

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	1052
Project Name	North Pikounda REDD+
Review Type	Verification
Program(s)	VCS
Verification Period	01-January-2013 to 31-October-2021
Project Proponent	Congolaise Industrielle des Bois
Methodology	VM0011 Methodology for Calculating GHG Benefits from Preventing Planned Degradation, Version 1.0
VVB	KBS Certification Services Ltd
Assessment Criteria	VCS Standard, version 4.5
Date of First Issue	04 July 2024
Date of Second Issue	19 September 2024
Date of Third Issue	26 September 2024
Review Conclusion	Approved
Date of Final Issue	17 January 2025

FINDINGS

#	Finding Description	VVB Response	Status
1	Clarification needed on the validity of the logging right in the project area		
	<p><u>Issue</u></p> <p>1) In Section 1.11 of the MR no information/evidence is provided on whether the logging right in the project area is still valid, considering that the last VR was issued on 26 August 2013.</p> <p>2) The VVB has also not provided an assessment of the same.</p> <p><u>Action Required</u></p> <p>1) The VVB must ensure the PP provides information/evidence – a legally authorised letter or document that clearly demonstrates that the logging right in the project area is still valid.</p> <p>2) The VVB must update the VR and provide an assessment of the evidence provided to demonstrates that the logging right in the project area is still valid.</p> <p><u>Program Rule(s)</u> VM0011, V1.0 Sections 1.2.2</p>	<p>Round 1</p> <p><u>VVB Response</u></p> <p>Logging rights is now updated in Section 1.1 of MR. Though specifically VVB did not give assessment in FVR CAR 01 was raised and closed with the PP’s demonstration with the following documents for the logging rights:</p> <ul style="list-style-type: none"> English Version_EF-AR-92 - POKOLA & PIKOUNDA.pdf¹ French Version_EF-AR-92 - POKOLA & PIKOUNDA.pdf² <p>These documents (in both English and French) were approved in 2012 by the MDDEFE, with a duration of 25 years (Article 2). This evidence is also shared along with PRR response to VERRA for review.</p> <p>VVB assessment on the Logging rights are now detailed in the section 4.2.7.4 of VR.</p> <p><u>Verra Response</u></p> <p>The MR has been updated to provide information on the validity of the logging right. The VVB has also provided an assessment of the logging documents provided by the PP to demonstrate validity of the logging rights (until 2037). This finding is closed and, no further action</p>	Closed

¹ Verra_PRR\Evidences\Finding_01\English Version_EF-AR-92 - POKOLA & PIKOUNDA.pdf

² Verra_PRR\Evidences\Finding_01\French Version_EF-AR-92 - POKOLA & PIKOUNDA.pdf

	is required.	
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2 Missing information on the assessment of losses		
<p><u>Issue</u> In Section 4.3 of the MR the project proponent mentions that “no losses in the project area recorded”, however, the VVB has not provided an assessment of whether they are losses that have occurred during this monitoring period.</p> <p><u>Action Required</u> The VVB must provide an assessment of whether they are losses or not that have occurred during this monitoring period.</p> <p><u>Program Rule(s)</u> VCS Standard v4.5, Sections 3.2.20</p>	<p>Round 1</p> <p><u>VVB Response</u> PP had carried out illegal logging analysis and natural disturbances analysis and was submitted previously to in response to CL17. The analyses carried out by PP to identify the presence of losses related to illegal activities and natural disturbances are clear:</p> <ul style="list-style-type: none"> - Appendix 12, Land Cover Maps³; and - Appendix 13, Satellite Images Analysis⁴. <p>PP by analysis had clearly demonstrated that no illegal logging was present in the area during the monitoring period (Appendix 13).</p> <p>Section 4.3 and 4.3.1 of the MR is now updated. Section 4.2.6.1 of FVR is detailed with additional information of VVB assessment.</p> <p><u>Verra Response</u> Section 4.3 and 4.3.1 of the MR and Section 4.2.6.1 of VR have been updated to provide information on whether they are losses that have occurred during this monitoring period. This finding is closed and, no further action is required.</p>	Closed

