# REDUCED EMISSIONS FROM DEFORESTATION AND DEGRADATION IN KEO SEIMA WILDLIFE SANCTUARY VCS+CCB VERIFICATION REPORT

Document Prepared By Aster Global Environmental Solutions, Inc.

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| **Report Title** | Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Verification Report |
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**Summary**

Aster Global Environmental Solutions, Inc., was contracted by the Wildlife Conservation Society (WCS), on 30 November 2019 to conduct the third monitoring period verification under VCS/CCB for the period 01 January 2018 – 31 December 2019 - 2-years, of the Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project ("the project") [Validated Project Description (PD) dated 29 December 2014]. The project follows the framework of Reducing Emissions from Deforestation and Degradation (REDD) and is achieving Greenhouse Gas (GHG) emission reductions from unplanned deforestation in addition to climate, community, biodiversity and biodiversity gold level following the CCB criteria.

For this project, the verification objective was to assess whether the project GHG emission reduction quantification complies with the verification criteria as set out in the guidance documents listed in in the criteria section of this report.

The scope of the verification following Section 4.3.4 of ISO 14064-3:2006 included the GHG project implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project follows the framework of project activities listed within this report.

The criteria followed the verification guidance documents provided by VCS located at http://v-cs.org/program-documents. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document as of November 2019.

A summary of all VCS findings (15 total) are included in Appendix B and CCB findings are included in Appendix C. All findings were satisfied to a reasonable level of assurance and there are no restrictions of uncertainty.

After review of all project information, procedures, calculations, and supporting documentation, Aster Global confirms that the monitoring conducted by the project proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS Version 4 and CCB Third Edition criteria, the validated PD, and the selected methodology (VM0015). Aster Global confirms that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project

Monitoring Report (v2.1 dated 25 September 2020) has been implemented in accordance with the validated PD.

Aster Global confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS Version 4 (and all associated updates), and CCB Project Design Standards (Third Edition), as documented in this report are complete. Aster Global concludes without any qualifications or limiting conditions that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project Monitoring Report (v2.1 dated 25 September 2020) meets the requirements of VCS Version 4 (and all associated updates) and CCB Project Design Standards (Third Edition) for the verification period/reporting period (01 January 2018 – 31 December 2019 - 2-years). In addition, Aster Global asserts that the project complies with the verification criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level Distinction for Biodiversity.

The GHG assertion provided by Wildlife Conservation Society and verified by Aster Global has resulted in the GHG emissions reduction or removal of 1,641,141 $tCO_2$ equivalents by the project during the verification period/reporting period (01 January 2018 – 31 December 2019: 2 years). This value is gross of the 10% (246,534 $tCO_2$ equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 1,394,606 $tCO_2$ equivalents of credits eligible for issuance as VCUs.

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# 1 INTRODUCTION

## 1.1 Objective

For this project, the verification objective was to ensure implementation of project activities and assess project compliance with the VCS Program Guide, VCS Standard, AFOLU Requirements, selected methodologies, the validated VCS Project Description (PD) and the verification criteria as set out in the guidance documents listed in in Section 1.2 of this report. An additional objective of the verification was to assess whether the project complies with the requirements of the CCB Program and all community and biodiversity criteria. Aster Global assessed the GHG emission removals for the AFOLU project, specifically REDD.

## 1.2 Scope and Criteria

The scope of the verification following Section 4.3.4 of ISO 14064-3:2006 included the GHG project implementation; physical infrastructure, activities, technologies and processes of the GHG project; GHG sources, sinks and/or reservoirs; types of GHGs; and time periods covered. The scope of the project was outlined by the Project Proponent within the Project Description dated 29 December 2014 and is re-defined as follows for the GHG project:

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| Baseline Scenario | Unplanned deforestation -illegal deforestation/agricultural activities |
| Activities/Technologies/Processes | Utilize VM0015 – Methodology for avoided unplanned deforestation and CCB 3rd Edition for Climate, Community and Biodiversity benefits |
| Sources/Sinks/Reservoirs | Above Ground Biomass (tree included / non-tree excluded)<br>Below Ground Biomass (included)<br>Deadwood (included)<br>Harvested Wood Products (excluded)<br>Litter (excluded)<br>Soil Organic Carbon (excluded)<br>Sources: Baseline Scenario - Biomass Burning and Livestock Emissions (excluded)<br>Project Scenario – Biomass Burning (included for CH4) |
| GHG Type | CO2 and CH4 |
| Time Period (state date, crediting period, verification period) | Project State Date: 01 January 2010<br>Project Crediting Period: 01 January 2010 – 31 December 2069<br>First Monitoring Period: 01 January 2010 – 31 December 2015<br>Second Monitoring Period: 01 January 2016 – 31 December 2017<br>**Third Monitoring Period: 01 January 2018 – 31 December 2019** |

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| Project Boundary | Mondulkiri Province, Cambodia<br>Project Area: 166,983 ha (within the KSWS Core Protection Area)<br>106°55'15.7"E 12°8'13.109"N<br>Communities: 6 Commune Councils, 17 key villages (3 other user villages) |
| GHG reduction and/or removal | 1,641,141 $tCO_2e$. This value is gross of the 10% (246,534 $tCO_2$ equivalents) buffer withholding based on the non-permanence risk assessment tool. |

The criteria followed the verification guidance documents provided by VCS located at http://v-c-s.org/program-documents and CCBA located at www.climate-standards.org. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS guidance document. These documents include the following:

- VCS Program Guide (v4.0, 19 September 2019)
- VCS Standard (v4.0, 19 September 2019)
- VCS Program Definitions (v3.7, 21 June 2017)
- AFOLU Non-Permanence Risk Tool (v4.0, 19 September 2019)
- Program Validation and Verification Manual (v3.2, 19 October 2016)
- VM0015, v1.1 – Methodology for Avoided Unplanned Deforestation
- CCB Program Definitions (v3.0, June 2017)
- CCB Standards (Third Edition, v3.1, June 2017)
- CCB Program Rules (v 3.1 June 2017)
- Guidance for the Use of the CCB Standards (May 2014)
- Validated PD (29 December 2014)

## 1.3 Level of Assurance

The level of assurance was used to determine the depth of detail that the Verifier placed in the Verification and Sampling Plan to determine if there are any errors, omissions, or misrepresentations (ISO 14064-3:2006). Aster Global assessed the project's implementation of general principles, data collection and processing, sampling descriptions, documentation, ex post calculations, etc., to provide reasonable assurance to meet the Project Level requirements of the VCS Program. Based on the verification findings, a final evaluation statement reasonably assures that the project GHG representations are materially accurate. The evidence used to achieve a reasonable level of assurance is specified in subsequent sections of this report.

### 1.4 Summary Description of the Project

The project is located in the Mondulkiri Province of Cambodia and is aimed at reducing emissions related to unplanned deforestation. The project has already resulted in emission reductions of at least 16 million tCO2e from avoided unplanned deforestation. The project reserves forest areas that provide the basic needs and traditional cultural identity for over 2,500 households (approximately 12,500 people) within the 20 REDD+ participating villages. The project has resulted in the benefits as described in Section 1 of the Monitoring Report.

## 2 VERIFICATION PROCESS

The verification and re-validation of the baseline assessed the Project's compliance with the VCS Version 4, the selected methodology (VM0015 v1.1), and the validated PD. The methods employed by Aster Global in the validation and verification process were derived from VCS documents and ISO 14064-3 to develop and implement a Verification & Sampling Plan. This verification assessed the GHG emission removals for the AFOLU project, specifically REDD.

According to the ISO 14064-3, the verification criteria are the "policy, procedure or requirement used as a reference against which evidence is compared". Therefore, the reported Project results and supporting evidence were assessed for compliance against the following criteria:

- VCS Program Guide (v4.0, 19 September 2019)
- VCS Standard (v4.0, 19 September 2019)
- VCS Program Definitions (v3.7, 21 June 2017)
- AFOLU Non-Permanence Risk Tool (v4.0, 19 September 2019)
- Program Validation and Verification Manual (v3.2, 19 October 2016)
- VM0015, v1.1 – Methodology for Avoided Unplanned Deforestation
- CCB Program Definitions (v3.0, June 2017)
- CCB Standards (Third Edition, v3.1, June 2017)
- CCB Program Rules (v 3.1 June 2017)
- Guidance for the Use of the CCB Standards (May 2014)
- Validated PD (29 December 2014)

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan is to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error is reduced to a reasonable level. Modifications to the Verification and Sampling plan

were made based upon the conditions observed in order to detect the processes with highest risk of material discrepancy.

The Verification and Sampling Plan was derived from the verification criteria stated above. Specifically, the sampling plan used the VCS guidance documents and ISO 14064-3.

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

For VCS/CCB verifications, Aster Global maintains an experienced internal staff of Lead Verifiers, in addition to Certified Foresters, Registered Professional Foresters, The Wildlife Society Biologists, Forest Biometricians, Remote Sensing/GIS Specialists, and VCS-approved AFOLU Experts in IFM, REDD, and WRC categories. Aster Global's Lead Verifier is a certified forester who had remote oversight of field verification activities. Aster Global completed all calculation/modeling reviews in-house with our team of forest biometricians, GIS/remote sensing specialists, and soil scientist. Aster Global has been involved in 68 VCS verifications and 36 CCB verifications, and more than 10 methodology assessments. Aster Global has a specialist on staff with nine years of CCB experience who handles all CCB components for project review. All Aster Global staff involved in the verification audit have ecological, biodiversity, natural resources and forestry background to fulfill these requirements. Additionally, for the site visit two local natural and cultural resource specialists were utilized with previous experience in VCS and CCB project assessments, Lakhena Chan and Vouchsim Kong.

## 2.2 Method and Criteria

The verification assessed the Project's compliance with VCS Version 4, CCB Third Edition, and all associated updates, the selected methodology (VM0015, v1.1), and the validated Project Description (PD) Reduced Emissions from Deforestation and Degradation in Seima Protection Forest dated 29 December 2014. Aster Global assessed the Greenhouse Gas (GHG) emission removals for the third monitoring period/verification period (01 January 2018 – 31 December 2019: 2 years) through Agriculture, Forestry and Other Land Use (AFOLU) criteria, specifically; Reduced Emissions from Deforestation and Degradation (REDD) activities. Aster Global assessed whether the Project Proponent adequately addressed project emissions, unplanned reductions in carbon stocks, and any possible leakage outside of the project boundary.

The non-permanence risk analysis was assessed for this verification. Further, following Section 2.1.2 of the VCS Validation & Verification Manual, V3.2, the objectives of the verification exercise were to evaluate the monitoring report and assess:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description. This includes ensuring conformance with the monitoring plan.

- The extent to which GHG Emission Reductions or Removals reported in the monitoring report are materially accurate.

The criteria followed the verification guidance documents provided by VCS and CCBA. Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS or CCBA guidance document. Please also see Section 1.2 of this report.

In the verification process, there is a risk that potential errors, omissions, and misrepresentations will be found; therefore, a risk-based approach was used to guide the collection of appropriate and sufficient evidence to support a reasonable level of assurance. A risk-based approach means that the verification team focused on items that might result in a material misstatement of the reported GHG assertion.

