are accessible and understandable to the local community, including non-literate members. ii. How those mechanisms allow stakeholders to contribute to the activities' design and to raise concerns about potential negative impacts during the project implementation. <p>2. The VVB must update Section 2.4 of the verification report</p>	<p>background were reviewed. VVB responses as per the actions required items are as follows.</p> <p>1 (a) As per this comment, PP has provided the complete details of stakeholder consultation conducted since the project start date. FPIC procedures provided in the registered PD and previous MRs and VRs have been studied and during the site visit of the current monitoring period, VVB interviewed the communities to ensure the practice of already established continuous stakeholder consultations and grievance mechanism. This has been elaborated in the section 2.4 of the verification report and also in the below response. Further, PP engages in continued stakeholder consultation both leading up to, and since the project start date, until today. VVB has checked the supportive document "A response to the recent Rainforest Foundation UK report on Mai Ndombe REDD+ in the DRC" (submitted with this PRR response) which was produced in response to the Rainforest Foundation UK, 2020 report titled "REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme". In PP's original response to the 2020 RFUK article, which was cited by the 2023 UC Berkeley Study funded by Carbon Market Watch, Wildlife Works explained the following: "WWC considers FPIC an ongoing obligation, to ensure that the community remains knowledgeable about and supportive of the project, even after original consent was given by each of the communities prior to project initiation, because it is only once they begin to see the real benefits the project can bring to their village that they can be truly informed of their decision to support the project."</p>	
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<p>to detail the interviews conducted with communities, including (but not limited to) how the communities and members within the communities were selected, how many members were interviewed, whether the interviews were individual or group interviews, etc.</p> <p>3. The VVB must update Section 4.3.5 of the verification report to provide further details on how they assessed and confirmed the project complies with VCS and CCB requirements in terms of stakeholder consultation.</p> <ol style="list-style-type: none"> a. Findings from independent sources must be incorporated when assessing the adequacy and efficiency of the process. b. The VVB must describe how they confirmed the PP communicated information about the project design and implementation, risks, costs and benefits, relevant laws and regulations, and the process of VCS and CCB validation to stakeholders impacted by the project. <p><u>Program Rule(s)</u> <i>Climate, Community & Biodiversity Standards, v2.0; Section G3.8-3.9</i> <i>VCS Standard, v4.4, Section 3.18.4 and 3.18.18</i></p> <p><u>Background</u> The 2 reports available at the time of verification are:</p> <ul style="list-style-type: none"> - Gauthier, M. (2018, March 14). Mai-Ndombe: Will the REDD+ laboratory benefit Indigenous peoples and local communities? Rights and Resources. Retrieved from https://rightsandresources.org/publication/mai-ndombe-will-redd-laboratory-benefit-indigenous-peoples-local-communities/ 	<p>During the site visit of this project in current (4th) monitoring period, VVB verified that through Local Development Committees (CLDs) and Women’s Groups (OBs), PP engaged in extensive consultation with the communities, and acquired written consent from each of the customary chiefs for each verification period. The evidence checked has been added in the verification report section 2.4 and has been submitted with this PRR response considering the evidence are deemed sufficient, if not beyond, CCB requirements for ongoing stakeholder consultation.</p> <p>1(b) PP has provided the response and clear explanation in their reports "A response to the recent Rainforest Foundation UK report on Mai Ndombe REDD+ in the DRC" (submitted with this PRR response) which was produced in response to the Rainforest Foundation UK, 2020 report titled "REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme". Another report “Rebuttal of RRI’s anti Mai Ndombe REDD+ Paper” provided responses to the report “Quality Assessment of REDD+ Carbon Credit Projects”. These reports by the PP have been submitted with these PRR responses. VVB has studied the responses provided by PP and based on the responses and site visit observations, it was concluded that the stakeholder consultations have been carried out as per the requirements of CCB and VCS standards.</p> <p>1(c) VVB checked that the initial stakeholder consultation mechanism was designed at project validation and is described in the CCB PDD in Section G3.8. This section describes identification of stakeholders, lists initial consultation phases, including participatory rural</p>	
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<p>- Berk, N., & Lungungu, P. (2020). REDD-MINUS: The rhetoric and reality of the Mai Ndombe REDD+ Programme. Rainforest Foundation UK. Retrieved from https://www.rainforestfoundationuk.org/media.ashx/redd-minus.pdf</p> <p>The findings of these 2 reports were cited in a more recent publication by Carbon Market Watch (https://carbonmarketwatch.org/wp-content/uploads/2023/09/Quality-Assessment-of-REDD-Carbon-Crediting-1.pdf)</p>	<p>appraisal, a participatory mapping exercise conducted with traditional village chiefs and community workshops on climate change and ecosystems. In addition, the Local Development Committees (CLDs) and Local Development Plan (PLD) mechanisms described above were created as part of this process. The CCB PDD was assessed and verified by the VVB who conducted the project’s validation and first verification, the reports for which are available on the Verra website.</p> <p>According to PP (Wildlife Works), in each village, the Local Development Committees (CLDs) act as organizational entities or frameworks within the community for the REDD+ project. They provide platforms for joint decision-making, where community members actively engage. These committees are also crucial in identifying available communication methods within the communities and determining the subjects on which the community desires further information about project activities.</p> <p>The level of involvement and the roles undertaken by women, both young and elderly, within the CLDs are deemed vital by WWC for understanding the socio-cultural dynamics of the communities. The administrative mechanism for the project is chosen via a democratic vote during an annual general assembly or as agreed upon by the community. In this gathering, anyone can be elected.</p> <p>Typically, communication within the community is facilitated through the CLDs and the Animateurs appointed for each community. However, all</p>	