³ Verra_PRR\Evidences\Finding_02\Appendix 12, Land Cover Maps.zip

⁴ Verra_PRR\Evidences\Finding_02\Appendix 13, Satellite Images Analysis.zip

3 Missing information on the assessment of the accuracy of GHG ERR Calculations		
<p><u>Issue</u></p> <ol style="list-style-type: none"> 1. The steps and the results of the application of the “CDM Tool for testing significance of GHG emissions in A/R CDM project activities” have not been presented in the MR. 2. Section 5.1 of the MR does not include the procedures for quantifying baseline emissions and/or carbon stock changes, including all relevant baseline equations and justification for the methodological choices. 3. The MR and VR do not discuss the uncertainty assessment and deductions applied by the project. <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure that Section 5 of the MR is updated to include information on how the “CDM Tool for testing significance of GHG emissions in A/R CDM project activities” was applied. 2) The VVB must ensure that Section 5.1 of the MR is revised to include the procedures for quantifying baseline emissions and/or carbon stock changes, including all relevant baseline equations and justification for the methodological choices. 3) The VVB must ensure the MR is revised to discuss the uncertainty assessments and deductions following the methodology provisions. 4) The VVB must update VR to include information on the steps and the results of its assessment of 	Round 1	<p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. PP did not test for the significance of GHG emissions with the “CDM Tool for testing significance of GHG emissions in A/R CDM project activities”, since no losses were identified during the monitoring period (see Finding #2 for more information on how the PP demonstrated the absence of losses from illegal and natural disturbances during the monitoring period). Moreover, it was already proved that the emissions related to administration, planning, travel and field work were negligible. PP has modified section 5.2 of MR to better explain how these disturbances were proved to be not non-existent during the monitoring period, so the CDM tool for significance use was not deemed necessary. 2. Sections 5.1 and 5.2 of the MR were updated accordingly to include the procedures to identify baseline emissions and/or carbon stock changes, including the methodological choices. 3. Section 5.4 of MR is also updated to include the uncertainty assessment and deductions applied to the project 4. VVB has updated further the non-application of the CDM Tool for testing significance of GHG emissions in A/R CDM project activities in
		Closed

<p>the above changes.</p> <p><u>Program Rule(s)</u> <i>VM0011, Sections 1.2.3 and 6, VCS Standard v4.5, Sections 3.5.5, VCS Monitoring Report Template, v4.3, Section 5.1</i></p>	<p>section 4.3 of VR.</p> <p><u>Verra Response</u> Section 5.1 of the MR has been updated to include the procedures for quantifying baseline emissions and/or carbon stock changes. The non application of the CDM Tool for testing significance of GHG emissions in A/R CDM project activities has also been assessed in section 4.3 of VR. This finding is closed and, no further action is required.</p>	
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4 Inadequate assessment of the methodology deviation in this MP		
<p><u>Issue</u> The reference provided in Section 3.1 of the VR are insufficient to demonstrate how the VVB assessed whether the methodology deviation applied in this MP does not negatively impact the conservativeness of the monitored parameters and quantification of GHG emission reductions or carbon dioxide removals.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must update Section 3.1 of the VR to describe the steps taken to assess whether the methodology deviation does not negatively impact the conservativeness of the monitored parameters and quantification of GHG emission reductions or carbon dioxide removals. 2) The VVB must describe how it validated, against objective evidence, the data and parameters 	<p>Round 1</p> <p><u>VVB Response</u> Methodological deviations related to calculation (deviations mentioned in Section 3.1 of the VR, unless 2.2.2 Temporal Boundaries) were already validated in the PD. VERRA is thus referring to the deviation related to the extension in verification of temporal boundaries. PP in response to CL11 and CAR03 has provided the relevant information to assess the conservativeness of the monitored parameters and quantification of GHG emission reductions or carbon dioxide removals and how it validated the data and parameters for the verification.</p> <p>PP has provided evidence to prove that forest composition has not changed, which demonstrates that the project has been active in protecting the forest</p>	<p>Closed</p>