A project specific Verification and Sampling Plan was developed to guide the verification auditing process to ensure efficiency and effectiveness. The purpose of the Verification and Sampling Plan was to present a risk assessment for determining the nature and extent of verification procedures necessary to ensure the risk of auditing error was reduced to a reasonable level. The Verification & Sampling Plan methodology was derived from all items in our verification process stated above. Specifically, the sampling plan utilized the VCS and CCBA guidance documents and ISO 14064-3. Any modifications applied to the Verification and Sampling plan were made based upon the conditions observed for monitoring to detect the processes with highest risk of material discrepancy. A detailed field plan was developed to guide the verification site visit and is embedded within the Verification and Sampling Plan.

For the field sampling effort, direct measurement, observation, interviews and review of the monitoring period emission reductions in the key areas were determined to be the greatest risk, followed by ground-truthing and review of project activities. Field sampling and techniques were based on the project parameters/scope and best professional judgment of the VVB to meet a reasonable level of assurance as directed by the professional judgment of the Lead Verifier. Because the biomass inventory (REDD) was validated and has not changed, inventory plots were not selected for detailed review/re-measurement.

Extensive review of all remote sensing data was undertaken of the project area to aid the VVB in establishing a reasonable level of assurance regarding confirming the reported areas of ex-post disturbance (from the remote sensing-based analysis) for the quantification of project emissions.

In addition, a risk-based approach was used for the on-the-ground field sampling effort to select key areas for direct observation of unplanned deforestation monitoring, stratification and post-fire conditions, and stated project activities. The most likely access points for anthropogenic degradation (along road access points) within the Project Area and adjacent lands were toured to allow the VVB to establish a reasonable level of assurance regarding the implementation of project activities, and to further confirm the reported areas of ex post disturbance. Please see Section 2.4 of this report for more details.

The desktop verification component included a full review of all project documentation and calculations received from the Project Proponent as described throughout this report.

## 2.3 Document Review

A detailed review of all project documentation was conducted to ensure consistency with, and identify any deviation from, VCS Program requirements, CCB program requirements, the methodology (VM0015), and the validated PD. Initial review focused on the validated PD and Monitoring Report (MR) relative to the field conditions observed and interviews with project management staff. Project details, implementation status, data and parameters, and quantification of GHG emission reductions and removals were thoroughly examined. Key supporting documents were also reviewed. These included monitoring data (i.e., remote sensing/Geographic Information System (GIS) data), Standard Operating Procedures (SOPs), financial analyses, boundaries, maps and aerial imagery, fire-specific monitoring data, biomass

and carbon calculation spreadsheets, CCB interview/survey results, and responses to Non-conformance Requests (NCRs) and Clarification Requests (CLs).

The VCS AFOLU Non-Permanence Risk Tool was used by the Project Proponent to assess overall project risk. The VVB reviewed the Non-Permanence Risk Report provided with the verification supporting documentation and confirmed that the Project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B. The final score was calculated to be 10%.

For a listing of all documents received from the client for this verification, please see Appendix A.

## 2.4 Interviews

Interviews were performed during the verification site inspection and as part of the overall verification process, in addition to what was provided in the project description, monitoring report and any supporting documents.

It is important to note that during this third period verification, employees of Aster Global, the VVB, were unable to travel to the project site due to the Covid-19 pandemic. As a result, Aster Global contracted Lakhena Chan and Vouchsim Kong, who reside within Cambodia, to complete the site visit portion of the audit. Aster Global provided the training, background, and specific areas of interest necessary for Ms. Chan to conduct the site visit independently.

Throughout the site inspection and verification process, the verification team met with individuals with various roles in the project. This included a series of interviews with on-site and in-country staff that support the mission of the project and other conservation objectives. Onsite interviews and informal discussions were conducted with Royal Government of Cambodia, Ministry of Environment staff, Law Enforcement staff, Wildlife Conservation Society staff, and Keo Seima Wildlife Sanctuary project staff, members and leaders of the local communities and saving groups. The following is a list of some of the key interviewees. Note that the community members were interviewed as groups in most instances, so it was not possible to include a full listing of all in attendance here. Scans of sign-in sheets are on file.

| Individual | Affiliation | Role |
|---|---|---|
| His Excellency Dr. Paris Chuop | Ministry of Environment | Director General, General Directorate of Environmental Knowledge and Information |
| Mr. Than Pin Niro | Keo Seima Wildlife Sanctuary Headquarters, (PDoE), Ministry of Environment (MoE) | Deputy Director of KSWS Headquarter, Mondulkiri |
| Mr. Olly Griffin | Wildlife Conservation Society | National Technical Advisor and Monitoring |
| Mr. Colin Moore | Wildlife Conservation Society | Business and Conservation Advisor |

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| Mr. Ken Sereyrotha | Wildlife Conservation Society | Country Program Director of WCS Cambodia |
| Ms. Kimheak Chhay | Wildlife Conservation Society | REDD+ Technical Advisor |
| Simon Mahood | Wildlife Conservation Society | |
| Ms. Ouch Laksmey | Wildlife Conservation Society | National Community Development Specialist |
| Srae Preah Community | Village | Keo Seima District |
| Ms. Chas Vutha | Community Engagement Facilitator | Andoung Kroloeng Village |
| Ms. Nak Nita | Community Engagement Facilitator | Pu Haim Village |
| Mr. Prum Vibol Rath | Keo Seima Wildlife Sanctuary Headquarter | Director |
| Ms. Rithiny Teng | WCS | Chief of Party |
| Mr. Nai Sonsak | WCS | GIS Officer |
| Mr. Setha Tan | Wildlife Conservation Society | Protected Area Management Advisor |
| Mr. Keo Socheat | Sansom Mlub Prey (SMP) | Director |
| Mr. Vong Rith | Sansom Mlub Prey (SMP) | Community Coordinator |
| Chay Kalyan | Sansom Mlub Prey (SMP) | Coordination Officer |
| Mr. Meas Viphou | Cambodian Rural Development Team (CRDT) | Program Director |
| Mr. Ou Channy | Cambodian Rural Development Team (CRDT) | Operational Director |
| Mr. Bo Ravuth | Cambodian Rural Development Team (CRDT) | Program Coordinator |
| Mr. Heng Kheng | Provincial Department of Environment (PDoE) | Deputy Director |
| Mr. Bek Pheaktra | Provincial Department of Environment (PDoE) | Office Director |
| Mr. Prum Vibol Rathnak | Provincial Department of Environment (PDoE) | Director of KSWS Headquarters |
| Mr. Kyle Winney | World Hope International (WHI) | Tourism Manager |
| 9 Community Members (sign-in sheets on file) | Andoung Kroloeng Village | |

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|---|---|---|
| 10 Community Members (sign-in sheets on file) | Pu Haim Village | |
| Ms. Jemma Bullock | Elephant Livelihood Initiatives and Environment Organization (ELIE) and Elephant Valley Project (EVP) | Program Manager |

## 2.5 Site Inspections

The verification site inspection followed the VVB's prepared Verification and Sampling Plan process and was conducted on 10-15 August 2020 by the Verification Team. The verification site visit was a required tool to help the VVB reach reasonable assurance for verification of monitoring period reported elements. It also allowed the VVB to; understand application of the methodology on-site, confirm the implementation of project activities, and to identify possible sources of error to focus desktop verification efforts.

The objectives of the on-site inspections performed were to:

- Conduct a risk-based review of the project area and project activities to check that the project adhered to the requirements of the VCS rules and the methodology during the monitoring period
- Select data samples from ground measurements for verification purposes in order to achieve a reasonable level of assurance and meet the materiality requirements of the project following Section 5.1.3 of the VCS Standard
- Check that monitoring was conducted in accordance with the requirements of the validated monitoring plan, the VM0015 methodology and VCS rules

A ground inspection was made of the Keo Seima Wildlife Sanctuary project and surrounding areas. The following areas/communities were visited, and interviews conducted for VCS and CCB elements: Pu Char,O Rona, Pu Haim, Andoung Kroloeng, and O Am village. The site visit ground inspection was performed to assess monitoring efforts, including but not limited to: unplanned deforestation activities, unplanned degradation, and community member feedback. During the project site visit, a strong sample of CCB components of the project were assessed including the full range of Community Based Development Activities which were active and achieved during the monitoring period including but not limited to:

- Interviewed project staff to confirm the appropriateness of the VCS AFOLU NonPermanence Risk score claimed for the project

- Interviewed project staff (see Section 2.4 of this report) to collect information pertaining to the monitoring procedures and project implementation

- Conducted appropriate and comprehensive cross-checks to confirm the accuracy of the data for methodology required monitoring efforts.

- Interviewed community individuals and leaders to confirm implementation of project activities

## 2.6 Resolution of Findings

During the verification process, there was a risk that potential errors, omissions, and misrepresentations would be found. The actions taken when errors, omissions, and misrepresentations were found included: notifying the client of the issue(s) identified and expanding our review to the extent that satisfied the Lead Verifier's professional judgment.

The process of resolution of findings involved two (2) formal rounds of assessment by the VVB. Findings were resolved during the verification by the Project Proponent implementing corrective actions such as amending the Monitoring Report and calculations, as well as providing written responses. This resulted in project documentation that was in conformance with the requirements of the VCS Standard and CCB Third Edition for GHG projects.

Findings were characterized in the following manner:

Non-Conformity Reports (NCRs) were issued as a response to material discrepancies in a part of the project and generally fell into these categories:

- Non-conformity to a VCS or CCB guiding document listed in Sections 1.2 and 2.2 above

- Consistency among project documentation or calculations was lacking

- Mathematical formulae were incorrect

- Additional information was required by the VVB to confirm reasonable assurance for compliance

Clarifications (CL) were issued when language within a project document needed extra clarification to avoid ambiguity.

Opportunities for Improvement (OFI) were issued to the Project Proponents when an opportunity for improvement was identified.

During the verification, fifteen (15) VCS findings were identified. Detailed summaries of each VCS finding, including the issue raised, responses, and final conclusions, are provided in Appendix B. Please also see APPENDIX C for all findings raised during the CCB review. All NCRs/CLs were satisfactorily addressed.

### 2.6.1 Forward Action Requests

No forward action requests were raised during this verification period.

Two forward action requests from the last verification period (see G3.12 and G5.5 in the appendix of the verification report for the previous verification period) were examined and those indicators were successfully closed.

## 2.7 Eligibility for Validation Activities

Validation activities were not undertaken as part of the third monitoring period verification. Further, Aster Global holds an active and current accreditation for validation under sectoral scope 14 (AFOLU).

# 3 VALIDATION FINDINGS

## 3.1 Participation under Other GHG Programs

The verification team is not aware of project involvement in other forms of environmental credits from its activities. The project has not been registered, and is not seeking registration, under any other GHG programs. The Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary project currently only seeks carbon credits with the CCB label under the VCS program. This was confirmed through a risk-based internet review and interview with project proponents. Therefore, the verification team deems the project eligible to participate under the VCS Program.