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		<p>communications are ultimately directed to the WWC / ERA Congo office in Inongo.</p> <p>For each verification, including for this current 4th verification event, PP (WWC) reports on ongoing stakeholder engagement, including community engagement activities, project activities executed during the current monitoring period, information about the publicity of the public comment period, distribution of project information to the communities and maintenance / adherence to the grievance redress mechanism established at validation. These items are addressed in section 2.3 of the MR. Earthood verified (See MR Section 2.3.3) that project information has been made available to communities, including:</p> <ul style="list-style-type: none"> • A summary of the monitoring report (MR) in English, French, and Lingala at the project office in Inongo and by the Local Development Committees (CLDs) in the Project villages. These documents have been checked by VVB and submitted with this PPP for review. • Communication by animateurs (community liaisons) and the CLDs to the communities about the start of the comment period and an explanation of the Project and important documents during consultation meetings. • Verification that the general public has free access to the Project office to view detailed Project information, or get a spoken explanation of the Project. <p>In addition to descriptions of the above, WWC has provided us with supporting evidence of these ongoing activities in the form of a complete list of CLD meetings</p>	
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		<p>along with attendance records as well as signed consent forms from the traditional land chiefs in all the participating villages.</p> <p>The overall selection and implementation of project activities result from a Theory of Change process developed in conjunction with the communities. The priority order is established as follows: 1) schools, 2) medical centers, and 3) intensification of agriculture, fishing, and 4) the provision of clean water.</p> <p>It is concluded that PP has effectively established the stakeholder consultation procedures and have been working continuously and collected feedback from communities. Furthermore, it has come to light that currently new ideas for activities originate from the community and are directed through the CLDs established in each village. The integration of these concepts takes place within a Local Development Plan, and subsequently, potential activities are determined by Grand CLDs. The larger CLDs generally give priority to more substantial villages initially. The main emphasis is on carrying out activities in 24 communities, with the majority located in the eastern part of the project.</p> <p>2. Section 2.4 of the verification report has been updated to include the details of the interviews conducted with communities and the approach to determine the community sampling plan for the site visit.</p> <p>Selection of communities for the site visit interviews have been provided below.</p>	
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		<p>a. As per the requirements of CCB and VCS standards, PP needs to inform communities about auditors' site visit and regularly update about the project progress. Community members within the sampled communities were seen voluntarily participating during the site visit and gathered for discussion. Following is the approach used for the selection of communities for the site visit interviews in this monitoring period. For community interviews, VVB randomly selected villages based on following aspects. (1) Location villages within project area; (2) social activities implemented in this MP that needed to be captured on site and reconfirmed from communities were a focus for interviews. It is to be noted that the communities have been decided based on the information provided in the MR, responses of draft findings raised before site visit, and documents review which is independently carried out and without the involvement of PP's preference to villages to avoid any biases. (3) Records of issues – it would be preferred to interview communities who raised concern to understand and record the grievance mechanism on site; however, no records of project grievances during this monitoring period were documented before site visit planning. (4) Other reports or independent desk review that could cover the news articles and concerns raised publicly for the current monitoring period (i.e., 01/01/2021 to 31/12/2021). Following CCB standard requirements, VVB reviewed the registered PD and current MR to identify the villages or communities. FPIC procedure is clearly given in MR section 2.5.2. Following various meetings conducted since project initial conceptualization, the Free Prior Informed Consent has been granted from the following clans: Ipokyetoyi, Ikoli, Basanza, Mpama, Mpatambalu, Mpatambalu, Bomwanza, Kesenge, Bomwanza, Mpama, Ibali, lonka, Botongambela, Lobalu,</p>	