<p>applied by the project in justifying the methodology deviation.</p> <p><u>Program Rule(s)</u> VCS Standard v4.5; Section 3.20; VM0011, Sections 7.1.3</p>	<p>during the proposed monitoring period (2013-2019): (also refer response to Finding #2 for evidence).</p> <p>Now the VR section 3.1 is updated. Incorporated the assessment and validation of the methodology deviation, including the extension of temporal boundaries, based on the evidence provided by the PP.</p> <p><u>Verra Response</u> Section 3.1 of the VR has been updated to include an assessment of the impact on the change in the monitoring frequency as a methodology deviation. The VVB has also raised a FAR ensure the monitoring frequency is inline with the methodology in subsequent verification. This finding is closed and, no further action is required.</p>	
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5 Missing information on stakeholder identification		
<p><u>Issue</u> The reference provided in Section 4.1 of the VR are insufficient to demonstrate how the VVB assessed whether the stakeholders consulted for the validation and in the first verification period have not changed in the last nine years.</p> <p><u>Action Required</u> The VVB must update Section 4.1 of the VR to describe the steps taken to assess whether the stakeholders consulted for the validation and in the</p>	<p>Round 1</p> <p><u>VVB Response</u> Section 4.2.1 of VR is detailed out on unchanged consulted stakeholder from the validation and First verification period.</p> <p><u>Verra Response</u> Section 4.1 of the VR has been updated to demonstrate how the VVB assessed whether the stakeholders consulted for the validation and in the first verification period have not changed in the last nine years. This finding is closed and, no further action is required.</p>	<p>Closed</p>

<p>first verification period have not changed in the last nine years.</p>		
<p><u>Program Rule(s)</u> VCS Standard v4.5; Section 3.18</p>		

6 Missing information on leakage emissions and leakage assessment		
<p><u>Issue</u> Section 5.3 of the MR refers to Appendix 3a for a broader explanation and Appendix 3c for the calculations of leakage emissions, however, these have not been provided.</p>	<p>Round 1</p> <p><u>VVB Response</u> PP has provided an update to section 5.3 of MR, to include the relevant leakage equations and justification for the methodological choices.</p> <p>Section 4.3 of VR is updated to reflect changes.</p>	<p>Closed</p>
<p><u>Action Required</u></p> <ol style="list-style-type: none"> 1) The VVB must ensure the project proponent provides Appendix 3a and Appendix 3c for review. Additionally, the MR must be updated to include the relevant leakage equations and justification for the methodological choices. 2) The VVB must describe how it validated, against objective evidence, the data and parameters applied by the project in justifying the leakage emissions ($C_{leakage}$) are equal to 10% of the baseline for this 	<p><u>Verra Response</u> Section 5.3 of the MR has been updated to provide the calculations of leakage emissions. However, this finding cannot be closed.</p> <p><u>Issue</u> Verra cannot efficiently review the leakage emissions calculations without Appendix 3a, Appendix 3c, and the full citation of the paper by Sharma et al. (2012) referenced by the PP.</p> <p><u>Action required</u> The VVB must provide Verra with Appendix 3a, Appendix 3c, and the full citation of the paper by Sharma et al. (2012) to facilitate efficient review of the leakage calculations.</p>	
	<p>Round 2</p>	