## 3.2 Methodology Deviations

There was one methodology deviation applied for this verification period. This deviation was verified by the VVB in the second monitoring period. The methodology deviation is related to land-use and land-cover change monitoring that is similar in subject matter to methodology deviations applied in the previous verification period. A detailed description of the methodology deviation can be found in Section 2.2.2 of the Monitoring Report.

The deviation satisfies the criteria for permittable methodology deviations as set forth in Section 3.5.1 of the VCS Standard, because following the methodology it represents a deviation from the criteria and procedures relating to monitoring. Verifiers agree with the assertions by proponents that land-use and land-cover change monitoring can use additional hand-digitized higher resolution data sources to increase accuracy and precision. Use of Sentinel2 data to bolster the classification effort is inherently conservative through capture of additional deforestation areas using a finer resolution dataset. The methodology Section 2.4.2 broadly prescribes methods for change detection. This deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals. The methodology deviation is described sufficiently within the Monitoring Report. Verifiers believe that this deviation, as applied to the project for the current monitoring period is valid.

Nine (9) methodology deviations have been previously applied to the project, please see VCS validation and verification reports,[1] available on the VCS website, for details.

[1] https://www.vcsprojectdatabase.org/#/project_details/1650

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

No new project description deviations were applied during this verification period for VCS or CCB. A change in project proponent occurred prior to the end of the first reporting period and was approved by the verifier at the time. The Ministry of Environment is now the project proponent. Please see the separate Gap Validation report available on the VCS website, for details.

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

The project for this monitoring period did not experience any changes (minor or significant) to the project's validated design and remains in compliance.

### 3.5 Grouped Project (G1.13 – G1.15, G4.1)

This section is not applicable as the project is not a grouped project.

## 4 VERIFICATION FINDINGS

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

The public comment period was conducted over two periods: 2 Mar - 1 Apr 2020 and 26 Aug - 25 Sep 2020. First period was for the MIR only and did not include the climate section. The second period was for the full document. No public comments were received for this project as confirmed by a review of the Verra program website.

The audit team notes that the project proponent submitted a request to Verra for an exemption from the requirements in Sections 4.3.4 and 4.3.11 of the CCB Program Rules. This exemption was given and the full response can be found on the Verra website; however, an excerpt from the Verra's decision is below.

In Verra's response they state "Considering the limited non-conformance impacts associated with allowing project documents that are incomplete to undergo public comment and VVB assessment, given that they will be made public again for a second public comment period and VVB assessment, Verra grants the project proponent, the Environment Ministry of the Royal Government of Cambodia, an exemption from the requirements set out in Sections 4.3.4 and 4.3.11 of the CCB Program Rules, version 3.1, for the documents that are posted for the 30-day public comment period for the third verification of the project under the CCB Program. Prior to submission of final CCB verification documents the project must undergo a public comment period with a complete CCB monitoring report."

### 4.2 Summary of Project Benefits

Please see Section 1.4 of this report for a summary description of the *Reduced Emissions from Deforestation and Degradation in Seima Protection Forest* project.

The project seeks to mitigate deforestation threats which harm biodiversity and local forest-dependent livelihoods. As stated in Section 2.1 of the monitoring report, "sustainable financing from carbon revenue for the site is essential to enable conservation action to be expanded and sustained in the long-term. It will allow the Royal Government of Cambodia and its NGO partners to expand activities to match the level

of threat, ensure long-term support by covering operating costs, and generate financial incentives for conservation at local and national levels."

Project benefits are further described in Section 1 of the monitoring report.

## 4.3 General

### 4.3.1 Implementation Status (G1.9)

Previously validated methodology deviations, project description deviations, and minor changes to the project description occurred in earlier verification periods and are detailed in previous verification reports.

The project activities and Monitoring Plan, as described in the validated PD, have been initiated. There are no remaining issues from the validation. As this is the third verification, activities have been implemented, and verifiers observed progress during the verification site visit compared to the activities reported as part of the initial verification. The project proponent change during the previous verification period was not shown to significantly affect implementation of the project for this verification as a commitment was demonstrated to project activities and technical and management capacity was available.

This verification report covers the period from January 1st, 2018 through December 31st, 2019 for VCS and CCB. The verification team requested to visit examples of all activities during the various site inspections and subsequently confirmed the implementation of items related to climate, community, and biodiversity. Climate objectives achieved included avoiding the emission of 1,641,141 $tCO_2e$.

For this period the verification team confirmed the project has continued to build upon activities conducted during the last monitoring period and introduce new activities as required. The verification team witnessed on site on-going conservation and forest protection efforts focused on deforestation (forest crime) prevention, capacity building and land tenure establishment participation.

No material discrepancies were found between the assessed project implementation and the validated project description. This was confirmed through on-site interviews with project personnel and community members in addition to site visit observations. The implementation status of the monitoring plan and the completeness of monitoring, including the suitability of the implemented monitoring system was confirmed through review of VM0015 adopted procedures and comparison of monitoring results against the validated project design.

No new methodology deviations relating to monitoring and/or measurement of GHG emission reductions or removals were applied by the project developer/identified by Aster Global during this monitoring period verification (please see Section 3.2). No new PD deviations were applied during this period, but they are listed in Section 3.3.

The GHG emission reductions generated by the project have not become included in an emissions trading program other than the VCS program and it has not received or sought any other form of environmental credit as confirmed through a risk-based review by the verification team (see Section 3.1).

Sustainable development contributions are not applicable to this project as it is not participating in any national sustainable development programs. Verifiers can conclude that the project has been implemented as described in the validated project description.

Please see Section 3.2 and 3.3 for descriptions of the Methodology Deviations and PD Deviations, respectively.

### 4.3.2 Risks to the Community and Biodiversity Benefits (G1.10)

The monitoring report states that risks are being managed as planned to ensure project permanence and the VCS AFOLU Non-Permanence Risk Tool was applied. The verification team witnessed during the site visit personnel dedicated to assisting communities that wish to receive their indigenous communal title (ICT) and allow for their involvement in land ownership discussions. Internal, external and natural risks were considered as part of the desktop review and site visit inspection. Measures to control these drivers include promotion of alternative livelihoods, increase funding to strengthen governance, empower community approaches and increase formal land tenure, increase value of standing forests through environmental payments. The verification team can reasonably conclude that steps are actively being taken by the project to mitigate risks to communities and biodiversity.

### 4.3.3 Community and Biodiversity Benefit Permanence (G1.11)

The protected status of the forest (2009 Sub-Decree) is expected to be maintained permanently including eligible land titling, as it has been officially recognized for its biodiversity and carbon stocks. Community benefits are designed to eventually be managed by the communities themselves, without outside inputs, particularly training in livelihood initiatives and extension training. Project proponents view the project as a showcase, setting an example for sustainable land use management.

Several measures to extend project benefits beyond the project lifetime are discussed:

- The legal basis for the project is strong, with governmental decrees used to establish it
- ICT titling will strengthen the claim communities have on their respective community lands
- Demarcation measures are being attempted to increase awareness
- The Seima Carbon Company was established for long-term financing of the project
- Adaptive management techniques are used to respond to new/developing challenges. Long-term engagement of communities, including outreach and consultation
- Agricultural extension courses
- Sustainable livelihood pilot projects
- Environmental awareness activities
- Attempts to draw the labor force from the local communities

Measures taken are reasonable, and include both legal aspects protecting the project lands, education and attempts to tie community success to project success. Auditors visited with community members and observed alternative livelihood programs and found people were receptive to these activities, some of which are already successful. There is no reason the communities wouldn't continue them. Educational efforts and efforts to maintain the legally protected status of the land will likely maintain at least some of the project's benefits beyond the project lifetime.

### 4.3.4 Stakeholder Access to Information (G3.1- G3.3)

The monitoring report discusses how original project documentation was distributed and discussed. The monitoring report goes on to describe regular ongoing meetings with a wide range of stakeholders, including Vietnamese counterparts, by both the Ministry of Environment, WCS and other associated government agencies and NGOs. Section 2.3.8 of the monitoring report includes a list of the meetings and consultations between the project and stakeholders that are conducted, and how often meetings are repeated. The monitoring report states that project documentation was distributed to local community leaders, and that project staff disseminated the information that independent auditors would be visiting. From the site visit, it appeared that monitoring report summaries were discussed and distributed to community leaders, and that local offices had copies of the monitoring report. Many community members are illiterate and depend on educated community leaders to disseminate such information to them. The verification team confirmed that virtually all community members and stakeholders were aware of the project. No visual announcements of the site visit were seen during the visit. It was apparent that all stakeholders were aware of the project and its implications on their lives. The methods for dissemination of project information, especially to local communities, appears to be effective.

### 4.3.5 Stakeholder Consultation (G3.4 – G3.5)

The monitoring report discusses the way stakeholders were involved in the project design initially. It also lists the ongoing meetings with different stakeholders, especially community groups. Meetings/consultations regarding design and implementation of benefit sharing arrangements are included. Community members are involved in land use planning for the ICT process, which is being facilitated by the project as a project activity. Interviews with community members and leaders, and one meeting regarding setting priorities for project benefits that was held during the site visit, indicate that the communities are still involved with the project implementation, including regarding the benefits they would like to see from the project. Requests from community leaders are being considered. Communication between the project and communities is strong and open, by all appearances. Community stakeholders seem to be generally satisfied, at this time. Pertinent information about the project is being well disseminated by the project, through traditional channels of communication. Adequate levels of information are reaching stakeholders.

### 4.3.6 Stakeholder Participation in Decision-making and Implementation (G3.6)

The communities of the project area are indigenous Bunong communities. They are the people most affected by project activities, or the failure to implement project activities. All efforts to enable participation of communities in the project design, implementation and monitoring were aimed at these communities.

Given that most community members are not literate, the effective method of communicating is by word of mouth and face-to-face meetings. Project representatives appear to be doing so effectively, based on

interviews. Project representatives meet with community members on such a frequent basis, that community members could not readily quantify how often these meetings occur.

Most community leaders are men, though some community representatives are women. Women participated freely in community meetings/interview with the auditors.

Project personnel are effectively communicating and getting the participation needed from local communities through appropriate ongoing meetings with individuals and local leaders.

### 4.3.7 Anti-discrimination (G3.7)

The monitoring report states, “according to the Cambodian Constitution, all persons are equal before law without any discrimination on the basis of race, color, sex, language, beliefs, religions, political tendencies, birth origin, social status, wealth, or other situations.” The monitoring report further explains that all KSWS staff annually attend anti-discrimination and gender sensitization training. The verification team reasonably assumes the Cambodian government, which is the project proponent, is following its own laws regarding employment. If all KSWS staff follow and adhere to the annual training on anti-discrimination and gender sensitization training, discrimination and harassment in hiring would likely be uncommon.