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		<p>Programme. Rainforest Foundation UK, including other articles. It has been noted that PP has previously provided the responses to these reports in support of this project. On further review, it was found that the information provided of villages or communities of Mai Ndombe mentioned in these reports could not be interpreted in demonstrating failure of VCS 934 project. This is because the Bolukluki methodology used in the reports visited 26 villages and surveyed more than 400 people that are particularly not influenced by the Mai Ndombe REDD+ project. Moreover, the communities interviewed during the site visit confirmed the implementation of the project and provided the positive opinion and support with respect to current and future implementation activities. They were aware of PP and field team, REDD+ project concept in layman language, grievance mechanism and purpose of the visit that were made by the verification audit team. Therefore, VVB found absence of any evitable proof in support of such reports. Moreover, direct discussion with communities and other stakeholders confirmed the positive impact of project in the area and in the lives of communities.</p> <p>b. VVB confirmed that PP has sufficiently discussed and communicated information about the project design and implementation, risks, costs and benefits, relevant laws and regulations, and the process of VCS and CCB validation to stakeholders impacted by the project. This has been thoroughly checked on site during interviews with communities. Communities' selection criteria have been provided above in this response. The VVB checklist template and a few filled checklists have been provided with this PRR response for VERRA review. Kindly note that</p>	
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		<p>based on the responses from communities, follow up on open ended questions were also discussed with communities to ensure that proper information has been captured during the site visit on the implementation status of the project, stakeholder consultations, grievance mechanism, benefits provided to communities in this monitoring period and overall conservation implemented in the current monitoring period.</p>	
		<p><u>Verra Response:</u> The VVB has shared more evidence and details about the stakeholder consultation conducted by the project since its inception. Based on the evidence provided and interviews, they confirmed a continuous consultation process and direct implication of the communities via the CLDs. The VVB also shared with Verra a detailed and documented rebuttal of both reports referenced in the background section of the finding. They confirmed that the stakeholder consultation performed by the VVB was representative of the communities impacted by the project. The verification report has been updated accordingly and strong supporting evidence have been provided. This finding is closed.</p>	

7 Additional information needed on the grievance mechanism			
	<p><u>Issue</u></p> <ol style="list-style-type: none"> Section 4.3.6 of the verification report confirms the grievance mechanism is in place and that community members are aware of it. However, insufficient details are provided to understand how the VVB reached this conclusion. 	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> VVB reviewed the project’s grievance redressal policy during the initial assessment of project. It was confirmed that this policy is the same one that has been distributed to the project communities and accurately states the process to 	<p>Closed</p>

<p>2. No information is provided on the grievance mechanism's effectiveness and transparency and it is not clear if the VVB reviewed and assessed any evidence of a functioning local committee to resolve REDD+ disputes as described in the CCB project description.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must verify the existence and functionality of the grievance redress mechanism described by the project proponent, particularly whether the local committee is active and equipped to handle disputes. The VVB must update Section 4.3.6 of the verification report accordingly. 2. The VVB must ensure the project proponent provides evidence of community awareness regarding the grievance procedure, including how to access it and the process involved. 3. The VVB must ensure that the project proponent demonstrates proactive measures taken to publicize and explain the grievance mechanism to all community members, including through local languages and accessible formats. 4. The VVB must incorporate findings from independent sources to assess the adequacy of the grievance redressal mechanism. <p><u>Program Rule(s)</u> <i>Climate, Community & Biodiversity Standards, v2.0; Section G3.10</i> <i>VCS Standard, v4.4, Section 3.18.19</i></p>	<p>submit grievances to the project and how the project seeks to resolve them. While there were no grievances submitted in the M4 monitoring period, the PP provided documentation of 2 issues that were raised by the communities in prior monitoring periods and the resolution of these issues. A minor issue that was raised in M4 which was included as well as resolved by the PP. This was a small issue in a village that arose between the chief and the villagers that Wildlife Works (PP) was asked to mediate. Therefore, it was not included as a project grievance as it did not involve the project or project staff. The issue was raised with project staff and they helped mediate the resolution. Therefore, even though the issue did not concern the project, the project's grievance policy was used to resolve it. The documents demonstrate that community members are aware of the grievance mechanism and how to access it. They also show that the grievance process can successfully resolve issues to the satisfaction of all parties.</p> <p>It is also to be noted that the "local committee" referenced in the project grievance policy will seek resolution to any grievance that could not be resolved at the prior levels or for a grievance involving the ERA Congo Managing Director, Operations Manager or Project Manager. This committee does exist, but it is not a standing committee. It is formed, and they generally only meet when there is need to resolve a grievance that cannot be resolved through the other means listed in the grievance policy. This is an official government committee and is required under the National forest code for any holder of a forest concession and is governed under the government decree N.103/CAB/MIN/ECN-T/15/JEB/09. There have not been any major grievances in the area that have required the convening of the committee for resolution. In prior monitoring</p>	