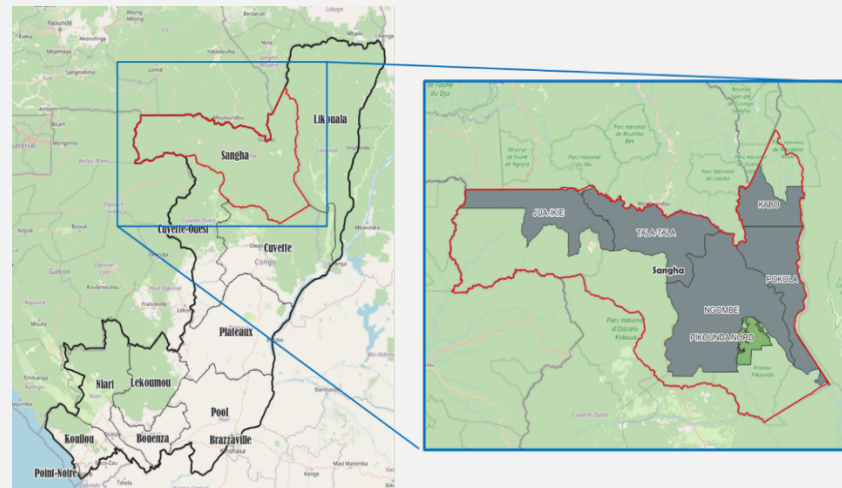
<p>monitoring period.</p> <p><u>Program Rule(s)</u> <i>VM0011, v1.0 Section 5.2; VCS Standard v4.5, Sections 3.5.5, VCS Monitoring Report Template, v4.3, Section 5.3</i></p>	<p><u>PP Response</u> The following documents are shared with the VVB:</p> <ul style="list-style-type: none"> ● Appendix 3a ● Appendix 3c ● Article from Sharma et al. 2012 <p><u>VVB Response</u> Appendix 3a, 3c and Research article by Sharma et.al. 2012 is shared with PRR R2.</p> <hr/> <p><u>Verra Response</u> Appendix 3a, Appendix 3c, and the full citation of the paper by Sharma et al. (2012) have been provided to Verra.</p> <p>However, this finding cannot be closed.</p> <p><u>Issue:</u> The methodology provisions for quantifying market leakage have not been followed. Specifically, the project has followed section 3.7.15 of the VCS Methodology Requirements v4.2 instead of Table 3 of the VCS Standard v4.5.</p> <p><u>Action required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure that the project quantifies market leakage according to the methodology provisions, specifically Table 3 of the VCS Standard v4.5 or applies a methodology deviation. 2. The VVB must assess the updated leakage calculations. If a methodology deviation is applied, the VVB must evaluate 	
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		<p>whether it meets the requirements in section 3.20.2 of the VCS Standard v4.5. The VR must be updated accordingly.</p> <p><u>Background</u> <i>VM0011, v1.0, Section 5.3:</i> The Project Proponent must demonstrate how market leakage has been accounted for in accordance with the most recent version of applicable VCS rules.</p> <p>The VCS Methodology Requirements are intended for methodology developers, while the VCS Standard is designed for project developers. Accordingly, the project should refer to the VCS Standard v4.5, specifically Table 3.</p>	
		<p>Round 3</p>	
		<p><u>VVB Response</u> The verification team has reviewed the leakage calculations for the project, now the project has quantified market leakage according to the methodology provisions, specifically Table.3 of the VCS Standard v4.5.</p> <p>Further verification team reviewed the calculations to ensure the accuracy and reliability of the data and parameters used by the PP to justify that leakage emissions ($C_{leakage}$) equal to 20% of the baseline for this monitoring period.</p> <p><u>In the MR, the following is included</u> Now PP has reassessed the leakage of the project in line with Table.3 of the VCS Standard v4.5. For that, the ratio of merchantable to total biomass was calculated in other concessions close to the concession of the project in the Shanga region. The explanations are</p>	

compiled in the report for market leakage⁵ and the calculation is the Excel file⁶ attached as supporting information.

In the project case, the IFM activity falls into the 3rd project action (IFM activity that substantially reduces harvest levels permanently (e.g., RIL activity that reduces timber harvest across the project area, or project that halts logging by at least 25%)) causing a leakage risk of moderate to high.

Therefore, the concessions within the Shanga region were selected because of proximity and the same type of forest. Furthermore, worth mentioning that information disposal was not the same for all the concessions so the values were calculated in different ways with the available data. The concessions selected for the analysis were the following: Kabo, Pokola, Ngombe, Tala-Tala, and Jua-Ikie; apart from Pikounda North.