### 4.3.8 Stakeholder Feedback and Grievance Redress Procedure (G3.8)

A grievance procedure was provided in the validated PD, following the 3-stage procedure guidelines provided in the CCB standard. From site visit interviews, it is clear that grievances rarely require redress through the formal procedure. Individuals interviewed know who to speak with if they have a problem or comment to make, regarding the project. There are also suggestion boxes in some community locations. The formal grievance process was outlined sufficiently in the monitoring report and confirmed on-site during discussions with community members and project personnel.

### 4.3.9 Worker Relations (G3.9 – G3.12)

The monitoring report states that Ministry of Environment staff, WCS staff and community members employed or working in community patrols are trained according to the needs of their jobs. Monitoring report Tables 2.1 and 2.2 describe the types of training given to employees and community members. Community trainings include agricultural training, training specific to ecotourist industry workers, GPS use, and training for community patrols. The monitoring report also states that community members with recognized ability receive additional training to help advance their careers. According to both the monitoring report and site visit interviews of community project employees and volunteers, training is given, including training in cooking/food prep and other ecotourismrel ated skills. For example, Bunong community members largely run and staff the Jahoo Gibbons Ecotourism camp. The verification team also confirmed through site visit interviews that agricultural extension courses are given to interested farmers. Instruction in chicken and egg production has been provided. Some WCS employees are from the local communities. It is clear to the verification team that the project is building local capacity through job skills training which is on-going.

### 4.3.10 Management Capacity (G4.2 – G4.3)

The project proponent is the Royal Government of Cambodia Ministry of Environment, represented by H. E. Paris Chuop, Deputy Secretary General, National Council for Sustainable Development. WCS Cambodia serves as the lead technical partner and coordinates other NGOs, led by Ken Sereyrotha. The other NGO partners and contacts are provided. The monitoring report Table 2.3 describes the objectives of the project in terms of the skills required to carry them out. It also shows which entities are responsible for those objectives. The governing structure and the responsibilities of key individuals are described sufficiently. The management team was confirmed to include individuals with skills necessary to undertake all project activities through interviews and the site visit. The project proponents and technical consultants have experience in the management of large projects. The project employs staff with years in combined experience in implementing/managing carbon projects. The project management and staff displayed competence, professionalism and expertise in both technical and social aspects of project activities and overall project implementation. Management capacity to satisfy Indicators G4.2 – G4.3 was confirmed through interviews and is most exhibited in the quality of the development of the project.

### 4.3.11 Commercially Sensitive Information (*Rules* 3.5.13 – 3.5.14)

Commercially sensitive information is mentioned in Section 2.4.6 of the monitoring report. The verification team agrees with project proponents that the monitoring report does not deliberately exclude commercially sensitive information.

### 4.3.12 Rights Protection and Free, Prior and Informed Consent (G5.1-G5.5)

Indicator G5.1: The MIR states, “In December 2017, the National REDD+ Strategy (NRS) and National REDD+ Roadmap—developed through the national REDD+ readiness process—was endorsed by the RGC.” A list of laws relevant to REDD+ projects and the establishment of the biodiversity area follows. The project area was all state land at the project start date. On a local level, all 20 communities in the project zone gave written consent for the project. Land ownership by the Government of Cambodia was determined during project validation. The site visit confirmed the local communities are aware of the project and its requirements, and that they are willing participants in project activities. The project is also facilitating the process of the communities obtaining land title through the ICT program.

Indicator G5.2: The project area is government property. The project proponent is the Royal Government of Cambodia. There are no plans to increase the size of the project area. Explicit, written consent was obtained from local communities, though they technically have no claim on the carbon rights of the project area. Consent was granted through a series of meetings explaining the project requirements and benefits. The project is actively helping the communities obtain land title through the ICT program. The project area is owned by the Cambodian government and community members are well informed, regarding their rights and the changes the project brings to their lives. Communities seemed to view the project favorably.

Indicator G5.3: The monitoring report states, “The project has not resulted in nor anticipates involuntary relocations of legitimate occupants of the area from either residential or agricultural land. However, illegal settlers or land grabbers attempting to occupy state or community land may be arrested by the relevant authorities and removed without compensation, and possibly prosecuted, in accordance with the law.” In addition, some strict protection zones will eventually be established for sensitive wildlife, and almost all

human use will be restricted within them. These areas will be chosen to impact the fewest community members and will not be an involuntary process. Negotiations of mutually acceptable compensation packages are included. Established communities were not relocated, but strict enforcement by local patrols has kept new settlements from being established. Local communities view the project as protecting their lands as well as the forest lands. Future plans that may restrict community and individual use of some land will be done via FPIC negotiations and include compensation for lost use of the forest.

G5.4: The illegal activities that would affect climate, biodiversity and community wellbeing are illegal logging and illegal clearing for settlements/agriculture. Actions being taken include enforcement of laws through patrols, the establishment of a law enforcement monitoring network (SMART system), substations for patrols, training of community patrol teams. In addition, the project is helping communities develop participatory land use plans and legally registering communities via the ICT process. Extensive and regular communications are maintained with communities. The verification team confirmed these elements through site visit interviews with law enforcement and community patrols, including observations of confiscated property taken from illegal loggers/land clearers. The illegal logging/clearing activities identified have the biggest potential to impact the well-being of communities, biodiversity and climate benefits of the project. Patrols using several branches of law enforcement and community groups are currently active, and more is planned. Communications between the communities and the project staff appear to be very good.

G5.5: The ownership of the project area land is well established as belonging to the government of Cambodia. The indigenous people who lived in the project zone were identified as were their traditional lands. The project is actively aiding communities in receiving land title through the government's ICT program. The conflicts that might arise are between the indigenous communities and outsiders seeking to clear forest land for agricultural development. No land use conflicts or disputes are reported between indigenous communities in the project zone. There appear to be no current or unresolved past conflicts over land rights, and project staff are actively helping with community mapping and land use planning, aimed at satisfying the requirements of the ICT program as well as conforming to project goals.

#### 4.3.13 Legal Status (G5.6)

The monitoring report lists national laws, local laws, and regulations that are relevant to project activities, including labor laws. It states the project is in compliance with these laws and regulations. Staffs of NGOs involved in the project receive copies of their employment contracts, which outline rights. The project assumes the governmental agencies involved in the project follow their national laws. The verification team finds no reason to believe the project is in violation of any local or national laws or regulations. Staff are aware of their rights.

### 4.4 Climate

#### 4.4.1 Accuracy of GHG Emission Reduction and Removal Calculations

Aster Global conducted an intensive review of all input data, parameters, formulae, calculations, conversions, statistics and resulting uncertainties and output data to ensure consistency with the VCS Standard, the validated PD, and VM0015. Data with associated conversion factors, formulas, and calculations were provided by the project proponent in spreadsheet format to ensure all formulae were accessible for review. The verification team recalculated subsets of the analyses to confirm correctness

and assess if data transposition errors occurred to achieve a reasonable level of assurance and to meet the materiality requirements of the project, as required by Section 5.1.3 of the VCS Standard. The project proponent also provided answers to questions on calculations to ensure the verification team understood the approach and could confirm its consistency with VM0015 and the PD.

An overview of the data and parameters monitored, along with verification team findings, are included in the table below. This is not an exhaustive list of all MRV parameters that are available for verification, but all were data checked as part of the comprehensive desktop the data and parameters used to calculate the GHG emission reductions and removals, and describe the steps taken to assess the following for each of them:

| Data Unit / Parameter | Accuracy of GHG emission reductions and removals | Whether methods and formulae set out in the PD have been followed | Appropriateness of default values |
|---|---|---|---|
| *Ap* | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) |
| *ABSLLK* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *ABSLPAi,t* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *ABSLRRi,t* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *ABSLPAct,t* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *ABSLRRct,t* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |

| | | | |
|---|---|---|---|
| *CFdc* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *CFj* | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) | N/A (parameter not used this period for GHG emission reductions or removals) |
| *cl* | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) |
| *d1, d2, ..., dn* | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) |
| *DBH* | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) | N/A (confirmed at validation; not monitored until baseline renewal, otherwise following Section 1.1.3 of Part 3 of methodology) |
| *ACPAicl,t* | N/A. Parameter not applied this period as no catastrophic event occurred. Confirmed via independent imagery review. | N/A. Parameter not applied this period as no catastrophic event occurred. Confirmed via independent imagery review. | N/A. Parameter not applied this period as no catastrophic event occurred. Confirmed via independent imagery review. |
| *APDPAicl,t* | N/A. Value applied appropriately zero as no planned deforestation occurred during the period. | N/A. Value applied appropriately zero as no planned deforestation occurred during the period. | N/A. Value applied appropriately zero as no planned deforestation occurred during the period. |
| *APFPAicl,t* | N/A. Value applied appropriately zero as no planned fuelwood or charcoal activities occurred during the period. | N/A. Value applied appropriately zero as no planned fuelwood or charcoal activities occurred during the period. | N/A. Value applied appropriately zero as no planned fuelwood or charcoal activities occurred during the period. |

| | | | |
|---|---|---|---|
| *APLPAicl,t* | N/A. Value applied appropriately zero as no planned logging activities occurred during the period. | N/A. Value applied appropriately zero as no planned logging activities occurred during the period. | N/A. Value applied appropriately zero as no planned logging activities occurred during the period. |
| *APNiPAicl,t* | N/A (parameter not applied this period) | N/A (parameter not applied this period) | N/A (parameter not applied this period) |
| *APSLKfcl,t* | N/A (parameter not applied this period) | N/A (parameter not applied this period) | N/A (parameter not applied this period) |
| *AUFPAicl,t* | N/A. No areas subject to unplanned and significant carbon stock decrease, e.g. due to uncontrolled forest fires and other catastrophic events. See findings appendix for forest fire finding. | N/A. No areas subject to unplanned and significant carbon stock decrease, e.g. due to uncontrolled forest fires and other catastrophic events. See findings appendix for forest fire finding. | N/A. No areas subject to unplanned and significant carbon stock decrease, e.g. due to uncontrolled forest fires and other catastrophic events. See findings appendix for forest fire finding. |

Calculations for all project activities were reviewed at length as prescribed by the methodology and confirmed to result in correct estimates. The methods and formulae set out in the PD for calculating baseline emissions, project emissions, and leakage were confirmed to have been followed. The total end of the monitoring period carbon stocks in all project activities for all relevant pools resulting from carbon stock changes were correctly quantified. Analysis of project inventory data used appropriate formulas, conversions, and parameters, supported by scientific literature. Where ranges of parameters exist, or other types of formulaic uncertainty, appropriately conservative values were used in data analysis.

In conclusion, the quantification methods for GHG emission reductions and removals have been performed correctly and in accordance with the validated PD and VM0015 v1.1.

### 4.4.2 Quality of Evidence to Determine GHG Emission Reductions and Removals

During this verification assessment, the evidence provided by the project proponent was sufficient in both quantity and quality to support the determination of GHG emission removals reported by the project. Throughout the verification, the project proponent demonstrated a commitment toward conservativeness and took all measures appropriate to ensure the reliability of evidence provided.