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<p><u>Background</u> Issues about accessibility and function of the grievance mechanism are raised in the reports listed in finding #6 above.</p>	<p>periods there were grievances submitted to the project and these have been resolved through the REDD+ project grievance policy without requiring the official committee to convene. Section 4.3.6 of the verification report has now been updated to include the complete assessment of grievance mechanism.</p> <p>2. VVB has assessed the evidence for the grievance records as mentioned in the above response. This evidence is provided with this PRR response in the 'confidential documents' folder. Further to this, the independent reports and PP's relevant responses have been submitted with this PRR review. The site visit did not reveal any proof to substantiate the allegations made by RFUK. It was observed that the local community is well-aware of the project details, thanks to the employment of local individuals as 'animateurs.' These animateurs are responsible for spreading awareness about the project's initiatives, collecting feedback, and addressing any concerns from the community. Additionally, the community is familiar with the operation of the Community-Led Development Committees (CLDs) and the project's organizational structure. Elections for CLD members occur regularly, as determined by the community, ensuring active participation in governance. Moreover, to discuss current projects and future plans, frequent meetings involving the entire community are held.</p> <p>3. It has been observed during site visit and confirmed through desk review that PP continuously publicizes and explains the grievance mechanism to all community members, including through local languages and accessible formats. MR summary and grievance related documents are available to communities in local language. The project proponent ensures</p>	
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		<p>that the project community members have knowledge of the grievance policy and the process with which they can submit any grievances and have them resolved. The methods that the PP used to publicize the grievance policy during the project development and to continue building knowledge of the policy are detailed in the project’s CCB PD and the monitoring reports. As the project communities communicate primarily through verbal means due to the high rate of illiteracy, education on the project’s grievance policy is mostly done in community meetings, during workshops, through local development committees (CLDs) and through outreach by project staff called ‘animateurs’. The animateurs are project staff hired from within the communities who serve a very important community relations function. They are based in their villages and provide an essential communications function, ensuring that community members are informed of project impacts and policies, such as the grievance policy, and reporting back to the project manager any community issues or concerns, including grievances. These outreach efforts are all held in Lingala, the primary language for the majority of the project communities, except in the pygmy villages where it is done in their language. The grievance policy has also been translated into Lingala and distributed to project communities and provided to the CLDs. Further, as described in section 2.3.4 of the MR, The Project has an open-door policy toward grievances related to project operation and activities. PP demonstrated that they maintain a close link with stakeholders by working actively with each and every community on a daily basis. VVB also verified the same policy for staff wishing to talk about issues they may be facing.</p> <p>4. Project documents especially pertaining to MP4 and desk review were carried out to confirm the grievance procedures. Further, review of the articles available on open-accessible</p>	
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		<p>sources were checked. While addressing this PRR comment, VVB also reviewed the 2 reports , viz., Gauthier, M. (2018, March 14) and Berk, N., & Lungungu, P. (2020). REDD-MINUS: The rhetoric and reality of the Mai Ndombe REDD+ Programme. Rainforest Foundation UK, including other articles. It has been noted that PP has already provided the responses to these reports in support of this project. On further review, it was found that the information provided of villages and communities of Mai Ndombe mentioned in these reports could not be interpreted in demonstrating failure of VCS 934 project. This is because the Bolukluki methodology covered visiting 26 villages and surveyed more than 400 people that are particularly not covered in this project. Moreover, the communities interviewed during the site visit confirmed the implementation of the project and provided the positive opinion and support with respect to current and future implementation activities. They were aware of PP and field team, REDD+ project concept in layman language, grievance mechanism and purpose of the visit that were made by the auditors of the verification team.</p> <p>Further, Interviews with communities and other interviewee during site visit ensured VVB to capture the grievance redressal mechanism on site. It was concluded that the grievance redressal mechanism is in place and communities are well informed about the project cycle, project proponent, implementation status, grievance procedures and purpose of VVB visit. They were willing to interact and provide their views on overall projects. VVB has submitted site visit photographs, checklist templates, filled scanned copy of few of the closed ended questionnaire. Follow up open ended questions were asked during site in order to record the comprehensive</p>	
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		<p>understanding on field. All the evidence and revised verification report are submitted with this PRR document.</p>	
		<p><u>Verra Response:</u> The VVB has provided evidence to confirm the grievance mechanism is in place, community members are aware of it and have access to it. This finding is closed.</p>	