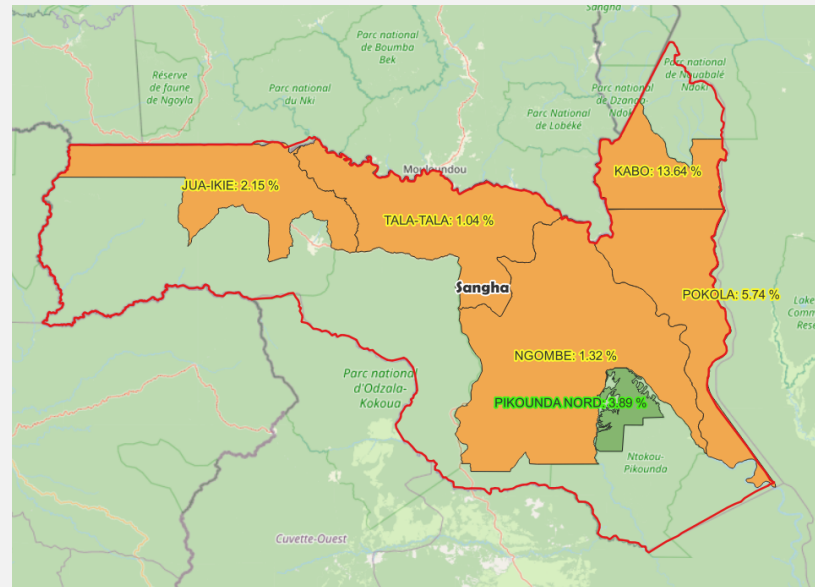


⁵ Appendix 3a Leakage Assessment Report_clean.docx

⁶ Appendix 3e 2nd monitoring market leakage effect_FINAL.xlsx

As depicted in the map and the table below the ratio of merchantable to total biomass is summarized. The aggregated value of all the regions where leakage could be displaced in the Shanga region (Pokola, Kabo, Ngombe, Tala-Tala, and Jua-Ikie concessions) is 4.78% compared to the 3.89% from the Pikounda concession.

Concession	Ratio of merchantable biomass to total biomass (R _{merch-total biomass})	Aggregated ratio	
	% (AGB m3/ha)	% (AGB m3/ha)	
PIKOUNDA	3.89%	3.89%	Pikounda
POKOLA	5.74%	4.78%	Concessions in Shanga Region
KABO	13.65%		
NGOMBE	1.32%		
TALA-TALA	1.04%		
JUA-IKIE	2.15%		



		<p>Therefore, and according to Table.3 of the standard, the ratio of merchantable biomass to total biomass is higher within the area to which harvesting is displaced (4.78%) compared to the project area (3.89%), concluding that the market leakage discount factor applied is 20%.</p> <p>The updated documents (i.e., MR, Appendix 3a, Appendix 3e, Appendix 4 and FVR) are submitted for review.</p> <p>Now as the project has quantified market leakage according to the methodology provisions, specifically Table 3 of the VCS Standard v4.5. This is now reported as a PD Deviation in line with section 3.21 of the VCS Standard v4.7 and an assessment of the same provided in section 3.2 of validation report.</p> <p><u>Verra Response</u> The project documentation has been updated accordingly.</p>	
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7 Clarification needed on stratification				
<p><u>Issue</u> No assessment has been provided by the VVB on whether the stratification was updated during this monitoring period to account for changes (if any) in carbon in existing stratum.</p> <p><u>Action Required</u> The VVB must update Section 3.1 of the VR to</p>	<table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #1a3d4d; color: white;">Round 1</th> </tr> </thead> <tbody> <tr> <td> <p><u>VVB Response</u> Two strata have been identified in the registered PD:</p> <ul style="list-style-type: none"> - Wetland; these areas are part of the North Pikounda UFE, but they are excluded from the crediting area; - Dryland mixed forests typical of Northern Congo: these forests would have been </td> </tr> </tbody> </table>	Round 1	<p><u>VVB Response</u> Two strata have been identified in the registered PD:</p> <ul style="list-style-type: none"> - Wetland; these areas are part of the North Pikounda UFE, but they are excluded from the crediting area; - Dryland mixed forests typical of Northern Congo: these forests would have been 	Closed
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<p>describe the steps taken to assess whether the stratification was updated during this monitoring period to account for changes (if any) in carbon in existing stratum.</p>	<p>harvested under the baseline scenario and the ones that have been inventoried for this project.</p>	
<p><u>Program Rule(s)</u> <i>VM0011, v1.0 Section 2.2.1.1.1 & 7.1.2.1; VCS Verification Report Template, v4.3, Section 3.1</i></p>	<p>These strata didn't change during the 2nd monitoring period (as they didn't change during the 1st one). This Finding is related to the Finding #10. The PP provided an updated version of the project area <i>.kml</i> file, which identified only the forest area. A <i>.kml</i> file of North Pikounda UFE and wetland areas inside the concession is also provided to the VVB and the Standard for consultation.</p>	
	<p>VVB has verified that in this 2nd monitoring period, the stratification of the project area was thoroughly assessed, and it was determined that no updates were required. The existing strata, Wetland and Dryland mixed forests, remained unchanged in terms of carbon stocks.</p> <p>The section 3.1 of the VR now accurately describes the steps taken to evaluate the stratification, ensuring compliance with monitoring requirements.</p>	
	<p><u>Verra Response</u> Section 3.1 of the VR has been updated to describe the steps taken to assess whether the stratification was updated during this monitoring period to account for changes (if any) in carbon in existing stratum. This finding is closed and, no further action is required.</p>	