The threshold for materiality with respect to the aggregate of errors, omissions and misrepresentations relative to the total reported GHG emission reductions and/or removals was met for this project as defined in the Verification Sampling Plan. Materiality is a concept that errors, omissions and misrepresentations could affect the GHG reduction assertion and influence the intended users (ISO 14064-3:2006). As defined by VCS Version 4, the materiality will be 1% for this large project.

The evidence provided to determine emission reductions reported in the Monitoring Report included values, notations, units and sources. This evidence has been cross-checked with supplied emission

reduction calculation spreadsheets. The procedure for data recording, transfer and final transposition was also verified and found to be in compliance with the monitoring plan outlined in the PD. The verification team confirmed through cross checks that adequate monitoring mechanisms are in place where the required parameters need to be monitored.

The verification team was provided access to the project's calculation files and monitoring data compilations for quantification steps and reporting for assessment of accurate information flow for monitoring efforts. Interviews conducted (oral evidence) are outlined in Section 2.3 above, and the final documents received from the Project Proponent supporting the determination of GHG removals can be viewed in Appendix A.

### 4.4.3 Non-Permanence Risk Analysis

The *Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary* Project utilized the permanence risk analysis tool, VCS AFOLU Non-Permanence Risk Tool, to assess risk according to internal risk, external risk, natural risk, and mitigation measures for minimizing risk. The verification team reviewed the Non-Permanence Risk Report following VCS AFOLU Requirements Section 3.7.3 and confirmed that the project adheres to the requirements set out in the VCS AFOLU Non-Permanence Risk Tool. At all levels, the verification team evaluated the rationale, appropriateness, and justifications of risk ratings chosen by the project proponent. Each risk factor was thoroughly assessed for conformance. Any identified NCR and/or CL findings related to the AFOLU Non-Permanence Risk Tool/Report are presented in Appendix B.

The final score was calculated to be 10%. A brief review of each factor is found in the table below:

| Risk Factor | Rationale & Quality | Conclusion |
|---|---|---|
| **Internal Risks** | | |
| Project Management | The management team includes individuals with skills necessary to undertake all project activities. Management team is based partly on site and partly in Phnom Penh, less than 5 hours travel from the site. A value of zero is appropriate. Other project management components were confirmed to have been applied during the site visit. Both mitigation credits were applied and determined to be appropriate by the VVB. | A risk rating of **-2** is appropriate given the rationale provided and all statements made are substantiated. |
| Financial viability | Project proponents provided the verification team appropriate and verifiable documentation to prove project financial breakeven is less than or equal to 4 years from this risk assessment. Items presented to the verification team by project proponents give reasonable assurance that the risk rating for financial viability is appropriately set. Values were sourced from reputable sources and calculations were confirmed correct through data checks. | A risk rating of **0** is appropriate given the rationale provided and all statements made are substantiated. |

| | | |
|---|---|---|
| | Additionally, the mitigation credit is applied and the VVB confirms that this is appropriate based on the provided documentation. | |
| Opportunity Cost | A Social Impact Assessment was provided to substantiate the most profitable alternative (unsustainable resource extraction) is 100% more than the project scenario. The document indicates that baseline subsidence activities will not generate not positive community impacts. As the criteria chosen is the most aggressive and conservative the verification team finds this reasonable. Both mitigation scores are claimed due to the presence of the legally binding commitment (Sub-Decree). | A risk rating of **-2** is appropriate given the rationale provided. |
| Project Longevity | A legal contractual agreement in the form of the Sub-Decree to address enforceability of carbon stock protection for the project exist as the project holds this legal commitment which covers the entire project lifetime. As such, the value applied was appropriate. | A risk rating of **0** is appropriate given the rationale provided. |
| | **Total Internal Risks** | **0** |
| **External Risks** | | |
| Land Tenure | For this Cambodian project, the ownership and resource access/use can be held by different entities. The government owns the land and traditional users retain some resource rights. The Sub-Decree allows for the mitigation score to be awarded. | A risk rating of **0** is appropriate given the rationale provided. |
| Community Engagement | Extensive stakeholder consultation and community institution building was confirmed during the site visit. Consultation on community needs was confirmed for those communities visited that are close to the project area. The project, has strong intentions to improve the social and economic well-being of local communities. | A risk rating of **-5** is appropriate given the rationale provided. |
| Political Risk | Verification Team confirmed the political risk to be rated correctly for the average governance score from the World Bank. Cambodia participates in and is working on REDD+ Readiness activities as confirmed through an internet search. | A risk rating of **2** is appropriate given the rationale provided. |
| | **Total External Risks** | **0** |

| Natural Risks | | |
|---|---|---|
| Natural Risk | The risk rating given for fire was justified by historic imagery analysis of fires which supports the notion that fire likelihood is insignificant. Natural high-intensity fire incidence is relatively low as the forest is adapted to low intensity burns. The verification team agrees with this assessment as being appropriate.<br><br>The VVB confirms that the likelihood of losses due to pests and disease is insignificant and a rating of every 25 to less than 50 years is appropriate based on an analysis of historic inventory to catastrophic disturbance caused by insect pests or forests diseases.<br><br>Project proponents appropriately base risk of extreme weather risk rating from the likelihood of wind disturbance which could influence carbon stocks.<br><br>Local geology (i.e. volcanos, fault lines) are not active in the project area and the risk rating was appropriately given. | A combined natural risk rating of **5.0** is appropriate given the rationale provided and all statements made are substantiated. |
| | **Total Natural Risks** | **5.0** |
| **Overall Risk Rating = 5%**<br>**Non-Permanence Risk Rating = 10%** | | |

The verification team believes the project is able to effectively manage risks to project benefits during the monitoring period (and project lifetime) in a variety of ways. Risk mitigation strategies were confirmed to have been implemented as planned in the validated PD and are summarized in the non-permanence risk assessment conducted by the project. The verification team notes that the non-permanence risk assessment was intended to address the risk to climate benefits but is also applicable to risks associated with community and biodiversity benefits. The verification team did not identify additional risks to project benefits, including community and biodiversity benefits.

In summary, project proponents have accounted for risk factors in a reasonable manner and have reached an overall risk rating that encompasses all risks of non-permanence. The project has applied the minimum Non-Permanence Risk Rating of 10%. As required, risk will be reassessed and given risk scores at each verification period

#### 4.4.4 Dissemination of Monitoring Plan and Results (CL4.2)

This CCB Indicator is met through successful satisfaction of Indicator G3.1. In short, many community members are illiterate, and depend on educated community leaders to disseminate such information to them. The majority of interviewed community members said they were briefed by their leaders on the project monitoring report and had received notice of the monitoring.

#### 4.4.5 Optional Gold Level: Climate Change Adaptation Measures (GL1.3)

This indicator is not applicable.

#### 4.4.6 Optional Gold Level: Climate Change Adaptation Benefits (GL1.4)

This indicator is not applicable.

### 4.5 Community

#### 4.5.1 Community Impacts (CM2.1)

Project actions and positive impacts were listed and described in section 4.1 of the monitoring report. The positive impacts listed for this verification period include:

- Prevention of 25,000 ha of deforestation.
- Prevention of several proposed extractive projects.
- Ensuring long-term access for legitimate users.
- Reduced impacts from industrial activities.
- Reduced cross-border threats to natural resources.
- Reduce threats through increased patrols.
- Increased coordination between provincial and national authorities to increase effectiveness of patrols and processing of criminal cases.
- Strengthened tenure security and land use rights.
- Collaboration between local communities and provincial and national governments
- Increased sustainable income opportunities.
- Ag extension courses.
- Increased literacy.

Project activities that contribute to these positive impacts are described and seem reasonable. The evidence used to assess conformance to this Indicator was found in Section 7.1 of the monitoring report, site visit observations and interviews. The verification team observed that local communities expressed support of the project and project activities during the site visit. Community and other law enforcement patrols are very active in the reduction of illegal logging and land clearing.

### 4.5.2 Negative Community Impact Mitigation (CM2.2)

Section 4.1.2 of the monitoring report presents a table which lists each project action with comments on; expected positive impacts, potential negative impacts, most vulnerable groups who might be impacted, assessment and threat mitigation for each project action. Potential negative impacts include restriction of development options, exclusion of traditional harvest activities in some locations, undue representation of certain groups in management decisions, inappropriate prevention of legal uses of zoned land, etc. Each of these potential impacts is paired with common sense proposals to prevent the problem from occurring, or to mitigate for the problem, should it occur.

The verification team notes that project actions themselves were designed to preserve or enhance community and biodiversity HCVs. However, the project provides mitigation activities, and active, participatory management solutions, should the actions not work as intended. The site visit did not reveal any obvious negative impacts on community groups.

### 4.5.3 Net Positive Community Well-being (CM2.3)

Section 4.1.3 of the monitoring report includes a discussion of the negative community benefits associated with the business as usual scenario and the positive benefits expected from the project activity. The project proponent has taken significant steps to assess the needs of the affected communities and these are described in Section 2.2 of the PD and previous monitoring reports. The project produces positive impacts and there are almost no negative impacts. It is clear to the verifiers that the project's impacts are positive in comparison to the 'without project' scenario which would threaten social advancements in the project zone.

### 4.5.4 Protection of High Conservation Values (CM2.4)

The two community-related HCVs identified include forest areas fundamental to meeting basic needs and Forest areas critical to local communities' traditional cultural identity. Both of these HCVs depend on maintaining current land use patterns. Project activities are designed to protect these values through forest protection and land use planning. There is no project activity described that could conceivably negatively impact these HCVs. Monitoring includes consultation with communities on their perceptions of the conditions of the HCVs, as well as monitoring via patrols and remote sensing.

If the project is implemented as described, the verification team does not believe that project activities would negatively affect HCVs, since its goals are to protect them. However, if unforeseen impacts occur, HCVs are monitored through remote sensing, through patrols, and through direct consultation with communities.

### 4.5.5 Other Stakeholder Impacts (CM3.2-CM3.3)

The verification team is assured that by the nature of the project no negative impacts on other shareholders can be expected. Leaving much of the land as it is can be expected to have little impact on other stakeholders, and negative impacts are unlikely in the project scenario. The only conceivable negative impacts would be on those seeking to profit through illegal logging or land clearing. The project activities, which revolve around forest protection and enhancing sustainable income producing opportunities, are unlikely to have a negative impact on any stakeholder, unless that stakeholder's interest requires the destruction of the forest and forest habitat the project seeks to protect.

### 4.5.6 Community Monitoring Plan (CM4.1, CM4.2, GL2.2, GL2.3, GL2.5)

The validated PDD includes the plan for monitoring community-related HCVs. The monitoring methods include demographic and socioeconomic monitoring, as well as threats monitoring and remote sensing. Annual meetings will allow community representatives to comment on impacts. The results of community monitoring were provided to the verification team in the form of a document and confirmed adequate. It includes an in-depth description of the recent monitoring of social well-being, security, land productivity and a review of the threats to project goals. The verification team concludes there is a clear plan for monitoring community-related HCVs. The monitoring methods include demographic and socioeconomic monitoring, as well as individual threat monitoring and remote sensing.

### 4.5.7 Community Monitoring Plan Dissemination (CM4.3)

The results of community monitoring were provided to the verification team in the form of a document and confirmed adequate. It includes an in-depth description of the recent monitoring of social well-being, security, land productivity and a review of the threats to project goals. Through site visit interviews the verification team was able to confirm monitoring report summaries were distributed to communities and other stakeholders.

### 4.5.8 Optional Gold Level: Short-term and Long-term Community Benefits (GL2.2)

This Indicator not applicable.

### 4.5.9 Optional Gold Level: Smallholder/community member Risks (GL2.3)

This Indicator not applicable.

### 4.5.10 Optional Gold Level: Marginalized and/or Vulnerable Community Groups (GL2.4)

This Indicator not applicable.

### 4.5.11 Optional Gold Level: Net Impacts on Women (GL2.5)

This Indicator not applicable.

### 4.5.12 Optional Gold Level: Benefit Sharing Mechanisms (GL2.6)

This Indicator not applicable.

#### 4.5.13 Optional Gold Level: Governance and Implementation Structures (GL2.8)

This Indicator not applicable.

#### 4.5.14 Optional Gold Level: Smallholders/Community Members Capacity Development (GL2.9)

This Indicator not applicable.

### 4.6 Biodiversity

#### 4.6.1 Biodiversity Changes (B2.1)

The monitoring report states that the populations of monitored species in KSWS have remained stable except for the red muntjac. However, the project proponent has taken steps to understand the decline. Their research suggests that although populations of the red muntjac are declining the project activities have helped to reduce the population decline. The project proponents use various methods to monitor biodiversity, but the verification believes that all monitoring efforts are appropriate and scientifically valid. The verification team believes that maintaining the current high level of biodiversity is the best that can be expected. There is little scope for increase due to natural limiting factors. Changes in biodiversity are therefore limited to loss. No significant change in biodiversity was detected during this verification period through on-site observations and review of monitoring period imagery for disturbance. The verification team has little reason to believe the project area remains less rich in biodiversity in aggregate for this monitoring period than the project start.

#### 4.6.2 Mitigation Actions (B2.3)

The use of snares by poachers has the potential to negatively impact the species populations. The monitoring report states that although patrols regularly collect snares, but the removal of snares was not necessarily a priority. In 2017, the project proponent initiated an anti-snare team to specially address this concern. Additionally, their research suggests that the removal of snares alone will not adequately address the negative impacts of snare hunting; therefore, during this reporting period the project proponent established a Human-Wildlife Conflict Team that provides education about ways other than snares to reduce crop raiding by animals. Additionally, the domestic dog population poses threats to wildlife populations and the project proponent has initiated a project to address this concern. The first step, started in this monitoring period, was to collect data to understand the movement and disease load of the domestic dogs in the project area. There were no negative impacts on biodiversity or HCV attributes recorded, so no measures were necessary to mitigate impacts, beyond the routine operation of the project.

#### 4.6.3 Net Positive Biodiversity Impacts (B2.2)

The project seeks to preserve a largely intact forest habitat that the endemic and endangered species rely upon for survival, rich in biodiversity. The ‘without project’ scenario results in the eventual elimination of that ecosystem, and the wildlife it includes. Verifiers reviewed remote sensing imagery and visited areas determined to be degraded. The verification team evidence to assess conformance is simply the nature of the project and the nature of the habitat required by the species that live there. The verification team concludes that the net impacts on biodiversity in the with-project scenario are positive in the project area and zone, in comparison with the without-project scenario.

### 4.6.4 High Conservation Values Protected (B2.4)

Describe the steps taken to verify that no high conservation values were negatively affected by the project.

The project is using line transects, fecal DNA, capture-recapture and occupancy surveys, as well as remote sensing, to assess habitat condition and whether significant concentrations of wildlife exist. Project activities were designed to protect HCVs and monitoring did not detect negative impacts, this was confirmed from site visit interviews and observations. Some degradation was reported and confirmed by the verification team. The degradation was caused by illegal acts and not by the project. Project activities are designed to avoid HCV degradation and also to replace the illegal livelihoods that cause deforestation and degradation.

### 4.6.5 Invasive Species (B2.5)

Species used in planting efforts are native to the area. The verification team noted that monitoring report table 5.2 includes a list of the known invasive species within the project area. The monitoring report states that only local native tree or bamboo species are used in any reforestation activities. The verification team is reasonably assured that the project proponent is not introducing invasive species into the project area.

### 4.6.6 Impacts of Non-native Species (B2.6)

The project proponents state that 9 non-native species have been recorded in the project area. However, the project proponents have determined that these 9 non-native species have been shown to not have any negative impact.

### 4.6.7 GMO Exclusion (B2.7)

The verification team notes that Section 5.1.7 of the monitoring report states that no GMO is used anywhere in the project zone, as far as is known. Further it states no GMOs will be used in project activities, and REDD+ funded agricultural assistance projects will not support farms using GMOs. The verification team has no reason to believe that GMOs will be used by the project to generate emission reductions or removals.

### 4.6.8 Inputs Justification (B2.8)

The verification team confirmed that most project activities seek to reduce the need to use fertilizers and pesticides. Some activities within the project area, supporting sustainable agricultural practices as alternative livelihoods include fertilizer and pesticide alternatives, such as compost and plant-based deterrents. No chemical pesticides or biological control agents are expected to be used in the project.

### 4.6.9 Negative Offsite Biodiversity Impacts (B3.1) and Mitigation Actions (B3.2)

It is not possible for a project of this nature to produce negative offsite impacts, other than those cause by leakage. No actual impacts were observed during the site visit or reported during the monitoring period.

### 4.6.10 Net Offsite Biodiversity Benefits (B3.3)

Net biodiversity impacts from a project that protects habitat within a project area is unlikely to be anything but positive or neutral.

Biodiversity within the project zone is unquestionably impacted positively, especially over the 'without project' scenario. Activity shifting leakage is unlikely to affect an area greater than the area under protection. With no detected negative offsite biodiversity impacts, net biodiversity impacts are positive.

### 4.6.11 Biodiversity Monitoring Plan (B4.1, B4.2, GL3.4)

Results of monitoring were reported, were confirmed reported according to the parameters described in the validated project description. The biodiversity monitoring plan was developed and implemented, as described in the validated PDD. Monitoring of biodiversity-related HCVs was confirmed covered by the overall monitoring plan as follows:

- HCV1, significant concentrations of biodiversity values, is monitored via line transects, and capture-recapture and occupancy surveys.
- HCV2, Landscape level forests, is monitored through remote sensing.
- HCV3, threatened ecosystems, is monitored through remote sensing and measurements of forest condition during reassessments of the project baseline.

The monitoring plan, included in the validated PDD, states the three-trigger species are threatened by habitat loss and hunting. Habitat loss is largely monitored through remote sensing. Data on hunting is derived from the SMART reporting system adopted by Cambodia. Indicator GL3.4 was successfully satisfied during project validation and the verification team has no reason to believe monitoring indicators are ineffective as seen by the results of monitoring.

### 4.6.12 Biodiversity Monitoring Plan Dissemination (B4.3)

As described elsewhere in this review, the verification team observed that dissemination of project materials occurred consistently, including to leaders of the communities where community members could be informed verbally. The verification team observed that the dissemination patterns confirmed as part of the audit has led to increased awareness of the project to all interested community members, beyond leadership.

### 4.6.13 Optional Gold Level: Trigger Species Population Trends (GL3.3)

Primary threats to the trigger species are loss of habitat and poaching. These are addressed through protection and monitoring measures taken through both remote sensing and law enforcement patrols. The activities designed to reduce the threats of habitat loss and hunting are in effect as confirmed through document review and subsequent site visit observations.

#### 4.6.14 Optional Gold Level: Effectiveness of Threat Reduction Actions (GL3.4)

The monitoring plan, included in the validated PDD, states the three-trigger species are threatened by habitat loss and hunting. The verification team confirmed that habitat loss is largely monitored through remote sensing. Data on hunting is derived from the SMART reporting system adopted by Cambodia. The effectiveness of threat reduction actions are directly related to existing monitoring efforts as confirmed elsewhere in the review

### 4.7 Additional Project Implementation Information

No additional project implementation is relevant for reporting here as details on project implementation are included in preceding sections.

### 4.8 Additional Project Impact Information

The project has been able to demonstrate impacts to all CCB indicators as mentioned throughout this report in addition to achieving CCB Gold Level. No further steps to verify additional monitoring were warranted. The reported project impact information was sufficient and suitable for the verification of the project's CCB impacts.

## 5 VERIFICATION CONCLUSION

After review of all project information, procedures, calculations, and supporting documentation, Aster Global confirms that the monitoring conducted by the project proponent, along with the supporting Monitoring Report, are accurate and consistent with all aforementioned VCS Version 4 and CCB Third Edition criteria, the validated PD, and the selected methodology (VM0015). Aster Global confirms that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project Monitoring Report (v2.1 dated 25 September 2020) has been implemented in accordance with the validated PD.

Aster Global confirms all verification activities, including objectives, scope and criteria, level of assurance, validated Project Description implementation, and project monitoring report adherence to VCS Version 4 (and all associated updates), and CCB Project Design Standards (Third Edition), as documented in this report are complete. Aster Global concludes without any qualifications or limiting conditions that Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary Project Monitoring Report (v2.1 dated 25 September 2020) meets the requirements of Version 4 (and all associated updates) and CCB Project Design Standards (Third Edition) for the verification period/reporting period (01 January 2018 – 31 December 2019 - 2-years). In addition, Aster Global asserts that the project complies with the verification criteria for projects set out in the Third Edition of the CCB Standards to achieve Gold Level Distinction for Biodiversity.

The GHG assertion provided by Wildlife Conservation Society and verified by Aster Global has resulted in the GHG emissions reduction or removal of 1,614,141 tCO2 equivalents by the project during the verification period/reporting period (01 January 2016 – 31 December 2017 - 2-years). This value is gross of the 10% (246,534 tCO2 equivalents) buffer withholding based on the non-permanence risk assessment tool. This results in 1,394,606 tCO2 equivalents of credits eligible for issuance as VCUs.