8 Insufficient information on the risk of double counting and double claiming				
<p><u>Issue</u> In Section 1.10 of the MR no information is provided on whether the World Bank’s Forest Carbon Partnership Facility (FCPF) pose any double counting risk.</p> <p><u>Action Required</u> 1) The VVB must ensure the PP provides information on whether the World Bank’s Forest Carbon Partnership Facility (FCPF) pose a risk of double-counting/ double-claiming. 2) The VVB must update Section 4.1 of the VR to describe how they have assessed – against which evidence – the absence of double-counting/ double-claiming.</p> <p><u>Program Rule(s)</u> <i>VCS Monitoring Report Template, v4.3, Section 1.10;</i> <i>VCS Verification Report Template, v4.3, Section 4.1.</i></p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #1a3d4d; color: white;">Round 1</th> </tr> </thead> <tbody> <tr> <td> <p><u>VVB Response</u> PP has updated MR and modified its monitoring period to 1st-January-2013 to 31st-December-2019. There was the risk of double counting with another program in which CIB/Olam has been involved. This is the REDD+ project, including the Shanga region from the RoC government financed by the World Bank under the Forest Carbon Partnership Facility (FCPF) started in 2008. After the readiness phase, in 2021 RoC signed a contract (ERPA) with the World Bank to implement the project whose crediting period goes from 2020 to 2024. It is not sure if the government of RoC will continue with VCS or if they will change to the FCPF. For that reason, the years 2020 and 2021 were subtracted from the present verification to avoid the risk of double counting. CAR 06 was issued and successfully resolved to address the issues of double counting and declarations from the Project Participant (PP). VR is updated section 4.1 to reflect the changes.</p> </td> </tr> <tr> <td> <p><u>Verra Response</u> The MR has been updated to a monitoring period of 1st-January-2013 to 31st-December-2019 to exclude the risk of double counting with another program in which CIB/Olam is involved. The ERR calculations have been</p> </td> </tr> </tbody> </table>	Round 1	<p><u>VVB Response</u> PP has updated MR and modified its monitoring period to 1st-January-2013 to 31st-December-2019. There was the risk of double counting with another program in which CIB/Olam has been involved. This is the REDD+ project, including the Shanga region from the RoC government financed by the World Bank under the Forest Carbon Partnership Facility (FCPF) started in 2008. After the readiness phase, in 2021 RoC signed a contract (ERPA) with the World Bank to implement the project whose crediting period goes from 2020 to 2024. It is not sure if the government of RoC will continue with VCS or if they will change to the FCPF. For that reason, the years 2020 and 2021 were subtracted from the present verification to avoid the risk of double counting. CAR 06 was issued and successfully resolved to address the issues of double counting and declarations from the Project Participant (PP). VR is updated section 4.1 to reflect the changes.</p>	<p><u>Verra Response</u> The MR has been updated to a monitoring period of 1st-January-2013 to 31st-December-2019 to exclude the risk of double counting with another program in which CIB/Olam is involved. The ERR calculations have been</p>
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Closed				