Monitoring period: From 01 January 2018 to 31 December 2019

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

| Year | Baseline emissions or removals ($tCO_2e$) | Project emissions or removals ($tCO_2e$) | Leakage emissions ($tCO_2e$) | Net GHG emission reductions or removals ($tCO_2e$) |
|---|---|---|---|---|
| Year 2018 | 2,334,697 | 1,154,270 | 623,256 | 557,171 |
| Year 2019 | 2,455,808 | 1,170,886 | 200,952 | 1,083,969 |
| **Total** | **4,790,505** | **2,325,157** | **824,208** | **1,641,141** |

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## APPENDIX A: LIST OF DOCUMENTS RECEIVED AND REVIEWED

| Name | Date Received |
|---|---|
| Seima VCS CCB MIR 2018 - 2019 v20200206.pdf | 7/9/2020 |
| Setha Quarterly report Apr-Jun-2019.docx | 7/9/2020 |
| កំណត់ហេតុសិក្ខាសាលាការពង្រឹងការអនុវត្តច្បាប់ថ្ងៃទី_ ១៦ កក្កដា ២០១៩.docx | 7/9/2020 |
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| 20_KSWS_Key species population distribution.pdf | 7/9/2020 |
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## APPENDIX B: CL/NCR/OFI REQUESTS

| **Findings** | 1 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | 3.1 General Requirements |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | 3.1.3 Projects and the implementation of project activities shall not lead to the violation of any applicable law, regardless of whether or not the law is enforced. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MR Section 2.5.6; Supporting Documents |
| **Aster Global Initial Findings** | The Monitoring Report Section 2.5.6 lists different laws and regulations that are (or have previously been) relevant to the project. It is not believed that the project is doing anything illegal. No evidence of any illegal activities were observed by the auditors.<br><br>Although the narrative in MR Section 2.5.6 clarifies that the project area falls under the jurisdiction of the MoE, it is not clear whether this is an exhaustive list of all relevant national and local laws. The verification team is unclear whether implementation of project activities has led to violation of any applicable laws without consideration of all relevant laws. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify whether all relevant laws and regulations were considered in terms of project activity implementation as prescribed by this requirement. Please update reporting in the MR if warranted to support assertions. |
| **Round 1 Response from Project Proponent** | All relevant laws and regulations have been considered in relation to project activity implementation. Section 2.5.6 of the Monitoring Report was updated to include all relevant laws applicable to the implementation of project activities. |
| **Aster Global Findings Round 2** | Section 2.5.6 National and Local Laws (G5.6) is updated with all relevant laws and regulations. Refer to Seima VCS CCB MIR 2018 - 2019 v2020925.docx. |

| **Findings** | 2 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | 3.2.9 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | 3.2.9 Projects shall prepare a non-permanence risk report in accordance with the VCS Program document *AFOLU Non-Permanence Risk Tool* at both validation and verification. In the case of projects that are not validated and verified simultaneously, having their initial risk assessments validated at the time of VCS project validation will assist VCU buyers and sellers by providing a more accurate early indication of the number of VCUs projects are expected to generate. The non-permanence risk report shall be prepared using the *VCS Non-Permanence Risk Report Template*, which may be included as an annex to the project description or monitoring report, as applicable, or provided as a stand-alone document. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | NPRR |
| **Aster Global Initial Findings** | Title Page:<br>- The font of items in the box is Franklin Gothic Book. This should be Arial or Century Gothic as instructed by the template.<br>- The font size of "Document Prepared by the Wildlife Conservation Society" is 13. This should be 12 as instructed by the template. |
| **Round 1 NCR/CL/OFI** | CL: Please update the findings as directed by <VCS-Non-Permanence-Risk-Report-Template-v4.0.docx>: "TITLE PAGE: Complete all items in the box on the title page using Arial or Century Gothic 10.5 point, black, regular (non-italic) font. This box must appear on the title page of the final document. Project descriptions may also feature the project title and preparers' name, logo and contact information more prominently on the title page, using the format below (Arial or Century Gothic 24 point and Arial or Century Gothic 12 point, black, regular font)."<br><br>Please also update 4.2. Calculation of Total VCUs after Climate Section is completed. |
| **Round 1 Response from Project Proponent** | Project documentation has been updated to correct these items. |

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| **Aster Global Findings Round 2** | Font and sizes are updated. Refer to VCS-Non-Permanence-Risk-Report-Template-vFINAL 2.docx.<br><br>Section 4.2 Calculation of Total VCUs is updated from the table in Section 3.2.4 Net GHG Emission Reductions and Removals of Seima VCS CCB MIR 2018 - 2019 v2020925.docx.<br><br>This item is addressed. |

| **Findings** | 3 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | 3.4.3 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | 3.4.3 The project proponent shall use the *VCS Monitoring Report Template* or an approved combined monitoring report template available on the Verra website, as appropriate, and adhere to all instructional text within the template. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MR |
| **Aster Global Initial Findings** | The project is using the most current version of CCB & VCS Project Description Template, CCB v3.0, VCS v3.3 (Issued on 21 June 2017).<br><br>The font size of "Document Prepared by Wildlife Conservation Society" in the Title page is 12. This should be size 11 as instructed by the template. |
| **Round 1 NCR/CL/OFI** | CL: Please correct the font size of "Document Prepared by Wildlife Conservation Society" to 11. |
| **Round 1 Response from Project Proponent** | This change has been made to the revised documentation. |
| **Aster Global Findings Round 2** | The font size is updated to 11. Refer to Seima VCS CCB MIR 2018 - 2019 v2020925.docx.<br><br>This item is addressed. |

| **Findings** | 4 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | ***7.1.1 Ex ante* estimation of actual carbon stock changes due to planned activities** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Planned deforestation (e.g. to build project infrastructure); |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MR 3.1.3.4 |
| **Aster Global Initial Findings** | 3.1.3.4 states that no controlled deforestation and planned harvest occurred during the verification period. However, the verification team noted some deforestation had occurred during the period as observed during the site visit. Clarification is requested on whether the project has allowed infrastructure construction for instance within the project area. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify whether planned deforestation in the form of infrastructure development or similar occurred during the site visit. |
| **Round 1 Response from Project Proponent** | There has been no planned deforestation in the form of infrastructure development or similar occurred during the reporting period. |
| **Aster Global Findings Round 2** | The response from the proponent corroborates observations on-site and spot check imagery review. No further action is needed. The item is addressed. |

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| **Findings** | 5 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | ***7.1.1 Ex ante* estimation of actual carbon stock changes due to planned activities** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Planned degradation (e.g. timber logging, fuel-wood collection or charcoal production); |

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| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MR 3.1.3.4 |
| **Aster Global Initial Findings** | 3.1.3.4 states that no controlled deforestation and planned harvest occurred during the verification period.<br><br>Members of the audit team engaged in a discussion with WCS and PDoE during the site visit where they mentioned that they are working on the new zoning and land classification process. The WCS provincial staffs were unable to provide a new map and any details information on this matter. The drone survey photos, where forest degradation was observed at multiple locations, and through discussions with on-site staff, suggested perhaps WCS is planning to cut these degraded areas from the REDD+ project zone or they may register these areas as the ICT or other community land use purposes. |
| **Round 1 NCR/CL/OFI** | CL: Please address the findings related to degradation, including whether a new zoning and land classification process is being considered. |
| **Round 1 Response from Project Proponent** | Since coming under the jurisdiction of the MOE in 2016, the KSWS is required to be zoned according to 4 recognized zones: core zone, conservation zone, sustainable use zone and community zone. WCS is currently assisting MOE in this process which is not complete and therefore no final maps are available.<br><br>In determining the zonation, the current land use and land cover is being considered, including how much land should be assigned for community needs which may include previously deforested or degraded lands. This may increase the area traditionally considered community land and is done to meet the development aspirations of the target communities.<br><br>In no case, however, are the lands being zoned as per MOE requirements for protected areas impacting the REDD+ project area. This remains the same as identified in the PD. |
| **Aster Global Findings Round 2** | The audit team understands that these zones are specific to the MOE and do not affect the carbon project. The definitions of the zones are defined in the MR Section 2.5.3 and 2.5.5, and elsewhere. The boundaries of the project area are not subject to change. The item is addressed. |

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| **Findings** | 6 |

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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | ***8.2 Ex ante* estimation of the decrease in carbon stocks and increase in GHG emissions due to activity displacement leakage** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Activities that will cause deforestation within the project area in the baseline case could be displaced outside the project boundary due to the implementation of the AUD project activity. If carbon stocks in the leakage belt area will decrease more during project implementation than projected in the baseline case, this will be an indication that leakage due to displacement of baseline activities has occurred. Leakage due to activity displacement can thus be estimated by ex post monitoring of deforestation in the leakage belt and comparing ex post observed deforestation with ex ante projected baseline deforestation. A baseline for the leakage belt is therefore necessary and methods to establish this baseline were described in section 6.1.2 and 6.1.3. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MIR Section 4.3.2 (RP2) |
| **Aster Global Initial Findings** | At the previous verification it was established that Economic Land Concessions (ELCs) were granted in the leakage belt after project start. The presence of ELCs in the leakage belt is presumed to cause deforestation. Preservation of the original leakage belt boundaries and accounting for all deforestation during monitoring is inherently conservative. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify whether the project has made any adjustments (LB boundaries or otherwise) as a result of ELC presence for this reporting period in the leakage belt. |
| **Round 1 Response from Project Proponent** | The project has not made any geospatial adjustments to any defined boundaries, including the leakage belt. |
| **Aster Global Findings Round 2** | The audit team confirms no changes to the leakage belt boundaries and this is appropriate. The item is addressed. |

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| **Findings** | 7 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.2 Monitoring of land-use and land-cover change within the project area** |

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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | It the project must do a monitoring of other categories (II and/or III) and these are not included in the existing program, the existing program can only be used for monitoring category I, and the project proponent must implement a separate monitoring program for category II and/or III. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MIR 1.1.3; |
| **Aster Global Initial Findings** | Category II is not required to be monitored, as it is mandatory only for AUD project activities having planned logging, fuel-wood collection and charcoal production activities above the baseline. According to section 3.1.3.4 of the MIR, there was no controlled deforestation and planned harvest during the verification but the MIR does not specifically address whether fuel-wood collection and charcoal production. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify in the MIR in section 3.1.3.4 whether or not there was fuel-wood collection and/or charcoal production that could affect carbon stocks. |
| **Round 1 Response from Project Proponent** | Project activities did not include fuel-wood collection nor charcoal production during the reporting period. Project documentation has been updated to reflect this information. |
| **Aster Global Findings Round 2** | The audit team reviewed the updated MIR and confirms that the requested additional language has been added to section 3.1.3.4 of the MIR. No further action is required. This item is closed. |

| **Findings** | 8 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.2 Monitoring of land-use and land-cover change within the project area** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | The results of monitoring shall be reported by creating ex post tables of activity data per stratum **(Tables 9.a, 9.b and 9.c Pages 49 & 50)**; per initial forest class icl **(Tables 11.a, 11.b and 11.c Pages 56 & 57)**; per post-deforestation zone z (**Tables 13.a, 13.b and 13.c Pages 58 & 59)** and, where applicable, per category of land-use change ct (**Tables 14.a, 14.b and 14.c Pages 60 & 61**).or ctz **(Tables 19.a, 19.b and 19.c Pages 71 & 72)**. |
| **Applicability to the Project (Y or N/A)** | Y |