		updated accordingly. The VVB has also raised a FAR to assess the risk of double counting in the next verification. This finding is closed and, no further action is required.	
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9	Clarification needed on NPRT assessment		
	<p><u>Issue</u> In Section 4.5 of the VR (NPR Project Management) the VVB opinion states that “project is based on REDD+ mechanism and does not involve tree planting”, however, this project is a Logged to Protected Forests.</p> <p><u>Action Required</u> The VVB must update Section 4.5 of the VR (NPR Project Management) to provide the correct assessment consistent with the project type.</p> <p><u>Program Rule(s)</u> VCS Verification Report Template, v4.3, Section 4.5.</p>	<p>Round 1</p> <p><u>VVB Response</u> Now Section 4.5 of VR is updated to reflect the changes.</p> <p><u>Verra Response</u> The VR has been updated to reflect the correct project type. This finding is closed and, no further action is required.</p>	Closed

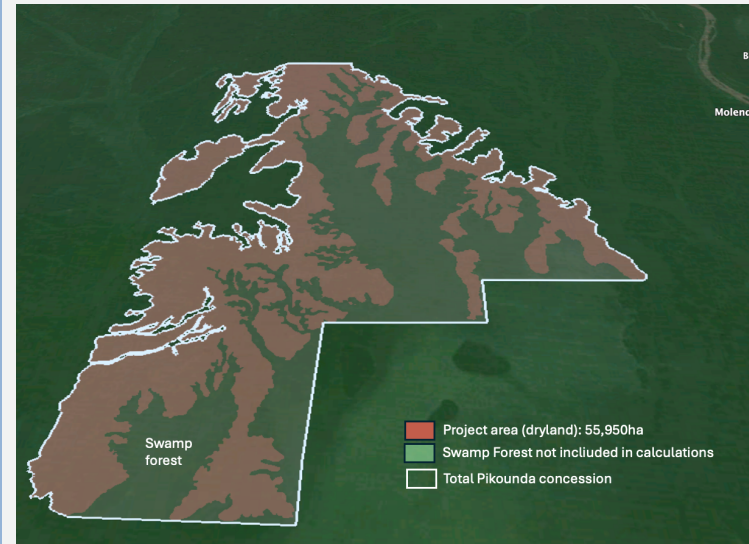
10	The KML includes ineligible area		
	<p><u>Issue</u> It is unclear whether the swamp forest has been excluded from the project area.</p> <p><u>Action Required</u> 1. The VVB must ensure that the swamp forest</p>	<p>Round 1</p> <p><u>VVB Response</u> 1. The KML found in the VERRA webpage of the project represents the entire North Pikounda UFE, the forest concession of CIB/OLAM. As mentioned in the validated PDD, the area includes the following strata:</p>	Closed

	<p>is excluded from the project area. The project must update the KML, ERRs calculations and other relevant sections of the MR.</p> <ol style="list-style-type: none"> 2. If action item 1 above is implemented, the change in the project area must be described as a project description deviation in section 3.2.2 of the MR. 3. The VVB must assess the changes above and update the verification report as needed. <p><u>Program Rule(s)</u> <i>VM0011, v1.0, Section 1.1, Table 1-1, VCS Standard v4.5; Sections 3.11.2 (3) C) and A1.14</i></p>	<p>-Wetlands, that are excluded from the crediting area; -Dryland mixed forests typical of Northern Congo forest formations which can be included in the tropical semi-evergreen forests. These forests would have been harvested under the baseline scenario and the ones that have been inventoried for this project. There was thus no change in the area during the second monitoring period.</p> <p>The calculations have been carried out considering only the dryland mixed forest area, without considering the wetland area. The figure below illustrates the total concession area (92,530ha), highlighting both the swamp forests (36,580ha) and the dryland forests (55,950ha). Dryland forests are the only forest types included in the Emission Reduction (ER) calculations (Appendix 4).</p>	
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Background

The project area polygon in the KML comprise ineligible area i.e., swamp forest.

Per VM0011, v1.0, the methodology is applicable in tropical forests, including evergreen tropical rainforests, moist deciduous forests, tropical dry forests, and tropical upland forests, except peat swamp forests.



Please refer to the table below, which is extracted from the Monitoring Estimation of Credits Pikounda Excel file, for detailed information. The Monitoring estimations file takes into account just the 55,950ha of the dryland forest and not the swamp forest.