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| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | period3_verification_calculations_v2.0.xlsx |
| **Aster Global Initial Findings** | Tables 3.21 and 3.22 appear to satisfy the methodological requirements for these tables. The audit team noticed a slight 10ha discrepancy with deforested hectares as related to the adjustments for manual delineation. |
| **Round 1 NCR/CL/OFI** | CL: Please address the findings related to the deforested hectares from the manually delineated areas added in. |
| **Round 1 Response from Project Proponent** | The documentation has been updated to correct this discrepancy. |
| **Aster Global Findings Round 2** | The audit team reviewed the newly submitted v3.0 calculation worksheet and noted that the hectare discrepancy between manually delineated areas and GIS hectares does not appear to have been addressed. |
| **Round 2 NCR/CL/OFI** | CL: Please address the findings related to the deforested hectares from the manually delineated areas added in. |
| **Round 2 Response from Project Proponent** | Since coming under the jurisdiction of the MOE in 2016, the KSWS is required to be zoned according to 4 recognized zones: core zone, conservation zone, sustainable use zone and community zone. WCS is currently assisting MOE in this process which is not complete and therefore no final maps are available.<br><br>In determining the zonation, the current land use and land cover is being considered, including how much land should be assigned for community needs which may include previously deforested or degraded lands. This may increase the area traditionally considered community land and is done to meet the development aspirations of the target communities.<br><br>In no case, however, are the lands being zoned as per MOE requirements for protected areas impacting the REDD+ project area. This remains the same as identified in the PD. |
| **Final Aster Global Findings** | The audit team understands that these zones are specific to the MOE and do not affect the carbon project. The definitions of the zones are defined in the MR Section 2.5.3 and 2.5.5, and elsewhere. The boundaries of the project area are not subject to change. The item is addressed. |

| **Findings** | 9 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.3 Monitoring of carbon stock changes and non-CO2 emissions from forest fires** |

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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Areas subject to unplanned and significant carbon stock decrease, e.g. due to uncontrolled forest fires and other catastrophic events. In these areas, carbon stock losses must be estimated as soon as possible after the catastrophic event. See section 1.1.4 below for more detailed guidance |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | 05_2017_verification_calculations_v0.4.xlsx; MIR Step 1.1.3 |
| **Aster Global Initial Findings** | Monitoring for controlled deforestation and planned harvest activities was implemented. Monitoring was conducted USGS Fire Information Resource Management System (FIRMS) and forest fire observations.<br><br>The MIR states that no significant loss of carbon was detected from forest fires; however, there has been an increase in the number of fires during the monitoring period and as a result the project proponent began quantitative monitoring of non-CO2 emissions during this monitoring period. The quantitative analysis indicated that CO2 emissions from fire only resulted in 1.28% of the total project area emissions and thus it does not meet the 5% significance threshold and ultimately not included in final emission calculations. The audit team noted a few miscalculations; however, the true value is lower than the reported value, 1.28. Specifically the errors occur in cells, M9 which affects cells E15 and E16. Furthermore the PA Emissions total for above ground and below ground carbon reported in cell H23 is incorrect.<br><br>The audit team was unable to locate the MODIS data used for the fire analysis. Also, the MR appears to incorrectly report 1,658ha of burnt areas as compared to results "Area Burned Defor LULUC_2018_2019" within the period 3 calculation workbook. |
| **Round 1 NCR/CL/OFI** | CL: Please correct the formulas used in Cells M9 and H23 and update the MIR to reflect the true values of the reported parameters.<br><br>Please also provide the MODIS raw data and derivative analysis files to support the hectares applied for the de minimis demonstration. Please clarify reported hectares of burnt areas in the MR Section 3.1.3.4. |
| **Round 1 Response from Project Proponent** | Formulas corrected in the calculation spreadsheet and updates included in MIR.<br><br>The MODIS FIRMS data used for the fire analysis can be found in the folders shared with the verification team. |

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| **Aster Global Findings Round 2** | The audit team reviewed the updated workbook and MIR and confirms that the appropriate changes have been made.<br><br>In addition, the MODIS FIRMS data was reviewed and confirmed to be appropriate. The audit team agrees that most fires are low intensity in nature in the region. The de minimis analysis was noted to have been performed in a conservative manner. However, some reporting was noted to be incorrect as compared to calculation worksheets within the MR Section 3.1.3.4. |
| **Round 2 NCR/CL/OFI** | CL: Please ensure reporting in Section 3.1.3.4 is in line with calculation results. |
| **Round 2 Response from Project Proponent** | The values for hectares impacted by fire and the total emissions in the project area were updated and now align with the values in the calculation spreadsheet. |
| **Final Aster Global Findings** | Section 3.1.3.4 now reports correct values. The item is addressed. |

| **Findings** | 10 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.4 Monitoring of impacts of natural disturbances and other catastrophic events** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Use tables 25.e, 25.f and 25.g to report carbon stock decreases and, optionally, tables 26.e, 26.f and 26.g to report carbon stock increases that may happen on the disturbed lands after the occurrence of an event. Use tables 23 and 24 to report emissions from forest fires. |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MR |
| **Aster Global Initial Findings** | The audit team reviewed the MR and could find no language addressing whether or not there have been catastrophic events that have resulted in CO2 emissions. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify in the MR whether catastrophic natural disturbances occurred in the respective project and leakage areas. |
| **Round 1 Response from Project Proponent** | No catastrophic natural disturbances occurred in the project or leakage areas during the reporting period. Project documentation has been updated to reflect this information. |

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| **Aster Global Findings Round 2** | The audit team reviewed the updated MIR and confirms that the requested additional language has been added to section 3.1.3.4 of the MIR. No further action is required. This item is closed. |

| **Findings** | 11 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.4 Monitoring of impacts of natural disturbances and other catastrophic events** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | No VCUs can be issued to the project until all carbon stock losses and increases in GHG emissions have been offset, i.e. until the following condition is satisfied: |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | period3_verification_calculations_v2.0 |
| **Aster Global Initial Findings** | The "Ex-post CSC PA" tab of the period3_verification_calculations_v2.0 contains different equations for the different carbon stock pool estimates. For example, the cell D19 does not use a sum formula but D40 does use a sum formula. It would appear that the Sum formulas in the calculation of the below-ground and deadwood pools were erroneously used. |
| **Round 1 NCR/CL/OFI** | CL: Please clarify the noted inconsistency in the "Ex-post CSC PA" tab of period3_verification_calculations_v2.0 |
| **Round 1 Response from Project Proponent** | The equation in cell D19 reflects aboveground biomass carbon stock changes, which are assumed to be lost at the time of conversion. The equation in cell D40 reflects belowground biomass carbon stock changes, which is assumed to decay over a ten year period. Therefore, the sum of areas coverted over a 10-year period is appropriate for determining belowground carbon stock change. |
| **Aster Global Findings Round 2** | The audit team reviewed the equations questioned in the previous round and findings and confirms that these values are computed correctly. No further action is required. This item is closed. |

| **Findings** | 12 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | **1.1.5 Total *ex post* estimated actual net carbon stock changes and GHG emissions in the project area** |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Summarize the results of all *ex post* estimations in the project area using the same table format used for the *ex ante* assessment: |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | period3_verification_calculations_v2.0 |
| **Aster Global Initial Findings** | Similar to the reviewers comments about the Ex-post CSC PA tab in the period3_verification_calculations_v2.0, in the Ex-post CSC LK tab there is a sum formula used to calculate carbon stock change each year. The audit team does not understand why these sum formulas are used when they are calculating annual changes in carbon stock. |
| **Round 1 NCR/CL/OFI** | CL: Please explain why the sum formulas used to calculate yearly carbon stock changes in the Ex-post CSC LK are appropriate. If they were erroneously included please update the Ex-post CSC LK formulas. |
| **Round 1 Response from Project Proponent** | The equation in cell D19 reflects aboveground biomass carbon stock changes, which are assumed to be lost at the time of conversion. The equation in cell D40 reflects belowground biomass carbon stock changes, which is assumed to decay over a ten year period. Therefore, the sum of areas coverted over a 10-year period is appropriate for determining belowground carbon stock change. |
| **Aster Global Findings Round 2** | The audit team reviewed the equations questioned in the previous round and findings and confirms that these values are computed correctly. No further action is required. This item is closed. |

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| **Findings** | 13 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | ***1.3 Ex post* net anthropogenic GHG emission reductions** |

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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | Report the *ex post* estimated net anthropogenic GHG emissions and calculation of Verified Carbon Units (VCUt, and VBCt) using the same table format used for the ex ante assessment: |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | MIR; period3_verification_calculations_v2.0 |
| **Aster Global Initial Findings** | The audit team reviewed the Ex-post VCUs tab of the period3_verification_calculations_v2.0. It is unclear to the audit team which VM0015 equation is used to calculate the "Ex post net anthropogenic GHG emission reductions". |
| **Round 1 NCR/CL/OFI** | CL: Please clarify which equation from the VM0015 methodology is used to calculate the "Ex post net anthropogenic GHG emission reductions" on the Ex-post VCUs tab of the period3_verification_calculations_v2.0. |
| **Round 1 Response from Project Proponent** | Equation 19 from VM0015 is being used to calculate ex post net anthropogenic GHG emissions reductions. |
| **Aster Global Findings Round 2** | Thank you for the clarification. The audit team confirms that this equation is applied correctly. No further action is required. This item is closed. |

| **Findings** | 14 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | -2 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | i) **Mitigation**: Project has available as callable financial resources at least 50% of total cash out before project reaches breakeven |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |

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| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | KSWS_financial_projections_FINAL.xlsx |
| **Aster Global Initial Findings** | As required by the risk tool, "Callable financial resources are those not included in secured funding, but that are readily available to the project. The availability of such resources may be indicated through letters of credit, revolving credit lines or other financial backing, as evidenced by signed agreements and which demonstrate the project's ability to access funding as needed." |
| **Round 1 NCR/CL/OFI** | CL: Please address the findings. |
| **Round 1 Response from Project Proponent** | The prior version of the NPR incorrectly misstated that the project lacked these callable resources. As evidenced by the financial model, the project does have these callable resources and this mitigation is applicable. Project documentation has been updated to correct this item. |
| **Aster Global Findings Round 2** | The fiscal status of WCS for the year 2018 and 2019 has been provided as "Audited_Financial_Statements_2019_WCS.pdf" to confirm that the organization has callable resources.<br><br>This item is addressed. |

| **Findings** | 15 |
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| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Section)** | 8 |
| **VCS Standard VCS Version 4.0 Requirements Document 19 September 2019, v4.0 (Description)** | a) NPV from the most profitable alternative land use activity is expected to be at least 100% more than that associated with project activities; or where baseline activities are subsistence-driven, net positive community impacts are not demonstrated |
| **Applicability to the Project (Y or N/A)** | Y |
| **Requirement Met (Y, N, Pending)** | Y |
| **Evidence Used to Assess (Location in PD/MR or Supporting Documents)** | KSWS_financial_projections_FINAL.xlsx |

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| **Aster Global Initial Findings** | As required by the risk tool,<br><br>The origin and supporting documentation for the values shown in 'REDD Reserve <KSWS_financial_projections_FINAL.xlsx>' need to be provided. Carbon price also needs to be stated and be supported by proof of sales or contracts/commitments to purchase provided to the verifier. |
| **Round 1 NCR/CL/OFI** | NCR: Please address the findings. |
| **Round 1 Response from Project Proponent** | Additional documentation of carbon sales agreements has been provided confidentially to the verification team. |
| **Aster Global Findings Round 2** | The documentation of carbon sales agreements has been provided to the audit team.<br><br>This item is addressed. |