In the PDD from 2013 (page 10) the introduction describes the dryland forests accounting for carbon with the same 55,950ha, and a total concession of 92,530ha.



PROJECT DESCRIPTION

1 PROJECT DETAILS

1.1 Summary Description of the Project

The **North Pikounda REDD+ Project** (the Project) is a reducing emission from deforestation and degradation plus conservation and sustainable forestry (REDD+) project designed to protect 92,530 hectares (ha) of unlogged native Congolese forest, legally designated as a selective logging concession. The area is comprised of 60% of dry land mixed forest and 40% of areas designated as wetlands. The anticipated selective logging would normally have been undertaken on the dry lands, consisting on an area of 55,950 ha. Those dry lands constitute the project crediting area.

The concession is owned by Congolaise Industrielle des Bois (CIB) which has been established as a timber operator in the North of Congo since 1968. The company currently has five active sawmills, dryers and moulding units in Pokola and Loundoungou and employs over 900 people permanently and more than 100 subcontractors. Four forest concessions are allocated to the CIB and all have been engaged in sustainable forest management for several years. CIB was the first timber company to submit a Forest Management Plan in Congo in 2005 and the first to become FSC certified in 2006. The North Pikounda *Unité Forestière d'Exploitation* or Forest Exploitation Unit (UFE) was allocated to CIB by Ministerial Decree in 2002 and is 92,530 ha (the Project Area).

2. There was no change in the accounting area during the Monitoring period, so no project description

		<p>deviation should be done in the current monitoring period.</p> <p>3. There was no change in the accounting area during the Monitoring period, so no project description deviation should be done in the current monitoring period.</p> <p>This Finding is related to the Finding #7. The PP provided an updated version of the project area .kml file, which identified only the forest area. A .kml file of North Pikounda UFE and wetland areas inside the concession is also provided to the VVB and the Standard for consultation.</p> <p>Review and Confirmation by VVB: KML File Review: Verified that the KML files on the VERRA webpage accurately represent the North Pikounda UFE, including both swamp forests and dryland mixed forests. Documentation Verification: Confirmed that swamp forests are excluded from the crediting area and that the ER calculations only consider the dryland mixed forests. Update to Verification Report:</p> <p>Section 3.1 Update: Revised Section 3.1 of the Verification Report (VR) to detail the confirmation of swamp forest exclusion and the accurate</p>	
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		<p>representation of the project area in the KML files. Section 3.2.2 Update: Updated Section 3.2.2 of the MR to reflect that there has been no change in the accounting area and therefore no project description deviation is necessary.</p>	
		<p><u>Verra Response</u> An explanation has been provided regarding the exclusion of the swamp forest from the project area.</p> <p>However, this finding cannot be closed.</p> <p><u>Issue</u> The updated KML file, excluding the swamp forest from the project area, has not been provided to Verra for review.</p> <p><u>Action required</u> The VVB must provide an updated KML file that excludes the ineligible swamp forest to Verra to enable an efficient review of the project area.</p>	
		<p>Round 2</p>	
		<p><u>PP answer</u> The KML from the project was shared with the VVB</p> <p><u>VVB Response</u> The KML file is reviewed and is shared with along with PRR R2.</p>	
		<p><u>Verra Response</u></p>	

		The updated KML has been provided. This finding is closed and, no further action is required.	
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11 Incorrect description of the project activity.			
	<p><u>Issue</u> Under sections 1.3 and 1.1 of the MR, the project activity is incorrectly described as REDD+ instead of an IFM.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. The VVB must ensure MR is corrected to accurately describe the project activity. 2. The VVB must assess the revised MR and update the verification report as needed. <p><u>Program Rule(s)</u> VCS Standard v4.5; Section A1.4 (2)</p>	<p>Round 1</p> <p><u>VVB Response</u> Now section 1.1 and 1.3 of MR are revised to actually reflect the fact that the project falls under the IFM category. Accordingly, Section 3, 4.5 and 5.1 of VR is updated to make consistent with the IFM classification.</p> <p><u>Verra Response</u> Sections 1.3 and 1.1 of the MR have been updated to correctly describe the project activity. This finding is closed and, no further action is required.</p>	Closed